

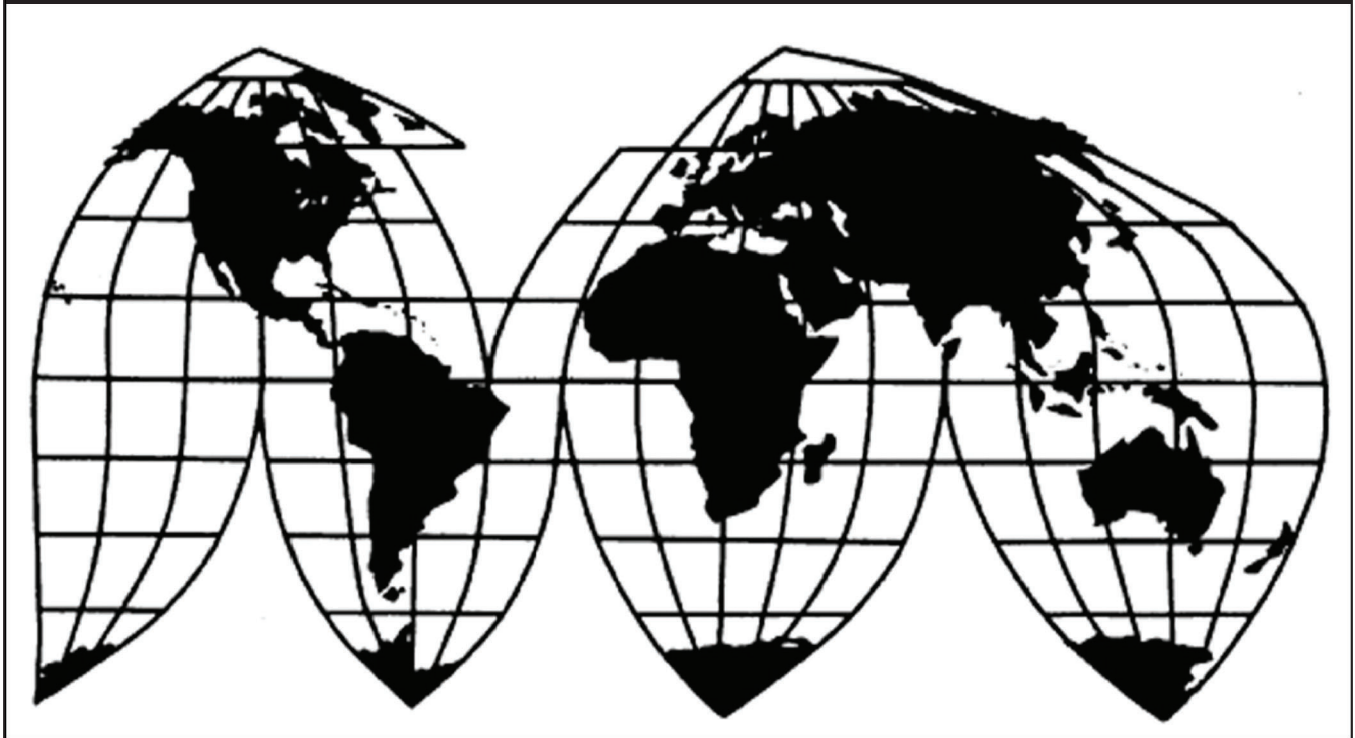
Circular Welded Pipe and Tube from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey

Investigation Nos. 701-TA-253 and
731-TA-132, 252, 271, 273, 532-534,
and 536 (Fifth Review)

Publication 5481

December 2023

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual concerns may not be published.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-253 and 731-TA-132, 252, 271, 273, 532-534, and 536 (Fifth Review)

Circular Welded Pipe and Tube from
Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey

DETERMINATIONS

On the basis of the record¹ developed in the subject five-year reviews, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that revocation of the countervailing duty order on circular welded pipe and tube from Turkey and the antidumping duty orders on circular welded pipe and tube from India, Mexico, South Korea, Taiwan, Thailand, and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. The Commission further determines that revocation of the antidumping duty order on circular welded pipe and tube from Brazil would not be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.²

BACKGROUND

The Commission instituted these reviews on January 3, 2023 (88 FR 107) and determined on April 10, 2023 that it would conduct full reviews (88 FR 23687, April 18, 2023). Notice of the scheduling of the Commission’s reviews 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 June 16, 2023 (88 FR 39475).

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

² Commissioner Rhonda K. Schmittlein determines that revocation of the countervailing duty order on circular welded pipe and tube from Turkey and the antidumping duty orders on circular welded pipe and tube from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

Since one interested party requested cancellation of the hearing in the event that no other interested party requested to appear and no other parties submitted a request to appear at the hearing, the public hearing in connection with the reviews, originally scheduled for October 26, 2023, was cancelled (88 FR 73378, October 25, 2023).

Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the countervailing duty order on certain circular welded pipe (“CWP”) from Turkey and the antidumping duty orders on CWP from India, Mexico, South Korea,¹ Taiwan, Thailand, and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. We also determine that revocation of the antidumping duty order on CWP from Brazil would not be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.²

I. Background

Original Investigations: The subject orders followed from a series of original investigations.³ On April 17, 1984, the Commission determined that a domestic industry was materially injured by reason of imports of small-diameter circular welded carbon steel pipe and tube from Taiwan sold at less than fair value (“LTFV”).⁴ On February 12, 1986, two Commissioners determined that a domestic industry was materially injured and two found the industry threatened with material injury by reason of subsidized imports from Turkey and by LTFV imports from Thailand of welded carbon steel standard pipe and tube.⁵ On April 21, 1986,

¹ For consistency, we use the term “South Korea” throughout, including where in the prior proceedings the terms “Korea” or “Republic of Korea” were used.

² Commissioner Rhonda K. Schmidlein determines that revocation of the countervailing duty order on CWP from Turkey and the antidumping duty orders on CWP from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. Except where noted, she joins sections I-III.D. and IV of these Views. See Dissenting Views of Commissioner Rhonda K. Schmidlein.

³ Confidential Report, Memorandum INV-VV-104 (Nov. 27, 2023) (“CR”) and *Circular Welded Pipe and Tube from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey*, Inv. Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536 (Fifth Review), USITC Pub. 5481 (Dec. 2023) (“PR”) at Table I-2 (tabulating original investigations).

⁴ *Certain Welded Carbon Steel Pipes and Tubes from the Republic of Korea and Taiwan*, Inv. Nos. 731-TA-131, 132, and 138 (Final), USITC Pub. 1519 (Apr. 1984) (“*Original Determination for Taiwan*”). Commerce issued an antidumping duty order on this product on May 7, 1984. *Certain Circular Welded Carbon Steel Pipes and Tubes from Taiwan: Antidumping Duty Order*, 49 Fed. Reg. 19369 (May 7, 1984).

⁵ *Certain Welded Carbon Steel Pipes and Tubes from Turkey and Thailand*, Inv. Nos. 701-TA-253 and 731-TA-252 (Final), USITC Pub. 1810 (Feb. 1986) (“*Original Determinations for Turkey and Thailand*”). Commerce issued countervailing and antidumping duty orders on these products on March (Continued...)

two Commissioners determined that a domestic industry was materially injured and one Commissioner found the domestic industry threatened with material injury by reason of LTFV imports of standard pipe and tube from India and Turkey.⁶ On October 20, 1992, the Commission determined that a domestic industry was materially injured by reason of LTFV imports of standard and structural pipe and tube from Brazil, Mexico, South Korea, Taiwan (those imports not already subject to an order), and Venezuela.⁷

First Reviews: In May 1999, the first five-year reviews of the preceding CWP orders were grouped for review with certain antidumping duty orders on imports of light-walled rectangular pipe and tube (“LWR pipe”) in order to promote administrative efficiency due to similarities in the products and/or market participants.⁸ With respect to CWP, the Commission conducted full reviews and made a negative determination concerning imports from Venezuela and affirmative determinations concerning imports from Brazil, India, Mexico, South Korea, Taiwan (two orders), Thailand, and Turkey (two orders).⁹

(...Continued)

7 and March 11, 1986, respectively. *Countervailing Duty Order; Certain Welded Carbon Steel Pipe and Tube Products from Turkey*, 51 Fed. Reg. 7984 (Mar. 7, 1986); *Antidumping Duty Order; Circular Welded Carbon Steel Pipes and Tubes from Thailand*, 51 Fed. Reg. 8341 (Mar. 11, 1986).

⁶ *Certain Welded Carbon Steel Pipes and Tubes from India, Taiwan, and Turkey*, Inv. Nos. 731-TA-271-273 (Final), USITC Pub. 1839 (Apr. 1986) (“*Original Determinations for India and Turkey*”). Commerce issued antidumping duty orders on May 12 and May 15, 1986. *Antidumping Duty Order; Certain Welded Carbon Steel Standard Pipes and Tubes from India*, 51 Fed. Reg. 17384 (May 12, 1986); *Antidumping Duty Order; Welded Carbon Steel Standard Pipe and Tube Products from Turkey*, 51 Fed. Reg. 17784 (May 15, 1986). Producers Gujarat Steel Tubes, Ltd. and Zenith Steel Pipes and Industries were excluded from the antidumping duty order on CWP from India because they received de minimis dumping margins. CR/PR at I-5 n.20.

⁷ *Certain Circular, Welded, Non-Alloy Steel Pipes and Tubes from Brazil, the Republic of Korea, Mexico, Romania, Taiwan, and Venezuela*, Inv. Nos. 731-TA-532-537 (Final), USITC Pub. 2564 (Oct. 1992) (“*Original Determinations for Brazil, Korea, Mexico, and Taiwan*”) (also making a negative injury determination regarding imports from Romania that the Commission concluded were negligible). Commerce issued antidumping orders on November 2, 1992. *Notice of Antidumping Duty Orders: Certain Circular Welded Non-Alloy Steel Pipe from Brazil, the Republic of Korea (Korea), Mexico, and Venezuela, and Amendment to Final Determination of Sales at Less than Fair Value: Certain Circular Welded Non-Alloy Steel Pipe from Korea*, 57 Fed. Reg. 49453 (Nov. 2, 1992); *Notice of Antidumping Duty Order: Circular Welded Non-Alloy Steel Pipe from Taiwan*, 57 Fed. Reg. 49454 (Nov. 2, 1992).

⁸ *Certain Pipe and Tube from Argentina, Brazil, Canada, India, Korea, Mexico, Singapore, Taiwan, Thailand, Turkey, and Venezuela*, Inv. Nos. 701-TA-253, 731-TA-132, 252, 271, 273, 276, 277, 296, 409, 410, 532-534, 536, and 537 (Review), USITC Pub. 3316 at 6 (July 2000) (“*First Five-Year Reviews*”). At the time of the first reviews, these orders were also grouped with orders regarding various oil country tubular goods (“OCTG”). The Commission made negative first five-year review determinations concerning all OCTG orders. *Id.* at 3.

⁹ *First Five-Year Reviews*, USITC Pub. 3316 at 3.

Second Reviews: In the second five-year reviews, instituted on July 1, 2005, the nine CWP orders again were grouped with certain orders on LWR pipe.¹⁰ With respect to CWP, the Commission conducted full reviews and determined that revocation of the orders on imports from the seven subject countries would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.¹¹

Third Reviews: In the third five-year reviews, instituted on July 1, 2011, the nine CWP orders were grouped with the lone remaining order on LWR pipe from the prior reviews (Taiwan).¹² With respect to CWP, the Commission conducted full reviews and determined that revocation of the orders on imports from the seven subject countries would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.¹³

Fourth reviews: On June 1, 2017, the Commission instituted the fourth five-year reviews of the nine orders on CWP.¹⁴ On January 24, 2018, after conducting full reviews, the Commission determined that revocation of the orders on imports from the seven subject countries would be likely to lead to continuation or recurrence of material injury to an industry

¹⁰ *Certain Pipe and Tube from Argentina, Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey*, Inv. Nos. 701-TA-253, 731-TA-132, 252, 271, 273, 409, 410, 532-534, and 536 (Second Review), USITC Pub. 3867 at 4-5 (July 2006) (“*Second Five-Year Reviews*”).

¹¹ *Second Five-Year Reviews*, USITC Pub. 3867 at 3, 16 (exercising its discretion to cumulate subject imports from all seven subject countries).

¹² *Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey*, Inv. Nos. 701-TA-253, 731-TA-132, 252, 271, 273, 532-534, and 536 (Third Review), USITC Pub. 4333 at 4 n.12 (June 2012) (“*Third Five-Year Reviews*”).

¹³ *Third Five-Year Reviews*, USITC Pub. 4333 at 27, 45 (exercising its discretion to cumulate subject imports from all seven subject countries).

¹⁴ *Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey; Institution of Five-Year Reviews*, 82 Fed. Reg. 25328 (June 1, 2017). Commerce initiated its five-year reviews of these nine orders on June 2, 2017. *Initiation of Five-Year (Sunset) Reviews*, 82 Fed. Reg. 25599 (June 2, 2017); *Initiation of Five-Year (Sunset) Review; Correction*, 82 Fed. Reg. 27690 (June 16, 2017). It issued the results of its expedited reviews thereafter. *Certain Welded Carbon Steel Pipes and Tubes from India, Thailand, and Turkey: Final Results of the Expedited Fourth Sunset Reviews of the Antidumping Duty Orders*, 82 Fed. Reg. 46485 (Oct. 5, 2017); *Certain Circular Welded Non-Alloy Steel Pipe from Brazil, Mexico, the Republic of Korea, and Taiwan and Certain Circular Welded Carbon Steel Pipes and Tubes from Taiwan: Final Results of Expedited Fourth Sunset Reviews of the Antidumping Duty Orders*, 82 Fed. Reg. 46761 (Oct. 6, 2017); *Circular Welded Carbon Steel Pipes and Tubes from Turkey: Final Results of Expedited Fourth Sunset Review of Countervailing Duty Order*, 82 Fed. Reg. 46768 (Oct. 6, 2017).

in the United States within a reasonably foreseeable time.¹⁵ Commerce issued a notice of continuation of the orders on February 7, 2018.¹⁶

Current Reviews: On January 3, 2023, the Commission instituted the current reviews of the countervailing duty order on subject imports of CWP from Turkey and the antidumping duty orders on subject imports of CWP from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey.¹⁷ The Commission received a joint response to its notice of institution on behalf of Bull Moose Tube Co. (“Bull Moose”), Maruichi American Corp. (“Maruichi”), Nucor Tubular Products, Inc. (“Nucor”), and Zekelman Industries (“Zekelman”)¹⁸ (collectively, “Domestic Producers”).¹⁹ No response to the notice of institution was received from any respondent interested party, except the government of Brazil, which submitted an individually adequate response. On April 10, 2023, the Commission found that the domestic interested party group response to its notice of institution was adequate and that the respondent interested party group responses were inadequate. The Commission found that there were other circumstances that warranted conducting full reviews of the orders, however, and therefore determined to conduct full reviews.²⁰

Parties to the Investigation. The Commission received joint prehearing and posthearing submissions and final comments from the Domestic Producers.²¹

¹⁵ *Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey*, Inv. Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536 (Fourth Review), USITC Pub. 4754 (Jan. 2018) (“*Fourth Five-Year Reviews*”).

¹⁶ *Certain Welded Carbon Steel Pipes and Tubes from India, Thailand, and Turkey; Certain Circular Welded Non-Alloy Steel Pipe from Brazil, Mexico, the Republic of Korea, and Taiwan, and Certain Circular Welded Carbon Steel Pipes and Tubes from Taiwan: Continuation of Antidumping Duty Orders and Countervailing Duty Order*, 83 Fed. Reg. 5402 (Feb. 7, 2018).

¹⁷ *Circular Welded Pipe and Tube from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey; Institution of Five-Year Reviews*, 88 Fed. Reg. 107 (Jan. 3, 2023).

¹⁸ Zekelman Industries includes both Atlas and Wheatland.

¹⁹ Domestic Producers’ Response to Notice of Institution, EDIS Doc. 789300 (Feb. 2, 2023); Confidential Domestic Producers’ Response to Notice of Institution, EDIS Doc. 789298 (Feb. 2, 2023) (“Domestic Producers’ Response”).

²⁰ *Circular Welded Pipe and Tube from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey; Notice of Commission Determination to Conduct Full Five-Year Reviews*, 88 Fed. Reg. 23687 (Apr. 10, 2023); *Explanation of Commission Determination on Adequacy*, EDIS Doc. 794720 (Apr. 21, 2023).

²¹ See Domestic Producers’ Prehearing Brief, EDIS Doc. 806151 (Oct. 17, 2023); Domestic Producers’ Confidential Prehearing Brief, EDIS Doc. 806150 (Oct. 17, 2023) (“Domestic Producers’ Prehearing Br.”); see also Domestic Producers’ Posthearing Brief, EDIS Doc. 807900 (Nov. 7, 2023); Domestic Producers’ Confidential Posthearing Brief, EDIS Doc. 807989 (Nov. 7, 2023) (“Domestic (Continued...)”).

One respondent entity also participated in the reviews. The government of Brazil submitted a prehearing brief and responses to the Commission’s questions in its posthearing brief.²²

Data/Response Coverage. U.S. industry data are based on the questionnaire responses of five domestic producers, which accounted for approximately *** percent of domestic CWP production in 2022.²³ U.S. import data and related information are based on a combination of questionnaire responses from U.S. importers of CWP and official import statistics of the Commerce, adjusted using data submitted in response to Commission questionnaires and data compiled from proprietary, Census-edited Customs records.²⁴ The questionnaire responses from eleven U.S. importers of CWP are estimated to have accounted for *** percent of subject imports, *** percent of nonsubject imports, and *** percent of total imports, based on adjusted official import statistics.²⁵ Foreign industry data and related information are based on the questionnaire responses of two producers of CWP in Mexico, which accounted for an estimated *** percent of production in Mexico in 2022, and one producer of CWP in Turkey, which accounted for an estimated *** percent of production in 2022, as well as information from the original investigations and prior reviews, available information submitted by Domestic Producers and the government of Brazil in these full reviews, and publicly available information,

(...Continued)

Producers’ Posthearing Br.”); Domestic Producers’ Final Comments, EDIS Doc. 809785 (Dec. 5, 2023) (“Domestic Producers’ Final Comments”).

²² See Government of Brazil’s Prehearing Brief, EDIS Doc. 806159 (Oct. 17, 2023) (“GOB’s Prehearing Br.”); see also Government of Brazil’s Response to Commission’s Questions, EDIS Doc. 807912 (Nov. 6, 2023) (“GOB’s Posthearing Response”).

²³ CR/PR at III-1.

²⁴ CR/PR at IV-2. Official U.S. imports statistics based on Harmonized Tariff Schedule (“HTS”) statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090 were adjusted using data submitted in response to Commission questionnaires to remove reported out-of-scope imports and using data compiled from proprietary, Census-edited Customs records using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed October 1, 2023, to remove out-of-scope imports and to allocate India subject vs. India nonsubject imports. *Id.* at Table IV-1 Note.

²⁵ CR/PR at IV-1. Imports of CWP from nonsubject sources, particularly Canada, may be overstated, even after adjustments, due to incomplete reporting. *Id.* at IV-2. Responding importers accounted for *** percent of subject imports from Turkey but reported no subject imports from Brazil, India, Mexico, South Korea, Taiwan, or Thailand. *Id.* at IV-2.

such as Global Trade Atlas (“GTA”) data, gathered by staff.²⁶ No subject producers in Brazil, India, South Korea, Taiwan, or Thailand responded to the Commission’s questionnaires.²⁷

II. Domestic Like Product and Industry

A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the “domestic like product” and the “industry.”²⁸ The Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this subtitle.”²⁹ The Commission’s practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.³⁰

1. The Original Investigations and Prior Five-Year Reviews

The domestic like products defined by the Commission in the various underlying CWP original investigations differed from one another in some respects because of differences in wall thicknesses and excluded products among the CWP scope definitions.³¹ In each of the original investigations, the domestic like product definitions generally conformed to Commerce’s scope definition for the corresponding original investigation.³²

²⁶ CR/PR at I-19; *** Foreign Producer Questionnaire at Question II-7; *** Foreign Producer Questionnaire at Question II-7; *** Foreign Producer Questionnaire at Question II-7.

²⁷ CR/PR at IV-27, IV-30, IV-42, IV-45, IV-48.

²⁸ 19 U.S.C. § 1677(4)(A).

²⁹ 19 U.S.C. § 1677(10); *see, e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. 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); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991); *see also* S. Rep. No. 249, 96th Cong., 1st Sess. 90-91 (1979).

³⁰ *See, e.g., Internal Combustion Industrial Forklift Trucks from Japan*, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8-9 (Dec. 2005); *Crawfish Tail Meat from China*, Inv. No. 731-TA-752 (Review), USITC Pub. 3614 at 4 (July 2003); *Steel Concrete Reinforcing Bar from Turkey*, Inv. No. 731-TA-745 (Review), USITC Pub. 3577 at 4 (Feb. 2003).

³¹ *See* CR/PR at Table I-21 (providing scope definitions for individual orders).

³² There were two principal exceptions. In the 1992 investigation concerning CWP from Taiwan, the Commission’s domestic like product definition included CWP between 0.375 and 4.5 inches in diameter, which Commerce had excluded from the scope of the investigation because it was already covered by the 1984 antidumping duty order. Additionally, in the 1992 investigations concerning (Continued...)

In the first five-year reviews, all parties expressing a position on the issue asked the Commission to reconsider the domestic like product definition and to define a single domestic like product consisting of all circular welded non-alloy steel pipes and tubes not more than 16 inches in outside diameter.³³ After considering the record and party arguments, the Commission agreed and applied the requested domestic like product definition to all orders under review.³⁴

In the second, third, and fourth five-year reviews, no party argued that the domestic like product definition in the first five-year reviews should be revisited, and the record in each of these prior reviews did not indicate any changes in the relevant facts.³⁵ Consequently, the Commission again defined the domestic like product as all circular, welded, non-alloy steel pipes and tubes not more than 16 inches in outside diameter.³⁶

2. The Current Reviews

In these fifth five-year reviews, Domestic Producers agree with the domestic like product definition adopted by the Commission in the prior reviews.³⁷ There is no new information in the record indicating that the pertinent characteristics and uses of CWP have changed since the prior proceedings that would warrant revisiting the definition of the domestic like product.³⁸ We therefore again define a single domestic like product consisting of circular, welded, non-alloy steel pipes and tubes not more than 16 inches in outside diameter (also referred to as “CWP”).

(...Continued)

imports from Brazil, Mexico, South Korea, and Taiwan (large diameter), the Commission defined finished conduit and mechanical tubing, which were not entirely excluded from the scope of those investigations, as separate like products from CWP, and it made negative final determinations regarding imports from Brazil, Mexico, Romania, South Korea, Taiwan, and Venezuela of finished conduit and mechanical tubing that was not cold drawn or cold rolled. *Original Determinations for Brazil, Korea, Mexico, and Taiwan*, USITC Pub. 2564 at 5, 8-17.

³³ *First Five-Year Reviews*, USITC Pub. 3316 at 12.

³⁴ *First Five-Year Reviews*, USITC Pub. 3316 at 12.

³⁵ *Second Five-Year Reviews*, USITC Pub. 3867 at 7; *Third Five-Year Reviews*, USITC Pub. 4333 at 10; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 8-9.

³⁶ *Second Five-Year Reviews*, USITC Pub. 3867 at 7; *Third Five-Year Reviews*, USITC Pub. 4333 at 10; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 8-9.

³⁷ Domestic Producers' Prehearing Br. at 6.

³⁸ See generally CR/PR at I-46-50.

B. Domestic Industry

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”³⁹ 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 each of the original investigations and the subsequent reviews, the Commission defined the domestic industry to include all domestic producers of CWP.⁴⁰ There were no related party issues in the original investigations.⁴¹ In the first and second five-year reviews, the Commission found a domestic producer, ***, to be a related party, but concluded that appropriate circumstances did not exist to exclude it from the domestic industry.⁴²

In the third five-year reviews, three firms were potentially subject to exclusion as related parties.⁴³ The Commission found that, even assuming *arguendo* that the firms were related parties, appropriate circumstances did not exist to exclude them.⁴⁴

In the fourth five-year reviews, there were no related party issues.⁴⁵

In the current reviews, Domestic Producers and the government of Brazil raise no objection to the domestic industry as defined in the prior proceedings. There are no related

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

⁴⁰ *Original Determination for Taiwan*, USITC Pub. 1519 at 4; *Original Determinations for Turkey and Thailand*, USITC Pub. 1810 at 7; *Original Determinations for India and Turkey*, USITC Pub. 1839 at 6-7; *Original Determinations for Brazil, Korea, Mexico, and Taiwan*, USITC Pub. 2564 at 8; *First Five-Year Reviews*, USITC Pub. 3316 at 18-19; *Second Five-Year Reviews*, USITC Pub. 3867 at 8-9; *Third Five-Year Reviews*, USITC Pub. 4333 at 11; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 9.

⁴¹ *Original Determination for Taiwan*, USITC Pub. 1519 at 4; *Original Determinations for Turkey and Thailand*, USITC Pub. 1810 at 7; *Original Determinations for India and Turkey*, USITC Pub. 1839 at 6-7; *Original Determinations for Brazil, Korea, Mexico, and Taiwan*, USITC Pub. 2564 at 8.

⁴² *First Five-Year Reviews*, USITC Pub. 3316 at 18-19; *Confidential First Five-Year Review Determinations*, EDIS Doc. 791903 (Mar. 9, 2000) (“*Confidential First Five-Year Reviews*”) at 23-25; *Second Five-Year Reviews*, USITC Pub. 3867 at 8-9; *Confidential Second Five-Year Review Determinations*, EDIS Doc. 791906 (July 6, 2006) (“*Confidential Second Five-Year Reviews*”) at 12-13 n.41.

⁴³ *Third Five-Year Reviews*, USITC Pub. 4333 at 11.

⁴⁴ *Third Five-Year Reviews*, USITC Pub. 4333 at 11.

⁴⁵ *Fourth Five-Year Reviews*, USITC Pub. 4754 at 9.

parties issues in these reviews.⁴⁶ Therefore, consistent with our recommended definition of the domestic like product, and absent any argument to the contrary, we again define the domestic industry as all domestic producers of CWP.

III. Cumulation

A. Legal Standard

With respect to five-year reviews, section 752(a) of the Tariff Act provides as follows: the Commission may cumulatively assess the volume and effect of imports of the subject merchandise from all countries with respect to which reviews under section 1675(b) or (c) of this title were initiated on the same day, if such imports would be likely to compete with each other and with domestic like products in the United States market. The Commission shall not cumulatively assess the volume and effects of imports of the subject merchandise in a case in which it determines that such imports are likely to have no discernible adverse impact on the domestic industry.⁴⁷

Cumulation therefore is discretionary in five-year reviews, unlike original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.⁴⁸ The Commission may exercise its discretion to cumulate, however, only if the reviews are initiated on the same day, the Commission determines that the subject imports are likely to compete with each other and the domestic like product in the U.S. market, and imports from each such subject country are not likely to have no discernible adverse impact on the domestic industry in the event of revocation. Our focus in five-year reviews is not only on present conditions of competition, but also on likely conditions of competition in the reasonably foreseeable future.

⁴⁶ CR/PR at I-52, III-14.

⁴⁷ 19 U.S.C. § 1675a(a)(7).

⁴⁸ 19 U.S.C. § 1677(7)(G)(i); *see also, e.g., Nucor Corp. v. United States*, 601 F.3d 1291, 1293 (Fed. Cir. 2010) (Commission may reasonably consider likely differing conditions of competition in deciding whether to cumulate subject imports in five-year reviews); *Allegheny Ludlum Corp. v. United States*, 475 F. Supp. 2d 1370, 1378 (Ct. Int'l Trade 2006) (recognizing the wide latitude the Commission has in selecting the types of factors it considers relevant in deciding whether to exercise discretion to cumulate subject imports in five-year reviews); *Nucor Corp. v. United States*, 569 F. Supp. 2d 1328, 1337-38 (Ct. Int'l Trade 2008).

B. The Original Investigations and Prior Reviews

Because the orders in these five-year reviews originated from a series of original investigations initiated and conducted over a span of several years, the Commission observed that the first five-year reviews provided the initial opportunity to consider cumulation with respect to all orders subject to review.⁴⁹ In the prior five-year reviews, the Commission rejected arguments that certain imports were likely to have no discernible adverse impact on the domestic industry if each of the corresponding orders were revoked or that subject imports would likely compete under different conditions of competition.⁵⁰ In each of those reviews, the Commission exercised its discretion to cumulate subject imports from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey.⁵¹

C. The Current Reviews

The statutory threshold for cumulation is satisfied in these reviews because all reviews were initiated on the same day: January 3, 2023.⁵²

1. Party Arguments

Domestic Producers argue that the Commission should exercise its discretion to cumulate subject imports from all sources. They maintain that imports from all subject sources are not likely to have no discernible adverse impact and that there will likely be a reasonable overlap in competition among subject imports from each subject source and between the

⁴⁹ *Second Five-Year Reviews*, USITC Pub. 3867 at 11.

⁵⁰ *First Five-Year Reviews*, USITC Pub. 3316 at 26; *Second Five-Year Reviews*, USITC Pub. 3867 at 11-14, 16; *Third Five-Year Reviews*, USITC Pub. 4333 at 13; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 11-21.

⁵¹ *First Five-Year Reviews*, USITC Pub. 3316 at 26; *Second Five-Year Reviews*, USITC Pub. 3867 at 11-14, 16; *Third Five-Year Reviews*, USITC Pub. 4333 at 13; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 21. In the first five-year reviews, the Commission further found that subject imports from Venezuela were likely to have no discernible adverse impact on the domestic industry if the relevant order were revoked and therefore did not cumulate imports from Venezuela with other subject imports. *First Five-Year Reviews*, USITC Pub. 3316 at 26.

⁵² *Circular Welded Pipe and Tube from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey; Institution of Five-Year Reviews*, 88 Fed. Reg. 107 (Jan. 3, 2023); *Antidumping or Countervailing Duty Order, Finding, or Suspended Investigation; Advance Notification of Sunset Review*, 88 Fed. Reg. 63 (Jan. 3, 2023).

domestic like product and subject imports from each source if the orders are revoked.⁵³ They further argue that imports from each subject source are likely to compete under similar conditions of competition upon revocation of the orders.⁵⁴

The government of Brazil argues the Commission should exercise its discretion not to cumulate subject imports from Brazil because they would likely have no discernible adverse impact on the domestic industry and compete under different conditions of competition upon revocation of the order.⁵⁵

2. Analysis

a) Likelihood of No Discernible Adverse Impact

The statute precludes cumulation if the Commission finds that subject imports from a country are likely to have no discernible adverse impact on the domestic industry.⁵⁶ Neither the statute nor the Uruguay Round Agreements Act (“URAA”) Statement of Administrative Action (“SAA”) provides specific guidance on what factors the Commission is to consider in determining that imports “are likely to have no discernible adverse impact” on the domestic industry.⁵⁷ With respect to this provision, the Commission generally considers the likely volume of subject imports and the likely impact of those imports on the domestic industry within a reasonably foreseeable time if the orders are revoked. Our analysis for each of the subject countries takes into account, among other things, the nature of the product and the behavior of subject imports in the original investigations.

Brazil. In 1991, during the original investigations, subject imports from Brazil totaled 54,000 short tons and accounted for 2.8 percent of apparent U.S. consumption.⁵⁸ Subject imports from Brazil were 45 short tons in 1998 (in the first five-year reviews), 0 short tons in 2005 (in the second five-year reviews), and 401 short tons in 2011 (in the third five-year

⁵³ Domestic Producers’ Prehearing Br. at 7-23; Domestic Producers’ Posthearing Br. at 3-9; Domestic Producers’ Final Comments at 2-6.

⁵⁴ Domestic Producers’ Prehearing Br. at 23-28; Domestic Producers’ Posthearing Br. 3-9, Exhibits 1, 3-5; Domestic Producers’ Final Comments at 2-6.

⁵⁵ GOB’s Prehearing Br. at 3-4; GOB’s Posthearing Response at 3-4, 7-8.

⁵⁶ 19 U.S.C. § 1675a(a)(7).

⁵⁷ SAA, H.R. Rep. No. 103-316, vol. I at 887 (1994).

⁵⁸ CR/PR at Appendix C at Table I-1.

reviews), accounting for either zero or less than 0.05 percent of apparent U.S. consumption in each of the periods.⁵⁹

In the fourth five-year reviews, subject imports from Brazil were highest in 2013, at 1,620 short tons, and lowest in 2014, at 201 short tons.⁶⁰ Subject imports from Brazil accounted for *** percent of apparent U.S. consumption in 2016.⁶¹

In the current reviews, there were *** subject imports of CWP from Brazil from January 1, 2020 to June 30, 2023.⁶² CWP originating in Brazil is subject to an absolute quota of 2,865 short tons under section 232 of the Trade Expansion Act of 1962, as amended (“Section 232”).⁶³

In these reviews, no Brazilian firm responded to the Commission’s foreign producer/exporter questionnaire, although ten firms were identified by Domestic Producers as possible producers of CWP in Brazil.⁶⁴ According to Domestic Producers, Brazilian CWP producers continue to have large production capacity and remain export oriented.⁶⁵ In the previous reviews, the Commission found that the Brazilian CWP industry had substantial

⁵⁹ CR/PR at Table I-4, Appendix C at Table I-1; *Third Five-Year Reviews*, USITC Pub. 4333 at Table IV-1.

⁶⁰ CR/PR at Appendix C at Table I-1; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 12.

⁶¹ CR/PR at Table I-4, Appendix C at Table I-1; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 12.

⁶² CR/PR at Tables I-26, C-1. As Domestic Producers observe, no subject producers from Brazil responded to the Commission’s questionnaire. Domestic Producers’ Posthearing Br. at 4; Domestic Producers’ Final Comments at 3. Accordingly, the Commission relies on the information available in these reviews for CWP from Brazil, including information from the original investigations and prior reviews, available information submitted by Domestic Producers and the government of Brazil, and publicly available information, such as GTA data, gathered by staff.

⁶³ Effective March 23, 2018, CWP originating in Brazil became exempt from duties pursuant to Section 232 and instead became subject to an absolute import quota. CR/PR at I-40-42, Table I-22. The annual quota usage rates for relevant HTS subheadings that include CWP suggest that the quota was filled in 2022 and were as follows: HTS 9903.80.22 (130 percent of 987,756 kg filled), HTS 9903.80.24 (109 percent of 1,611,145 filled). ***. *Id.* at IV-18. Imports of out-of-scope products from Brazil in excess of the volumes permitted under the quota resulted from approved product exclusions. *Id.* at I-42 n.70. Further, there were *** subject imports from Brazil from 2020 to June 2023 (the data collection period). CR/PR at Table C-1.

⁶⁴ Domestic Producers’ Response at Exhibits 1, 5; CR/PR at IV-27. As noted, the government of Brazil submitted a prehearing brief and responses to the Commission’s questions in its post-hearing brief. GOB’s Prehearing Br.; GOB’s Posthearing Br.; *see also* section I., above.

⁶⁵ Domestic Producers’ Posthearing Br. at 5. Domestic Producers claim that Brazilian subject producers have at least 1.5 million short tons of CWP capacity. *Id.*

unused capacity and was export oriented.⁶⁶ GTA data for pipes, tubes, and hollow profiles, NESOI, welded, of circular cross section, of iron or nonalloy steel (“welded tubes, pipes and hollow profiles”), a category that includes CWP and out-of-scope merchandise, indicate that Brazilian exports of these products globally increased from 14,890 short tons in 2020 to 16,784 short tons in 2021 and 17,921 short tons in 2022.⁶⁷ The leading destination market for exports of such merchandise from Brazil was Uruguay and Paraguay in 2022.⁶⁸ CWP from Brazil is subject to safeguard measures in the European Union (“EU”).⁶⁹

In the original investigations, subject imports from Brazil undersold the domestic like product in 33 of 36 quarterly comparisons, with underselling margins ranging from 0.4 to 19.5 percent.⁷⁰ In the prior reviews, as well as the current five-year reviews, no product-specific pricing data were available for the limited volumes of subject imports from Brazil.⁷¹

In light of the foregoing, including the volume of subject imports from Brazil and underselling by such imports in the original investigations and the information available regarding Brazil’s production and export capacity, we find that revocation of the antidumping duty order on subject imports from Brazil would not likely have no discernible adverse impact on the domestic industry.^{72 73 74}

⁶⁶ *First Five-Year Reviews*, USITC Pub. 3316 at 36; *Second Five-Year Reviews*, USITC Pub. 3867 at 11-12; *Third Five-Year Reviews*, USITC Pub. 4333 at 37-38; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 30.

⁶⁷ CR/PR at Table IV-8.

⁶⁸ CR/PR at Table IV-8.

⁶⁹ CR/PR at IV-62-63, Table IV-31. Under the EU safeguard measures, CWP from Brazil is subject to a tariff rate quota (“TRQ”) based on historical import levels, and imports above the TRQ level are subject to an additional duty of 25 percent. *Id.* at Table IV-31. The safeguard has been extended until June 30, 2024. *Id.*

⁷⁰ Original Investigations of CWP from Brazil, Korea, Romania, Mexico, Taiwan, and Venezuela Staff Report, EDIS Doc. 791830 (Oct. 8, 1992) (“Original Investigations Brazil, Korea, Romania, Mexico, Taiwan, and Venezuela Staff Report”) at Tables 29-32; *Third Five-Year Reviews*, USITC Pub. 4333 at 17 n.95.

⁷¹ *First Five-Year Reviews Staff Report*, EDIS Doc. 791884 (May 22, 2000) (“First Five-Year Reviews Staff Report”) at CIRC-V-6; *Second Five-Year Reviews*, USITC Pub. 3867 at 25 n.152; *Third Five-Year Reviews*, USITC Pub. 4333 at 40 n.260; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 33; CR/PR at V-8, Tables V-4-7.

⁷² Although the Section 232 quota *** from Brazil in 2022, and *** subject imports from Brazil entered the United States from January 1, 2020 to June 30, 2023, subject imports from Brazil *** under the quota if the order were revoked. CR/PR at I-41-42, n.71. The quota is administered on a first-come, first-served basis, and there is nothing in the record to suggest that subject imports from Brazil would face any less opportunity to enter the U.S. market under the quota than out-of-scope imports if the order were revoked. *Id.* at I-41-42, n.71. Indeed, in view of the volume and underselling of subject (Continued...)

India. In 1985, during the original investigations, subject imports from India totaled 22,000 short tons and accounted for 0.9 percent of apparent U.S. consumption.⁷⁵ Subject imports from India were 12,137 short tons in 1998 (in the first five-year reviews), accounting for 0.4 percent of apparent U.S. consumption; *** short tons in 2005 (in the second five-year reviews), accounting for less than *** percent of apparent U.S. consumption; and *** short tons in 2011 (in the third five-year reviews), accounting for *** percent of apparent U.S. consumption.⁷⁶

During the fourth five-year review period, subject imports from India increased from *** short tons in 2012 to *** short tons in 2015, before declining to *** short tons in 2016.⁷⁷ The share of apparent U.S. consumption represented by subject imports from India was *** percent in 2016.⁷⁸

In the current reviews, the volume of subject imports from India increased irregularly from *** short tons in 2020 to *** short tons in 2021 and *** short tons in 2022; it was *** short tons from January to June 2023 (“interim 2023”), as compared to *** short tons from January to June 2022 (“interim 2022”).⁷⁹ Subject imports from India as a share of apparent U.S. consumption ranged from *** percent to *** percent during the POR.⁸⁰ Effective March 23,

(...Continued)

imports from Brazil during the original period of investigation (“POI”) and the information regarding the Brazilian industry’s production and export capacity, we find it likely that subject imports from Brazil *** under the quota.

⁷³ The issue of no discernible adverse impact as it relates to Brazil presents a close call due to the limited opportunity for such imports to enter the U.S. market in the event of revocation of the antidumping duty order, due not only to the annual quota of 2,865 short tons but also the likelihood that the quota amount will be shared by out-of-scope imports, which as of 2022 was filling the quota. But for the reasons discussed above, we find on balance that revocation of the order is not likely to lead to no discernible adverse impact.

⁷⁴ Commissioner Schmidtlein concurs with the finding of the majority on the issue of no discernible adverse impact for Brazil, but disagrees with the majority’s reasoning as to whether it is a “close call” due to the Section 232 quota and the filling of that quota. See Dissenting Views of Commissioner Rhonda K. Schmidtlein.

⁷⁵ CR/PR at Appendix C at Table I-1. Imports of CWP from Indian producers Gujarat Steel Tubes, Ltd. and Zenith Steel Pipes and Industries were excluded from the order on CWP from India in the original investigations and are therefore nonsubject imports. *Id.* at IV-30 n.25.

⁷⁶ CR/PR at Table I-4, Appendix C at Table I-1.

⁷⁷ CR/PR at Table I-4, Appendix C at Table I-1; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 12-13.

⁷⁸ CR/PR at Table I-4, Appendix C at Table I-1; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 12-13.

⁷⁹ CR/PR at Table IV-1.

⁸⁰ CR/PR at Tables I-26, C-1.

2018, CWP originating in India became subject to an additional 25 percent *ad valorem* duty under Section 232.⁸¹

In these reviews, no Indian firm responded to the Commission's foreign producer/exporter questionnaire, although 28 firms were identified by Domestic Producers as possible producers of CWP in India.⁸² According to Domestic Producers, subject producers in India maintain large capacities, are export oriented, have the incentive to supply the U.S. market, and would likely use their significant production capacity to dramatically increase volumes of low priced CWP to the United States if the orders were revoked.⁸³ In the prior reviews, the Commission found that the Indian CWP industry had substantial unused capacity, was export oriented, and faced trade barriers in third-country markets.⁸⁴ GTA data concerning welded tubes, pipes, and hollow profiles, a category that includes CWP and out-of-scope merchandise, indicate that India was the fourth-largest global exporter in 2022.⁸⁵ GTA data also indicate that Indian exports of such products globally increased irregularly from 222,674 short tons in 2020 to 366,523 short tons in 2021 and 315,874 short tons in 2022.⁸⁶ The leading destination market for exports of such merchandise in 2022 was the United States, followed by Australia.⁸⁷ CWP from India is subject to antidumping duties in Canada and to safeguard measures in the EU.⁸⁸

In the original investigations, subject imports from India undersold the domestic like product in *** quarterly comparisons, with underselling margins ranging from *** to *** percent.⁸⁹ In the first five-year reviews, subject imports from India undersold the domestic like

⁸¹ CR/PR at I-40-41.

⁸² Domestic Producers' Response at Exhibits 1, 13; CR/PR at IV-30.

⁸³ Domestic Producers' Prehearing Br. at 18; Domestic Producers' Posthearing Br. at 9; Domestic Producers' Final Comments at 7-8.

⁸⁴ *First Five-Year Reviews*, USITC Pub. 3316 at 36; *Second Five-Year Reviews*, USITC Pub. 3867 at 11-12; *Third Five-Year Reviews*, USITC Pub. 4333 at 37; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 30.

⁸⁵ CR/PR at Table IV-32.

⁸⁶ CR/PR at Table IV-9.

⁸⁷ CR/PR at Table IV-9.

⁸⁸ CR/PR at IV-62-63, Table IV-31. CWP from India is subject to an antidumping duty order in Canada that is equivalent to 54.2 percent of the export price. *Id.* at Table IV-31. Under the EU safeguard, CWP from India is subject to a TRQ based on historical import levels, and imports above the TRQ level are subject to an additional duty of 25 percent. *Id.* The safeguard has been extended until June 30, 2024. *Id.*

⁸⁹ Original Investigations for CWP from India, Taiwan, and Turkey Staff Report, EDIS Doc. 71828 (Apr. 5, 1986) ("Original Investigations India, Taiwan, and Turkey Staff Report") at Table I-13; *Third Five-Year Reviews*, USITC Pub. 4333 at 17 n.95.

product in *** of *** quarterly comparisons, with underselling margins ranging from *** to *** percent.⁹⁰ In the second five-year reviews, subject imports from India undersold the domestic like product in *** of *** quarterly comparisons, with underselling margins ranging from *** to *** percent.⁹¹ In the third five-year reviews, subject imports from India undersold the domestic like product in *** of *** quarterly comparisons, with underselling margins ranging from *** to *** percent.⁹² In the fourth and current five-year reviews, no product-specific pricing data were collected for subject imports from India.⁹³

In light of the foregoing, including the volume of subject imports from India and underselling by such imports in the original investigations and prior reviews, the continued presence of subject imports from India in the U.S. market during the POR, and the information available regarding Indian producers' production and export capacity, we find that revocation of the antidumping duty order on subject imports from India would not likely have no discernible adverse impact on the domestic industry.

Mexico. In 1991, during the original investigations, subject imports from Mexico totaled 48,000 short tons and accounted for 2.5 percent of apparent U.S. consumption.⁹⁴ Subject imports from Mexico were 16,282 short tons in 1998 (in the first five-year reviews), accounting for 0.5 percent of apparent U.S. consumption; *** short tons in 2005 (in the second five-year reviews), accounting for *** percent of apparent U.S. consumption; and 66,017 short tons in 2011 (in the third five-year reviews), accounting for *** percent of apparent U.S. consumption.⁹⁵

During the fourth five-year reviews, subject imports from Mexico declined from 66,490 short tons in 2012 to 57,765 short tons in 2014 and then increased to 61,038 short tons in 2016, when they accounted for 4.2 percent of apparent U.S. consumption.⁹⁶

During the current reviews, the volume of subject imports from Mexico increased from *** short tons in 2020 to *** short tons in 2021 and *** short tons in 2022; it was higher in

⁹⁰ First Five-Year Reviews Staff Report at Tables CIRC-V-1-6; Third Five-Year Reviews Staff Report, EDIS Doc. 791913 (May 29, 2012) ("Third Five-Year Reviews Staff Report") at Table V-10.

⁹¹ Second Five-Year Reviews Staff Report, EDIS Doc. 791908 (June 12, 2006) ("Second Five-Year Reviews Staff Report") at Table CIRCULAR-V-8; Third Five-Year Reviews Staff Report at Table V-10.

⁹² *Third Five-Year Reviews*, USITC Pub. 4333 at 40 n.260; Third Five-Year Reviews Staff Report at Table V-9.

⁹³ *Fourth Five-Year Reviews*, USITC Pub. 4754 at 33; CR/PR at V-8, Tables V-4-7.

⁹⁴ CR/PR at Appendix C at Table I-1.

⁹⁵ CR/PR at Table I-4, Appendix C at Table I-1.

⁹⁶ CR/PR at Table I-4, Appendix C at Table I-1; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 14.

interim 2023, at *** short tons, than in interim 2022, at *** short tons.⁹⁷ Subject imports from Mexico as a share of apparent U.S. consumption was relatively stable during the POR, ranging from *** percent to *** percent.⁹⁸

In these reviews, the Commission issued questionnaires to twelve firms believed to produce and/or export CWP in Mexico.⁹⁹ Usable responses to the Commission's questionnaire were received from two firms: Productos Especializados and Productos Laminados.¹⁰⁰ These firms are estimated to account for *** of U.S. imports of CWP from Mexico in 2022.¹⁰¹

According to the responding Mexican producers, practical CWP capacity in Mexico was *** short tons in 2020, *** short tons in 2021, and *** short tons in 2022; in interim 2023 it was *** short tons, as compared to interim 2022, at *** short tons.¹⁰² Reported CWP production in Mexico was *** short tons in 2020, *** short tons in 2021, and *** short tons in 2022; it was *** short tons in interim 2023, as compared to *** short tons in interim 2022.¹⁰³ Capacity utilization of the responding Mexican producers declined from *** percent in 2020 to *** percent in 2021 and *** percent in 2021; it was *** percent in interim 2023, as compared to *** percent in interim 2022.¹⁰⁴ In 2022, responding Mexican producers possessed excess capacity of *** short tons, equivalent to *** percent of apparent U.S. consumption that year.¹⁰⁵ Both responding Mexican producers reported producing other products on the same equipment and machinery used to produce CWP.¹⁰⁶ Responding Mexican producers' exports as a share of total shipments of CWP ranged from *** percent to *** percent during the POR, with exports to the United States accounting for between *** to *** percent of total shipments.¹⁰⁷

According to GTA data concerning welded tubes, pipes and hollow profiles, a category that includes CWP and out-of-scope merchandise, exports of such merchandise from Mexico

⁹⁷ CR/PR at Table I-26.

⁹⁸ CR/PR at Table I-26.

⁹⁹ Domestic Producers' Response at Exhibits 1, 27; CR/PR at IV-33 n.31.

¹⁰⁰ CR/PR at IV-33, Table IV-10.

¹⁰¹ CR/PR at IV-33, Table IV-10. Responding Mexican producers collectively reported exporting *** short tons of CWP to the United States in 2022. *Id.* According to official Commerce statistics, U.S. imports of CWP from Mexico equaled *** short tons during the same period. *Id.* at Table I-26.

¹⁰² CR/PR at Table IV-13.

¹⁰³ CR/PR at Table IV-13.

¹⁰⁴ CR/PR at Table IV-13.

¹⁰⁵ *Calculated* from Tables IV-13, I-26.

¹⁰⁶ CR/PR at IV-39, Table IV-17.

¹⁰⁷ CR/PR at Tables IV-15, IV-16.

increased irregularly during the POR, decreasing from 86,350 short tons in 2020 to 69,356 short tons in 2021, before increasing to 90,328 short tons in 2022.¹⁰⁸ The leading destination market for exports of such merchandise from Mexico was the United States throughout the POR.¹⁰⁹ CWP from Mexico is subject to safeguard measures in the EU.¹¹⁰

In the original investigations, subject imports from Mexico undersold the domestic like product in *** of *** quarterly comparisons, with underselling margins ranging from *** to *** percent.¹¹¹ In the first five-year reviews, subject imports from Mexico undersold the domestic like product in *** quarterly comparisons, with underselling margins ranging from *** to *** percent.¹¹² In the second five-year reviews, subject imports from Mexico undersold the domestic like product in *** of *** quarterly comparisons, with underselling margins ranging from *** to *** percent.¹¹³ In the third five-year reviews, subject imports from Mexico undersold the domestic like product in *** quarterly comparisons, with underselling margins ranging from *** to *** percent.¹¹⁴ In the fourth and current five-year reviews, no product-specific pricing data were collected for subject imports from Mexico.¹¹⁵

In light of the foregoing, including the volume of subject imports from Mexico and underselling by such imports in the original investigations and prior reviews, the continued presence of subject imports from Mexico in the U.S. market during the POR, and the large production capacity, including excess capacity, and volume of global exports of welded tubes, pipes, and hollow profiles from Mexico, we find that revocation of the antidumping duty orders on subject imports from Mexico would not likely have no discernible adverse impact on the domestic industry.

¹⁰⁸ CR/PR at Table IV-18.

¹⁰⁹ CR/PR at Table IV-18.

¹¹⁰ CR/PR at IV-62-63, Table IV-31. Under the EU safeguard measures, CWP from Mexico is subject to a TRQ based on historical import levels, and imports above the TRQ level are subject to an additional duty of 25 percent. *Id.* The safeguard has been extended until June 30, 2024. *Id.*

¹¹¹ Original Investigations Brazil, Korea, Romania, Mexico, Taiwan, and Venezuela Staff Report at Tables 29-32; *Third Five-Year Reviews*, USITC Pub. 4333 at 17 n.95.

¹¹² First Five-Year Reviews Staff Report at Table CIRC-V-6; Third Five-Year Reviews Staff Report at Table V-10.

¹¹³ Second Five-Year Reviews Staff Report at Table CIRCULAR-V-8; Third Five-Year Reviews Staff Report at Table V-10.

¹¹⁴ *Third Five-Year Reviews*, USITC Pub. 4333 at 40 n.260; Third Five-Year Reviews Staff Report at Table V-9.

¹¹⁵ *Fourth Five-Year Reviews*, USITC Pub. 4754 at 33; CR/PR at V-8, Tables V-4-7.

South Korea. In 1991, during the original investigations, subject imports from South Korea totaled 325,000 short tons and accounted for 16.9 percent of apparent U.S. consumption.¹¹⁶ Subject imports from South Korea were 174,929 short tons in 1998 (in the first five-year reviews), accounting for 5.8 percent of apparent U.S. consumption; 29,000 short tons in 2005 (in the second five-year reviews), accounting for 1.3 percent of apparent U.S. consumption; 48,054 short tons in 2011 (in the third five-year reviews), accounting for 3.3 percent of apparent U.S. consumption; and 87,668 short tons in 2016 (in the fourth five-year reviews), accounting for 6.0 percent of apparent U.S. consumption.¹¹⁷

In the current reviews, the volume of subject imports from South Korea increased from 60,640 short tons in 2020 to 62,057 short tons in 2021 and 75,560 short tons in 2022; it was higher in interim 2023, at 40,531 short tons, as compared in interim 2022, at 33,509 short tons.¹¹⁸ Subject imports from South Korea as a share of apparent U.S. consumption ranged from *** percent to *** percent during the POR.¹¹⁹ CWP originating in South Korea is subject to an absolute annual quota of 85,878 short tons under Section 232.¹²⁰

In these reviews, no South Korean firm responded to the Commission's foreign producer/exporter questionnaire, although 14 firms were identified by Domestic Producers as possible producers of CWP in South Korea.¹²¹ Domestic Producers argue that subject producers in South Korea maintain large capacities, are export oriented, have the incentive to supply the U.S. market, and would likely use their significant production capacity to dramatically increase volumes of low priced CWP to the United States if the orders were revoked.¹²² In prior reviews, the Commission found that the South Korean CWP industry had substantial unused capacity, was export oriented, and faced trade barriers in third-country markets.¹²³ According to GTA

¹¹⁶ CR/PR at Appendix C at Table I-1.

¹¹⁷ CR/PR at Table I-4, Appendix C at Table I-1.

¹¹⁸ CR/PR at Table I-26.

¹¹⁹ CR/PR at Table I-26.

¹²⁰ Effective March 23, 2018, CWP originating in South Korea is exempt from duties pursuant to Section 232 but is instead subject to an absolute import quota. CR/PR at I-40-42, Table I-22. The annual quota usage rates for relevant HTS subheadings that include CWP suggest that in 2022 the quota was filled for one HTS subheading but not the other, and were as follows: HTS 9903.80.22 (100 percent of 69,469,685 kg filled), HTS 9903.80.24 (64 percent of 8,438,050 kg filled). *Id.* at I-42 n.71.

¹²¹ Domestic Producers' Response at Exhibit 1; CR/PR at IV-42.

¹²² Domestic Producers' Prehearing Br. at 18; Domestic Producers' Posthearing Br. at 9; Domestic Producers' Final Comments at 7-8.

¹²³ *First Five-Year Reviews*, USITC Pub. 3316 at 36; *Second Five-Year Reviews*, USITC Pub. 3867 at 11-12; *Third Five-Year Reviews*, USITC Pub. 4333 at 37; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 30.

data concerning welded tubes, pipes, and hollow profiles, a category that includes CWP and out-of-scope merchandise, South Korea was the fifth-largest global exporter of such merchandise in 2022.¹²⁴ GTA data also indicate that South Korean exports of such merchandise decreased from 300,963 short tons in 2020 to 279,274 short tons in 2021, before increasing to 287,936 short tons in 2022.¹²⁵ The leading destination market for exports of such merchandise from South Korea in 2022 was the United States.¹²⁶ CWP from South Korea is subject to antidumping duties in Canada and Australia and to safeguard measures in the EU.¹²⁷

In the original investigations, subject imports from South Korea undersold the domestic like product in *** of *** quarterly comparisons, with underselling margins ranging from *** to ***.¹²⁸ In the first five-year reviews, subject imports from South Korea undersold the domestic like product in *** of *** quarterly comparisons, with underselling margins ranging from *** to *** percent.¹²⁹ In the second five-year reviews, subject imports from South Korea undersold the domestic like product in *** of *** quarterly comparisons, with underselling margins ranging from *** to *** percent.¹³⁰ In the third five-year reviews, subject imports from South Korea undersold the domestic like product in *** of *** quarterly comparisons, with underselling margins ranging from *** to *** percent.¹³¹ In the fourth and current five-year reviews, no product-specific pricing data were collected for subject imports from South Korea.¹³²

¹²⁴ CR/PR at Table IV-32.

¹²⁵ CR/PR at Table IV-19.

¹²⁶ CR/PR at Table IV-19.

¹²⁷ CR/PR at IV-62-63, Table IV-31. CWP from South Korea is subject to an antidumping duty order in Canada that is equivalent to 54.2 percent of the export price. *Id.* CWP from South Korea is also subject to antidumping duties in Australia. *Id.* Under the EU safeguard, CWP from South Korea is subject to a TRQ based on historical import levels, and imports above the TRQ level are subject to an additional duty of 25 percent. *Id.* The safeguard has been extended until June 30, 2024. *Id.*

¹²⁸ Original Investigations Brazil, Korea, Romania, Mexico, Taiwan, and Venezuela Staff Report at Tables 29-32; Original Investigations of CWP from Korea and Taiwan Staff Report, EDIS Doc. 791824 (Apr. 11, 1984) (“Original Investigations Korea and Taiwan Staff Report”) at Tables 20-23; *Third Five-Year Reviews*, USITC Pub. 4333 at 17 n.95.

¹²⁹ First Five-Year Reviews Staff Report at Tables CIRC-V-1-6; Third Five-Year Reviews Staff Report at Table V-10.

¹³⁰ Second Five-Year Reviews Staff Report at Table CIRCULAR-V-8; Third Five-Year Reviews Staff Report at Table V-10.

¹³¹ *Third Five-Year Reviews*, USITC Pub. 4333 at 40 n.260; Third Five-Year Reviews Staff Report at Table V-9.

¹³² *Fourth Five-Year Reviews*, USITC Pub. 4754 at 33; CR/PR at V-8, Tables V-4-7.

In light of the foregoing, including the volume of subject imports from South Korea and underselling by such imports in the original investigations and prior reviews, the continued presence of subject imports from South Korea in the U.S. market during the POR, and the information available regarding South Korean producers' production and export capacity, we find that revocation of the antidumping duty order on subject imports from South Korea would not likely have no discernible adverse impact on the domestic industry.

*Taiwan.*¹³³ In 1983, during one of the original investigations, subject imports from Taiwan totaled 131,000 short tons and accounted for 6.6 percent of apparent U.S. consumption.¹³⁴ Subject imports from Taiwan were 41,007 short tons in 1998 (in the first five-year reviews), accounting for 1.4 percent of apparent U.S. consumption; 19,000 short tons in 2005 (in the second five-year reviews), accounting for 0.8 percent of apparent U.S. consumption; 22,966 short tons in 2011 (in the third five-year reviews), accounting for 1.6 percent of apparent U.S. consumption; and 14,487 short tons in 2016 (in the fourth five-year reviews), accounting for 1.0 percent of apparent U.S. consumption.¹³⁵

In the current reviews, the volume of subject imports from Taiwan decreased irregularly from 3,220 short tons in 2020 to 751 short tons in 2021 and 814 short tons in 2022; it was higher in interim 2023, at 414 short tons, as compared to interim 2022, at 227 short tons.¹³⁶ Subject imports from Taiwan as a share of apparent U.S. consumption ranged from *** percent to *** percent during the POR.¹³⁷ Effective March 23, 2018, CWP originating in Taiwan became subject to an additional 25 percent *ad valorem* duty under Section 232.¹³⁸

In these reviews, no firm from Taiwan responded to the Commission's foreign producer/exporter questionnaire, although five firms were identified by Domestic Producers as

¹³³ The Commission's typical practice in grouped five-year reviews involving multiple orders with different scopes concerning an individual subject country is to evaluate each order separately for purposes of the no discernible adverse impact analysis. See *Carbon and Alloy Seamless Standard, Line, and Pressure Pipe from Japan and Romania*, Inv. Nos. 731-TA-847 and 849 (Third Review), USITC Pub. 4731 at 27 n.118 (Oct. 2017); *Stainless Steel Sheet and Strip from Japan, Korea, and Taiwan*, Inv. Nos. 701-TA-382 and 731-TA-800, 801, and 803, USITC Pub. 4725 at 19 (Sept. 2017). In these reviews, data are not available on the current volume of imports subject to each of the separate orders on subject imports from Taiwan. Hence, data are presented on a country-wide, rather than order-specific, basis.

¹³⁴ CR/PR at Appendix C at Table I-1.

¹³⁵ CR/PR at Table I-4, Appendix C at Table I-1.

¹³⁶ CR/PR at Table I-26.

¹³⁷ CR/PR at Table I-26.

¹³⁸ CR/PR at I-40-41, Table I-22.

possible producers of CWP in Taiwan.¹³⁹ According to Domestic Producers, subject producers in Taiwan maintain large capacities, are export oriented, have the incentive to supply the U.S. market, and would likely use their significant production capacity to dramatically increase volumes of low priced CWP to the United States if the orders were revoked.¹⁴⁰ In the prior reviews, the Commission found that the CWP industry in Taiwan had substantial unused capacity and was export oriented.¹⁴¹ According to GTA data concerning welded tubes, pipes, and hollow profiles, a category that includes CWP and out-of-scope merchandise, exports of such merchandise from Taiwan increased irregularly during the POR, rising from 33,830 short tons in 2020 to 41,153 short tons in 2021, before decreasing to 37,242 short tons in 2022.¹⁴² The leading destination markets for exports of such merchandise from Taiwan in 2022 were Canada and Thailand.¹⁴³ CWP from Taiwan is subject to antidumping duties in Canada and Australia and to safeguard measures in the EU.¹⁴⁴

In the original investigations, subject imports from Taiwan undersold the domestic like product in *** of *** quarterly comparisons, with underselling margins ranging from *** to *** percent.¹⁴⁵ In the first five-year reviews, subject imports from Taiwan undersold the domestic like product in *** of *** quarterly comparisons, with underselling margins ranging from *** to *** percent.¹⁴⁶ In the second five-year reviews, subject imports from Taiwan undersold the domestic like product in *** quarterly comparisons, with underselling margins

¹³⁹ Domestic Producers' Response at Exhibit 1; CR/PR at IV-45.

¹⁴⁰ Domestic Producers' Prehearing Br. at 18; Domestic Producers' Posthearing Br. at 9; Domestic Producers' Final Comments at 7-8.

¹⁴¹ *First Five-Year Reviews*, USITC Pub. 3316 at 36; *Second Five-Year Reviews*, USITC Pub. 3867 at 11-12; *Third Five-Year Reviews*, USITC Pub. 4333 at 37; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 30.

¹⁴² CR/PR at Table IV-20.

¹⁴³ CR/PR at Table IV-20.

¹⁴⁴ CR/PR at IV-62-63, Table IV-31. CWP from Taiwan is subject to an antidumping duty order in Canada that is equivalent to 54.2 percent of the export price. *Id.* CWP from Taiwan is also subject to antidumping duties in Australia. *Id.* Under the EU safeguard, CWP from Taiwan is subject to a TRQ based on historical import levels, and imports above the TRQ level are subject to an additional duty of 25 percent. *Id.* The safeguard has been extended until June 30, 2024. *Id.*

¹⁴⁵ Original Investigations Brazil, Korea, Romania, Mexico, Taiwan, and Venezuela Staff Report at Table 32; Original Investigations Korea and Taiwan Staff Report at Tables 20-23; Original Investigations India, Taiwan, and Turkey Staff Report at Table II-13; *Third Five-Year Reviews*, USITC Pub. 4333 at 17 n.95.

¹⁴⁶ *First Five-Year Reviews* at Tables CIRC-V-1-6; *Third Five-Year Reviews* Staff Report at Table V-10.

ranging from *** to *** percent.¹⁴⁷ In the third five-year reviews, subject imports from Taiwan undersold the domestic like product in *** of *** quarterly comparisons, with underselling margins ranging from *** to *** percent.¹⁴⁸ In the fourth and current five-year reviews, no product-specific pricing data were collected for subject imports from Taiwan.¹⁴⁹

In light of the foregoing, including the volume of subject imports from Taiwan and underselling by such imports in the original investigations and prior reviews, the continued presence of subject imports from Taiwan in the U.S. market during the POR, and the information available regarding Taiwan producers' production and export capacity, we find that revocation of the antidumping duty orders on subject imports from Taiwan would not likely have no discernible adverse impact on the domestic industry.

Thailand. In 1984, during the original investigations, subject imports from Thailand totaled less than 500 short tons and accounted for less than 0.05 percent of apparent U.S. consumption; in January to September 1985, subject imports from Thailand were 29,738 short tons and accounted for 0.7 percent of apparent U.S. consumption.¹⁵⁰ Subject imports from Thailand were 28,049 short tons in 1998 (in the first five-year reviews), accounting for 0.9 percent of apparent U.S. consumption; 81,000 short tons in 2005 (in the second five-year reviews), accounting for 3.5 percent of apparent U.S. consumption; 47,696 short tons in 2011 (in the third five-year reviews), accounting for 3.2 percent of apparent U.S. consumption; and 58,348 short tons in 2016 (in the fourth five-year reviews), accounting for 4.0 percent of apparent U.S. consumption.¹⁵¹

In the current reviews, the volume of subject imports from Thailand decreased irregularly from 52,302 short tons in 2020 to 9,942 short tons in 2021 and 37,299 short tons in 2022; it was much higher in interim 2023, at 64,027 short tons, as compared to interim 2022, at 1,535 short tons.¹⁵² Subject imports from Thailand as a share of apparent U.S. consumption ranged from *** percent to *** percent during the POR.¹⁵³ Effective March 23, 2018, CWP

¹⁴⁷ Second Five-Year Reviews Staff Report at Table CIRCULAR-V-8; Third Five-Year Reviews Staff Report at Table V-10.

¹⁴⁸ *Third Five-Year Reviews*, USITC Pub. 4333 at 40 n.260; Third Five-Year Reviews Staff Report at Table V-9.

¹⁴⁹ *Fourth Five-Year Reviews*, USITC Pub. 4754 at 33; CR/PR at V-8, Tables V-4-7.

¹⁵⁰ CR/PR at Appendix C at Table I-1; *Original Determinations for Thailand and Turkey*, USITC Pub. 1810 at Tables I-9, I-11.

¹⁵¹ CR/PR at Table I-4, Appendix C at Table I-1.

¹⁵² CR/PR at Table I-26.

¹⁵³ CR/PR at Table I-26.

originating in Thailand became subject to an additional 25 percent *ad valorem* duty under Section 232.¹⁵⁴

In these reviews, no Thai firm responded to the Commission's foreign producer/exporter questionnaire, although five firms were identified by Domestic Producers as possible producers of CWP in Thailand.¹⁵⁵ Domestic Producers argue that subject producers in Thailand have large capacities, are export oriented, have the incentive to supply the U.S. market, and would likely use their significant production capacity to dramatically increase volumes of low priced CWP to the United States if the orders were revoked.¹⁵⁶ In the prior reviews, the Commission found that the CWP industry in Thailand had substantial unused capacity, was export oriented, and faced trade barriers in third-country markets.¹⁵⁷ According to GTA data concerning welded tubes, pipes, and hollow profiles, a category that includes CWP and out-of-scope merchandise, Thailand was the eleventh-largest global exporter of such merchandise in 2022.¹⁵⁸ Exports of such merchandise from Thailand increased irregularly during the POR, rising from 121,629 short tons in 2020 to 194,495 short tons in 2021 before decreasing to 163,044 short tons in 2022.¹⁵⁹ The leading destination market for exports of such merchandise from Thailand in 2022 was the United States.¹⁶⁰ CWP from Thailand is subject to antidumping duties in Canada and to safeguard measures in the EU.¹⁶¹

In the original investigations, subject imports from Thailand undersold the domestic like product in *** of *** quarterly comparisons, with underselling margins ranging from *** to *** percent.¹⁶² In the first five-year reviews, subject imports from Thailand undersold the

¹⁵⁴ CR/PR at I-40-41, Table I-22.

¹⁵⁵ Domestic Producers' Response at Exhibit 1; CR/PR at IV-48.

¹⁵⁶ Domestic Producers' Prehearing Br. at 18; Domestic Producers' Posthearing Br. at 9; Domestic Producers' Final Comments at 7-8.

¹⁵⁷ *First Five-Year Reviews*, USITC Pub. 3316 at 36; *Second Five-Year Reviews*, USITC Pub. 3867 at 11-12; *Third Five-Year Reviews*, USITC Pub. 4333 at 37; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 30.

¹⁵⁸ CR/PR at Table IV-21.

¹⁵⁹ CR/PR at Table IV-21.

¹⁶⁰ CR/PR at Table IV-21.

¹⁶¹ CR/PR at IV-62-63, Table IV-31. CWP from Thailand is subject to an antidumping duty order in Canada that is equivalent to 54.2 percent of the export price. *Id.* Under the EU safeguard measures, CWP from Thailand is subject to a TRQ based on historical import levels, and imports above the TRQ level are subject to an additional duty of 25 percent. *Id.* The safeguard has been extended until June 30, 2024. *Id.*

¹⁶² Original Investigations of CWP from Turkey and Thailand Staff Report, EDIS Doc. 791825 (Feb. 5, 1986) ("Original Investigations Turkey and Thailand Staff Report") at Table I-13; *Third Five-Year Reviews*, USITC Pub. 4333 at 17 n.95.

domestic like product in *** of *** quarterly comparisons, with underselling margins ranging from *** to *** percent.¹⁶³ In the third five-year reviews, subject imports from Thailand undersold the domestic like product in *** of *** quarterly comparisons, with underselling margins ranging from *** to *** percent.¹⁶⁴ In the second, fourth, and current five-year reviews, no product-specific pricing data were collected for subject imports from Thailand.¹⁶⁵

In light of the foregoing, including the volume of subject imports from Thailand and underselling by such imports in the original investigations and prior reviews, the increased presence of subject imports from Thailand in the U.S. market during the POR, and the information available regarding Thai producers' production and export capacity, we find that revocation of the antidumping duty order on subject imports from Thailand would not likely have no discernible adverse impact on the domestic industry.

Turkey. In 1985, during the original investigations, subject imports from Turkey totaled 36,000 short tons and accounted for 1.5 percent of apparent U.S. consumption.¹⁶⁶ Subject imports from Turkey were 7,396 short tons in 1998 (in the first five-year reviews), accounting for 0.2 percent of apparent U.S. consumption; 39,000 short tons in 2005 (in the second five-year reviews), accounting for 1.7 percent of apparent U.S. consumption; and 31,723 short tons in 2011 (in the third five-year reviews), accounting for 2.2 percent of apparent U.S. consumption; and 50,293 short tons in 2016 (in the fourth five-year reviews), accounting for 3.5 percent of apparent U.S. consumption.¹⁶⁷

During the current reviews, the volume of subject imports from Turkey increased from 22,769 short tons in 2020 to 43,751 short tons in 2021 and 115,583 short tons in 2022; it was lower in interim 2023, at 16,589 short tons, as compared to interim 2022, at 54,488 short tons.¹⁶⁸ Subject imports from Turkey as a share of apparent U.S. consumption ranged from ***

¹⁶³ First Five-Year Reviews Staff Report at Tables CIRC-V-1-4; Third Five-Year Reviews Staff Report at Table V-10.

¹⁶⁴ *Third Five-Year Reviews*, USITC Pub. 4333 at 40 n.260; Third Five-Year Reviews Staff Report at Table V-9.

¹⁶⁵ Second Five-Year Reviews Staff Report at Table CIRCULAR-V-8; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 33; CR/PR at V-8, Tables V-4-7.

¹⁶⁶ CR/PR at Appendix C at Table I-1.

¹⁶⁷ CR/PR at Table I-4, Appendix C at Table I-1.

¹⁶⁸ CR/PR at Table I-26.

to *** percent during the POR.¹⁶⁹ Effective March 23, 2018, CWP originating in Turkey became subject to an additional 25 percent *ad valorem* duty under Section 232.¹⁷⁰

In these reviews, the Commission issued questionnaires to three firms believed to produce and/or export CWP in Turkey.¹⁷¹ One firm, Borusan Mannesmann Boru San. Tic. A.Ş. (“Borusan”), responded to the Commission’s questionnaire.¹⁷² Borusan is estimated to account for a substantial share of subject imports from Turkey.¹⁷³

According to Borusan, capacity in Turkey was *** short tons from 2020 to 2022 and was *** short tons in the interim periods.¹⁷⁴ Reported CWP production in Turkey increased from *** short tons in 2020 to *** short tons in 2021 and *** short tons in 2022; it was *** short tons in interim 2023, as compared to *** short tons in interim 2022.¹⁷⁵ The capacity utilization of responding producer Borusan increased from *** percent in 2020 to *** percent in 2021 and *** percent in 2021; it was *** percent in interim 2023, as compared to *** percent in interim 2022.¹⁷⁶ In 2022, responding producer Borusan possessed excess capacity of *** short tons, equivalent to *** percent of apparent U.S. consumption that year.¹⁷⁷ Responding producer Borusan reported producing other products on the same equipment and machinery used to produce CWP.¹⁷⁸ Responding producer Borusan’s exports as a share of total shipments of CWP ranged from *** percent to *** percent during the POR, with exports to the United States accounting for *** percent to *** percent of total export shipments.¹⁷⁹

According to GTA data concerning welded tubes, pipes, and hollow profiles, a category that includes CWP and out-of-scope merchandise, Turkey was the third-largest global exporter

¹⁶⁹ CR/PR at Table I-26.

¹⁷⁰ CR/PR at I-40-41, Table I-22. The 25 percent *ad valorem* duty under Section 232 was temporarily raised to 50 percent, effective August 13, 2018, but restored to 25 percent, effective May 21, 2019. *Id.*

¹⁷¹ Domestic Producers’ Response at Exhibit 1; CR/PR at IV-51.

¹⁷² CR/PR at IV-51, Table IV-22.

¹⁷³ CR/PR at Table IV-22. Turkish producer Borusan reported exporting *** short tons of CWP to the United States in 2022. *Id.* According to official Commerce statistics, U.S. imports of CWP from Turkey equaled 115,583 short tons during the same period. *Id.* at Tables I-26, IV-27. ***. *Id.* at Table IV-22 Note.

¹⁷⁴ CR/PR at Table IV-24.

¹⁷⁵ CR/PR at Table IV-24.

¹⁷⁶ CR/PR at Table IV-24.

¹⁷⁷ *Calculated* from Tables IV-24, I-26.

¹⁷⁸ CR/PR at IV-57, Table IV-28.

¹⁷⁹ CR/PR at Tables IV-26, IV-27.

of such merchandise in 2022.¹⁸⁰ Exports of such merchandise from Turkey increased irregularly during the POR, rising from 578,506 short tons in 2020 to 709,347 short tons in 2021 and 736,892 short tons in 2022.¹⁸¹ The leading destination market for exports of such merchandise from Turkey in 2022 was the United States.¹⁸² CWP from Turkey is subject to antidumping duty orders in Canada and to safeguard measures in the EU.¹⁸³

In the original investigations, subject imports from Turkey undersold the domestic like product in *** quarterly comparisons, with underselling margins ranging from *** to *** percent.¹⁸⁴ In the first five-year reviews, subject imports from Turkey undersold the domestic like product in *** of *** quarterly comparisons, with underselling margins ranging from *** to *** percent.¹⁸⁵ In the second five-year reviews, subject imports from Turkey undersold the domestic like product in *** of *** quarterly comparisons, with underselling margins ranging from *** to *** percent.¹⁸⁶ In the third five-year reviews, subject imports from Turkey undersold the domestic like product in *** of *** quarterly comparisons, with underselling margins ranging from *** to *** percent.¹⁸⁷ In the fourth five-year reviews, no product-specific pricing data were collected for subject imports from Turkey.¹⁸⁸ In the current reviews, subject imports from Turkey undersold the domestic like product in *** of *** quarterly comparisons, with underselling margins ranging from *** to *** percent.¹⁸⁹

In light of the foregoing, including the large and increasing volume of subject imports from Turkey and underselling by such imports in the original investigations, prior reviews, and current reviews, the increased presence of subject imports from Turkey in the U.S. market

¹⁸⁰ CR/PR at Table IV-29.

¹⁸¹ CR/PR at Table IV-29.

¹⁸² CR/PR at Table IV-29.

¹⁸³ CR/PR at IV-62-63, Table IV-31. CWP from Turkey is subject to an antidumping duty order in Canada that is equivalent to 45.8 percent of the export price. *Id.* Under the EU safeguard, CWP from Turkey is subject to a TRQ based on historical import levels, and imports above the TRQ level are subject to an additional duty of 25 percent. *Id.* The safeguard has been extended until June 30, 2024. *Id.*

¹⁸⁴ Original Investigations Turkey and Thailand Staff Report at Table I-14; *Original Investigations India, Taiwan, and Turkey* at Table II-14; *Third Five-Year Reviews*, USITC Pub. 4333 at 17 n.95.

¹⁸⁵ First Five-Year Reviews Staff Report at Tables CIRC-V-1-6; Third Five-Year Reviews Staff Report at Table V-10.

¹⁸⁶ Second Five-Year Reviews Staff Report at Table CIRCULAR-V-8; Third Five-Year Reviews Staff Report at Table V-10.

¹⁸⁷ *Third Five-Year Reviews*, USITC Pub. 4333 at 40 n.260; Third Five-Year Reviews Staff Report at Table V-9.

¹⁸⁸ *Fourth Five-Year Reviews*, USITC Pub. 4754 at 33.

¹⁸⁹ CR/PR at Table V-9.

during the POR, and the large production capacity, including excess capacity, and the export orientation of the CWP industry in Turkey, we find that revocation of the antidumping and countervailing duty orders on subject imports from Turkey would not likely have no discernible adverse impact on the domestic industry.

b) Likelihood of a Reasonable Overlap of Competition

The Commission generally has considered four factors intended to provide a framework for determining whether subject imports compete with each other and with the domestic like product.¹⁹⁰ Only a “reasonable overlap” of competition is required.¹⁹¹ In five-year reviews, the relevant inquiry is whether there likely would be competition even if none currently exists because the subject imports are absent from the U.S. market.¹⁹²

Fungibility. In the prior reviews, the Commission found that CWP is a standardized product generally made to ASTM A53, A135, A795, or similar common specifications.¹⁹³ A majority of market participants in all prior reviews that compared products from different

¹⁹⁰ The four factors generally considered by the Commission in assessing whether imports compete with each other and with the domestic like product are as follows: (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 geographical markets of 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 subject imports are simultaneously present in the market with one another and the domestic like product. *See, e.g., Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

¹⁹¹ *See Mukand Ltd. v. United States*, 937 F. Supp. 910, 916 (Ct. Int’l Trade 1996); *Wieland Werke*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”); *United States Steel Group v. United States*, 873 F. Supp. 673, 685 (Ct. Int’l Trade 1994), *aff’d*, 96 F.3d 1352 (Fed. Cir. 1996). We note, however, that there have been investigations where the Commission has found an insufficient overlap in competition and has declined to cumulate subject imports. *See, e.g., Live Cattle from Canada and Mexico*, Inv. Nos. 701-TA-386 and 731-TA-812-13 (Preliminary), USITC Pub. 3155 at 15 (Feb. 1999), *aff’d sub nom., Ranchers-Cattlemen Action Legal Foundation v. United States*, 74 F. Supp. 2d 1353 (Ct. Int’l Trade 1999); *Static Random Access Memory Semiconductors from the Republic of Korea and Taiwan*, Inv. Nos. 731-TA-761-62 (Final), USITC Pub. 3098 at 13-15 (Apr. 1998).

¹⁹² *See generally, Cheflene Corp. v. United States*, 219 F. Supp. 2d 1313, 1314 (Ct. Int’l Trade 2002).

¹⁹³ *First Five-Year Reviews*, USITC Pub. 3316 at 30; *Second Five-Year Reviews*, USITC Pub. 3867 at 14; *Third Five-Year Reviews*, USITC Pub. 4333 at 21; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 18; CR/PR at I-18 to I-20, PR at I-14 to I-16.

sources found them to be at least “frequently” if not “always” interchangeable.¹⁹⁴ During the third five-year reviews, the majority of questionnaire respondents reported products made in each subject country were “comparable” to one another and the domestic like product in terms of all but two specified factors, only reporting differences in availability and delivery time between imports from Mexico and products imported from South Korea, Taiwan, Thailand, and Turkey.¹⁹⁵ Due to the expedited nature of the fourth five-year reviews, there was no new information on the record to indicate that the fungibility of subject imports had changed.¹⁹⁶

In these reviews, the record shows that subject imports from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey, and the domestic like product remain fungible. The majority of responding U.S. producers reported that product from each subject source was always or frequently interchangeable with domestically produced CWP.¹⁹⁷ The majority of importers reported the domestic like product and imports from subject sources were frequently or always interchangeable, except when comparing imports from Turkey to the domestic like product or other subject sources.¹⁹⁸ The majority of responding purchasers reported that CWP from domestic and subject sources were frequently or always interchangeable, except when comparing the domestic like product to subject imports from Brazil or Mexico.¹⁹⁹

¹⁹⁴ *First Five-Year Reviews*, USITC Pub. 3316 at 30-31; *Second Five-Year Reviews*, USITC Pub. 3867 at 14 and n.72; *Third Five-Year Reviews*, USITC Pub. 4333 at 21-22.

¹⁹⁵ *Third Five-Year Reviews*, USITC Pub. 4333 at 21-22. During the second and third five-year reviews, fewer market participants offered views concerning the comparability of subject imports from Brazil. *Second Five-Year Reviews*, USITC Pub. 3867 at 14 and n.72; *Third Five-Year Reviews*, USITC Pub. 4333 at 21-22.

¹⁹⁶ *Fourth Five-Year Reviews*, USITC Pub. 4754 at 18.

¹⁹⁷ CR/PR at Table II-16.

¹⁹⁸ CR/PR at Table II-17. In comparing imports from Turkey with the domestic like product or CWP from other subject sources and the domestic like product *** responding importer reported they were always interchangeable and *** reported they were sometimes interchangeable. *Id.*

¹⁹⁹ CR/PR at Table II-18. *** responding purchaser reported that the domestic like product is always interchangeable with imports from Brazil, while *** reported they are sometimes interchangeable. *Id.* Regarding imports from Mexico, *** of responding purchasers reported they are sometimes interchangeable with the domestic like product, and *** reported that they are always or frequently interchangeable with the domestic like product. *Id.* No purchaser reported that CWP from any subject source is never interchangeable with CWP from another subject source or with the domestic like product. *Id.*

Purchaser responses comparing domestically produced CWP and CWP from each subject source with respect to fifteen purchasing factors were mixed.²⁰⁰ However, with respect to the factors that more than half of the responding purchasers identified as very important – namely availability, delivery time, product consistency, quality meets industry standards, and reliability of supply, with the exception of price²⁰¹ – most responding purchasers reported that domestically produced CWP was comparable or superior as compared to imports from each subject country.²⁰² Additionally, all purchasers reported that CWP from domestic and subject sources always or usually met minimum quality specifications.²⁰³

Responding U.S. producers reported shipments of all types of CWP in terms of standards/stenciling in 2022, with ASTM A135/A795 accounting for the plurality of total U.S. shipments, followed by ASTM A500/A252 and ASTM A53.²⁰⁴ Although U.S. shipments of each standard/stenciling of CWP were not reported for all subject sources in 2022, the record indicates that U.S. shipments of domestically produced CWP and imports from Turkey overlapped with respect to ASTM A135/A795 and ASTM A53.²⁰⁵ With respect to wall thickness, there were U.S. shipments of domestically produced CWP and subject imports from Turkey reported for each thickness in 2022.²⁰⁶ With respect to nominal pipe sizes, U.S. shipments by domestically produced CWP and subject imports from Turkey were made in all nominal pipe sizes (“NPS”) except one in 2022.²⁰⁷

Geographic Overlap. In all prior reviews, the Commission found a likely geographic overlap on the basis that many domestic producers sold their products nationwide and

²⁰⁰ CR/PR at Table II-15. There were no purchasers that compared U.S.-produced CWP with CWP from Brazil. *Id.* at II-26.

²⁰¹ CR/PR at II-22, Table II-12.

²⁰² CR/PR at Table II-15. An equal number of firms reported the domestic like product to be superior, comparable, and inferior to subject imports from Mexico on reliability of supply. Regarding price, an equal number of firms reported that the domestic like product was comparable and inferior to India, and an equal number of firms reported that the domestic like product was superior, comparable, and inferior to Mexico. A majority of firms reported that the domestic like product was inferior to imports from South Korea, Taiwan, Thailand, and Turkey on price. *Id.*

²⁰³ CR/PR at Table II-13.

²⁰⁴ CR/PR at Table IV-4.

²⁰⁵ CR/PR at Table IV-4. There were no reported U.S. shipments of CWP from other subject countries. *Id.*

²⁰⁶ CR/PR at Table IV-2. There were no reported U.S. shipments of CWP from other subject countries. *Id.*

²⁰⁷ CR/PR at Table IV-3. A small percentage of U.S. shipments of domestically produced CWP were made in NPS 14 to 16, whereas no U.S. shipments of imports from Turkey were made in this category. There were no reported U.S. shipments of CWP from other subject countries. *Id.*

importers of subject merchandise were located throughout the United States.²⁰⁸ In the fourth five-year reviews, subject imports from six of the seven subject countries entered the United States through Texas ports (Houston-Galveston and Laredo) and at least one additional common port, except for subject imports from Brazil, which entered the United States through the Chicago port, as did subject imports from India.²⁰⁹

In these reviews, domestically produced CWP continues to be sold nationwide.²¹⁰ CWP from all subject sources, except for Brazil, entered through ports in every region of the United States.²¹¹

Channels of Distribution. In all prior reviews, the Commission found that CWP, regardless of source, was principally sold through distributors.²¹² In the current reviews, the majority of U.S. shipments from domestic producers were sold to distributors throughout the POR, with the balance sold to end users.²¹³ Available information indicates that U.S. shipments of subject imports from Turkey were sold primarily to distributors during the POR, with small but appreciable quantities sold to end users in 2021 and 2022.²¹⁴ There is no new information on the record indicating that the channels of distribution for subject imports from other sources have changed since the last reviews.

Simultaneous Presence in Market. In all the prior reviews, the record showed domestic industry shipments and imports of CWP from each of the seven subject countries were in the U.S. market during most years of the relevant period of review.²¹⁵ In these reviews, the

²⁰⁸ *First Five-Year Reviews*, USITC Pub. 3316 at 31; *Second Five-Year Reviews*, USITC Pub. 3867 at 14-15; *Third Five-Year Reviews*, USITC Pub. 4333 at 21-22; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 18-19. In the third five-year reviews, questionnaire responses and Commerce data showed that CWP manufactured in the United States, Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey served the U.S. market nationwide, despite the fact that not all subject imports entered the U.S. market in overlapping ports of entry. *Third Five-Year Reviews*, USITC Pub. 4333 at 21-22.

²⁰⁹ *Fourth Reviews*, USITC Pub. 4754 at 18-19. Subject imports from Brazil also entered the United States through the New York port. *Id.* at 19 n.128.

²¹⁰ CR/PR at Table II-3.

²¹¹ CR/PR at Table IV-5. There were *** subject imports from Brazil in the U.S. market from January 1, 2020 to June 30, 2023. *Id.* at Tables IV-5, IV-18.

²¹² *First Five-Year Reviews*, USITC Pub. 3316 at 31; *Second Five-Year Reviews*, USITC Pub. 3867 at 15; *Third Five-Year Reviews*, USITC Pub. 4333 at 22; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 19.

²¹³ CR/PR at Table II-2. No importers of subject imports from Brazil, India, Mexico, South Korea, Taiwan, or Thailand reported data on channels of distribution. *Id.*

²¹⁴ CR/PR at Table II-2. No responding importers provided U.S. shipment data on subject imports from Brazil, India, Mexico, South Korea, Taiwan, or Thailand. *Id.* at IV-2.

²¹⁵ *First Five-Year Reviews*, USITC Pub. 3316 at 31; *Second Five-Year Reviews*, USITC Pub. 3867 at 15; *Third Five-Year Reviews*, USITC Pub. 4333 at 22; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 19.

domestic like product and imports of CWP from the India, Mexico, South Korea, and Turkey were present in the U.S. market every month from January 2020 to June 2023, while imports of CWP from Taiwan and Thailand were present in all but two months of these months.²¹⁶ Imports from Brazil were present in 8 of the 42 months during from January 2020 to June 2023, ***.²¹⁷ There is no evidence on the record, however, that subject imports from Brazil would not be simultaneously present with subject imports from other sources and the domestic like product, as they were in the original investigations, if the orders were revoked.

Conclusion. The record in these reviews continues to indicate that there is a reasonable overlap of competition between subject imports from Brazil, India, Mexico, South Korea, Taiwan, Thailand, Turkey, and the domestic like product. In particular, the domestic like product and imports from each subject country remain fungible. The domestic like product and imports from each subject country, except Brazil, were simultaneously present in the U.S. market for most of the POR and overlapped in terms of geographic market. Although subject imports from Brazil were not present in the U.S. market during the POR, there is no evidence on the record that subject imports from Brazil would not be simultaneously present with subject imports from other sources and the domestic like product and sold nationwide if the orders were revoked. The available information also shows that the domestic like product and imports from each subject country are primarily shipped through the same or similar channels of distribution. Consequently, we find that there would likely be a reasonable overlap of competition among subject imports from Brazil, India, Mexico, South Korea, Taiwan, Thailand, Turkey and between the domestic like product and subject imports from each source if the orders were revoked.

c) Likely Conditions of Competition²¹⁸

In determining whether to exercise our discretion to cumulate subject imports, we assess whether subject imports from Brazil, India, Mexico, South Korea, Taiwan, Thailand, Turkey would likely compete under similar or different conditions of competition. Based on our review of the record, we find that subject imports from Brazil are likely to compete in the U.S. market under conditions of competition that are different than the conditions that apply to subject imports from India, Mexico, South Korea, Taiwan, Thailand, and Turkey. We

²¹⁶ CR/PR at IV-18, Tables IV-6, V-4-7.

²¹⁷ CR/PR IV-18, Table IV-6.

²¹⁸ Commissioner Schmidlein does not join this section. See Dissenting Views of Commissioner Rhonda K. Schmidlein.

consequently exercise our discretion not to cumulate subject imports from Brazil with the other subject countries for purposes of our analysis in these reviews.²¹⁹ Because imports from all other subject sources are likely to compete under similar conditions of competition after revocation, we exercise our discretion to cumulate imports from those countries for purposes of our analysis in these reviews.

1. Brazil

We find that subject imports from Brazil would likely compete under different conditions of competition than imports from other subject countries in the event of revocation, given the effects of the Section 232 quota with respect to CWP from Brazil. Unlike all but one of the other subject countries, *i.e.*, South Korea, CWP from Brazil is subject to an absolute quota limit imposed under Section 232. The Section 232 quota took effect in June 2018 and is an absolute cap on the annual volume of subject imports from Brazil. The quota is set at 2,865 short tons per year for 2022, equivalent to *** percent of apparent U.S. consumption and *** percent of total imports in 2022.²²⁰

By comparison, subject imports from Mexico are not subject to any Section 232 measures and subject imports from India, Taiwan, Thailand, and Turkey have no quota limits but are subject instead to 25 percent *ad valorem* tariffs.²²¹

²¹⁹ In determining whether to exercise our discretion, the Commission has historically looked at a number of different likely conditions of competition. As discussed above in the Legal Standard for Cumulation, the Federal Circuit in *Nucor* affirmed that the Commission has wide latitude in selecting the types of factors it considers relevant in deciding whether to exercise discretion to cumulate subject imports in five-year reviews. *Nucor*, 601 F.3d at 1292; *see also, e.g., Nucor Corp. v. United States*, 605 F. Supp. 2d 1361, 1371, n. 13 (Ct. Int'l Trade 2009) (*citing Nucor Corp. v. United States*, 569 F. Supp.2d 1328, 1338 n.5 (Ct. Int'l Trade 2008)); *Cut-to-Length Carbon Steel Plate from China, Russia, South Africa, and Ukraine*, Inv. Nos. 731-TA-753-756 (Review), USITC Pub. 3626 (September 2003) at 16-17 (Commission declining to exercise its discretion to cumulate subject imports from South Africa with other subject imports based, in part, on South Africa's exemption from safeguard measures); *Cotton Shop Towels from Bangladesh, China, and Pakistan*, Inv. Nos. 701-TA-202 (Review) and 731-TA-103 and 514 (Review), USITC Pub. 3267 (January 2000) at 9-11 (citing differing textile quota conditions for China than for Bangladesh/Pakistan as basis for exercising discretion not to cumulate subject imports from China with subject imports from those other two countries). Consistent with this latitude and prior Commission decisions in five-year reviews identifying trade restricting measures as a relevant condition of competition, we find that the absolute quota on imports from Brazil is a relevant likely condition of competition affecting their ability to supply and compete in the U.S. market.

²²⁰ CR/PR at I-40-42, Tables I-22, C-1.

²²¹ CR/PR at I-40-42, Table I-22.

Further, although imports of CWP from South Korea also are currently subject to an absolute quota, there are significant differences between the level of South Korea's quota and presence of subject imports from South Korea in the U.S. market compared to subject imports from Brazil. The annual absolute quota on subject imports from South Korea is 85,878 short tons (equivalent to *** percent of apparent U.S. consumption in 2022), whereas the annual absolute quota on subject imports from Brazil is only 2,865 short tons (equivalent to *** percent of apparent U.S. consumption in 2022).²²² In other words, the absolute quota on subject imports from South Korea is approximately 30 times larger than the absolute quota for subject imports from Brazil. While subject imports from South Korea approached their quota limit and maintained a substantial presence in the U.S. market throughout the data collection period,²²³ accounting for *** percent of apparent U.S. consumption in 2022, there were no imports of CWP from Brazil during the data collection period, and the Section 232 quota covering CWP from Brazil was filled by imports of out-of-scope merchandise from Brazil in 2022.²²⁴

Given the absolute quota applicable to subject imports from Brazil, even if imports of CWP from Brazil reached the quota level, the substantially larger quota for South Korea and the absence of an absolute quota on imports from other subject countries means that, unlike subject imports from Brazil, imports from the other subject countries would be in a position to compete for a greater number of sales at larger volumes than subject producers in Brazil.²²⁵ As a result, the small absolute quota applicable to subject imports from Brazil is likely to prevent Brazilian exporters from competing under similar conditions of competition as producers in the other subject countries.²²⁶

²²² CR/PR at Tables I-22, I-26.

²²³ During the POR, the volume of subject imports from South Korea were *** short tons in 2020, *** short tons in 2021, *** short tons in 2022, *** short tons in interim 2022, and *** short tons in interim 2023. CR/PR at Tables I-26, C-1. As discussed above, available information indicates that the quota for South Korea was mostly filled in 2022. South Korea's annual quota usage rates for HTS statistical reporting numbers containing CWP products were the following in 2022: HTS 9903.80.22 (100 percent of 69,469,685 kg filled), HTS 9903.80.24 (64 percent of 8,438,050 kg filled). *Id.* at I-42 n.71.

²²⁴ CR/PR at I-42 n.71, IV-2 n.4, Table I-26, Appendix C at Table I-6.

²²⁵ Furthermore, it is unlikely that subject imports from Brazil would fill the absolute quota after revocation because they would have to compete for use of the quota with out-of-scope merchandise from Brazil that as of 2022 was filling the quota. CR/PR at I-42 n.71, IV-2 n.4, IV-18.

²²⁶ Domestic Producers argue that these reviews present different facts from those in the *Cold-Rolled Steel*, *Hot-Rolled Steel*, and *CTL plate* reviews, in which the Commission found that imports from Brazil were likely to compete under different conditions of competition based on the applicable Section 232 quotas, that warrant reaching a different result here. Specifically, they contend the U.S. market for (Continued...)

(...Continued)

CWP and individual CWP sales volumes are smaller than the markets and sales volumes at issue in the hot-rolled steel, cold-rolled steel, and CTL plate reviews, and that CWP producers in Brazil maintain significant capacity in contrast to the Brazilian capacity at issue in the cold-rolled steel reviews. Domestic Producers' Posthearing Br. at 8; Domestic Producers' Final Comments at 3-4. Based on these distinctions, Domestic Producers argue that subject imports from Brazil are likely to compete with imports from other subject sources under similar conditions of competition after revocation. In addition, Domestic Producers argue that the experience with cold-rolled steel, hot-rolled steel, and CTL plate shows that the Section 232 quotas do not prevent Brazilian producers from competing for sales and selling in the U.S. market at low prices. Domestic Producers' Posthearing Br. at 7-8.

We are unpersuaded by these arguments. Although the U.S. CWP market is smaller than the markets at issue in those prior reviews, the absolute quota applicable to subject imports from Brazil is likewise smaller and corresponds to a smaller share of apparent U.S. consumption, at *** percent in 2022, than the quotas on imports of subject merchandise from Brazil at issue in the hot-rolled steel reviews, in which the relevant quota equated to 0.25 percent of apparent U.S. consumption in 2021; the cold-rolled steel reviews, in which it equated to 0.20 percent of apparent U.S. consumption in 2021; and the CTL plate reviews, in which it equated to 0.19 percent of apparent U.S. consumption in 2021. *Calculated from CR/PR at Tables I-22, I-26, C-1; see also Cold-Rolled Steel Flat Products from Brazil, China, India, Japan, South Korea, and the United Kingdom, Inv. Nos. 701-TA-540-543 and 731-TA-1283-1287 and 1290 (Review), USITC Pub. 5339 (Aug. 2022) at 44 ("Cold-Rolled Steel"); Hot Rolled Steel from Australia, Brazil, Japan, Netherlands, Russia, South Korea, Turkey, and the United Kingdom, Inv. Nos. 701-TA-545-546 and 731-TA-1291-1297 (Review) and 731-TA-808 (Fourth Review), USITC Pub. 5380 (Nov. 2022) at 87 ("Hot-Rolled Steel"); Carbon Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey, Inv. Nos. 701-TA-560-561 and 731-TA-1317-1328 (Review), USITC Pub. 5399 (Jan. 2023) at 29 ("Carbon Alloy Steel CTL Plate").*

Nor does the record support Domestic Producers' other arguments. Even if sales of CWP in the U.S. market occur in relatively smaller volumes, as Domestic Producers argue, the absolute quota caps the total volume of sales that CWP from Brazil can obtain in a given quarter and year, and competition from out-of-scope products for the same quota would further limit the ability of such imports from Brazil to supply the U.S. market. By contrast, imports from the other subject sources would not be so constrained.

Moreover, although the information available indicates that the capacity of the welded pipe industry in Brazil is much larger than the capacity of the Brazilian industry at issue in the *Cold-Rolled Steel* reviews, subject producers' exports to the U.S. market could increase to no more than the volumes permitted under the quarterly and annual Section 232 quota after revocation. Domestic Producers Posthearing Br. at 5; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 30.

We are also unpersuaded by Domestic Producers' argument that the increased imports from Brazil after revocation of the orders on cold-rolled steel, hot-rolled steel, and CTL plate from Brazil somehow show that the Section 232 quota on imports of CWP from Brazil would not prevent such imports from competing with imports from other sources under similar conditions of competition. Domestic Producers' Posthearing Br. at 7-8; Domestic Producers' Final Comments at 5. As an initial matter, Commission determinations in five-year reviews are *sui generis*. See *American Bearing Manufacturers Association v. United States*, 350 F. Supp. 2d 1100, 1122 (Ct. Int'l Trade 2004); *Timken Co. v. United States*, 321 F. Supp. 2d 1361, 1372 (Ct. Int'l Trade 2004), *aff'd*, 122 Fed. Appx. 510 (Fed. Cir. 2005). These five-year reviews concern a different product and different subject industries than the (Continued...)

The absolute quota on imports from Brazil also is administered quarterly, and imports count against the quota as they arrive, up to 30 percent of the already small annual quota.²²⁷ This administration of the quota, coupled with the small quarterly limit (at most 859.5 short tons), is likely to introduce some uncertainty into the market as to whether an importer's arriving shipment of subject imports from Brazil will be permitted entry in a particular quarter. This uncertainty creates an additional obstacle for subject imports from Brazil, making it more difficult for U.S. importers of CWP from Brazil to take advantage of even the small quota amounts available, particularly as they compete with importers of out-of-scope merchandise from Brazil to fill the same quota.²²⁸

Therefore, in light of the foregoing, in particular the absolute annual quota on subject imports from Brazil, we find that subject imports from Brazil would likely compete under different conditions of competition than CWP imports from the other subject countries if the orders were revoked.²²⁹

(...Continued)

prior reviews on which Domestic Producers rely, and there is no information on the record to suggest that the Brazilian CWP industry would react to revocation of the order the same way. Moreover, our determination is not premised on finding that subject imports from Brazil are not likely to increase or compete in the U.S. market in the event of revocation but rather that the quota on subject imports from Brazil is likely to prevent those subject imports from competing under the same conditions of competition as imports from other subject countries. As discussed above, the absolute import quota of only 2,865 short tons is very small and the quota was completely filled by out-of-scope products rather than subject imports of CWP from Brazil during the review period, making it likely that in the event of revocation subject imports from Brazil would not reach the quota limits. CR/PR at I-41-42, n.71; *see also* discussion in section III.C.2.a., above (discussing no discernible impact).

Further, the record shows that imports of cold-rolled steel, hot-rolled steel, and CTL plate from Brazil to the U.S. market did not fill their respective Section 232 quotas after revocation. *See* Domestic Producers Posthearing at 6-7, Exhibits 3-5. This information is consistent with the Commission's determinations in the prior reviews that imports from Brazil were likely to compete under different conditions of competition than imports from other subject sources due to the Section 232 quotas applicable to imports from Brazil. *See Cold-Rolled Steel*, USITC Pub. 5339 at 20-23; *Hot-Rolled Steel*, USITC Pub. 5380 at 33; *Carbon Alloy Steel CTL Plate*, USITC Pub. 5399 at 29.

²²⁷ CR/PR at I-42 n.70.

²²⁸ *See* CR/PR at I-40-42, Table I-22.

²²⁹ As discussed further below, we also disagree with Domestic Producers' contention that the Section 232 action as it relates to imports of CWP from Brazil will likely be terminated in the reasonably foreseeable future, as well as their claim that the Brazilian industry will likely increase its export volumes above the absolute quota via product exclusions. *See infra* section IV.D.1.

2. India, Mexico, South Korea, Taiwan, Thailand, and Turkey

We also find that the record in these reviews does not indicate that there likely would be significant differences in the conditions of competition between subject imports from India, Mexico, South Korea, Taiwan, Thailand, and Turkey if the orders were revoked. Each of these subject sources have an ability to compete in the U.S. market in large volumes given their production and export capacity for CWP, as reviewed in section III.C.2.a. above, and the nature of Section 232 measures.²³⁰ We have also explained that there is likely to be a reasonable overlap of competition between subject imports from these sources if the antidumping and countervailing duty orders are revoked. Accordingly, we do not find differences in the conditions of competition sufficient to warrant exercising our discretion to not cumulate subject imports from India, Mexico, South Korea, Taiwan, Thailand, and Turkey.

D. Conclusion

We determine that if the orders were revoked, subject imports from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey would not be likely to have no discernible adverse impact on the domestic industry. We further find that there would likely be a reasonable overlap of competition between and among the subject imports from each of these countries and the domestic like product after revocation. In addition, we find that imports from each subject country except Brazil are likely to compete in the U.S. market under similar conditions of competition should the orders be revoked. We therefore exercise our discretion to cumulate subject imports from India, Mexico, South Korea, Taiwan, Thailand, and Turkey. As discussed above, however, we find that subject imports from Brazil are likely to compete under different conditions of competition than imports from the other subject countries if the orders were revoked, and therefore exercise our discretion not to cumulate imports from Brazil with imports from any other subject countries.²³¹

²³⁰ CR/PR at Tables IV-13, IV-29, IV-36, IV-43, IV-52, IV-59, IV-67.

²³¹ Commissioner Schmidlein determines that imports from each subject country would likely compete under similar conditions of competition upon revocation of the orders and exercises her discretion to cumulate imports from all subject countries for her analysis in these reviews.

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

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”²³² The SAA states that “under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports.”²³³ Thus, the likelihood standard is prospective in nature.²³⁴ The U.S. Court of International Trade (“CIT”) has found that “likely,” as used in the five-year review provisions of the Act, means “probable,” and the Commission applies that standard in five-year reviews.²³⁵

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

²³² 19 U.S.C. § 1675a(a).

²³³ SAA at 883-84. The SAA states that “{t}he likelihood of injury standard applies regardless of the nature of the Commission’s original determination (material injury, threat of material injury, or material retardation of an industry). Likewise, the standard applies to suspended investigations that were never completed.” *Id.* at 883.

²³⁴ While the SAA states that “a separate determination regarding current material injury is not necessary,” it indicates that “the Commission may consider relevant factors such as current and likely continued depressed shipment levels and current and likely continued {sic} prices for the domestic like product in the U.S. market in making its determination of the likelihood of continuation or recurrence of material injury if the order is revoked.” SAA at 884.

²³⁵ See *NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int’l Trade 2003) (“‘likely’ means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)”), *aff’d mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) (“more likely than not” standard is “consistent with the court’s opinion;” “the court has not interpreted ‘likely’ to imply any particular degree of ‘certainty’”); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) (“standard is based on a likelihood of continuation or recurrence of injury, not a certainty”); *Usinor v. United States*, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

time.”²³⁶ According to the SAA, a “‘reasonably foreseeable time’ will vary from case-to-case, but normally will exceed the ‘imminent’ timeframe applicable in a threat of injury analysis in original investigations.”²³⁷

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to “consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated.”²³⁸ It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).²³⁹ The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission’s determination.²⁴⁰

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.²⁴¹ In doing so, the Commission must consider “all relevant economic factors,” including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign

²³⁶ 19 U.S.C. § 1675a(a)(5).

²³⁷ SAA at 887. Among the factors that the Commission should consider in this regard are “the fungibility or differentiation within the product in question, the level of substitutability between the imported and domestic products, the channels of distribution used, the methods of contracting (such as spot sales or long-term contracts), and lead times for delivery of goods, as well as other factors that may only manifest themselves in the longer term, such as planned investment and the shifting of production facilities.” *Id.*

²³⁸ 19 U.S.C. § 1675a(a)(1).

²³⁹ 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings concerning CWP from any of the subject countries during the POR. CR/PR at I-20-21, I-24, I-28.

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

²⁴¹ 19 U.S.C. § 1675a(a)(2).

country, which can be used to produce the subject merchandise, are currently being used to produce other products.²⁴²

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.²⁴³

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.²⁴⁴ All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the orders under review and whether the industry is vulnerable to material injury upon revocation.²⁴⁵

B. Conditions of Competition and the Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors

²⁴² 19 U.S.C. § 1675a(a)(2)(A-D).

²⁴³ See 19 U.S.C. § 1675a(a)(3). The SAA states that “{c}onsistent with its practice in investigations, in considering the likely price effects of imports in the event of revocation and termination, the Commission may rely on circumstantial, as well as direct, evidence of the adverse effects of unfairly traded imports on domestic prices.” SAA at 886.

²⁴⁴ 19 U.S.C. § 1675a(a)(4).

²⁴⁵ The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, the Commission “considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.” SAA at 885.

“within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”²⁴⁶ The following conditions of competition inform our determinations.

1. The Original Investigations and Prior Five-Year Reviews

a) Demand Conditions

In all prior reviews, the Commission found that demand for CWP generally depended on construction levels, particularly spending levels for nonresidential construction.²⁴⁷ Both nonresidential construction spending and apparent U.S. consumption of CWP were increasing during the first five-year reviews, whereas during the second five-year reviews, nonresidential construction, when adjusted for inflation, declined slightly, and apparent U.S. consumption of CWP declined overall.²⁴⁸ During the third five-year reviews, nonresidential construction declined, and apparent U.S. consumption fluctuated but decreased overall to 1.5 million short tons in 2011.²⁴⁹ In the fourth five-year reviews, apparent U.S. consumption was *** short tons in 2016, which was slightly lower (**% percent) than in 2011 (** short tons) and notably lower (**% percent) than in 2001 (** short tons).²⁵⁰

b) Supply Conditions

Data collected during the first four five-year reviews indicated that the domestic industry supplied at least half or nearly half of the U.S. market during these periods, declining from 73.0 percent in 1998 to 56.0 percent in 2005 and to 51.1 percent in 2006, then increasing to 71.3 percent in 2009, before declining to 65.6 percent in 2010 and 2011 and to **% percent in 2016.²⁵¹ The varied share of the U.S. market held by subject imports and nonsubject imports during these periods was affected by the revocation of the order on subject imports from Venezuela in 2000 and the issuance of antidumping and countervailing duty orders covering

²⁴⁶ 19 U.S.C. § 1675a(a)(4).

²⁴⁷ *First Five-Year Reviews*, USITC Pub. 3316 at 32-33; *Second Five-Year Reviews*, USITC Pub. 3867 at 19; *Third Five-Year Reviews*, USITC Pub. 4333 at 29; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 25.

²⁴⁸ *First Five-Year Reviews*, USITC Pub. 3316 at 32-33; *Second Five-Year Reviews*, USITC Pub. 3867 at 19.

²⁴⁹ *Third Five-Year Reviews*, USITC Pub. 4333 at 29-30.

²⁵⁰ *Fourth Five-Year Reviews*, USITC Pub. 4754 at 25. The lone purchaser to respond to the Commission’s questionnaire in the fourth five-year reviews, **, stated that, during the period of review, ** and that **. *Id.* at 25 n.160.

²⁵¹ *Fourth Five-Year Reviews*, USITC Pub. 4754 at Tables I-5 to I-7, Appendix C.

CWP imports from China in 2008.²⁵² The market share of subject imports declined from 9.4 percent in 1998 to 7.5 percent in 2005, increased to *** percent in 2006 and *** percent in 2008, declined to *** percent in 2011, and then increased to *** percent in 2016.²⁵³ The market share of nonsubject imports increased from 17.7 percent in 1998 to 36.5 percent in 2005, declined to *** percent in 2006 and *** percent in 2009, and then increased to *** percent in 2011 and 34.9 percent in 2016.²⁵⁴

The Commission observed during the third five-year reviews that the composition of the domestic industry had changed since the original investigations due to new entrants, consolidations, and closures that affected the types of production facilities (fully integrated versus non- or partially integrated) manufacturing CWP.²⁵⁵ Commission reports in the original investigations and prior reviews identified about two dozen U.S. CWP producers in 1986, 21 producers in 1992, 25 producers in 1998, 20 producers in 2005, 17 producers in 2011, and eight producers in 2016.²⁵⁶

The Commission found in the prior reviews that some CWP producers in the United States and in the subject countries manufacture other products using the same manufacturing equipment and employees.²⁵⁷ Depending on changes in market demand, they had some ability to shift production among products, including small/medium line pipe, large-diameter line pipe, mechanical tubing, oil country tubular goods, and such other products as square and rectangular structural tubing, electrical conduit, slurry pipe, coupling stock, and strut.²⁵⁸ In most of the years for which data were collected in the prior reviews, the domestic industry's capacity to produce CWP approached or exceeded apparent U.S. consumption.²⁵⁹

²⁵² *Fourth Five-Year Reviews*, USITC Pub. 4754 at Table I-2.

²⁵³ *Fourth Five-Year Reviews*, USITC Pub. 4754 at Tables I-5 to I-7, Appendix C.

²⁵⁴ *Fourth Five-Year Reviews*, USITC Pub. 4754 at Tables I-5 to I-7, Appendix C.

²⁵⁵ *Third Five-Year Reviews*, USITC Pub. 4333 at 31.

²⁵⁶ *First Five-Year Reviews*, USITC Pub. 3316 at Table CIRC-I-4; *Second Five-Year Reviews*, USITC Pub. 3867 at Table CIRCULAR-I-11; *Third Five-Year Reviews*, USITC Pub. 4333 at Table I-13; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 26-27.

²⁵⁷ *Second Five-Year Reviews*, USITC Pub. 3867 at 20; *Third Five-Year Reviews*, USITC Pub. 4333 at 32; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 26.

²⁵⁸ *Third Five-Year Reviews*, USITC Pub. 4333 at 32-33.

²⁵⁹ *Fourth Five-Year Reviews*, USITC Pub. 4754 at Tables I-5 to I-7, Appendix C.

c) Substitutability and Other Conditions

In all of the prior reviews, the Commission found CWP, regardless of source, to be a standardized product generally made to ASTM standards.²⁶⁰ Market participants generally reported that CWP, whether imported or produced in the United States, was at least “frequently” if not “always” interchangeable, could be used for the same applications, and was comparable in most nonprice characteristics.²⁶¹ Furthermore, the Commission found in all prior reviews that price is an important factor in purchasing decisions for CWP in the U.S. market.²⁶² In view of the importance of price in purchasing decisions and the high substitutability of the products, the Commission found the U.S. CWP market to be price competitive.²⁶³

2. The Current Reviews

a) Demand Conditions

Demand for CWP is driven by the overall U.S. economy and construction spending, particularly nonresidential construction, but also oil and gas industry activity. In construction, its various applications include plumbing and heating systems, air conditioning units, automatic sprinklers systems, light loadbearing and mechanical applications, and other structural applications in general construction.²⁶⁴ All responding market participants reported that end uses for CWP have not changed since January 1, 2017.²⁶⁵

The record indicates that U.S. gross domestic product and nonresidential spending increased irregularly over the POR, though the COVID-19 pandemic had an impact on both in 2020 and 2021.²⁶⁶ Domestic Producers claim that nonresidential construction demand

²⁶⁰ *First Five-Year Reviews*, USITC Pub. 3316 at 30, 32-33; *Second Five-Year Reviews*, USITC Pub. 3867 at 14, 21; *Third Five-Year Reviews*, USITC Pub. 4333 at 34; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 27-28.

²⁶¹ *First Five-Year Reviews*, USITC Pub. 3316 at 33; *Second Five-Year Reviews*, USITC Pub. 3867 at 21; *Third Five-Year Reviews*, USITC Pub. 4333 at 34; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 27-28.

²⁶² *First Five-Year Reviews*, USITC Pub. 3316 at 37; *Second Five-Year Reviews*, USITC Pub. 3867 at 12, 13, 23-25; *Third Five-Year Reviews*, USITC Pub. 4333 at 34; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 27-28.

²⁶³ *First Five-Year Reviews*, USITC Pub. 3316 at 32, 37; *Second Five-Year Reviews*, USITC Pub. 3867 at 12, 24; *Third Five-Year Reviews*, USITC Pub. 4333 at 17, 34; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 27-28.

²⁶⁴ CR/PR at II-7.

²⁶⁵ CR/PR at II-7.

²⁶⁶ CR/PR at II-8, II-8, Figures II-1-2, Tables II-5-6. U.S. gross domestic product increased steadily through the fourth quarter of 2019, dropped in the first two quarters of 2020, and then increased (Continued...)

generally increased over the POR, but spending dropped in 2020 and 2021 due to the COVID-19 pandemic.²⁶⁷ They assert that the unknown effects of future variants and outbreaks of COVID-19, rising interest rates, and economic and political uncertainty generated by “events in Ukraine, Israel, and the U.S. House of Representatives” may impact demand for CWP.²⁶⁸

Most U.S. producers reported that demand for CWP in the U.S. market since January 1, 2017 steadily increased or fluctuated upwards.²⁶⁹ A majority of purchasers and all foreign producers reported there was no change in U.S. demand, while U.S. importers responses were mixed.²⁷⁰ In terms of anticipated demand, a majority of U.S. producers and foreign producers and a plurality of purchasers reported anticipating that U.S. demand for CWP would not change, while a plurality U.S. importers anticipated that U.S. demand would fluctuate up.²⁷¹

During the POR, apparent U.S. consumption increased from *** short tons in 2020 and 2021 to *** short tons in 2022; it was lower in interim 2023, at *** short tons, than in interim 2022, at ***.²⁷²

b) Supply Conditions

During the POR, the domestic industry remained the largest supplier of CWP to the U.S. market, although it lost market share during the full years of the POR. The domestic industry's share of apparent U.S. consumption decreased from *** percent in 2020 to *** percent in 2021 and to *** percent in 2022; it was *** higher in interim 2023, at *** percent, compared to *** percent in interim 2022.²⁷³

(...Continued)

through the second quarter of 2023, ending at 44.3 percent higher in the third quarter of 2023 compared to the first quarter of 2017. *Id.* at II-8, Figure II-1, Table II-5. Nonresidential construction spending was relatively flat from 2017 to 2019, generally decreased throughout 2020, remained relatively steady through early 2022, and then increased through July 2023. Residential construction spending increased irregularly during the POR but declined during the May 2018–February 2019, March 2020–May 2020, and May 2022–April 2023 periods. Overall, between January 2017 and September 2023, residential construction spending increased 70.4 percent and nonresidential construction spending increased by 51.2 percent. *Id.* at II-10, Figure II-2, Table II-6.

²⁶⁷ Domestic Producers’ Prehearing Br. at 28; Domestic Producers’ Posthearing Br. at 9-10.

²⁶⁸ Domestic Producers’ Prehearing Br. at 28; Domestic Producers’ Posthearing Br. at 9-10.

²⁶⁹ CR/PR at Table II-8.

²⁷⁰ CR/PR at Table II-8. Two U.S. importers reported that U.S. demand fluctuated up, one reported there was no change, and one reported that it fluctuated down during the POR. *Id.*

²⁷¹ CR/PR at Table II-9.

²⁷² CR/PR at Table I-26.

²⁷³ CR/PR at Tables I-26, C-1.

There have been several changes to the domestic industry since January 1, 2017, including several plant openings, expansions, and acquisitions.²⁷⁴

As a result of these changes, the domestic industry's capacity increased from *** short tons in 2020 to *** short tons in 2021 and 2022; it was higher in interim 2023, at *** short tons, than in interim 2022, at *** short tons.²⁷⁵ The domestic industry's reported capacity utilization decreased from *** percent in 2017 to *** percent in 2022; it was lower in interim 2023 (*** percent) than in interim 2022 (*** percent).²⁷⁶

During the POR, cumulated subject imports accounted for the smallest share of apparent U.S. consumption, although subject import market share increased irregularly during the 2020-2022 period and was higher in interim 2023 compared to interim 2022. Subject imports' share of apparent U.S. consumption decreased from *** percent in 2020 to *** percent in 2021, before increasing to *** percent in 2022; it was higher at *** percent in interim 2023 compared to *** percent in interim 2022.²⁷⁷

Nonsubject imports were the second-largest source of supply to the U.S. market during the POR.²⁷⁸ Nonsubject imports' share of apparent U.S. consumption increased from *** percent in 2020 to *** percent in 2021 and *** percent in 2022; it was lower at *** percent in interim 2023 than in interim 2022 at *** percent.²⁷⁹ The largest sources of nonsubject imports in 2022 were Canada, Oman, the United Arab Emirates ("UAE"), and Vietnam.²⁸⁰ Nonsubject imports from China have been subject to antidumping and countervailing duty orders since 2008, which were continued after the second five-year reviews in June 2019, and nonsubject

²⁷⁴ Notably, Nucor acquired Southland Tube, Inc. and Republic Conduit in 2017, the assets of Century Tube, LLC in 2018, and the majority ownership of California Steel Industries, Inc. in 2022; Zekelman acquired Western Tube & Conduit Corp. and American Tube Manufacturing, Inc. in 2017 and EXLTUBE in 2022. CR/PR at Tables III-1-2. Additionally, Nucor began construction on a new tube mill in 2021, Bull Moose began construction on a hollow structural steel and sprinkler pipe mill in 2021, and Wheatland Tube (a subsidiary of Zekelman) began construction on a fully automated warehouse. *Id.* at Table III-1. *** during the POR, and Wheatland Tube reported opening a production facility in 2023. *Id.* at Table III-2. Atlas Tube reported idling its Chicago facility during the POR. *Id.* Wheatland Tube reported curtailing production at its Long Beach facility in 2022, before ceasing production at the end of 2022 and closing the facility in April 2022; it plans to curtail production at its Chicago facility in 2024 and close it in 2025. *Id.* at Tables III-2-3.

²⁷⁵ CR/PR at Tables III-4, C-1.

²⁷⁶ CR/PR at Tables III-4, C-1.

²⁷⁷ CR/PR at Tables I-26, C-1.

²⁷⁸ CR/PR at Tables I-26, C-1. Nonsubject imports include imports from producers/exporters in India that have been excluded from the orders. *Id.* at I-5 n.20.

²⁷⁹ CR/PR at Tables I-26, C-1.

²⁸⁰ CR/PR at II-6.

imports from Oman, Pakistan, and the UAE have been subject to antidumping and countervailing duty orders since 2016, which were continued after the first five-year reviews in December 2022.²⁸¹

Most responding U.S. producers, importers, and purchasers reported that they did not experience any supply constraints since January 1, 2017.²⁸² One responding U.S. producer reported that it experienced a period of limited raw material supplies and that the COVID-19 pandemic had impacted its ability to fulfill its orders.²⁸³

c) Substitutability and Other Conditions

In these reviews, we find that there is a high degree of substitutability between domestically produced CWP and subject imports.²⁸⁴ As discussed above, the majority of responding U.S. producers, U.S. importers, and purchasers reported that CWP imported from each subject source was always or frequently interchangeable with domestically produced CWP, with the exception of subject imports from Turkey for U.S. importers and subject imports from Mexico for purchasers.²⁸⁵ Purchaser responses comparing domestically produced CWP and CWP from each subject source with respect to fifteen purchasing factors were mixed.²⁸⁶ However, with respect to the factors that more than half of the responding purchasers identified as very important – availability, delivery time, product consistency, quality meets industry standards, reliability of supply, and price,²⁸⁷ most responding purchasers reported that domestically produced CWP was comparable or superior as compared to imports from each

²⁸¹ CR/PR at Table I-3.

²⁸² CR/PR at II-7. One of five U.S. producers, one of five importers, and two of 18 purchasers reported experiencing supply constraints since January 1, 2017. *Id.*

²⁸³ CR/PR at II-7.

²⁸⁴ CR/PR at II-19-20.

²⁸⁵ CR/PR at Tables II-16-18. In comparing imports from Turkey with the domestic like product or CWP from other subject sources, *** responding importer reported they were always interchangeable and *** reported they were sometimes interchangeable. *Id.* at Table II-17. *** of responding purchasers reported imports from Mexico are sometimes interchangeable with the domestic like product, and *** reported that they are always or frequently interchangeable with the domestic like product. *Id.* at Table II-18.

²⁸⁶ CR/PR at Table II-15.

²⁸⁷ CR/PR at II-22, Table II-12.

subject country, with the exception of price.²⁸⁸ Additionally, all purchasers reported that CWP from domestic and subject sources always or usually met minimum quality specifications.²⁸⁹

As also discussed above, U.S. producers reported shipments of all types of CWP in terms of standards/stenciling in 2022, with ASTM A135/A795 accounting for the plurality of total U.S. shipments, followed by ASTM A500/A252 and ASTM A53.²⁹⁰ Although U.S. shipments of each standard/stenciling of CWP were not reported for all subject sources in 2022, the record indicates that U.S. shipments of domestically produced CWP and imports from Turkey overlapped with respect to ASTM A135/A795 and ASTM A53.²⁹¹ With respect to wall thickness, there were U.S. shipments of domestically produced CWP and subject imports from Turkey reported for each thickness in 2022.²⁹² With respect to nominal pipe sizes, U.S. shipments by domestically produced CWP and subject imports from Turkey were made in all NPS except one in 2022.²⁹³

We also find that price is an important factor in purchasing decisions. Responding purchasers most frequently cited price, quality, and availability as the top three factors influencing their purchasing decisions. Price was most frequently reported as the most important factor (18 firms), followed by quality (15 firms).²⁹⁴ Responding purchasers most frequently reported quality meets industry standards (19 firms), availability (18 firms), product consistency (17 firms), reliability of supply (17 firms), price (16 firms), and delivery time (16 firms) as very important to their purchasing decisions.²⁹⁵ Most responding U.S. producers reported that differences other than price are never significant, while all importers reported

²⁸⁸ CR/PR at Table II-15. An equal number of firms reported that the domestic like product was superior, comparable, and inferior to subject imports from Mexico on reliability of supply. Regarding price, an equal number of firms reported that the domestic like product was comparable and inferior to India. An equal number of firms reported that the domestic like product was superior, comparable, and inferior to Mexico on price. A majority of firms reported that the domestic like product was inferior to imports from South Korea, Taiwan, Thailand, and Turkey on price. *Id.*

²⁸⁹ CR/PR at Table II-13.

²⁹⁰ CR/PR at Table IV-4.

²⁹¹ CR/PR at Table IV-4. There were no reported U.S. shipments of CWP from other subject countries. *Id.*

²⁹² CR/PR at Table IV-2. There were no reported U.S. shipments of CWP from other subject countries. *Id.*

²⁹³ CR/PR at Table IV-3. A small percentage of U.S. shipments of domestically produced CWP were made in NPS 14 to 16, whereas no U.S. shipments of imports from Turkey were made in this category. There were no reported U.S. shipments of CWP from other subject countries. *Id.*

²⁹⁴ CR/PR at Table II-11.

²⁹⁵ CR/PR at Table II-12.

that such differences are sometimes or never significant.²⁹⁶ A plurality of purchasers reported that differences other than price are sometimes or never significant except when comparing the domestic like product to subject imports from Taiwan.²⁹⁷ The majority of responding purchasers (13 of 19) reported that they usually purchase the lowest-priced product.²⁹⁸

The primary raw material input used in the production of CWP is hot-rolled steel.²⁹⁹ Raw material costs represent the largest component of total COGS; as a percentage of total COGS, raw material costs increased irregularly from *** percent in 2020 to *** percent in 2022 and was lower in interim 2023 (*** percent) than in interim 2022 (*** percent).³⁰⁰ On a per-short ton basis, U.S. producers' raw material costs increased from \$*** per short ton in 2020 to \$*** in 2022; they were lower in interim 2023 at \$*** per short ton than in interim 2022 at \$*** per short ton.³⁰¹ Rising raw material costs during the POR reflected increasing prices for hot-rolled coil, which were *** percent higher in September 2023 compared to January 2017.³⁰² Hot-rolled coil prices increased through the first half of 2018, steadily declined through July 2020, increased sharply to more than double by October 2021, and then fluctuated downwards towards the end of the POR.³⁰³

In these reviews, the majority of U.S. shipments from domestic producers were sold to distributors throughout the POR, with the balance sold to end users.³⁰⁴ U.S. shipments of subject imports from Turkey, the only subject country with respect to which information on channels of distribution was reported, were sold primarily to distributors during the POR, with small but appreciable quantities sold to end users in 2021 and 2022.³⁰⁵

U.S. producers reported selling a large majority of their commercial U.S. shipments of CWP in 2022 in the spot market, while *** subject imports were sold through short-term

²⁹⁶ CR/PR at Tables II-19-20.

²⁹⁷ CR/PR at Tables II-21. An equal number of responding importers (three of six) reported that differences other than price are sometimes or never and always or frequently significant when comparing the domestic like product to imports from Taiwan. *Id.*

²⁹⁸ CR/PR at II-21.

²⁹⁹ CR/PR at V-1.

³⁰⁰ CR/PR at Table III-11.

³⁰¹ CR/PR at Table III-11.

³⁰² CR/PR at V-1, Figure V-1.

³⁰³ CR/PR at V-1, Figure V-1.

³⁰⁴ CR/PR at Table II-2.

³⁰⁵ CR/PR at Table II-2. No importers of subject imports from Brazil, India, Mexico, South Korea, Taiwan, or Thailand reported data on channels of distribution. *Id.*

contracts.³⁰⁶ Most purchasers (16 of 18 firms) reported that they were familiar with raw material prices, while half (9 of 18 firms) reported that information on raw material prices affected their negotiations or contracts.³⁰⁷

The record indicates that approximately two-thirds of domestically produced CWP is sold from inventory, while the remainder is produced to order.³⁰⁸ The one responding subject importer reported that *** of its commercial shipments were produced to order, with lead times averaging 45 days.³⁰⁹

As discussed above, under Section 232, CWP imports from India, Mexico, Taiwan, Thailand, and Turkey became subject to 25 percent *ad valorem* duties effective March 23, 2018, while CWP imports from South Korea and Brazil have been subject to annual absolute quotas since May 1, 2018, and June 1, 2018, respectively.³¹⁰ CWP from these countries may also enter under product-specific exclusions from the Section 232 measures, which apply only to specific products generally defined more narrowly than 10-digit HTS subheadings and to the specific requestor/importer.³¹¹ Although the parties disagree,³¹² the record indicates that these Section 232 measures on subject imports are unlikely to be terminated in the reasonably foreseeable future.³¹³

U.S. producers, importers, and purchasers were asked to report the impact of the Section 232 measures on overall demand, supply, prices, or raw material costs. Most

³⁰⁶ See CR/PR at Table V-2. U.S. producers reported selling *** of their commercial U.S. shipments of CWP in 2022 in the spot market, with the remainder sold through short-term contracts (*** percent) and ***. *Id.*

³⁰⁷ CR/PR at V-1.

³⁰⁸ CR/PR at II-23.

³⁰⁹ CR/PR at II-23.

³¹⁰ 19 U.S.C. §1862; CR/PR at I-40-41, Table I-22. Regarding subject imports from Turkey, the 25 percent *ad valorem* duty under Section 232 was temporarily raised from to 50 percent, effective August 13, 2018, but restored to 25 percent, effective May 21, 2019. *Id.*

The annual quotas for imports of CWP from Brazil and South Korea for 2022 are 2,865 short tons and 85,878 short tons, respectively. *Id.* Imports of CWP originating from Mexico and certain nonsubject countries (Canada and Australia) are exempt from Section 232 measures entirely, and imports from certain other nonsubject countries are subject to annual absolute quotas (Argentina) or annual TRQs (other EU countries). *Id.*

³¹¹ CR/PR at I-43-46. CWP is not eligible for General Approved Exclusions (“GAEs”), as CWP is reported and enters the United States under HTS statistical reporting numbers that are not included among those that are subject to GAEs. *Id.*; Section 232 Quotas and Exclusions, EDIS Doc. 809240 (Nov. 27, 2023); *Section 232 Steel and Aluminum Tariff Exclusions Process*, 85 Fed. Reg. 81060 (Dec. 14, 2020).

³¹² See, e.g., Domestic Producers Prehearing Br. at 33; GOB Posthearing Br. a 7-8.

³¹³ See *infra* section IV.D.1.

responding firms reported that the measures caused overall demand to fluctuate up or not change, domestic supply of CWP to fluctuate down or not change, the supply of imports to not change, prices to fluctuate up, and raw material costs to not change.³¹⁴

C. Revocation of the Countervailing Duty and Antidumping Duty Orders on Subject Imports from India, Mexico, South Korea, Taiwan, Thailand, and Turkey Would Likely Lead to the Continuation or Recurrence of Material Injury Within a Reasonably Foreseeable Time

1. Likely Volume of Subject Imports

The Original Investigations. The Commission's analysis of subject import volume differed slightly in each of the original investigations. In the 1984 investigation, the Commission focused on volume and market share increases by the subject imports.³¹⁵ In the 1986 antidumping and countervailing duty investigations concerning CWP from Turkey and Thailand, the two Commissioners who made affirmative present material injury determinations focused on increases in the volume and market share of subject imports.³¹⁶ The two Commissioners making affirmative threat determinations noted that, although subject producers had a small market share, they had increased their market share substantially, had the ability to shift production between various tubular products, and, in the case of Turkey, had substantial underutilized capacity.³¹⁷ In the 1986 antidumping duty investigations concerning CWP from India, Taiwan, and Turkey, the Commission emphasized subject imports' dramatic increases in market share.³¹⁸ In the 1992 investigations, the Commission based its volume analysis on the absolute and relative increases in cumulated subject imports.³¹⁹

The First Five-Year Reviews. The Commission majority found that the orders had restrained subject imports.³²⁰ It concluded that if the orders were revoked, the likely volume of subject imports would be significant both in absolute terms and relative to U.S. consumption.³²¹

³¹⁴ CR/PR at Table II-1.

³¹⁵ *Original Determination for Taiwan*, USITC Pub. 1519 at 14.

³¹⁶ *Original Determinations for Turkey and Thailand*, USITC Pub. 1810 at 15-16, 21. These two Commissioners' volume analyses shared this common rationale, although each examined different combinations of subject imports due to divergent cumulation decisions.

³¹⁷ *Original Determinations for Turkey and Thailand*, USITC Pub. 1810 at 25-28.

³¹⁸ *Original Determinations for India and Turkey*, USITC Pub. 1839 at 12-13.

³¹⁹ *Original Determinations for Brazil, Korea, Mexico, and Taiwan*, USITC Pub. 2564 at 34-35.

³²⁰ *First Five-Year Reviews*, USITC Pub. 3316 at 34.

³²¹ *First Five-Year Reviews*, USITC Pub. 3316 at 36.

It based this conclusion on significant unused capacity in the subject countries; the ability of several subject producers to switch production from other tubular products to CWP; the attractiveness of the large, growing U.S. market; and subject producers' demonstrated ability to increase U.S. market share rapidly.³²²

The Second Five-Year Reviews. The Commission based its finding on the restraining effect of the orders, including responses by several foreign producers in questionnaires that the orders had precluded them from participating in the U.S. market or that they would increase U.S. shipments if the orders were revoked.³²³ Although CWP inventories in the subject countries were generally stable, the Commission found that revoking the orders would provide incentives for subject producers to use what it found to be substantial excess capacity to increase their U.S. exports, particularly given that producers in most of the subject countries faced antidumping duty orders in one or more of their major non-U.S. markets.³²⁴ Given the large amount of unused CWP capacity, which the Commission found was likely understated due to the failure of numerous firms to submit data, and the subject producers' ability in the original investigations to increase imports rapidly, it found that the likely volume of cumulated subject imports in the event of revocation would be significant absolutely and relative to U.S. consumption.³²⁵

The Third Five-Year Reviews. The Commission found that the orders served to restrain subject import volumes and that subject imports would increase upon their revocation.³²⁶ The Commission concluded that revocation of the orders would provide an incentive for the subject producers, many of which already had existing customers or sales networks in the United States, to use their excess production capacity or their existing foreign inventories of subject CWP to increase their exports to the United States.³²⁷ The Commission added that because subject producers in several of the subject countries faced orders or investigations of their CWP exports to one or more of their non-U.S. export markets, revocation of the orders would provide further incentive for them to direct additional shipments to the large U.S. market.³²⁸

³²² *First Five-Year Reviews*, USITC Pub. 3316 at 34-36.

³²³ *Second Five-Year Reviews*, USITC Pub. 3867 at 23.

³²⁴ *Second Five-Year Reviews*, USITC Pub. 3867 at 22-23.

³²⁵ *Second Five-Year Reviews*, USITC Pub. 3867 at 23-24 (noting that some subject producers had the ability to shift production from other products to CWP but explaining that it did not rely on this in making its affirmative determinations).

³²⁶ *Third Five-Year Reviews*, USITC Pub. 4333 at 38.

³²⁷ *Third Five-Year Reviews*, USITC Pub. 4333 at 36-38.

³²⁸ *Third Five-Year Reviews*, USITC Pub. 4333 at 37.

Given the large amount of unused capacity and the subject producers' ability to increase imports rapidly during the period of review as imports from China exited the U.S. market due to the issuance of antidumping and countervailing duty orders, the Commission found that if the orders under review were revoked, the likely volume of cumulated subject imports would be significant in absolute terms and relative to consumption in the United States.³²⁹

The Fourth Five-Year Reviews. In the expedited fourth five-year reviews, the Commission found that the information available indicated that subject imports continued to enter the U.S. market in substantial quantities and that the industries in each of the subject countries had substantial capacity and unused capacity and remained export oriented. The Commission also found that the U.S. market remained attractive to the subject industries, given the continued presence of subject imports throughout the POR and trade measures on CWP from India, South Korea, Taiwan, and Thailand in several third-country markets. Accordingly, the Commission found that the volume of subject imports would likely be significant, both in absolute terms and relative to consumption, should the orders be revoked.³³⁰

Current Reviews. Cumulated subject imports have maintained a presence in the U.S. market under the disciplining effects of the orders throughout the POR, though at much lower levels than during the original investigations. The volume of cumulated subject imports increased irregularly, initially decreasing from *** short tons in 2020 to *** short tons in 2021, before increasing to *** short tons in 2022, a level *** percent higher than in 2020; it was higher at *** short tons in interim 2023 compared to *** short tons in interim 2022.³³¹ Cumulated subject imports as a share of apparent U.S. consumption increased irregularly, decreasing from *** percent in 2020 to *** percent in 2021, before increasing to *** percent in 2022; cumulated subject import market share was higher at *** percent in interim 2023 compared to *** percent in interim 2022.^{332 333} We find that the lower volume and market

³²⁹ *Third Five-Year Reviews*, USITC Pub. 4333 at 36, 38. The Commission stated that it did not rely on product shifting as a basis for finding that significant quantities of subject imports were likely upon revocation of the orders. *Id.* at 37.

³³⁰ *Fourth Five-Year Reviews*, USITC Pub. 4754 at 30-31.

³³¹ CR/PR at Tables I-26, C-1. We note that the various Section 232 measures applicable to imports of CWP from the subject sources did not prevent the volume of cumulated subject imports from increasing during the POR.

³³² CR/PR at Tables I-26, C-1.

³³³ Commissioner Schmidlein notes that due to the *** subject imports from Brazil from 2020 to 2022, including ***.

share of cumulated subject imports during the POR compared to those in the original investigations reflects the disciplining effects of the orders.

Cumulated subject producers have the ability to export significant volumes of subject merchandise to the United States in the event of revocation of the orders. Based on the information available from responding Mexican and Turkish producers, the cumulated subject producers possessed significant production capacity throughout the period of review, although their capacity declined irregularly over the period, decreasing from *** short tons in 2020 to *** short tons in 2021, before increasing to *** short tons in 2022; it was *** short tons in interim 2023 compared to *** short tons in interim 2022.³³⁴ Because the cumulated subject producers' production increased by more than their capacity during the POR,³³⁵ their rate of capacity utilization increased from *** percent in 2020 to *** percent in 2021 and *** percent in 2022; it was *** short tons in interim 2023 compared to *** short tons in interim 2022.³³⁶ Nevertheless, responding cumulated subject producers possessed excess capacity of *** short tons in 2022, equivalent to *** percent of apparent U.S. consumption that year.³³⁷ Responding cumulated subject producers also maintained substantial and increasing end-of-period inventories throughout the POR, with end-of-period inventories of *** short tons in 2022, which were equivalent to *** percent of apparent U.S. consumption that year.³³⁸ As discussed in section III.C. above, cumulated subject producers also have the ability to increase production

³³⁴ CR/PR at Tables IV-30. Although no questionnaire responses were received from subject producers in India, South Korea, Taiwan, or Thailand, Domestic Producers claim that the subject industries in those countries possess substantial capacity to produce CWP, having identified 28 potential subject producers in India, 14 in South Korea, five in Taiwan, and five in Thailand. See Domestic Producers Prehearing Br. at 18; Domestic Producers' Posthearing Br. at 9; Domestic Producers' Final Comments at 7-8; CR/PR at IV-30, IV-42, IV-45, IV-48.

Commissioner Schmidlein notes that no questionnaire responses were received from subject producers in Brazil. Domestic producers claim that the subject industry in Brazil possesses substantial capacity to produce CWP, having identified five producers with an estimated total capacity of over 1.5 million short tons, and nine additional producers for which no capacity estimates are available. Domestic Producers' Response at Exh. 5.

³³⁵ Cumulated subject producers reported CWP production was *** short tons in 2020, *** short tons in 2021, and *** short tons in 2022; it was *** short tons in interim 2023 compared to *** short tons in interim 2022. CR/PR at Table IV-30.

³³⁶ CR/PR at Table IV-30.

³³⁷ *Calculated* from CR/PR at Tables IV-16, IV-20, IV-22, C-1.

³³⁸ Total end-of-period inventories of cumulated subject imports held by subject producers were *** short tons in 2020, *** short tons in 2021, and *** short tons in 2022; they were *** short tons in interim 2023 compared to *** short tons in interim 2022. CR/PR at Table IV-30.

of CWP for export to the United States by shifting production from out-of-scope products on the same equipment.³³⁹

Cumulated subject producers are also large exporters. Responding cumulated subject producers reported that their exports of CWP increased from *** short tons in 2020 to *** short tons in 2021 and *** short tons in 2022; they were *** short tons in interim 2023, as compared to *** short tons in interim 2022.³⁴⁰ Their exports as a share of total shipments ranged from *** to *** percent during the POR.³⁴¹ According to GTA data concerning exports of welded tubes, pipes, and hollow profiles, a category that includes CWP and out-of-scope merchandise, exports of such merchandise from cumulated subject producers remained at substantial levels throughout the POR, increasing from 1.4 million short tons in 2020 to 1.7 million short tons in 2021 and 2022.^{342 343} These GTA data also show that Turkey, India, South Korea, and Thailand were among the world's largest exporters of welded tubes, pipes, and hollow profiles.³⁴⁴

The U.S. market remains an attractive export market for cumulated subject producers, providing them with the incentive to export significant volumes of subject merchandise to the United States in the event of revocation. Cumulated subject imports maintained a substantial and increasing presence in the U.S. market during the POR, accounting for *** percent of apparent U.S. consumption in 2022, thereby retaining U.S. customers and distribution networks.³⁴⁵ Furthermore, the U.S. market for CWP is large and generally offers relatively

³³⁹ CR/PR at IV-39, IV-57. No subject producers in India, South Korea, Taiwan, or Thailand responded to the Commission's questionnaires. ***. CWP accounted for over *** percent of total production on shared equipment throughout the POR. *Id.* at IV-39, Table IV-17. ***. CWP accounted for over *** percent of total production on shared equipment throughout the POR. *Id.* at IV-57, Table IV-28.

Commissioner Schmidlein notes that no subject producers in Brazil responded to the Commission's questionnaire. Therefore, there is no evidence on the record showing that Brazilian producers do not also have the ability to shift production on the same equipment from out-of-scope to in-scope CWP products, as do the Mexican and Turkish producers.

³⁴⁰ CR/PR at Table IV-30.

³⁴¹ CR/PR at Table IV-30.

³⁴² CR/PR at Table IV-32.

³⁴³ According to GTA data for the same category, exports from subject producers in Brazil also increased, from 14,890 short tons in 2020 to 17,921 short tons in 2022. CR/PR at Table IV-8.

³⁴⁴ CR/PR at Table IV-32. Turkey was the third largest exporter, representing 12.1 percent of total global exports in 2022; India was the fourth largest exporter, representing 4.8 percent; South Korea was the fifth largest exporter, representing 4.4 percent; and Thailand was the seventh largest exporter, representing 2.5 percent. *Id.*

³⁴⁵ CR/PR at Table I-26.

higher prices for welded tubes, pipes, and hollow profiles, a category that includes CWP and out-of-scope products, than most other third-country markets.^{346 347} Moreover, the existence of multiple third-country trade barriers to subject imports from each of the subject sources would further enhance the relative attractiveness of the U.S. market to subject producers in those countries in the event of revocation.³⁴⁸

Finally, we find that the Section 232 measures on subject imports from India, South Korea, Taiwan, Thailand, and Turkey would not prevent the volume of cumulated subject imports from being significant if the orders were revoked.³⁴⁹ As discussed in section III.C.2.c. above, subject imports from Mexico are not subject to any Section 232 measures; subject imports from India, Taiwan, Thailand, and Turkey have no quota limits; and subject imports from South Korea are subject to an absolute quota that comprises nearly *** percent of apparent U.S. consumption. These measures did not prevent the volume of cumulated subject imports from increasing by *** percent in terms of volume and *** percentage points in terms

³⁴⁶ Based on GTA data of welded tubes, pipes, and hollow profiles, which likely also includes out-of-scope merchandise, the average unit values (“AUVs”) of exports from India, Taiwan, and Turkey to the United States in 2022 were higher than the AUVs of exports from those countries to any of their leading export markets, by quantity. CR/PR at Tables IV-9, 20, 29. The AUVs of exports from South Korea to the United States in 2022 were higher than the AUVs of South Korean exports to four of that country’s ten leading export markets, by quantity. *Id.* at Table IV-19. The AUVs of exports from Thailand to the United States in 2022 were higher than the AUVs of Thai exports to two of that country’s ten leading export markets, by quantity. *Id.* at Table IV-21. Although GTA data indicate that the AUVs of exports from Mexico to third-country markets exceeded those of Mexican exports to the United States in 2022, responding Mexican producers reported that the AUVs of their exports to the United States exceeded the AUVs of their exports to leading third-country markets in 2022. *Id.* at Tables IV-16, IV-18.

³⁴⁷ For the same reasons, Commissioner Schmidlein finds that the United States is an attractive market for cumulated subject producers including those from Brazil. CR/PR at Table IV-8.

³⁴⁸ CR/PR at Table IV-31. Among these third-country trade barriers are antidumping duty orders imposed by Canada on CWP from India, South Korea, Taiwan, and Thailand in 2012 and most recently continued in 2018. Canada also imposed an antidumping duty order on CWP imported from Turkey in 2019. Australia imposed antidumping duty orders on hollow structural steel sections from South Korea and Taiwan in 2012 and continued the orders in 2017. *Id.* at IV-62-63; Domestic Producers’ Response at Exhibit 26. In 2019, the EU imposed safeguard measures on steel products, including hollow structural steel, standard pipe, and other welded pipes, from all countries. Imports of such products are subject to a TRQ based on historical import levels, and imports above the TRQ levels are subject to an additional duty of 25 percent. In 2021, the safeguard measures were extended until June 30, 2024. CR/PR at IV-62-63.

³⁴⁹ Commissioner Schmidlein finds that the Section 232 measures on subject imports from Brazil would also not prevent the volume of cumulated subject imports from being significant if the orders were revoked. *See* Dissenting Views of Commissioner Rhonda K. Schmidlein.

of market share from 2020 to 2022, and thus would not preclude cumulated subject imports at significant levels.³⁵⁰

Accordingly, based on the significant and increasing volume and market share of cumulated subject imports during the original investigations; the substantial and increasing presence of cumulated subject imports in the U.S. market during the POR while under the disciplining effect of the orders; the cumulated subject producers' substantial capacity, excess capacity, inventories, and exports; and the attractiveness of the U.S. market, we find that the likely volume of cumulated subject imports would be significant, both in absolute terms and relative to consumption in the United States, if the orders were revoked.

2. Likely Price Effects

The Original Investigations. In each of the original determinations, the Commission centered its price effects analysis on pervasive underselling by the subject imports.³⁵¹ In several of the determinations, the Commission also found that the subject imports had significant price-depressing effects.³⁵²

The First Five-Year Reviews. The Commission characterized CWP as a price-sensitive product.³⁵³ Because CWP from various sources was generally interchangeable, price was important in purchasing decisions.³⁵⁴ The Commission observed that should the orders be revoked, there would likely be pervasive underselling by the subject imports, based on pricing patterns observed during both the original investigations and the period of review.³⁵⁵ Because the market for CWP was price sensitive, it found that the addition of even relatively small amounts of additional subject imports upon revocation would be likely to have significant price-depressing or -suppressing effects.³⁵⁶

³⁵⁰ CR/PR at Tables I-26, C-1.

³⁵¹ *Original Determination for Taiwan*, USITC Pub. 1519 at 15-16; *Original Determinations for Turkey and Thailand*, USITC Pub. 1810 at 16, 22, 25-26; *Original Determinations for India and Turkey*, USITC Pub. 1839 at 13-14; *Original Determinations for Brazil, Korea, Mexico, and Taiwan*, USITC Pub. 2564 at 36-37.

³⁵² *Original Determinations for Turkey and Thailand*, USITC Pub. 1810 at 16, 22; *Original Determinations for India and Turkey*, USITC Pub. 1839 at 13-14; *Original Determinations for Brazil, Korea, Mexico, and Taiwan*, USITC Pub. 2564 at 36-37.

³⁵³ *First Five-Year Reviews*, USITC Pub. 3316 at 37.

³⁵⁴ *First Five-Year Reviews*, USITC Pub. 3316 at 37.

³⁵⁵ *First Five-Year Reviews*, USITC Pub. 3316 at 37.

³⁵⁶ *First Five-Year Reviews*, USITC Pub. 3316 at 37.

The Second Five-Year Reviews. The Commission found that price continued to be critical to purchasing decisions and that the presence of likely significant U.S. CWP imports after revocation of the orders that were likely to undersell the domestically produced product would force domestic producers to lower prices or lose sales.³⁵⁷ It found domestic producers' raw material costs to be volatile.³⁵⁸ The Commission found the addition of significant quantities of low-priced subject imports would likely impair the domestic industry's ability to recover increased costs should these costs continue to rise as they did during the bulk of the period of review during the second five-year reviews.³⁵⁹ In light of these considerations and the price-sensitive nature of CWP, the Commission concluded that cumulated subject imports would likely have price-depressing or suppressing effects were the orders to be revoked.³⁶⁰

The Third Five-Year Reviews. The Commission found that price continued to be an important factor in purchasing decisions for CWP in the U.S. market given the general interchangeability of subject imports and domestically produced CWP.³⁶¹ Because the U.S. CWP market remained price sensitive, the Commission reaffirmed its finding from the prior reviews that sustained underselling by even a relatively small amount of subject imports would be likely to depress or suppress prices of the domestic like product to a significant degree.³⁶² Given the subject producers' demonstrated interest in the U.S. market during the original investigations and the continued presence of cumulated subject imports in the U.S. market after imposition of the orders at prices below those for the domestic like product, the Commission found that the subject producers were likely to find the large U.S. market attractive and that there would likely be significant price underselling should the orders be revoked.³⁶³ Because the likely significant volume of low-priced subject imports upon revocation would force the domestic industry to lower prices, limit price increases, or lose sales in this price-sensitive market, the Commission concluded that the increased cumulated subject imports likely would have significant price-depressing or suppressing effects.³⁶⁴

³⁵⁷ *Second Five-Year Reviews*, USITC Pub. 3867 at 24-25.

³⁵⁸ *Second Five-Year Reviews*, USITC Pub. 3867 at 25.

³⁵⁹ *Second Five-Year Reviews*, USITC Pub. 3867 at 25.

³⁶⁰ *Second Five-Year Reviews*, USITC Pub. 3867 at 25.

³⁶¹ *Third Five-Year Reviews*, USITC Pub. 4333 at 39.

³⁶² *Third Five-Year Reviews*, USITC Pub. 4333 at 40.

³⁶³ *Third Five-Year Reviews*, USITC Pub. 4333 at 40. Cumulated subject imports undersold the domestic like product in 452 of 492 quarterly observations during the third period of review. *Id.*

³⁶⁴ *Third Five-Year Reviews*, USITC Pub. 4333 at 40.

The Fourth Five-Year Reviews. The Commission again found that there was a high degree of substitutability between subject imports and the domestic like product and that price was an important factor in purchasing decisions. Based on the continued attractiveness of the U.S. market and the likely significant increase in subject import volume after revocation, the Commission found that underselling would likely recur in order for subject imports to gain market share, forcing the domestic industry to either lower prices or lose sales. Consequently, the Commission found that subject imports would likely significantly undersell the domestic like product and have significant depressing or suppressing effects on prices for the domestic like product upon revocation of the orders.³⁶⁵

Current Reviews. As discussed in section IV.B.2.c., we have found that there is a high degree of substitutability between domestically produced CWP and subject imports and that price is an important factor in purchasing decisions.

The Commission collected quarterly pricing data from U.S. producers and importers for the total quantity and f.o.b. values of four pricing products shipped to unrelated U.S. customers during the POR.³⁶⁶ Three U.S. producers and one importer provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters. Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. shipments of CWP and *** percent of U.S. shipments of subject imports from Turkey in 2022.³⁶⁷ ***.³⁶⁸

The limited pricing data available indicate that cumulated subject imports predominantly undersold the domestic like product during the POR. Cumulated subject imports undersold the domestic like product in *** of *** quarterly comparisons, involving *** short tons of CWP, at margins ranging from *** to *** percent and averaging *** percent.³⁶⁹

³⁶⁵ *Fourth Five-Year Reviews*, USITC Pub. 4754 at 33.

³⁶⁶ The Commission requested pricing data on the following products:

Product 1. —ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 2-4 inches inclusive;

Product 2. —ASTM A53 schedule 40 galvanized plain-end, with nominal outside diameter of 2-4 inches inclusive;

Product 3. —ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 6-8 inches inclusive; and

Product 4. —ASTM A53 and/or F1083 schedule 40 galvanized fence tube, with nominal outside diameter of 1-1/4-3 inches, inclusive. CR/PR at V-7.

³⁶⁷ CR/PR at V-8.

³⁶⁸ CR/PR at V-8.

³⁶⁹ CR/PR at Table V-9.

Cumulated subject imports oversold the domestic like product in the remaining *** quarterly comparisons, involving *** short tons of CWP, at margins ranging from *** to *** percent and averaging *** percent.³⁷⁰

We have also considered price trends. Over the POR, sales prices for domestically produced CWP increased, with domestic price increases ranging from *** to *** percent over the period, depending on the product.³⁷¹ There was insufficient pricing data to determine trends for the sales prices of subject imports.³⁷²

We find that cumulated subject imports are likely to undersell the domestic like product to a significant degree if the orders were revoked, as a means of gaining market share, based on the underselling observed during the original period of investigations and during the POR with the orders in place, the high degree of substitutability between the domestic like product and subject imports, and the importance of price in purchasing decisions. Absent the discipline of the orders, the likely significant volume of low-priced cumulated subject imports would likely force the domestic industry either to lower prices, forgo needed price increases, or else lose sales and market share to cumulated subject imports, as occurred in the original investigations.³⁷³ Consequently, we find that if the orders were revoked, cumulated subject imports would likely have significant price effects within a reasonably foreseeable time.

³⁷⁰ CR/PR at Table V-9.

³⁷¹ CR/PR at V-15, Table V-8.

³⁷² CR/PR at Table V-8.

³⁷³ We find the pattern of underselling prior to imposition of the orders, in which cumulated subject imports used significant underselling to capture market share from the domestic industry, to be relevant in considering pricing behavior of cumulated subject imports if the orders were revoked. See SAA at 884 (“This period is the most recent time during which imports of subject merchandise competed in the U.S. market free of the discipline of an order or agreement.”).

3. Likely Impact³⁷⁴

The Original Investigations. In each of the original determinations, the Commission's impact analysis focused on the poor operating performance of the domestic CWP industry.³⁷⁵ Other factors the Commission cited in individual original determinations included declines in production, shipments, and employment (in the 1984 Taiwan investigation), declines in market share and employment (in both 1986 determinations), and declines in employment and capacity utilization (in the 1992 investigations).³⁷⁶

The First Five-Year Reviews. The Commission found that the industry's condition had improved markedly since the original investigations, due to the existence of the orders and the recent increases in demand for construction materials.³⁷⁷ Although the domestic industry's operating performance had declined during that period of review, it was consistently better than during the original investigations.³⁷⁸ The Commission did not find the domestic industry to be vulnerable, but it concluded that if the orders were revoked, the adverse price effects associated with increased subject imports would likely have a significant impact on the domestic industry.³⁷⁹

³⁷⁴ In its expedited fifth sunset reviews of the antidumping duty orders, Commerce determined likely margins of up to 87.93 percent on subject imports from India, up to 7.32 percent on subject imports from Mexico, up to 1.20 percent on subject imports from South Korea, up to 15.60 percent on subject imports from Thailand, up to 23.12 percent on subject imports from Turkey, up to 8.91 percent on small-diameter CWP from Taiwan, and up to 27.65 percent on large-diameter CWP from Taiwan. *Certain Welded Carbon Steel Pipes and Tubes From India, Thailand, and Republic of Turkey: Final Results of the Expedited Sunset Review of the Antidumping Duty Orders*, 88 Fed. Reg. 29637, 29637 (May 8, 2023); *Certain Circular Welded Non-Alloy Steel Pipe From Brazil, Mexico, the Republic of South Korea, and Taiwan and Certain Circular Welded Carbon Steel Pipes and Tubes From Taiwan: Final Results of Expedited Fifth Sunset Reviews of the Antidumping Duty Orders*, 88 Fed. Reg. 29880, 29881 (May 9, 2023). In its review of the countervailing duty order on subject imports from Turkey, Commerce determined likely subsidy rates ranging from 1.80 percent to 4.10 percent. *Circular Welded Carbon Steel Pipes and Tubes From Turkey: Final Results of the Expedited Sunset Review of the Countervailing Duty Order*, 88 Fed. Reg. 24757 (Apr. 24, 2023).

³⁷⁵ *Original Determination for Taiwan*, USITC Pub. 1519 at 7-8; *Original Determinations for Turkey and Thailand*, USITC Pub. 1810 at 8-9; *Original Determinations for India and Turkey*, USITC Pub. 1839 at 7-9; *Original Determinations for Brazil, Korea, Mexico, and Taiwan*, USITC Pub. 2564 at 36-37.

³⁷⁶ *Original Determination for Taiwan*, USITC Pub. 1519 at 7-8; *Original Determinations for Turkey and Thailand*, USITC Pub. 1810 at 8-9; *Original Determinations for India and Turkey*, USITC Pub. 1839 at 7-9; *Original Determinations for Brazil, Korea, Mexico, and Taiwan*, USITC Pub. 2564 at 36-37.

³⁷⁷ *First Five-Year Reviews*, USITC Pub. 3316 at 38.

³⁷⁸ *First Five-Year Reviews*, USITC Pub. 3316 at 38.

³⁷⁹ *First Five-Year Reviews*, USITC Pub. 3316 at 38.

The Second Five-Year Reviews. The Commission did not find the domestic industry to be vulnerable to material injury but concluded that subject imports would likely increase to significant levels if the orders were revoked.³⁸⁰ Because the subject imports were good substitutes for the domestic like product, the domestic industry supplied the majority of the U.S. market, and there appeared to be no significant market segments in which the domestic industry participated exclusively, the Commission found that any increase in subject import volumes would likely be in substantial part at the domestic industry's expense.³⁸¹ Additionally, because of the likely aggressive pricing of the subject imports, the Commission found that the domestic industry would need to cut prices for the domestic like product or lose sales.³⁸² Under either scenario, it found that the domestic industry's revenues would likely decline significantly in light of the anticipated volume of subject imports and that its operating performance would deteriorate.³⁸³

The Third Five-Year Reviews. The Commission observed that many of the domestic industry's performance indicators declined overall between 2006 and 2011, peaking earlier in the period and not recovering to earlier levels by the end of the period.³⁸⁴ It found that the likely increase in cumulated subject imports would be substantially at the expense of the domestic industry, which supplied the majority of the U.S. market. The Commission further concluded that if the orders were revoked, the adverse price effects associated with increased subject imports would likely have a significant impact on the domestic industry.³⁸⁵

The Fourth Five-Year Reviews. The Commission concluded that the limited record was insufficient for it to make a finding as to whether the domestic industry was vulnerable to the continuation or recurrence of material injury in the event of the revocation of the orders.³⁸⁶ However, based on the information on the record, the Commission found that should the orders be revoked, the likely significant volume of subject imports and their price effects would likely have a significant impact on the domestic industry.³⁸⁷

³⁸⁰ *Second Five-Year Reviews*, USITC Pub. 3867 at 27.

³⁸¹ *Second Five-Year Reviews*, USITC Pub. 3867 at 27.

³⁸² *Second Five-Year Reviews*, USITC Pub. 3867 at 27.

³⁸³ *Second Five-Year Reviews*, USITC Pub. 3867 at 27.

³⁸⁴ *Third Five-Year Reviews*, USITC Pub. 4333 at 43-44.

³⁸⁵ *Third Five-Year Reviews*, USITC Pub. 4333 at 45. Three Commissioners found the domestic industry to be vulnerable, and three Commissioners did not find the industry to be vulnerable. *Id.* at 44-45 nn.288-289.

³⁸⁶ *Fourth Five-Year Reviews*, USITC Pub. 4754 at 35-36.

³⁸⁷ *Fourth Five-Year Reviews*, USITC Pub. 4754 at 36.

Current Reviews. The domestic industry’s performance indicators were mixed during the POR. The industry’s practical CWP production capacity increased throughout the POR, while its production decreased by *** percent from 2020 to 2022 and was *** percent lower in interim 2022 compared to interim 2023.³⁸⁸ The decrease in production caused the domestic industry’s capacity utilization rate to decline by *** percentage points from 2020 to 2022, from *** percent in 2020 to *** percent in 2022; it was *** percentage points lower in interim 2023, at *** percent, than interim 2022, at *** percent.³⁸⁹

The domestic industry’s employment-related indicators generally improved. The number of production related workers (“PRWs”), total hours worked, and wages paid increased between 2020 and 2022 and were higher in interim 2023 than in interim 2022.³⁹⁰ Productivity decreased from 2020 to 2022 and was lower in interim 2023 than in interim 2022.³⁹¹

The domestic industry’s U.S. shipments decreased by *** percent between 2020 and 2022 and were *** percent lower in interim 2023 compared to interim 2022.³⁹² The industry’s share of apparent U.S. consumption decreased from *** percent in 2020 to *** percent in 2021 and *** percent in 2022, a level *** percentage points lower than in 2020.³⁹³ Its share of apparent U.S. consumption was *** percentage points lower in interim 2023, at *** percent, than in interim 2022, at *** percent.³⁹⁴ The domestic industry’s end-of-period inventories

³⁸⁸ CR/PR at Table III-4. The domestic industry’s practical CWP production capacity increased from *** short tons in 2020 to *** short tons in 2021 and 2022; it was *** short tons in interim 2023, as compared to *** short tons in interim 2022. *Id.* The industry’s CWP production was *** short tons in 2020, 2021, and 2022; it was *** short tons in interim 2023 compared to *** short tons in interim 2022. *Id.*

³⁸⁹ CR/PR at Table III-4. The domestic industry’s practical CWP capacity utilization rate decreased from *** percent in 2020 to *** percent in 2021 and *** percent in 2022; it was *** percent in interim 2023, as compared to *** percent in interim 2022. *Id.*

³⁹⁰ CR/PR at Table III-10. The number of PRWs increased from *** in 2020 to *** in 2021 and *** in 2022; it was *** in interim 2023, as compared to *** in interim 2022. *Id.* Total hours worked increased from *** in 2020 to *** in 2021 and *** in 2022; they were *** in interim 2023, as compared to *** in interim 2022. *Id.* Wages paid increased from \$*** in 2020 to \$*** in 2021 and \$*** in 2022; they were \$*** in interim 2023, as compared to \$*** in interim 2022. *Id.*

³⁹¹ CR/PR at Table III-10. Productivity decreased from *** short tons per 1,000 hours in 2020 to *** in 2021 and *** tons in 2022; it was *** short tons per 1,000 hours in interim 2023, as compared to *** short tons in interim 2022. *Id.*

³⁹² CR/PR at Tables III-8. The domestic industry’s U.S. shipments decreased from *** short tons in 2020 and *** short tons in 2021 and 2022; they were *** short tons in interim 2023, as compared to *** short tons in interim 2022. *Id.*

³⁹³ CR/PR at Tables III-8, III-11.

³⁹⁴ CR/PR at Tables III-8, III-11.

increased irregularly by *** percent from 2020 to 2022, while they were *** percent higher in interim 2023 compared to interim 2022.³⁹⁵

The domestic industry's financial performance indicia generally improved overall during the POR. The industry's net sales revenues increased from 2020 to 2022 but was lower in interim 2023 than in interim 2022.³⁹⁶ Gross profits, operating income, and net income all increased between 2020 and 2022 and were higher in interim 2023 than in interim 2022.³⁹⁷ The domestic industry's operating and net income margins increased irregularly from 2020 to 2022 and were higher in interim 2023 compared to interim 2022.³⁹⁸ The industry's total net assets and return on assets increased from 2020 to 2022.³⁹⁹ Its capital expenditures also increased from 2020 to 2022 and were higher in interim 2023 than interim 2022.⁴⁰⁰

In assessing the vulnerability of the domestic industry, we observe that certain performance indicators showed improvements during the POR, including capacity, PRWs, hours worked, wages paid, while other indicators, such as production, capacity utilization, U.S. shipments, and market share, declined. Financial indicators, such as net sales revenue, gross profit, operating and net income, and operating and net income margins, all improved

³⁹⁵ CR/PR at Table III-9. The domestic industry's ending inventory quantities increased irregularly, decreasing from *** short tons in 2020 to *** short tons in 2021, before increasing to *** short tons in 2022; they were *** short tons in interim 2023, as compared to *** short tons in interim 2022. *Id.*

³⁹⁶ CR/PR at Tables III-11, C-1. The domestic industry's net sales revenues increased from \$*** in 2020 to \$*** in 2021 and 2022; they were \$*** in interim 2023, as compared to \$*** in interim 2022. *Id.*

³⁹⁷ CR/PR at Tables III-11, III-16. Its gross profits increased from \$*** in 2020 to \$*** in 2021 and \$*** in 2022; they were \$*** in interim 2023, as compared to \$*** in interim 2022. *Id.* Its operating income increased from \$*** in 2020 to \$*** in 2021 and \$*** in 2022; it was \$*** in interim 2023, as compared to \$*** in interim 2022. *Id.* Its net income increased from \$*** in 2020 to \$*** in 2021 and \$*** in 2022; it was \$*** in interim 2023, as compared to \$*** in interim 2022. *Id.*

³⁹⁸ CR/PR at Table III-11. The domestic industry's operating income margin increased irregularly, decreasing from *** percent in 2020 to *** percent in 2021 before increasing to *** percent in 2022; it was *** percent in interim 2023, as compared to *** percent in interim 2022. *Id.* The industry's net income margin increased from *** percent in 2020 to *** percent in 2021 and *** percent in 2022; it was *** percent in interim 2023, as compared to *** percent in interim 2022. *Id.*

³⁹⁹ CR/PR at Tables III-18, III-19. The domestic industry's total net assets increased from \$*** in 2020 to \$*** in 2021 and 2022. *Id.* at Table III-18. The industry's return on assets increased from *** percent in 2020 to *** percent in 2021 and *** percent in 2022. *Id.* at Table III-19.

⁴⁰⁰ CR/PR at Tables III-16, C-1. The domestic industry's capital expenditures increased from \$*** in 2020 to \$*** in 2021 and \$*** in 2022; they were \$*** in interim 2023, as compared to \$*** in interim 2022. *Id.* None of the responding firms reported research and development expenses. *Id.* at III-33

markedly, reflecting the domestic industry's strong performance toward the end of the period.⁴⁰¹ On the basis of the record as a whole, we do not find that the domestic industry is currently vulnerable.

As discussed above, we have found that if the orders were revoked, the volume of cumulated subject imports would likely be significant within a reasonably foreseeable time. We have also found that the significant volume of cumulated subject imports would likely undersell the domestic like product to a significant degree, forcing the domestic industry to either cut prices, forego needed price increases, or else lose market share to subject imports. The likely significant volume of cumulated subject imports, coupled with their significant price effects, would have a direct adverse impact on the domestic industry's production, shipments, profitability, and employment, as well as its ability to raise capital and make and maintain necessary capital investments. Accordingly, we find that if the orders were revoked, cumulated subject imports would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

We have also considered the likely role of nonsubject imports in the U.S. market. Nonsubject imports increased during the POR in terms of both volume and market share, accounting for *** percent of apparent U.S. consumption in 2022.⁴⁰² Given the domestic industry's market share of *** percent in 2022, the high degree of substitutability between the subject merchandise and the domestic like product, and the importance of price in purchasing decisions, the likely significant volume of low-priced cumulated subject imports would likely take market share, at least in part, from the domestic industry or force the domestic industry to reduce prices or forego price increases that otherwise would occur to retain sales and market

⁴⁰¹ We find that the domestic industry's improved condition during the POR compared to its condition during the original investigations is due at least in part to the antidumping and countervailing duty orders under review. The domestic industry generally reported higher levels of market share, capacity utilization, gross profits, operating income, operating income margins, and net sales revenues during the POR than in the original determinations. CR/PR at Appendix C at Table I-1. The industry also reported higher levels of production and U.S. shipments during the POR than in each of the original investigations, except for in the *Original Determinations for from Brazil, South Korea, Mexico, and Taiwan*, the last original determinations in the series. *Id.* The improvements in the domestic industry's condition also were evident in the prior reviews before the implementation of the Section 232 measures in 2018. *Id.*

⁴⁰² CR/PR at Table I-26. Nonsubject import volume increased from *** short tons in 2020 to *** short tons in 2021 and *** short tons in 2022; it was lower in interim 2022 (*** short tons) than interim 2023 (*** short tons). *Id.* Nonsubject imports' share of apparent U.S. consumption by volume increased from *** percent in 2020 to *** percent in 2021 and *** percent in 2022; it was higher in interim 2022, at *** percent, than in interim 2023, when it was *** percent. *Id.*

share. We find that the presence of nonsubject imports would not preclude cumulated subject imports from capturing market share from the domestic industry or depressing or suppressing prices for the domestic like product. We therefore find that subject imports would likely cause adverse effects on the domestic industry that are distinct from any effects attributable to nonsubject imports in the event of revocation.

In sum, we conclude that if the orders were revoked, subject imports from India, Mexico, South Korea, Taiwan, Thailand, and Turkey would likely have a significant impact on the domestic industry within a reasonably foreseeable time.⁴⁰³

D. Revocation of the Antidumping Order on Subject Imports from Brazil Is Not Likely to Lead to the Continuation or Recurrence of Material Injury to the Domestic Industry within a Reasonably Foreseeable Time

1. Likely Volume of Subject Imports

In the original investigations, the volume of subject imports from Brazil totaled 54,000 short tons in 1991, accounting for 2.8 percent of apparent U.S. consumption.⁴⁰⁴ Subject imports from Brazil were 45 short tons in 1998 (in the first five-year reviews), 0 short tons in 2005 (in the second five-year reviews), and 401 short tons in 2011 (in the third five-year reviews), accounting for either zero or less than 0.05 percent of apparent U.S. consumption in each of the periods.⁴⁰⁵ In the fourth five-year reviews, subject imports from Brazil were highest in 2013, at 1,620 short tons, and lowest in 2014, at 201 short tons.⁴⁰⁶ Subject imports from Brazil accounted for *** percent of apparent U.S. consumption in 2016.⁴⁰⁷

In the current reviews, subject imports of CWP from Brazil *** from January 1, 2020 to June 30, 2023.⁴⁰⁸ As discussed in section III.C.2. above, CWP originating in Brazil is subject to an absolute quota of 2,865 short tons under Section 232.⁴⁰⁹

⁴⁰³ Commissioner Schmidlein finds that if the antidumping and countervailing duty orders were revoked, cumulated subject imports from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey would likely have a significant impact on the domestic industry within a reasonably foreseeable time. She does not join the remainder of the Commission's Views.

⁴⁰⁴ CR/PR at Appendix C at Table I-1.

⁴⁰⁵ CR/PR at Table I-4, Appendix C at Table I-1; *Third Five-Year Reviews*, USITC Pub. 4333 at Table IV-1.

⁴⁰⁶ CR/PR at Table I-4, Appendix C; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 12.

⁴⁰⁷ CR/PR at Table I-4, Appendix C; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 12.

⁴⁰⁸ CR/PR at Table I-26.

⁴⁰⁹ Effective March 23, 2018, CWP originating in Brazil became exempt from duties pursuant to Section 232 and instead became subject to an absolute import quota. CR/PR at I-40-43, Table I-22. The (Continued...)

No Brazilian producer responded to the Commission's foreign producer/exporter questionnaire.⁴¹⁰ The information available, submitted by Domestic Producers, indicates that numerous Brazilian producers of "welded carbon steel pipe products, such as CWP," possess significant capacity.⁴¹¹ In the prior proceedings, the Commission found that Brazilian CWP producers had substantial capacity, including excess capacity, and were export oriented.⁴¹²

According to GTA data, exports of pipes, tubes, and hollow profiles, a category that may also include out-of-scope merchandise, from Brazil increased from 14,890 short tons in 2020 to 16,784 short tons in 2021 and 17,921 short tons in 2022.⁴¹³ The leading destination markets for exports of such merchandise from Brazil were Uruguay and Paraguay in 2022.⁴¹⁴ These data also indicate that the Brazilian industry's exports were almost exclusively focused on neighboring Latin American markets, with no exports of CWP to the United States during the POR.⁴¹⁵ As the government of Brazil explained, these nearby Latin American markets are particularly attractive markets for CWP producers in Brazil due to regional proximity and tariff preference programs.⁴¹⁶

Brazilian producers will be limited in their ability to export CWP to the United States after revocation by the absolute quota, administered on a quarterly basis, imposed under Section 232, effective March 23, 2018, that limits subject imports of CWP from Brazil, as well as imports of out-of-scope products under the same HTS subheadings from Brazil, to 2,865 short tons per year. It is also unlikely that subject producers could use the full quota to increase their exports of CWP to the U.S. market after revocation because they would need to compete for

(...Continued)

annual quota usage rates for relevant HTS subheadings that include CWP suggest that the quota was filled in 2022 and were as follows: HTS 9903.80.22 (130 percent of 987,756 kg filled), HTS 9903.80.24 (109 percent of 1,611,145 filled). ***. *Id.* at IV-18. Imports of out-of-scope products from Brazil in excess of the volumes permitted under the quota resulted from approved product exclusions. *Id.* at I-42 n.70.

⁴¹⁰ Despite the absence of any cooperation by Brazilian producer and exports in these reviews, we find that the information available on the record provides a sufficient basis for our determination.

⁴¹¹ Domestic Producers' Posthearing Br. at 12, Exhibit 1 at 1; Domestic Producers' Final Comments at 10. As noted above, Domestic Producers claim that Brazilian subject producers have at least 1.5 million short tons of CWP capacity. Domestic Producers' Posthearing Br. at 5.

⁴¹² *Original Determinations for Brazil, Korea, Mexico, and Taiwan*, USITC Pub. 2564 at 34-35; *First Five-Year Reviews*, USITC Pub. 3316 at 34-36; *Second Five-Year Reviews*, USITC Pub. 3867 at 23-24; *Third Five-Year Reviews*, USITC Pub. 4333 at 36-38; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 30-31.

⁴¹³ CR/PR at Table IV-8.

⁴¹⁴ CR/PR at Table IV-8.

⁴¹⁵ CR/PR at Table IV-8.

⁴¹⁶ GOB's Prehearing Br. at 4, 6; GOB's Posthearing Response at 5.

use of the quota with out-of-scope products, which entirely filled the quota in 2022.⁴¹⁷ Thus, even if subject imports from Brazil were to increase after revocation, they could total no more than 2,865 short tons per year, equivalent to only *** percent of apparent U.S. consumption in 2022, and would likely be less than that, given the likelihood that the quota would be filled in part by out-of-scope merchandise under the same HTS subheadings.⁴¹⁸

The record in these reviews does not indicate that the quota on subject imports from Brazil under Section 232 will likely be terminated or significantly relaxed in the reasonably foreseeable future. In his May 2018 proclamation, the President stated his “determination to exclude, on a long-term basis,” imports of CWP from Brazil from the Section 232 tariffs originally imposed in March 2018 and instead impose the quota.⁴¹⁹ This quota has been in place since that time, and there has been no announcement by the current Administration that it is considering revising or removing the quota on CWP from Brazil. Therefore, based on the record, we conclude that the Section 232 trade measure, as it is currently structured and enforced, likely will continue into the reasonably foreseeable future.⁴²⁰

We are unpersuaded by Domestic Producers’ arguments that the Brazilian CWP industry would likely use its significant capacity to rapidly increase exports to the United States, the most attractive market in the region, upon revocation.⁴²¹ As noted above, even if subject imports from Brazil were to increase after revocation, they would be limited to no more than 2,865 short tons under the Section 232 quota that is shared with out-of-scope merchandise.

⁴¹⁷ CR/PR at IV-18.

⁴¹⁸ CR/PR at I-41-42, Table I-26.

⁴¹⁹ *Proclamation 9759 of May 31, 2018 Adjusting Imports of Steel Into the United States*, 83 Fed. Reg. 25857, 25858 (June 5, 2018); *see also Proclamation 9705 of March 8, 2018 (Adjusting Imports of Steel Into the United States)*, 83 Fed. Reg. 11625 (Mar. 15, 2018). *See also* Statement of Assistant United States Trade Representative Adam Hodge (Dec. 9, 2022), EDIS Doc. 786641 (“The Biden Administration is committed to preserving U.S. national security by ensuring the long-term viability of our steel and aluminum industries, and we do not intend to remove the Section 232 duties as a result of {WTO} disputes.”).

⁴²⁰ Nor are we persuaded by the Domestic Producers’ argument that the section 232 program itself is likely to be revoked. Domestic Producers’ Prehearing Brief at 33. The Domestic Producers cite, for example, that the Section 232 program is subject to the President’s discretion and can be removed at any time, including on a country-specific basis. *Id.* We find this argument to be speculative on this record. We note that the program has been in place for more than five years. CR/PR at I-40-41; *see also* GOB’s Posthearing Response at 7-8. The Domestic Producers have not presented any evidence that the Section 232 program will be terminated in the imminent future. *See, e.g.,* Domestic Producers Prehearing Brief at 33.

⁴²¹ Domestic Producers’ Posthearing Br. at Exhibit 1 at 17; Domestic Producers’ Final Comments at 10.

Moreover, subject Brazilian producers did not use their capacity to export *** CWP to the U.S. market during the POR.⁴²²

We are also unpersuaded by the Domestic Producers' argument that the Brazilian industry would likely be able to increase its exports of CWP to levels above the 2,865 short ton quota by obtaining product exclusions from Commerce.⁴²³ As an initial matter, subject imports from Brazil are unlikely to fill the entire 2,865 short ton quota after revocation because out-of-scope products that filled the quota in 2022 would be in competition for the same quota. Furthermore, Commerce's exclusion process provides that an exclusion request will only be granted after determining the CWP article "not to be produced in the United States in a sufficient and reasonably available amount or of a satisfactory quality" or when warranted based upon specific national security considerations.⁴²⁴ Commerce may take months to review a request and generally denies the request whenever a domestic interested party makes a valid objection.⁴²⁵ Moreover, as noted in section IV.B.2. above, CWP is not eligible for GAEs.⁴²⁶ Domestic Producers have provided no evidence that any exclusion request pertaining to CWP from Brazil has been either requested or granted.⁴²⁷

Thus, given the absolute cap on the volume of subject imports from Brazil imposed by the Section 232 quota, equivalent to only 0.2 percent of apparent U.S. consumption in 2022; the utilization of the same quota by out-of-scope merchandise, which filled the quota in 2022; the absence of subject imports from Brazil from the U.S. market during the data collection period, despite the Brazilian industry's substantial capacity; and the Brazilian industry's focus on

⁴²² CR/PR at Table C-1.

⁴²³ Domestic Producers' Posthearing Br. at 13-14, Exhibit 1 at 9; Domestic Producers' Final Comments at 10.

⁴²⁴ See, e.g., CR/PR at I-42-46.

⁴²⁵ See, e.g., Domestic Producers' Prehearing Br. at 24, 34; Domestic Producers' Posthearing Br. at 10, 13; Domestic Producers' Final Comments at 4-5, 10-11.

⁴²⁶ CR/PR at Table I-23; Section 232 Quotas and Exclusions, EDIS Doc. 809240 (Nov. 27, 2023); *Section 232 Steel and Aluminum Tariff Exclusions Process*, 85 Fed. Reg. 81060 (Dec. 14, 2020); Domestic Producers' Prehearing Br. at 24, 34; Domestic Producers' Posthearing Br. at 10, 13; Domestic Producers' Final Comments at 10-11. We also observe that even if some exemptions were granted, subject imports from Brazil would likely remain only a fraction of one percent of the U.S. market. For example, even if U.S. importers were granted exemptions for certain CWP products imported from Brazil that allowed subject imports from Brazil to increase to twice the level permitted under the quota, subject imports from Brazil would only represent the equivalent of *** percent of apparent U.S. consumption in 2022. *Calculated from* CR/PR at Table I-26.

⁴²⁷ See generally Domestic Producers' Prehearing Br. at 34-35; Domestic Producers' Posthearing Br. at 13-14, Domestic Producers' Final Comments.

exports to third-country markets in Latin America with trade preferences, the Brazilian industry has little incentive or ability to export significant volumes of CWP to the U.S. market after revocation. Accordingly, we find that the likely volume of subject imports from Brazil would not be significant, either in absolute terms or relative to U.S. consumption, if the order were revoked.

2. Likely Price Effects

As discussed above, we have found that there is a high degree of substitutability between domestically produced CWP and subject imports, including subject imports from Brazil and that price is an important purchasing factor. In these reviews, no product-specific pricing data were available because there were *** subject imports from Brazil from January 1, 2020 to June 30, 2023.⁴²⁸

Given our finding that the volume of subject imports from Brazil is not likely to be significant after revocation, any likely volume of subject imports from Brazil would be too small to have a significant effect on prices for the domestic like product.⁴²⁹ As discussed above, the Brazilian industry's exports are almost exclusively focused on neighboring Latin American

⁴²⁸ In the original investigations, subject imports from Brazil undersold the domestic like product in 33 of 36 quarterly comparisons (91.7 percent), with underselling margins ranging from 0.4 to 19.5 percent. Original Investigations Brazil, Korea, Romania, Mexico, Taiwan, and Venezuela Staff Report at Tables 29-32; *Third Five-Year Reviews*, USITC Pub. 4333 at 17 n.95. In the prior reviews, no product-specific pricing data were collected for subject imports from Brazil. First Five-Year Reviews Staff Report at CIRC-V-6; *Second Five-Year Reviews*, USITC Pub. 3867 at 25 n.152; *Third Five-Year Reviews*, USITC Pub. 4333 at 40 n.260; *Fourth Five-Year Reviews*, USITC Pub. 4754 at 33.

⁴²⁹ We are unpersuaded by Domestic Producers' arguments that even the small volume of CWP from Brazil allowed under the Section 232 quota would have significant price effects because the CWP market is characterized by sales involving small volumes of CWP and distributors using low-priced offers for small volumes to drive down prices. Domestic Producers' Prehearing Br. at 32-33; Domestic Producers Posthearing Br. at 6-7; Domestic Interested Parties Final Comments 4. Even to the extent that distributors seek to use low-priced offers for small volumes to drive down prices, the Section 232 quota would cap the total volume of sales that CWP from Brazil could obtain in a given quarter and year to low levels after revocation. Accordingly, even if CWP from Brazil were to be priced lower than the domestic like product after revocation, the likely small volume and limited availability of subject imports from Brazil due to the quota would likely mitigate their effect on prices and limit the ability of purchasers to use any such low-priced CWP from Brazil to extract price concessions from domestic producers. Furthermore, as discussed below, the limited export volumes permitted under the Section 232 quota would provide subject producers with little incentive to use underselling as a means of gaining market share and an economic incentive to export higher-value CWP products, as a means of maximizing their profits.

markets, with no exports of CWP to the United States from January 1, 2020 to June 30, 2023.⁴³⁰ In addition, the volume of subject imports from Brazil permitted under the Section 232 quota is very small and the quota as of 2022 was entirely filled by out-of-scope CWP. Given this, the Brazilian industry would have little incentive or ability to use underselling to gain significant sales in the U.S. market after revocation.⁴³¹

Accordingly, we find that subject imports from Brazil are unlikely to undersell the domestic like product to a significant degree, or to have a significant depressing or suppressing effects on prices for the domestic like product, if the order were revoked.

3. Likely Impact⁴³²

In evaluating the likely impact of subject imports from Brazil on the domestic industry, we take into account our finding that the domestic industry is not currently in a vulnerable condition, as discussed in section IV.C.3. above. Given our findings that revocation of the order on CWP from Brazil would result in neither a significant volume of subject imports from Brazil nor significant price effects, we find that revocation of the order would not be likely to have a significant impact on the domestic industry.

For all these reasons, we conclude that revocation of the antidumping duty order on CWP from Brazil would not be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

⁴³⁰ CR/PR at IV-2 n.4, Table IV-8.

⁴³¹ We are unpersuaded by the Domestic Producers' arguments that Brazilian exporters will likely "rush in" imports of CWP and compete with each other aggressively on price to fill the limited quota as quickly as possible. Domestic Producers' Prehearing Br. at 26. As discussed above, we find that even if low-priced CWP from Brazil were to enter the U.S. market, the absolute quota, which is administered on a quarterly basis such that imports in each quarter cannot exceed 30 percent of the annual limit, would constrain the likely volume of such imports to levels that would be too small to have significant price effects, particularly when a portion of the quota is likely to be filled by out-of-scope merchandise. CR/PR at I-42 nn.70-71b, IV-2 n.4.

⁴³² In its expedited fifth sunset reviews of the antidumping duty orders, Commerce determined likely margins of up to 103.38 percent on subject imports from Brazil. *Certain Circular Welded Non-Alloy Steel Pipe From Brazil, Mexico, the Republic of South Korea, and Taiwan and Certain Circular Welded Carbon Steel Pipes and Tubes From Taiwan: Final Results of Expedited Fifth Sunset Reviews of the Antidumping Duty Orders*, 88 Fed. Reg. 29880, 29881 (May 9, 2023).

V. Conclusion

For the above reasons, we determine that revocation of the countervailing duty order on CWP from Turkey and the antidumping duty orders on CWP from India, Mexico, South Korea, Taiwan, Thailand, and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. We also determine that revocation of the antidumping duty order on CWP from Brazil would not be likely to lead to a continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

Dissenting Views of Commissioner Rhonda K. Schmidlein

Commissioner Schmidlein disagrees with the Majority's decision not to cumulate Brazil with the remaining subject countries for the purposes of analyzing the likely volume and effects of subject imports in these reviews.¹

Based on my review of the record, I find that there would not likely be significant differences in the conditions of competition under which subject imports from each country would likely compete if the orders were revoked. Consequently, I exercise my discretion to cumulate subject imports from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey.

As an initial matter, I note that no Brazilian circular welded pipe and tube ("CWP") producer chose to participate in these reviews. I further note that the statute authorizes the Commission to take adverse inferences in five-year reviews, although such authorization does not relieve the Commission of its obligation to consider the record evidence as a whole in making its determination.² In this case, none of the respondent interested parties from Brazil responded to the Commission's notice of institution, nor did they provide questionnaire responses or otherwise participate in these reviews by appearing at the hearing or filing briefs. Consequently, this failure deprives the Commission of critical data, and leaves the Commission with an incomplete picture of the Brazilian industry, the conditions affecting that industry, how it competes in the U.S. market, and how it would target the U.S. market in the absence of the antidumping order. Accordingly, I have relied on the facts available in these reviews, which consist primarily of the evidence in the record from the Commission's original investigations, the information collected by the Commission since the institution of these reviews, and information submitted by the domestic producers and any interested parties.³

Regarding the conditions of competition facing subject imports in the U.S. CWP market, subject imports from each of the seven countries generally exhibited similar behavior during the original investigations. Subject imports from each country increased at times during the period of investigation ("POI"), and purchasers reported buying subject imports from each

¹ Except as noted, I join the Commission's Views in sections I-III.C.2.b and IV.A-C.

² 19 U.S.C. Section 1677e(b); *GEO Specialty Chemicals, Inc. v. United States*, Slip Op. 09-13 at 17-18 (Ct. Int'l Trade Feb. 19, 2009).

³ The Government of Brazil, an interested party under 19 U.S.C. 1677(9)(B), by its Economic Advisor at the Embassy of Brazil in Washington D.C., Aluisio de Lima-Campos, submitted a prehearing brief, EDIS Doc. 806159 (Oct. 17, 2023) ("GOB's Prehearing Br."), and a response to the Commission's posthearing questions, EDIS Doc. 807912 (Nov. 6, 2023) ("GOB's Posthearing Response").

country instead of the domestic like product due primarily to the lower price of the imports.⁴ Additionally, subject imports from each country declined significantly after the orders were imposed.⁵ As explained in the Majority views, the Commission has already determined that producers in each subject country have the ability to export CWP to the United States in volumes that would have a discernible adverse impact on the domestic industry if the orders were revoked, and that there would likely be a reasonable overlap of competition between subject imports from each country, which would compete with each other and with the domestic like product for sales in the U.S. market. Imports from each subject country would likely be competing for similar sales with reasonably fungible products, in similar channels of distribution to similar customers, and would likely use aggressive prices to gain sales, as they did during the original investigations.⁶

I disagree with the Majority's finding that subject imports from Brazil are likely to compete under different conditions of competition than other subject imports in the event of revocation due to the Brazilian industry's alleged focus on its home market or differences in applicable Section 232 measures.

First, Brazilian CWP producers demonstrated a strong interest in exporting to the U.S. market during the original POI, similar to producers in other subject countries. Subject imports from Brazil increased rapidly during the POI, from 30,748 short tons in 1989 to 54,488 short tons in 1991, an increase of 77.2 percent.⁷ Following the same trend, subject imports from Brazil increased as a share of apparent U.S. consumption, from 1.4 percent in 1989 to 2.6

⁴ CR/PR at Appendix C at Table I-1; *Certain Welded Carbon Steel Pipes and Tubes from the Republic of Korea and Taiwan*, Inv. Nos. 731-TA-131, 132, and 138 (Final), USITC Pub. 1519 at 12-19 (Apr. 1984) ("*Original Determinations for South Korea and Taiwan*"); *Certain Welded Carbon Steel Pipes and Tubes from Turkey and Thailand*, Inv. Nos. 701-TA-253 and 731-TA-252 (Final), USITC Pub. 1810 at 25-26 (Feb. 1986) ("*Original Determinations for Turkey and Thailand*"); *Certain Welded Carbon Steel Pipes and Tubes from India, Taiwan, and Turkey*, Inv. Nos. 731-TA-271-273 (Final), USITC Pub. 1839 at 12-14 (Apr. 1986) ("*Original Determinations for India and Turkey*"); *Certain Circular, Welded, Non-Alloy Steel Pipes and Tubes from Brazil, the Republic of Korea, Mexico, Romania, Taiwan, and Venezuela*, Inv. Nos. 731-TA-532-537 (Final), USITC Pub. 2564 at 36-37 (Oct. 1992) ("*Original Determinations for Brazil, Mexico, South Korea, and Taiwan*").

⁵ CR/PR at Appendix C at Table I-1; *Certain Pipe and Tube from Argentina, Brazil, Canada, India, Korea, Mexico, Singapore, Taiwan, Thailand, Turkey, and Venezuela*, Inv. Nos. 701-TA-253, 731-TA-132, 252, 271, 273, 276, 277, 296, 409, 410, 532-534, 536, and 537 (Review), USITC Pub. 3316 (July 2000) at 34 ("*First Five-Year Reviews*").

⁶ Price/cost was the most often cited top three purchasing factor reported by responding purchasers in these reviews. CR/PR at Table II-11.

⁷ Original Investigations of CWP from Brazil, Korea, Romania, Mexico, Taiwan, and Venezuela Staff Report, EDIS Doc. 791830 (Oct. 8, 1992) at Table C-1 ("*Original Investigations Brazil, Korea, Romania, Mexico, Taiwan, and Venezuela Staff Report*").

percent in 1991.⁸ This occurred as subject imports from Brazil undersold the domestic like product in 33 of 36 quarterly comparisons (91.7 percent).⁹ The antidumping duty order had a significant restraining effect on the volumes of subject imports from Brazil, such that by the first five-year review, Brazilian imports quickly fell to insignificant levels, at 69 short tons and 45 short tons in 1997 and 1998, respectively.¹⁰ Subsequently, Brazilian imports have remained at insignificant levels¹¹, which suggests that it was the entry of the orders, not a change in industry focus to the home market, which drove the lack sales.

Second, the Brazilian industry has not provided the Commission any data to demonstrate that in the event of revocation, the industry would abandon its prior interest in the U.S. market. To the contrary, evidence on the record suggests that exports would resume.

Domestic producers have provided the names of five Brazilian producers of CWP, who are estimated to have annual production capacity of over 1.5 million short tons, and the names of nine more for whom no estimate is available.¹² This is consistent with prior Commission reviews, which have found that Brazilian producers are active, are export oriented, and have “substantial capacity” and “unused capacity.”¹³ In these reviews, the staff report includes data from the Global Trade Atlas (“GTA”) that reports an active export sector, with exports in 2022 from Brazil of 17,921 short tons of “welded tubes, pipes, and hollow profiles,” a category that includes CWP and out-of-scope products.¹⁴ The U.S. was the sixth largest export market for this category, accounting for 6.6 percent of Brazil’s exports, behind Uruguay, Paraguay, Bolivia,

⁸ Original Investigations Brazil, Korea, Romania, Mexico, Taiwan, and Venezuela Staff Report at Table C-1.

⁹ Original Investigations Brazil, Korea, Romania, Mexico, Taiwan, and Venezuela Staff Report at I-97-100, Tables 29-32.

¹⁰ *First Five-Year Reviews*, USITC Pub. 3316 at Table C-1.

¹¹ CR/PR at Appendix C, Tables I-1, I-6, I-7. *See also* Domestic Producers’ Response to Notice of Institution, EDIS Doc. 789300 (Feb. 2, 2023) at Exhibit 3 (“Domestic Producers’ Response”).

¹² Domestic Producers’ Response at Exhibits 1, 5. The foreign producers’ names are: Brastubo, Confab Industrial, Tuper S/A, Marcegaglia do Brazil, and Apolo, who have disclosed capacities of 1,396,000 metric tons, equal to 1,538,825 short tons.

¹³ *First Five-Year Reviews*, USITC Pub. 3316 at 36; *Certain Pipe and Tube from Argentina, Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey*, Inv. Nos. 701-TA-253, 731-TA-132, 252, 271, 273, 409, 410, 532-534, and 536 (Second Review), USITC Pub. 3867 at 11-12 (July 2006) (“*Second Five-Year Reviews*”); *Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey*, Inv. Nos. 701-TA-253, 731-TA-132, 252, 271, 273, 532-534, and 536 (Third Review), USITC Pub. 4333 at 37-38 (June 2012) (“*Third Five-Year Reviews*”); *Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey*, Inv. Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536 (Fourth Review), USITC Pub. 4754 at 16 (Jan. 2018) (“*Fourth Five-Year Reviews*”).

¹⁴ CR/PR Table IV-8.

Argentina, and Mexico, and is the export market with the highest average unit values (“AUVs”) of these six countries.¹⁵ Therefore, the combination of continued exports by the industry and the attractiveness of a high-priced U.S. market, absent evidence to the contrary, suggests a likely resumption of sales to the United States.¹⁶

In addition, since the revocation of the antidumping and/or countervailing duty orders on cold-rolled steel (“CRS”), hot-rolled steel (“HRS”), and cut-to-length plate (“CTL Plate”) from Brazil, data submitted by the domestic producers indicate that the Section 232 quotas (discussed further below) on these products have not prevented the rapid increase of significant quantities of low-priced imports from Brazil.¹⁷ In the case of CRS, the Section 232 annual quota is 57,251 short tons, and for the eight-month period of January to August 2023, shipments from Brazil reached 37,581 net tons with an AUV 20.6 percent lower than CRS from other sources. Prior to revocation in October 2022, annual imports had been insignificant, at 782 short tons in 2021.¹⁸ In the case of HRS, the annual quota is 143,416 short tons, and for the seven-month period February to August 2023, shipments totaled 40,829 net tons, with an AUV 13 percent lower than HRS from other sources. Prior to revocation, monthly imports had typically been zero in 2021 and 2022.¹⁹ In the case of CTL Plate, the annual quota is 10,049 short tons, and for the seven-month period from February to August 2023, shipments totaled 6,158 net tons with an AUV nearly 24 percent lower than from other sources. Prior to revocation, monthly imports had typically been zero in 2021 and 2022.²⁰ Clearly, this evidence

¹⁵ CR/PR Table IV-8.

¹⁶ The Government of Brazil, in prehearing and posthearing submissions, asserts that CWP exports from Brazil have been minimal, and therefore there would be no discernable impact from revocation, and further that the Section 232 absolute quota for Brazil is a unique condition of competition that permits decumulation. GOB’s Prehearing Br. at 3-4; GOB’s Posthearing Response at 3-4, 7-8.

¹⁷ In 2021, apparent U.S. consumption of HRS totaled 57.8 million short tons, CRS totaled 28.7 million short tons, and CTL Plate totaled 5.3 million short tons. In contrast, apparent U.S. consumption of CWP in 2021 was substantially smaller, at 1.6 million short tons. *Calculated* from CR/PR at Tables I-22, I-26; *see also Cold-Rolled Steel Flat Products from Brazil, China, India, Japan, South Korea, and the United Kingdom*, Inv. Nos. 801-TA-540-543 and 731-TA-1283-1287 and 1290 (Review), USITC Pub. 5339 (Aug. 2022) at 44; *Hot Rolled Steel from Australia, Brail, Japan, Netherlands, Russia, South Korea, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-546 and 731-TA-1291-1297 (Review) and 731-TA-808 (Fourth Review), USITC Pub. 5380 (Nov. 2022) at 87; *Carbon Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey*, Inv. Nos. 701-TA-560-561 and 731-TA-1317-1328 (Review), USITC Pub. 5399 (Jan. 2023) at 29.

¹⁸ Domestic Producers’ Posthearing Brief, EDIS Doc. 806151 (Oct. 17, 2023) at Exhibit 4 (“Domestic Producers’ Posthearing Br.”).

¹⁹ Domestic Producers’ Posthearing Br. at Exhibit 3.

²⁰ Domestic Producers’ Posthearing Br. at Exhibit 5.

of Brazilian producer participation in the CRS, HRS, and CTL Plate markets demonstrates that Brazilian producers of these products are able to compete successfully in the U.S. market despite the quotas.

Specifically with respect to the Section 232 measures themselves, I also do not find that any differences in those measures constitute different conditions of competition that warrant analyzing subject imports from Brazil on a decumulated basis. The fact that certain imports may be subject to absolute quotas while others are subject to tariffs or tariff-rate quotas does not affect the conditions of competition facing these imports in the U.S. market, nor does it suggest that the imports will not compete with each other and with the domestic product after revocation of the orders.²¹ The differences in measures do not affect the types of products that may be sold in the U.S. market, nor do they affect the locations or channels of distribution through which the imports may be sold.²² Simply put, any differences in these Section 232 measures will not result in the imports from different subject countries competing differently in the marketplace.²³

I also do not find that the size of the Section 232 absolute quota that CWP from Brazil is subject to would cause subject imports from Brazil to compete under significantly different conditions of competition than subject imports from other countries after revocation of the orders. CWP, along with other out-of-scope products, originating in Brazil is subject to an absolute import quota of 2,865 short tons (equivalent to *** percent of apparent U.S. consumption in 2021), administered on a quarterly basis.²⁴ I am unpersuaded that the size of

²¹ See 19 U.S.C. § 1675a(a)(7).

²² Producers, importers, and purchasers reported that subject imports from Brazil are almost always interchangeable with subject imports from each of the other subject countries and with the domestic product. CR/PR at Tables II-16-18.

²³ I note that in other recent reviews the Commission has cumulated subject imports from all subject countries despite Section 232 absolute quotas applying to subject imports from one country. See *Welded Stainless Steel Pipe from South Korea and Taiwan*, Inv. Nos. 731-TA-540-541 (Fifth Review), USITC Pub. 5395 (Dec. 2022); *Certain Corrosion-Resistant Products from China, India, Italy, South Korea, and Taiwan*, Inv. Nos. 701-TA-534-537 and 731-TA-1274-1278 (Review), USITC Pub. 5337 (Aug. 2022); *Heavy Walled Rectangular Welded Carbon Steel Pipes and Tubes from Korea, Mexico, and Turkey*, Inv. Nos. 701-TA-539 and 731-TA-1280-1282 (Review), USITC Pub. 5297 (Mar. 2022); *Stainless Steel Wire Rod from Japan, South Korea, and Taiwan*, Inv. Nos. 731-TA-771-772 and 775 (Fourth Review), USITC Pub. 5279 (Feb. 2022).

²⁴ CR/PR Table I-22. Effective March 23, 2018, CWP originating in Brazil became exempt from duties pursuant to Section 232 and instead became subject to an absolute import quota. *Id.* at I-40-43, Table I-22. The annual quota usage rates for relevant HTS subheadings that include CWP suggest that the quota was filled in 2022 and were as follows: HTS 9903.80.22 (130 percent of 987,756 kg filled), HTS 9903.80.24 (109 percent of 1,611,145 kg filled). ***. *Id.* at IV-18. Imports of out-of-scope products (Continued...)

this quota would significantly restrict the Brazilian industry's ability to compete for sales in the U.S. market if the order were revoked.²⁵ Domestic producers provided evidence showing that ***.²⁶ The ***.²⁷ The monthly import data similarly show that imports from a subject country in any given month can be as small as six short tons (Taiwan), 19 short tons (Thailand), or 44 short tons (Turkey).²⁸ In addition, purchasers of CWP will sometimes source an overall purchase from multiple producers with shipments made over the course of a few months. Wheatland President Kevin Kelly also noted that master distributors use low-priced import offers from one foreign producer to leverage down domestic prices and other import prices, such that one low-priced import offer for a small volume of CWP could affect CWP pricing for numerous sales and for a much larger volume.²⁹ This would allow Brazilian producers to compete readily, even with the quota, under the same conditions of competition as other subject sources, for these small volume sales.

Given the smaller size of the overall CWP market, the prevalence of smaller-volume sales and shipment quantities of CWP in the market, and the manner in which master distributors make purchases using multiple sources, the Section 232 quota on imports from Brazil likely will not significantly impede the Brazilian industry's ability to compete for CWP sales in the U.S. market and will allow Brazilian CWP producers to compete under the same or similar conditions of competition as other subject producers.

Finally, I disagree with the Majority's view that the difference in the quota volumes between Brazil and South Korea constitutes a different condition of competition that will result in imports from Brazil operating differently in the U.S. market.³⁰ Although the quota limit for

(...Continued)

from Brazil in excess of the volumes permitted under the quota resulted from approved product exclusions. *Id.* at I-42 n.70.

²⁵ Likewise, I do not find that the fact that this quota is currently filled by out-of-scope products would preclude Brazilian CWP producers from actively competing in the market by exporting subject merchandise. As domestic producers argue, Brazilian exporters could shift their exports to subject CWP products, and Commerce's product exclusion process also allows exports in excess of the quota. Indeed, as discussed above, the two CWP quota categories were filled in 2022 at rates of 130 percent and 109 percent, respectively, presumably due to product exclusions. CR/PR at I-42 n.71.

²⁶ Domestic Producers' Posthearing Br. at Exhibit 2 (statement of Wheatland Tube Division of Zekelman Industries President Kevin Kelly).

²⁷ Domestic Producers' Posthearing Br. at Exhibit 2.

²⁸ See CR/PR at Table IV-6.

²⁹ Domestic Producers' Posthearing Br. at Exhibit 2.

³⁰ CWP, along with out-of-scope products, originating in South Korea is subject to an annual absolute quota under Section 232 of 85,878 short tons, administered on a quarterly basis. CR/PR at I-43, Table I-22.

imports from Brazil is smaller than for imports from South Korea, the Brazilian CWP producers competing for approximately *** percent of apparent consumption in the U.S. market have the same incentive to price aggressively to gain sales as the producers in South Korea, who are competing for approximately *** percent of apparent consumption under their quota limit. Indeed, during the original POI, subject imports from Brazil were priced more aggressively than subject imports from South Korea.³¹ There are multiple CWP producers in both Brazil³² and South Korea that would seek to increase exports to the United States and maximize sales under their respective quotas after revocation of the orders. The quota did not prevent subject imports from South Korea from increasing in volume (24.6 percent) and market share (** percentage points, from *** percent to *** percent) during the POR.³³ Brazil's quota likewise will not prevent subject imports from Brazil from increasing or underselling the domestic product following revocation of the order.

In sum, while one may argue that the difference in quota levels between Brazil and South Korea may ultimately have a different impact on the domestic industry (and that is debatable), a difference in impact is not a different condition of competition. The Court of International Trade has held that it is an abuse of discretion to rely on circular reasoning that conflates the Commission's cumulation and injury analyses.³⁴ The problem with such reasoning is that it undermines the very purpose of the cumulation provision, which is to address the potential "hammering effect" of individual small volumes of unfair imports from multiple subject countries.³⁵

For all these reasons, I find that there are not likely to be differences in the conditions of competition between subject imports of CWP from Brazil and other subject countries upon revocation of the orders, and therefore cumulate imports from Brazil with the other subject countries for purposes of analyzing the likely effects of revoking the orders.

³¹ In the original investigations, subject imports from Brazil undersold the domestic product in 33 of 36 quarters (91.6 percent). Original Investigations Brazil, Korea, Romania, Mexico, Taiwan, and Venezuela Staff Report at Tables V-11-12. Brazil's AUVs were lower than South Korea's AUVs in each year of the POI, 1989-1991. *Id.*

³² Domestic Producers' Response at Exhibits 1, 5.

³³ See CR/PR at Tables I-26, C-1.

³⁴ See *Neenah Foundry Co. v. United States*, 155 F. Supp. 2d 766, 771-72 (Ct. Int'l Trade 2001), *aff'd per curiam*, 112 Fed. Appx. 59 (Fed. Cir. 2004).

³⁵ See *Neenah Foundry Co. v. United States*, 155 F. Supp. 2d 766, 771-72 (Ct. Int'l Trade 2001), *aff'd per curiam*, 112 Fed. Appx. 59 (Fed. Cir. 2004) (quoting H.R. Rep. No. 100-40, pt. 1, at 130 (1987)).

I generally concur with the Majority's analysis with respect to the lack of differences in the conditions of competition facing subject imports from the other countries and adopt that analysis herein, except as it pertains to Brazil.³⁶

I also join the Majority's analysis with respect to evaluating the likelihood of continuation or recurrence of material injury by reason of subject imports from India, Mexico, South Korea, Taiwan, Thailand, and Turkey, but I have also considered information regarding Brazil in the cumulated subject import and industry data, as noted in the Majority views. Based on this information, and for the reasons explained in the Majority views, I determine that revocation of the countervailing duty order on CWP from Turkey and the antidumping duty orders on CWP from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

³⁶ See Commission Views at section III.C.2.c.2.

Part I: Introduction

Background

On January 3, 2023, the U.S. International Trade Commission (“Commission” or “USITC”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),¹ that it had instituted reviews to determine whether revocation of the antidumping duty orders on circular welded pipe and tube (“CWP”) from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey and the countervailing duty order on CWP from Turkey would likely lead to the continuation or recurrence of material injury to a domestic industry.^{2 3} On April 10, 2023, the Commission determined that it would conduct full reviews pursuant to section 751(c)(5) of the Act.⁴ Table I-1 presents information relating to the background and schedule of this proceeding.⁵

¹ 19 U.S.C. 1675(c).

² 88 FR 107, January 3, 2023. All interested parties were requested to respond to this notice by submitting the information requested by the Commission.

³ In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. 88 FR 63, January 3, 2023.

⁴ 88 FR 23687, April 18, 2023. The Commission found that the domestic interested party group response to its notice of institution (88 FR 107, January 3, 2023) was adequate and that the respondent interested party group response was inadequate, but the Commission found that other circumstances warranted conducting full reviews.

⁵ The Commission’s notice of institution, notice to conduct full reviews and scheduling notice are referenced in appendix A and may also be found at the Commission’s web site (internet address www.usitc.gov). Commissioners’ votes on whether to conduct expedited or full reviews may also be found at the web site. Appendix B presents the request by the Domestic Interested Parties that the Commission cancelled its previously-scheduled public hearing.

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

Effective date	Action
August 22, 2000	Commerce's continuation of antidumping and countervailing duty orders after first five-year reviews (65 FR 50955)
August 8, 2006	Commerce's continuation of antidumping and countervailing duty orders after second five-year reviews (71 FR 44996)
July 17, 2012	Commerce's continuation of antidumping and countervailing duty orders after third five-year reviews (77 FR 41967)
February 7, 2018	Commerce's continuation of antidumping and countervailing duty orders after fourth five-year reviews (83 FR 5402)
January 3, 2023	Commission's institution of five-year reviews (88 FR 107, January 3, 2023)
January 3, 2023	Commerce's initiation of five-year reviews (88 FR 63, January 3, 2023)
April 10, 2023	Commission's determination to conduct full five-year reviews (88 FR 23687, April 18, 2023)
April 24, 2023	Commerce's final results of its expedited five-year review of the countervailing duty order on CWP from Turkey (88 FR 24757)
May 8, 2023	Commerce's final results of its expedited five-year reviews of the antidumping duty orders on CWP from India, Thailand, and Turkey (88 FR 29636)
May 9, 2023	Commerce's final results of its expedited five-year reviews of the antidumping duty orders on CWP from Brazil, Mexico, South Korea, and Taiwan (88 FR 29880)
June 7, 2023	Commission's scheduling of the reviews (88 FR 39475, June 16, 2023)
October 26, 2023	Scheduled date for the Commission's public hearing. This hearing was subsequently cancelled (88 FR 73378, October 25, 2023)
December 8, 2023	Commission's vote
December 28, 2023	Commission's determinations and views

Overview

These reviews of the countervailing duty order covering CWP from Turkey and the antidumping duty orders covering CWP from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey follow from a series of countervailing and antidumping duty petitions filed with Commerce and the Commission between 1983 and 1992. Table I-2 presents information on the original orders as issued by Commerce.

Table I-2
CWP: Effective dates for the orders on CWP from subject countries

Effective date of the order	Subject merchandise	Subject country	Commerce Inv. No.	Commission Inv. No.	Federal Register Notice
May 7, 1984	Small diameter carbon steel pipe tube	Taiwan	A-583-008	731-TA-132	49 FR 19369
March 7, 1986	Welded carbon steel pipe and tube	Turkey	C-489-502	701-TA-253	51 FR 7984
March 11, 1986	Welded carbon steel pipe and tube	Thailand	A-549-502	731-TA-252	51 FR 8341
May 12, 1986	Welded carbon steel pipe and tube	India	A-533-502	731-TA-271	51 FR 17384
May 15, 1986	Welded carbon steel pipe and tube	Turkey	A-489-501	731-TA-273	51 FR 17784
November 2, 1992	Circular welded nonalloy steel pipe	Brazil	A-351-809	731-TA-532	57 FR 49453
November 2, 1992	Circular welded nonalloy steel pipe	Mexico	A-201-805	731-TA-534	57 FR 49453
November 2, 1992	Circular welded nonalloy steel pipe	South Korea	A-580-809	731-TA-533	57 FR 49453
November 2, 1992	Circular welded nonalloy steel pipe	Taiwan	A-583-814	731-TA-536	57 FR 49454

Source: Cited Federal Register notices for the duty orders.

The original Taiwan (small diameter) investigations

The original investigation with respect to small diameter carbon steel pipe and tube (“small diameter CWP”) from Taiwan resulted from petitions filed on April 21, 1983 with Commerce and the Commission by the Committee on Pipe and Tube Imports (“CPTI”).⁶ On March 16, 1984, Commerce determined that imports of small diameter CWP from Taiwan were being sold at less than fair value (“LTFV”).⁷ The Commission determined on April 30, 1984 that

⁶ Certain Welded Carbon Steel Pipes and Tubes from the Republic of Korea and Taiwan, Inv. Nos. 731-TA-131, 132, and 138 (Final), USITC Publication 1519, April 1984 (“Original Taiwan publication”), p. A-1.

⁷ 49 FR 9931, March 16, 1984.

the domestic industry was materially injured by reason of LTFV imports of small diameter CWP from Taiwan.⁸ On May 7, 1984, Commerce issued its antidumping duty order on small diameter CWP from Taiwan with the final weighted-average dumping margins ranging from 9.7 to 43.7 percent.⁹

The original Thailand and Turkey (CVD) investigations

The original investigation with respect to CWP from Thailand resulted from petitions filed on February 28, 1985 with Commerce and the Commission by CPTI. The original investigation with respect to CWP from Turkey resulted from petitions filed on July 16, 1985 with Commerce and the Commission by individual members of the CPTI subcommittees on standard line and pipe.¹⁰ On January 10, 1986, Commerce determined that certain benefits which constitute subsidies within the meaning of the countervailing duty law were being provided to manufacturers, producers, or exporters in Turkey of CWP.¹¹ On January 27, 1986, Commerce determined that CWP from Thailand were being, or were likely to be, sold in the United States at LTFV.¹² The Commission determined on February 21, 1986 that an industry in the United States was materially injured, or threatened with material injury, by reason of imports from Turkey of CWP found to be subsidized by the government of Turkey and of imports from Thailand of CWP found to be sold at LTFV.¹³ On March 7, 1986, Commerce issued its countervailing duty order on CWP from Turkey with a net subsidy rate of 17.80 percent.¹⁴ On March 11, 1986, Commerce issued its antidumping duty order on CWP from Thailand with the final weighted average dumping margins ranging from 15.60 to 15.69 percent.¹⁵

⁸ 49 FR 19747, May 9, 1984.

⁹ 49 FR 19369, May 7, 1984.

¹⁰ Certain Welded Carbon Steel Pipes and Tubes from Turkey and Thailand, Inv. Nos. 701-TA-253 and 731-TA-252 (Final), USITC Publication 1810, February 1986 (“Original Thailand and Turkey publication”), p. A-2-A-3.

¹¹ 51 FR 1268, January 10, 1986.

¹² 51 FR 3384, January 27, 1986.

¹³ 51 FR 7342, March 3, 1986.

¹⁴ 51 FR 7984, March 7, 1986.

¹⁵ 51 FR 8341, March 11, 1986.

The original India and Turkey (AD) investigations

The original investigations with respect to CWP from India and Turkey result from petitions filed on July 16, 1985 with Commerce and the Commission by CPTI.¹⁶ On March 17, 1986, Commerce determined that CWP from India were being, or were likely to be, sold in the United States at LTFV.¹⁷ On April 17, 1986, Commerce determined that CWP from Turkey were being, or were likely to be, sold in the United States at LTFV.¹⁸ The Commission determined on April 30, 1986, that an industry in the United States was materially injured, or threatened with material injury, by reason of imports from India and Turkey of CWP found to be sold at LTFV.¹⁹ On May 12, 1986, Commerce issued its antidumping duty order on CWP from India with the final weighted average dumping margin of 7.08 percent.²⁰

The original Brazil, Mexico, South Korea, and Taiwan (larger diameter) investigations

The original investigations with respect to CWP from Brazil, Mexico, South Korea, and Taiwan resulted from petitions filed on September 24, 1991, with Commerce and the Commission by Allied Tube & Conduit Corp., Harvey, Illinois; American Tube Co., Phoenix, Arizona; Bull Moose Tube Co., Gerald, Missouri; Century Tube Corp., Pine Bluff, Arkansas; Sawhill Tubular Div., Cyclops Corp., Sharon, Pennsylvania; Laclede Steel Co., St. Louis, Missouri; Maruichi American Corp., Santa Fe Springs, California; Sharon Tube Co., Sharon, Pennsylvania; Western Tube & Conduit Corp., Long Beach, California; and Wheatland Tube Co., Collingswood, New Jersey.²¹ On September 17, 1992, Commerce determined imports of CWP from Brazil, Mexico, South Korea, and Taiwan were being, or were likely to be, sold in the United States at LTFV.²² The Commission determined on October 30, 1992, that an industry in the United States was materially injured by reason of imports from Brazil, Mexico, South Korea, and Taiwan of

¹⁶ 50 FR 32244, 50 FR 32245, August 9, 1985.

¹⁷ 51 FR 9089, March 17, 1986.

¹⁸ 51 FR 13044, April 17, 1986.

¹⁹ 51 FR 16908, May 7, 1986.

²⁰ 51 FR 17384, May 12, 1986. Gujarat Steel Tubes, Ltd. and Zenith Steel Pipes and Industries were excluded from the order.

²¹ Certain Circular, Welded, Non-Alloy Steel Pipes and Tubes from Brazil, the Republic of Korea, Mexico, Romania, Taiwan, and Venezuela, Inv. Nos. 731-TA-532-537 (Final), USITC Publication 2564, October 1992 (“Original Brazil, Mexico, South Korea, and Taiwan publication”), p. I-4.

²² 57 FR 42940, 57 FR 42942, 57 FR 42953, and 57 FR 42961, September 17, 1992.

CWP that have been found by Commerce to be sold in the United States at LTFV.²³ On November 2, 1992, Commerce issued its antidumping duty orders on CWP from Brazil, Mexico, South Korea, and Taiwan with the final weighted average dumping margins of 103.38 percent for Brazil, 32.62 percent for Mexico, from 4.91 to 11.63 percent for South Korea, and from 19.46 to 27.65 percent for Taiwan.²⁴

Subsequent five-year reviews

On August 5, 1999, the Commission determined that it would conduct full reviews of the antidumping and countervailing duty orders on CWP from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey.²⁵ ²⁶ On December 3, 1999, Commerce determined that revocation of the antidumping duty orders on CWP from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey would be likely to lead to continuation or recurrence of dumping.²⁷ On April 3, 2000, Commerce determined that revocation of the countervailing duty order on CWP from Turkey would be likely to lead to continuation or recurrence of a countervailable subsidy.²⁸ On August 1, 2000, the Commission determined that revocation of the orders would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.²⁹ Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective August 22, 2000, Commerce issued a continuation of the countervailing duty order on imports of CWP from Turkey and the antidumping duty orders on imports of CWP from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey.³⁰

²³ The Commission also determined that an industry in the United States was materially injured by reason of imports from Venezuela but was not materially injured by reason of imports from Romania. 57 FR 52638, November 4, 1992.

²⁴ 57 FR 49454 and 57 FR 49455, November 2, 1992.

²⁵ 64 FR 45276, August 19, 1999.

²⁶ The first reviews also included products such as light-walled rectangular (“LWR”) pipes and tubes and oil country tubular goods (casing and tubing and drill pipe). Among these other products, only the antidumping duty order on LWR pipe and tube from Taiwan remains in place, and it is no longer grouped with the CWP reviews.

²⁷ 64 FR 67852, 64 FR 67854, 64 FR 67873, 64 FR 67876, 64 FR 67879, December 3, 1999.

²⁸ 65 FR 17486, April 3, 2000.

²⁹ 65 FR 48733, August 9, 2000. The Commission also determined that revocation of the antidumping duty order on circular welded carbon steel pipe and tube from Venezuela would not be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. Commissioner Okun dissenting with respect to Mexico, Commissioner Askey dissenting with respect to India, Mexico, and Turkey, Commissioner Hillman dissenting with respect to Mexico, and Commissioner Bragg dissenting with respect to Venezuela.

³⁰ 65 FR 50955, 65 FR 50960, August 22, 2000.

On October 4, 2005, the Commission determined that it would conduct full reviews (second) of the antidumping and countervailing duty orders on CWP from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey.³¹ On October 28, 2005, Commerce determined that revocation of the countervailing duty order on CWP from Turkey would be likely to lead to continuation or recurrence of a countervailable subsidy.³² On November 8, 2005, Commerce determined that revocation of the antidumping duty orders on CWP from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey would likely lead to continuation or recurrence of dumping.³³ On July 18, 2006, the Commission determined that revocation of the orders would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.³⁴ Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective August 8, 2006, Commerce issued a continuation of the countervailing duty order on imports of CWP from Turkey and the antidumping duty orders on imports of CWP from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey.³⁵

On October 4, 2011, the Commission determined that it would conduct full reviews (third) of the antidumping and countervailing duty orders on CWP from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey.³⁶ On October 19, 2011, Commerce determined that revocation of the countervailing duty order on CWP from Turkey would be likely to lead to continuation or recurrence of a countervailable subsidy.³⁷ On October 28, 2011, Commerce determined that revocation of the antidumping duty orders on CWP from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey would be likely to lead to continuation or recurrence of dumping.³⁸ On June 29, 2012, the Commission determined that revocation of the orders would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.³⁹ Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective July 17, 2012, Commerce issued a continuation of the countervailing duty order on imports of CWP from Turkey and the antidumping duty orders on imports of CWP from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey.⁴⁰

³¹ 70 FR 60367, October 17, 2005.

³² 70 FR 62097, October 28, 2005.

³³ 70 FR 67662, November 8, 2005.

³⁴ 71 FR 42118, July 25, 2006.

³⁵ 71 FR 44996, August 8, 2006.

³⁶ 76 FR 65748, October 24, 2011.

³⁷ 76 FR 64900, October 19, 2011.

³⁸ 76 FR 66893, 76 FR 66899, October 28, 2011.

³⁹ 77 FR 39736, July 5, 2012.

⁴⁰ 77 FR 41967, July 17, 2012.

On September 5, 2017, the Commission determined that it would conduct expedited reviews (fourth) of the antidumping and countervailing duty orders on CWP from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey.⁴¹ On October 5, 2017, Commerce determined that revocation of the antidumping duty orders on CWP from India, Thailand, and Turkey would likely lead to a continuation or recurrence of dumping.⁴² On October 6, 2017, Commerce determined that revocation of the countervailing duty order on CWP from Turkey would likely lead to continuation or recurrence of a countervailable subsidy and revocation of the antidumping duty orders on CWP from Brazil, Mexico, South Korea, and Taiwan would be likely to lead to continuation or recurrence of dumping.⁴³ On January 19, 2018, the Commission determined that revocation of the orders would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.⁴⁴ Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective February 7, 2018, Commerce issued a continuation of the countervailing duty order on imports of CWP from Turkey and the antidumping duty orders on imports of CWP from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey.⁴⁵

Previous and related investigations

The Commission has conducted a number of previous import relief investigations on CWP or similar merchandise, as presented in table I-3.

⁴¹ 82 FR 49423, October 25, 2017.

⁴² 82 FR 46485, October 5, 2017.

⁴³ 82 FR 46761, 82 FR 46768, October 6, 2017.

⁴⁴ 83 FR 3366, January 24, 2018.

⁴⁵ 83 FR 5402, February 7, 2018.

Table I-3**CWP: Previous and related Commission proceedings and status of orders**

Date	Number	Country	Determination	Current status of order
1982	701-TA-165	Brazil	Terminated	N/A
1982	701-TA-166	France	Terminated	N/A
1982	701-TA-167	Italy	Negative (P)	N/A
1982	701-TA-168	Korea	Affirmative	Order revoked by Commerce - 1985
1982	701-TA-169	West Germany	Terminated	N/A
1983	731-TA-132	Taiwan	Affirmative	Order under review
1984	701-TA-220	Spain	Terminated	N/A
1984	731-TA-183	Brazil	Terminated	N/A
1984	731-TA-197	Brazil	Terminated	N/A
1984	731-TA-198	Spain	Terminated	N/A
1985	701-TA-242	Venezuela	Terminated	N/A
1985	701-TA-251	India	ITA Negative	N/A
1985	701-TA-252	Taiwan	ITA Negative	N/A
1985	701-TA-253	Turkey	Affirmative	Order under review
1985	731-TA-211	Taiwan	Negative	N/A
1985	731-TA-212	Venezuela	Terminated	N/A
1985	731-TA-252	Thailand	Affirmative	Order under review
1985	731-TA-253	Venezuela	Terminated	N/A
1985	731-TA-271	India	Affirmative	Order under review
1985	731-TA-273	Turkey	Affirmative	Order under review
1985	731-TA-274	Yugoslavia	Terminated	N/A
1986	731-TA-292	China	Negative	N/A
1986	731-TA-293	Philippines	Negative	N/A
1986	731-TA-294	Singapore	Negative	N/A
1991	701-TA-311	Brazil	ITA Negative	N/A
1991	731-TA-532	Brazil	Affirmative	Order under review
1991	731-TA-533	Korea	Affirmative	Order under review
1991	731-TA-534	Mexico	Affirmative	Order under review
1991	731-TA-535	Romania	Negative	N/A
1991	731-TA-536	Taiwan	Affirmative	Order under review
1991	731-TA-537	Venezuela	Affirmative	ITC negative, 2000 review
1995	731-TA-732	Romania	Negative	N/A
1995	731-TA-733	South Africa	Negative	N/A
2001	731-TA-943	China	Negative	N/A
2001	731-TA-944	Indonesia	Negative (P)	N/A
2001	731-TA-945	Malaysia	Negative (P)	N/A
2001	731-TA-946	Romania	Negative (P)	N/A
2001	731-TA-947	South Africa	Negative (P)	N/A

Continued.

Table I-3 Continued**CWP: Previous and related Commission proceedings and status of orders**

Date	Number	Country	Determination	Current status of order
2007	701-TA-447	China	Affirmative	Order in place
2007	731-TA-1116	China	Affirmative	Order in place
2011	701-TA-482	India	Negative	N/A
2011	701-TA-483	Oman	Negative	N/A
2011	701-TA-484	UAE	Negative	N/A
2011	701-TA-485	Vietnam	ITA Negative	N/A
2011	731-TA-1191	India	Negative	N/A
2011	731-TA-1192	Oman	Negative	N/A
2011	731-TA-1193	UAE	Negative	N/A
2011	731-TA-1194	Vietnam	Negative	N/A
2015	731-TA-1299	Oman	Affirmative	Order in place
2015	701-TA-549	Pakistan	Negative	N/A
2015	731-TA-1300	Pakistan	Affirmative	Order in place
2015	731-TA-1301	Philippines	Negative (P)	N/A
2015	731-TA-1302	UAE	Affirmative	Order in place
2015	731-TA-1303	Vietnam	Negative	N/A

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

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

Safeguard investigations

The Commission has conducted two global safeguard investigations concerning CWP and other steel products and one China-specific safeguard investigation concerning CWP since 1984. In 1984, the Commission conducted an investigation under section 201 of the Trade Act of 1974 regarding imports of a wide range of carbon and certain alloy steel products. The Commission made affirmative determinations with respect to five of the nine investigated products, and the Commission majority recommended various relief measures.⁴⁶ On September 18, 1984, President Reagan announced that he would not implement the remedies proposed by the Commission, however he recommended the negotiation of voluntary restraint agreements ("VRAs") with trading partners to address unfair surges in imports of steel products.⁴⁷ Between

⁴⁶ Carbon and Certain Alloy Steel Products, Inv. No. TA-201-51, USITC Publication 1553, July 1984.

⁴⁷ 49 FR 36813, September 20, 1984 (President's Memorandum).

October 1, 1984, and March 31, 1992, the United States limited imports into the U.S. market of non-alloy carbon steel products from the European Union and 19 other sources through VRAs.⁴⁸

In 2001, the Commission determined that certain carbon and alloy steel welded tubular products other than OCTG (including CWP as defined in the current proceeding) were being imported into the United States in such increased quantities as to be a substantial cause of serious injury, or threat thereof, to the domestic industry producing such articles, and recommended certain remedy measures to the President.⁴⁹ On March 5, 2002, the President announced the implementation of steel safeguard measures. Import relief relating to welded tubular products (other OCTG) consisted of an additional tariff for a period of three years and one day (15 percent ad valorem on imports in the first year, 12 percent in the second year, and 9 percent in the third year).⁵⁰ Following receipt of the Commission's mid-term monitoring report in September 2003, the President determined that the effectiveness of the action taken had been impaired by changed circumstances. Therefore, he terminated the U.S. measure with respect to increased tariffs on December 4, 2003.⁵¹

In 2005, the Commission conducted a China-specific safeguard investigation on circular welded nonalloy steel pipe (Inv. No. TA-421-6). Following the Commission's affirmative determination of market disruption and remedy recommendations, President Bush issued a proclamation on December 30, 2005, determining not to impose temporary import relief.⁵²

⁴⁸ Certain Circular, Welded, Non-Alloy Steel Pipes and Tubes from Brazil, the Republic of Korea, Mexico, Romania, Taiwan, and Venezuela, Inv. Nos. 731-TA-532-537 (Final), USITC Publication 2564, October 1992, p. I-47-48.

⁴⁹ Steel; Import Investigations, 66 FR 67304, December 28, 2001.

⁵⁰ Presidential Proclamation 7529 of March 5, 2002, To Facilitate Positive Adjustment to Competition from Imports of Certain Steel Products, 67 FR 10553, March 7, 2002. The President also instructed the Secretaries of Commerce and the Treasury to establish a system of import licensing to facilitate steel import monitoring.

⁵¹ Presidential Proclamation 7741 of December 4, 2003, To Provide for the Termination of Action Taken With Regard to Imports of Certain Steel Products, 68 FR 68483, December 8, 2003. Import licensing, however, remained in place through March 21, 2005, and continues in modified form at this time.

⁵² Presidential Proclamation 2006-7 of December 30, 2005, Presidential Determination on Imports of Circular Welded Non-Alloy Steel Pipe from the People's Republic of China, 71 FR 871, January 5, 2006.

Summary data

Table I-4 presents a summary of data from the terminal years of prior reviews and the current full five-year reviews.⁵³

Table I-4
CWP: Comparative data from 2005, 2011, 2016, and 2022

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

Item	Measure	2005	2011	2016	2022
Apparent consumption	Quantity	2,339,000	1,472,620	***	***
U.S. producers market share	Share of quantity	56.0	65.6	***	***
Brazil market share	Share of quantity	***	***	***	***
India subject market share	Share of quantity	***	***	***	***
Mexico market share	Share of quantity	***	***	***	***
South Korea market share	Share of quantity	1.3	3.3	6.0	***
Taiwan market share	Share of quantity	0.8	1.6	1.0	***
Thailand market share	Share of quantity	3.5	3.2	4.0	***
Turkey market share	Share of quantity	1.7	2.2	3.5	***
Subject sources market share	Share of quantity	***	***	***	***
Nonsubject sources market share	Share of quantity	***	***	***	***
All import sources market share	Share of quantity	44.0	34.4	53.8	***
Apparent consumption	Value	1,212,496	1,549,330	***	***
U.S. producers market share	Share of value	60.8	67.4	***	***
Brazil market share	Share of value	***	***	***	***
India subject market share	Share of value	***	***	***	***
Mexico market share	Share of value	***	***	***	***
South Korea market share	Share of value	1.2	3.3	4.3	***
Taiwan market share	Share of value	0.6	1.4	0.7	***
Thailand market share	Share of value	2.9	3.0	2.6	***
Turkey market share	Share of value	1.3	1.9	2.5	***
Subject sources market share	Share of value	***	***	***	***
Nonsubject sources market share	Share of value	***	***	***	***
All import sources market share	Share of value	39.2	32.6	55.0	***

Table continued.

⁵³ The original investigations and first reviews had a different allocation of subject countries and methodology for import data and therefore are not presented for direct comparison.

Table I-4 Continued
CWP: Comparative data from 2005, 2011, 2016, and 2022

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

Item	Measure	2005	2011	2016	2022
Brazil	Quantity	***	401	310	***
Brazil	Value	***	1,041	1,196	***
Brazil	Unit value	***	2,596	***	***
India, subject	Quantity	***	***	***	***
India, subject	Value	***	***	***	***
India, subject	Unit value	***	***	***	***
Mexico	Quantity	***	66,017	61,038	***
Mexico	Value	***	63,670	49,114	***
Mexico	Unit value	***	964	***	***
South Korea	Quantity	29,000	48,054	87,668	75,560
South Korea	Value	23,860	51,190	53,583	115,388
South Korea	Unit value	810	1,065	611	1,527
Taiwan	Quantity	19,000	22,966	14,487	814
Taiwan	Value	12,099	20,989	8,511	1,994
Taiwan	Unit value	628	914	587	2,450
Thailand	Quantity	81,000	47,696	58,348	37,299
Thailand	Value	58,397	46,507	32,953	57,035
Thailand	Unit value	723	975	565	1,529
Turkey	Quantity	39,000	31,723	50,293	115,583
Turkey	Value	26,711	30,124	31,231	173,955
Turkey	Unit value	685	950	621	1,505
Subject sources	Quantity	176,000	***	***	***
Subject sources	Value	129,786	***	***	***
Subject sources	Unit value	739	***	***	***
Nonsubject sources	Quantity	853,000	***	507,738	***
Nonsubject sources	Value	651,863	***	507,738	***
Nonsubject sources	Unit value	764	***	***	***
All import sources	Quantity	1,028,000	506,620	783,303	***
All import sources	Value	781,648	505,746	687,593	***
All import sources	Unit value	760	998	878	***

Table continued.

Table I-4 Continued
CWP: Comparative data from 2005, 2011, 2016, and 2022

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short tons; ratios in percent.

Item	Measure	2005	2011	2016	2022
U.S. producer capacity	Quantity	***	***	***	***
U.S. producer production	Quantity	***	***	***	***
Capacity utilization	Ratio	***	***	***	***
Producer U.S. shipments	Quantity	***	***	***	***
Producer U.S. shipments	Value	***	***	***	***
Producer U.S. shipments	Unit value	***	***	***	***
Producer inventories	Quantity	***	***	NA	***
Producer inventory ratio to total shipments	Ratio	***	***	NA	***
Production workers (number)	Noted in label	***	***	NA	***
Hours worked (in 1,000 hours)	Noted in label	***	***	NA	***
Wages paid (1,000 dollars)	Value	***	***	NA	***
Hourly wages (dollars per hour)	Value	***	***	NA	***
Productivity (short tons per 1,000 hours)	Noted in label	***	***	NA	***
Net sales	Quantity	1,348,000	1,016,000	NA	***
Net sales	Value	1,245,783	1,075,973	***	***
Net sales	Unit value	***	***	NA	***
Cost of goods sold	Value	1,063,038	950,989	***	***
Gross profit or (loss)	Value	182,745	124,984	***	***
SG&A expense	Value	73,528	93,915	***	***
Operating income or (loss)	Value	109,217	31,069	***	***
Unit COGS	Unit value	***	***	NA	***
Unit operating income	Unit value	***	***	NA	***
COGS/ Sales	Ratio	85.3	88.4	***	***
Operating income or (loss)/ Sales	Ratio	8.8	2.9	***	***

Source: Office of Investigations memorandum INV-DD-073 (May 30, 2006), memorandum INV-KK-084 (May 3, 2012), official U.S. import statistics, and compiled from data submitted in response to Commission questionnaires. For 2022, import data are compiled from data submitted in response to Commission questionnaires and from official U.S. imports statistics, adjusted using data submitted in response to Commission questionnaires to remove reported out-of-scope imports and using data compiled from proprietary, Census edited Customs records, accessed October 1, 2023, to remove out-of-scope imports and to allocate India subject vs. India nonsubject imports. Official import statistics for CWP imports from both subject and nonsubject sources may be overstated, even after adjustments, due to incomplete reporting. See Part IV for additional information.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Data for 2005 are from the last year of second reviews; 2011 the last year of the third reviews; 2016 the last year of the fourth reviews; and 2022 the last year of these fifth reviews. The original investigations and first reviews had a different allocation of subject countries and methodology for import data and therefore are not presented for direct comparison. Quantity data for 2005 and 2011 have been adjusted to present in short tons, and some data elements were not available ("NA") in 2016, as these were expedited reviews.

Table I-5 and figure I-1 present U.S. producers' U.S. shipments and U.S. imports from 2017 to 2022.

Table I-5
CWP: U.S. producers' U.S. shipments and U.S. imports, 2017-19

Quantity in short tons

Source	2017	2018	2019
U.S. producers	***	***	***
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	***	***	***

Table continued.

Table I-5 Continued
CWP: U.S. producers' U.S. shipments and U.S. imports, 2020-22

Quantity in short tons

Source	2020	2021	2022
U.S. producers	***	***	***
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	***	***	***

Source: Office of Investigations memorandum INV-X-160 (July 18, 2000), memorandum INV-DD-073 (May 30, 2006), memorandum INV-KK-084 (May 3, 2012), official U.S. import statistics, and compiled from data submitted in response to Commission questionnaires. For 2017-19, data presented are unadjusted official import statistics and are overstated compared to 2020-22 import data, which are adjusted using data submitted in response to Commission questionnaires and data compiled from proprietary, Census edited Customs records, accessed October 1, 2023, to remove reported out of scope imports and to allocate India subject vs. India nonsubject imports. Official import statistics for CWP imports from both subject and nonsubject sources may be overstated, even after adjustments, due to incomplete reporting. See Part IV for additional information.

Figure I-1

CWP: U.S. producers' U.S. shipments and U.S. imports, 2005, 2011, 2016, 2017-19, and 2020-22

* * * * *

Source: Office of Investigations memorandum INV-X-160 (July 18, 2000), memorandum INV-DD-073 (May 30, 2006), memorandum INV-KK-084 (May 3, 2012), official U.S. import statistics, and compiled from data submitted in response to Commission questionnaires. For 2017-19, data presented are unadjusted official import statistics and are overstated compared to 2020-22 import data, which are adjusted using data submitted in response to Commission questionnaires and data compiled from proprietary, Census edited Customs records, accessed October 1, 2023, to remove reported out of scope imports and to allocate India subject vs. India nonsubject imports. Official import statistics for CWP imports from both subject and nonsubject sources may be overstated, even after adjustments, due to incomplete reporting. See Part IV for additional information.

Note: Data for 2005 are from the last year of the second reviews; 2011 the last year of the third reviews; 2016 the last year of the fourth reviews; and 2022 the last year of these reviews, the fifth reviews. The original investigations and first reviews had a different allocation of subject countries and methodology for imports data and therefore are not presented for direct comparison.

Statutory criteria

Section 751(c) of the Act requires Commerce and the Commission to conduct a review no later than five years after the issuance of an antidumping or countervailing duty order or the suspension of an investigation to determine whether revocation of the order or termination of the suspended investigation “would be likely to lead to continuation or recurrence of dumping or a countervailable subsidy (as the case may be) and of material injury.”

Section 752(a) of the Act provides that in making its determination of likelihood of continuation or recurrence of material injury--

(1) IN GENERAL.-- . . . the Commission shall determine whether revocation of an order, or termination of a suspended investigation, would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time. The Commission shall consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated. The Commission shall take into account--

(A) its prior injury determinations, including the volume, price effect, and impact of imports of the subject merchandise on the industry before the order was issued or the suspension agreement was accepted,

(B) whether any improvement in the state of the industry is related to the order or the suspension agreement,

(C) whether the industry is vulnerable to material injury if the order is revoked or the suspension agreement is terminated, and

(D) in an antidumping proceeding . . . , (Commerce’s findings) regarding duty absorption . . .

(2) VOLUME.--In evaluating the likely volume of imports of the subject merchandise if the order is revoked or the suspended investigation is terminated, the Commission shall consider whether the likely volume of imports of the subject merchandise would be significant if the order is revoked or the suspended investigation is terminated, either in absolute terms or relative to production or consumption in the United States. In so doing, the Commission shall consider all relevant economic factors, including--

(A) any likely increase in production capacity or existing unused production capacity in the exporting country,

(B) existing inventories of the subject merchandise, or likely increases in inventories,

(C) the existence of barriers to the importation of such merchandise into countries other than the United States, and

(D) 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.

(3) PRICE.--In evaluating the likely price effects of imports of the subject merchandise if the order is revoked or the suspended investigation is terminated, the Commission shall consider whether--

(A) there is likely to be significant price underselling by imports of the subject merchandise as compared to domestic like products, and

(B) imports of the subject merchandise are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of domestic like products.

(4) IMPACT ON THE INDUSTRY.--In evaluating the likely impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated, the Commission shall consider all relevant economic factors which are likely to have a bearing on the state of the industry in the United States, including, but not limited to--

(A) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity,

(B) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, and

(C) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.

The Commission shall evaluate all such relevant economic factors . . . within the context of the business cycle and the conditions of competition that are distinctive to the affected industry.

Section 752(a)(6) of the Act states further that in making its determination, “the Commission may consider the magnitude of the margin of dumping or the magnitude of the net countervailable subsidy. If a countervailable subsidy is involved, the Commission shall consider information regarding the nature of the countervailable subsidy and whether the subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement.”

Organization of report

Information obtained during the course of the reviews that relates to the statutory criteria is presented throughout this report. A summary of trade and financial data for CWP as collected in the original investigations, prior reviews, and the current full five-year reviews is presented in appendix C. U.S. industry data are based on the questionnaire responses of five U.S. producers of CWP that are believed to have accounted for approximately *** percent of domestic production of CWP in 2022.⁵⁴ ⁵⁵ U.S. import data and related information are based on Commerce’s official import statistics, adjusted using data compiled from proprietary, Census edited Customs records, accessed October 1, 2023, and the questionnaire responses of eleven U.S. importers of CWP that are believed to have accounted for *** percent of adjusted subject imports and *** percent of total adjusted imports of merchandise under HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, which includes out-of-scope merchandise.⁵⁶ Foreign industry data and related information are based on the questionnaire responses of two producers of CWP in Mexico and one producer of CWP in Turkey.⁵⁷ Responses by U.S. producers, importers, purchasers, and foreign producers of CWP to a series of questions concerning the significance of the existing antidumping and countervailing duty orders and the likely effects of revocation of such orders are presented in appendix D.

⁵⁴ The coverage figure is based on the responding firms’ estimated share of total U.S. production of CWP during 2022. See Part III for additional information.

⁵⁵ Unless otherwise specified, the “interim” periods discussed throughout this report refer to January-June 2022 and January-June 2023.

⁵⁶ See Part IV for additional information on the coverage of these responses and on the representativeness of CWP within the above-listed HTS numbers.

⁵⁷ See the sections titled “The industry in Mexico” and “The industry in Turkey” in Part IV for additional information on the coverage of these responses.

Commerce's reviews

Administrative reviews⁵⁸

Brazil

Since the completion of the prior five-year reviews, Commerce has not conducted any administrative reviews, changed circumstances reviews, or scope rulings, nor issued any duty absorption findings, company revocations, or anti-circumvention findings with respect to imports of CWP from Brazil.

India

As shown below in table I-6, Commerce has completed two administrative reviews on CWP from India since the completion of the fourth five-year reviews. During this period, Commerce has not issued any duty absorption findings with respect to imports of CWP from India. On March 1, 2023, Commerce determined that imports of CWP completed in Oman and the United Arab Emirates from hot-rolled steel produced in India are not circumventing the antidumping duty order on CWP from India.⁵⁹ On November 9, 2023, Commerce determined that imports of certain welded carbon steel standard pipes and tubes (pipe and tube) completed in Vietnam using hot-rolled steel produced in India are circumventing the antidumping duty order on pipe and tube from India.⁶⁰

Table I-6
CWP: Administrative reviews of the antidumping duty order for India

Date results published	Period of review	Producer or exporter	Margin (percent)
January 16, 2020, 85 FR 2715; as amended November 1, 2022, 87 FR 65749	05/01/17-04/30/18	Garg Tube Export LLP and Garg Tube Limited	0.00
March 19, 2021, 86 FR 14873	05/01/18-04/30/19	Garg Tube Export LLP and Garg Tube Limited	13.90

Source: Cited Federal Register notices.

⁵⁸ For previously reviewed or investigated companies not included in an administrative review, the cash deposit rate continues to be the company-specific rate published for the most recent period.

⁵⁹ 88 FR 12917, March 1, 2023.

⁶⁰ 88 FR 77279, November 9, 2023.

Mexico

As shown below in table I-7, Commerce has completed one administrative review for which it assigned dumping margins on CWP from Mexico since the completion of the fourth five-year reviews. During this period, Commerce has not issued any duty absorption findings with respect to imports of CWP from Mexico.

Table I-7
CWP: Administrative reviews of the antidumping duty order for Mexico

Date results published	Period of review	Producer or exporter	Margin (percent)
May 23, 2018, 83 FR 23887	11/01/15-10/31/16	Maquilacero, S.A. de C.V.	48.33
May 23, 2018, 83 FR 23887	11/01/15-10/31/16	Productos Laminados de Monterrey, S.A. de C.V.	0.00
May 23, 2018, 83 FR 23887	11/01/15-10/31/16	Abastecedora y Perfiles y Tubos, S.A. de C.V.	24.17
May 23, 2018, 83 FR 23887	11/01/15-10/31/16	Conduit, S.A. de C.V.	24.17
May 23, 2018, 83 FR 23887	11/01/15-10/31/16	Ternium Mexico, S.A. de C.V.	24.17
April 13, 2020, 85 FR 20473	11/01/17-10/31/18	See note	See note

Source: Cited Federal Register notices.

Note: In the most recently completed administrative review, Commerce determined that Conduit, Mueller, Regiomontana de Perfiles y Tubos, S.A. de C.V./PYTCO, S.A. de C.V. made no shipments of subject merchandise during the period of review. 85 FR 20473, April 13, 2020.

South Korea

As shown below in table I-8, Commerce has completed five administrative reviews on CWP from South Korea since the completion of the fourth five-year reviews. During this period, Commerce has not issued any duty absorption findings with respect to imports of CWP from South Korea. On November 9, 2023, Commerce preliminarily determined that imports of CWP completed in Vietnam using hot-rolled steel produced in South Korea are circumventing the antidumping duty order on CWP from South Korea.⁶¹

⁶¹ 88 FR 77270, November 9, 2023.

Table I-8**CWP: Administrative reviews of the antidumping duty order for South Korea**

Date results published	Period of review	Producer or exporter	Margin (percent)
June 12, 2017, 82 FR 26910	11/01/14-10/31/15	Husteel Co., Ltd	1.20
June 12, 2017, 82 FR 26910	11/01/14-10/31/15	AJU Besteel	1.20
June 12, 2017, 82 FR 26910	11/01/14-10/31/15	NEXTEEL	1.20
June 12, 2017, 82 FR 26910	11/01/14-10/31/15	SeAH Steel Corporation	1.20
June 13, 2018, 83 FR 27542	11/01/15-10/31/16	AJU Besteel	19.28
June 13, 2018, 83 FR 27542	11/01/15-10/31/16	Husteel Co., Ltd	7.71
June 13, 2018, 83 FR 27542; amended August 31, 2022 in 87 FR 53458	11/01/15-10/31/16	Hyundai Steel Company	12.92
June 13, 2018, 83 FR 27542	11/01/15-10/31/16	NEXTEEL	19.28
June 13, 2018, 83 FR 27542; amended August 31, 2022 in 87 FR 53458	11/01/15-10/31/16	SeAH Steel Corporation	9.77
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	AJU Besteel	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Bookook Steel	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Chang Won Bending	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Dae Ryung	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Daewoo Shipbuilding & Marine Division (Dsme)	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Daiduck Piping	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Dong Yang Steel Pipe	9.53

Table continued.

Table I-8 Continued.

CWP: Administrative reviews of the antidumping duty order for South Korea

Date results published	Period of review	Producer or exporter	Margin (percent)
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Dongbu Steel	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Eew Korea Company	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Histeel	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Husteel	10.90
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Hyundai Rb	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Hyundai Steel (Pipe Division)	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Hyundai Steel Company	8.14
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Kiduck Industries	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Kum Kang Kind	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Kumsoo Connecting	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Miju Steel Mfg	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Nexteel	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Samkang M&T	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Seah Fs	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Seah Steel	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Steel Flower	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Vesta Co., Ltd.	9.53
June 6, 2019, 84 FR 26402	11/01/16-10/31/17	Ycp Co.	9.53
September 28, 2021, 86 FR 53632	11/01/18-10/31/19	Husteel	0.00
September 28, 2021, 86 FR 53632	11/01/18-10/31/19	Hyundai Steel Company	0.00
September 28, 2021, 86 FR 53632	11/01/18-10/31/19	Non-selected companies	0.00
May 4, 2022, 87 FR 26344	11/01/19-10/31/20	Husteel	4.07
May 4, 2022, 87 FR 26344	11/01/19-10/31/20	Hyundai Steel Company	1.97
May 4, 2022, 87 FR 26344	11/01/19-10/31/20	Non-selected companies	3.21
June 9, 2023, 88 FR 37852	11/01/20-10/31/21	Husteel	12.87
June 9, 2023, 88 FR 37852	11/01/20-10/31/21	NEXTEEL Co., Ltd.	0.00
June 9, 2023, 88 FR 37852	11/01/20-10/31/21	Non-selected companies	12.87

Source: Cited Federal Register notices.

Note: The non-selected companies in the 2018-2019 and 2019-2020 administrative reviews were Aju Besteel, Bookook Steel, Chang Won Bending, Dae Ryung, Daewoo Shipbuilding & Marine Engineering (Dsme), Daiduck Piping, Dong Yang Steel Pipe, Dongbu Steel, Eew Korea Company, Hyundai Rb, Kiduck Industries, Kum Kang Kind, Kumsoo Connecting, Miju Steel Mfg., Nexteel Co., Ltd., Samkang M&T, Seah Fs, Seah Steel, Steel Flower, Vesta Co., Ltd., and Ycp Co.

Note: The non-selected companies in the 2020-2021 administrative review were Aju Besteel, Bookook Steel, Chang Won Bending, Dae Ryung, Daewoo Shipbuilding & Marine Engineering (Dsme), Daiduck Piping, Dong Yang Steel Pipe, Dongbu Steel, Eew Korea Company, Histeel, Hyundai Rb, Kiduck Industries, Kum Kang Kind, Kumsoo Connecting, Miju Steel Mfg., Nexteel Co., Ltd., Samkang M&T, Seah Fs, Seah Steel, Steel Flower, Vesta Co., Ltd., and Ycp Co.

Taiwan

As shown below in table I-9, Commerce has completed two administrative reviews on CWP from Taiwan for which dumping margins were assessed since the completion of the fourth five-year reviews. During this period, Commerce has not issued any duty absorption findings with respect to imports of CWP from Taiwan. On August 9, 2023 Commerce determined that CWP imported into the United States during the period of inquiry, January 1, 2017, through December 31, 2021, were not completed in Vietnam using hot-rolled steel manufactured in Taiwan, and, therefore, no such imports are circumventing the antidumping duty orders on CWP from Taiwan.⁶²

Table I-9
CWP: Administrative reviews of the antidumping duty order for Taiwan

Date results published	Inv. No.	Period of review	Producer or exporter	Margin (percent)
October 16, 2018, 83 FR 52204	731-TA-132	05/01/16-04/30/17	Shin Yang Steel Co., Ltd	7.47
April 13, 2020, 85 FR 20470	731-TA-536	11/01/2017-10/30/2017	See note	See note
January 21, 2021, 86 FR 6302	731-TA-132	05/01/18-04/30/19	Shin Yang Steel Co., Ltd	1.71

Source: Cited Federal Register notices.

Note: In the 2017 administrative review of Certain Circular Welded Non-Alloy Steel Pipe from Taiwan (Inv. No. 731-TA-536), Commerce determined that Founder Land, Shin Yang, Tension Steel, Yieh Hsing, and Yieh Phui had no shipments of subject merchandise to the United States during the period of review.

Thailand

As shown below in table I-10, Commerce has completed five administrative reviews on CWP from Thailand since the completion of the fourth five-year reviews. During this period, Commerce has not issued any duty absorption findings with respect to imports of CWP from Thailand.

⁶² 88 FR 53864, August 9, 2023.

Table I-10**CWP: Administrative reviews of the antidumping duty order for Thailand**

Date results published	Period of review	Producer or exporter	Margin (percent)
October 15, 2018, 83 FR 51927	03/01/16-02/28/17	Thai Premium Pipe Company Ltd	30.98
November 20, 2019, 84 FR 64041	03/01/17-02/28/18	Saha Thai Steel Pipe (Public) Company, Ltd	5.15
November 20, 2019, 84 FR 64041	03/01/17-02/28/18	Apex International Logistics	5.15
November 20, 2019, 84 FR 64041	03/01/17-02/28/18	Aquatec Maxcon Asia	5.15
November 20, 2019, 84 FR 64041	03/01/17-02/28/18	Asian Unity Part Co., Ltd	5.15
November 20, 2019, 84 FR 64041	03/01/17-02/28/18	CSE Technologies Co., Ltd.	5.15

Table continued.

Table I-10 Continued
CWP: Administrative reviews of the antidumping duty order for Thailand

Date results published	Period of review	Producer or exporter	Margin (percent)
November 20, 2019, 84 FR 64041	03/01/17-02/28/18	Pacific Pipe Public Company Limited (also known as Pacific Pipe Company)	5.15
November 20, 2019, 84 FR 64041	03/01/17-02/28/18	Pacific Pipe and Pump	5.15
November 20, 2019, 84 FR 64041	03/01/17-02/28/18	Polypipe Engineering Co., Ltd	5.15
November 20, 2019, 84 FR 64041	03/01/17-02/28/18	Siam Fittings Co., Ltd	5.15
November 20, 2019, 84 FR 64041	03/01/17-02/28/18	Siam Steel Pipe Co., Ltd	5.15
November 20, 2019, 84 FR 64041	03/01/17-02/28/18	Thai Malleable Iron and Steel	5.15
November 20, 2019, 84 FR 64041	03/01/17-02/28/18	Thai Premium Pipe Company Ltd	5.15
November 20, 2019, 84 FR 64041	03/01/17-02/28/18	Vatana Phaisal Engineering Company	5.15
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Saha Thai Steel Pipe (Public) Company, Ltd	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Apex International Logistics	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Aquatec Maxcon Asia	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Asian Unity Part Co., Ltd	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Bis Pipe Fitting Industry Co., Ltd	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Blue Pipe Steel Center	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Blue Pipe Steel Center Co., Ltd.	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Chuhatsu (Thailand) Co., Ltd	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	CSE Technologies Co., Ltd.	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Expeditors International (Bangkok)	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	FS International (Thailand) Co., Ltd.	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Kerry-Apex (Thailand) Co., Ltd.	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Oil Steel Tube (Thailand) Co., Ltd.	37.55

Table continued.

Table I-10 Continued
CWP: Administrative reviews of the antidumping duty order for Thailand

Date results published	Period of review	Producer or exporter	Margin (percent)
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Otto Ender Steel Structure Co., Ltd.	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Pacific Pipe and Pump	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Pacific Pipe Public Company Limited (also known as Pacific Pipe Company)	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Panalpina World Transport Ltd.	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Polypipe Engineering Co., Ltd.	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Schlumberger Overseas S.A.	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Siam Fittings Co., Ltd	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Siam Steel Pipe Co., Ltd	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Sino Connections Logistics (Thailand) Co., Ltd.	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Thai Malleable Iron and Steel	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Thai Oil Group	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Thai Oil Pipe Co., Ltd.	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Thai Premium Pipe Company Ltd.	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Vatana Phaisal Engineering Company	37.55
January 27, 2021, 86 FR 7259	03/01/18-02/28/19	Visavakit Patana Corp., Ltd.	37.55
December 8, 2021, 86 FR 69621	03/01/19-02/28/20	Saha Thai Steel Pipe Public Company, Ltd.	36.97
December 8, 2021, 86 FR 69621	03/01/19-02/28/20	Non-selected companies	36.97
October 6, 2022, 87 FR 60656	03/01/20-02/28/21	Saha Thai Steel Pipe Public Co., Ltd.	0.00
October 6, 2022, 87 FR 60656	03/01/20-02/28/21	Non-selected companies	0.00
June 9, 2023, 88 FR 37855	03/01/21-02/28/22	Thai Premium Pipe Company Ltd.	0.71

Source: Cited Federal Register notices.

Note: The non-selected companies in the 2019-2020 administrative review were Apex International Logistics, Aquatec Maxcon Asia, Asian Unity Part Co., Ltd, Bis Pipe Fitting Industry Co., Ltd, Chuhatsu (Thailand) Co., Ltd, CSE Technologies Co., Ltd, Expeditors International (Bangkok), Expeditors Ltd, FS International (Thailand) Co., Ltd, Kerry-Apex (Thailand) Co., Ltd, Oil Steel Tube (Thailand) Co., Ltd, Otto Ender Steel Structure Co., Ltd, Pacific Pipe and Pump, Pacific Pipe Public Company Limited, Panalpina World Transport Ltd, Polypipe Engineering Co., Ltd, Schlumberger Overseas S.A, Siam Fittings Co., Ltd, Siam Steel Pipe Co., Ltd, Sino Connections Logistics (Thailand) Co., Ltd, Thai Malleable Iron and Steel, Thai Oil Group, Thai Oil Pipe Co., Ltd, Thai Premium Pipe Co., Ltd, Vatana Phaisal Engineering Company, and Visavakit Patana Corp., Ltd.

Note: The non-selected companies in the 2020-2021 administrative review were Apex International Logistics, Aquatec Maxcon Asia, Asian Unity Part Co., Ltd., Better Steel Pipe Company Limited., Bis Pipe Fitting Industry Co., Ltd., Blue Pipe Steel Center Co. Ltd., Chuhatsu (Thailand) Co., Ltd., CSE Technologies Co., Ltd., Expeditors International (Bangkok), Expeditors Ltd., FS International (Thailand) Co., Ltd., Kerry-Apex (Thailand) Co., Ltd., Oil Steel Tube (Thailand) Co., Ltd., Otto Ender Steel Structure Co., Ltd., Pacific Pipe and Pump, Pacific Pipe Public Company Limited, Panalpina World Transport Ltd., Polypipe Engineering Co., Ltd., Schlumberger Overseas S.A., Siam Fittings Co., Ltd., Siam Steel Pipe Co., Ltd., Sino Connections Logistics (Thailand) Co., Ltd., Thai Malleable Iron and Steel, Thai Oil Group, Thai Oil Pipe Co., Ltd., Thai Premium Pipe Co., Ltd., Vatana Phaisal Engineering Company, and Visavakit Patana Corp., Ltd.

Turkey

As shown below in table I-11, Commerce has completed six administrative reviews on the antidumping duty order CWP from Turkey since the completion of the fourth five-year reviews. During this period, Commerce has not issued any duty absorption findings with respect to imports of CWP from Turkey.

Table I-11
CWP: Administrative reviews of the antidumping duty order for Turkey

Date results published	Period of review	Producer or exporter	Margin (percent)
October 24, 2017, 82 FR 49179	05/01/15-04/30/16	Borusan Mannesmann Boru Sanayi ve Ticaret A.S./Borusan Istikbal Ticaret T.A.S	1.55
October 24, 2017, 82 FR 49179	05/01/15-04/30/16	Toscelik Profil ve Sac Endustrisi A.S./Tosyali Dis Ticaret A.S./Toscelik Metal Ticaret A.S.	0.00
October 24, 2017, 82 FR 49179	05/01/15-04/30/16	Yucel Boru ve Profil Endustrisi A.S	1.55
October 24, 2017, 82 FR 49179	05/01/15-04/30/16	Yucelboru Ihracat Ithalat ve Pazarlama A.S	1.55
October 24, 2017, 82 FR 49179	05/01/15-04/30/16	Cayirova Boru Sanayi ve Ticaret A.S	1.55
December 7, 2018, 83 FR 63155	05/01/16-04/30/17	Borusan Mannesmann Boru Sanayi ve Ticaret A.S./Borusan Istikbal Ticaret T.A.S	2.55
December 7, 2018, 83 FR 63155	05/01/16-04/30/17	Toscelik Profil ve Sac Endustrisi A.S./Tosyali Dis Ticaret A.S./Toscelik Metal Ticaret A.S.	0.00
December 7, 2018, 83 FR 63155	05/01/16-04/30/17	Cayirova Boru Sanayi ve Ticaret A.S	2.55
December 7, 2018, 83 FR 63155	05/01/16-04/30/17	Yucel Boru ve Profil Endustrisi A.S	2.55

Table continued.

Table I-11 Continued**CWP: Administrative reviews of the antidumping duty order for Turkey**

Date results published	Period of review	Producer or exporter	Margin (percent)
December 7, 2018, 83 FR 63155	05/01/16-04/30/17	Yucelboru Ihracat Ithalat ve Pazarlama A.S	2.55
January 22, 2020, 85 FR 3616, amended March 5, 2020 in 85 FR 12893	05/01/17-04/30/18	Borusan Mannesmann Boru Sanayi ve Ticaret A.S./Borusan Istikbal Ticaret T.A.S	8.48
January 22, 2020, 85 FR 3616	05/01/17-04/30/18	Toscelik Profil ve Sac Endustrisi A.S./Tosyali Dis Ticaret A.S./Toscelik Metal Ticaret A.S.	0.00
January 22, 2020, 85 FR 3616	05/01/17-04/30/18	Kale Baglanti Teknolojileri San. ve Tic	9.99
January 22, 2020, 85 FR 3616	05/01/17-04/30/18	Noksel Selik Boru Sanayi A.S	9.99
January 22, 2020, 85 FR 3616	05/01/17-04/30/18	Cinar Boru Profil San. ve Tic. As	9.99
March 22, 2021, 86 FR 15190	05/01/18-04/30/19	Borusan Mannesmann Boru Sanayi ve Ticaret A.S./Borusan Istikbal Ticaret T.A.S	12.03
March 22, 2021, 86 FR 15190	05/01/18-04/30/19	Non-examined companies	12.03
February 16, 2022, 87 FR 8786	05/01/19-04/30/20	Borusan Mannesmann Boru Sanayi ve Ticaret A.S./Borusan Istikbal Ticaret T.A.S	5.80
February 16, 2022, 87 FR 8786	05/01/19-04/30/20	Non-examined companies	5.80
December 9, 2022, 87 FR 75596; amended January 17, 2023 in 88 FR 2607	05/01/20-04/30/21	Borusan Mannesmann Boru Sanayi ve Ticaret A.S./Borusan Istikbal Ticaret T.A.S	12.80
December 9, 2022, 87 FR 75596; amended January 17, 2023 in 88 FR 2607	05/01/20-04/30/21	Non-examined companies	12.80

Source: Cited Federal Register notices.

Note: The non-selected companies in the 2018-2019 administrative review were Borusan Birlesik; Borusan Gemlik; BMBYH; Borusan Ihracat; Borusan Ithicat; BMYH; Tubeco; Erbosan; Kale Baglanti; Kale Baglann; and Istikbal Ticaret

Note: The non-selected companies in the 2019-2020 and 2020-2021 administrative reviews were Borusan Holding, Borusan Mannesmann Yatirim Holding; Kale Baglanti Teknolojileri San. ve Tic. A.S.; Kale Baglann Teknolojileri San. Ve Tic. A.S.; Noksel Celik Boru Sanayi A.S.

As shown below in table I-12, Commerce has completed four administrative reviews on the countervailing duty order CWP from Turkey since the completion of the fourth five-year reviews.

Table I-12
CWP: Administrative reviews of the antidumping duty order for Turkey

Date results published	Period of review	Producer or exporter	Margin (percent)
October 12, 2017, 82 FR 47479	01/01/2015- 12/31/2015	Borusan Group, Borusan Holding, A.S. (Borusan Holding), Borusan Mannesmann Boru Sanayi ve Ticaret A.S. (Borusan), Borusan Istikbal Ticaret T.A.S. (Istikbal), (collectively, the Borusan Companies)	0.49 (De minimis)
October 12, 2017, 82 FR 47479	01/01/2015- 12/31/2015	Toscelik Profil ve Sac Endustrisi A.S. (Toscelik Profil), Toscelik Metal Ticaret AS., and Tosyali Dis Ticaret AS. (Tosyali) (collectively, the Toscelik Companies)	6.64
October 12, 2017, 82 FR 47479	01/01/2015- 12/31/2015	Guyen Steel Pipe (also known as Guven Celik Born San. Ve Tic. Ltd.) (Guyen)	6.64
October 12, 2017, 82 FR 47479	01/01/2015- 12/31/2015	Umran Celik Born Sanayii A.S. (also known as Umran Steel Pipe Inc.) (Umran)	6.64
October 12, 2017, 82 FR 47479	01/01/2015- 12/31/2015	Erbosan Erciyas Boru Sanayi ve Ticaret A.S. (Erbosan)	6.64
October 12, 2017, 82 FR 47479	01/01/2015- 12/31/2015	Yucel Boru ye Profil Endustrisi A.S., Yucelboru Ihracat lthalat ye Pazarlama A.S. and Cayirova Boru Sanayi ye Ticaret A.S. (collectively, the Yucel Companies)	6.64
October 21, 2019, 84 FR 56173	01/01/2017- 12/31/2017	Borusan Group, Borusan Holding, A.S. (Borusan Holding), Borusan Mannesmann Boru Sanayi ve Ticaret A.S. (Borusan), Borusan Istikbal Ticaret T.A.S. (Istikbal), (collectively, the Borusan Companies)	0.82
October 21, 2019, 84 FR 56173	01/01/2017- 12/31/2017	Toscelik Profil ve Sac Endustrisi A.S. (Toscelik Profil), Toscelik Metal Ticaret AS., and Tosyali Dis Ticaret AS. (Tosyali) (collectively, the Toscelik Companies)	1.53
October 21, 2019, 84 FR 56173	01/01/2017- 12/31/2017	Cagil Makina Sanayi ve Ticaret A.S	1.18
October 21, 2019, 84 FR 56173	01/01/2017- 12/31/2017	Cayirova Boru Sanayi ve Ticaret A.S	1.18
October 21, 2019, 84 FR 56173	01/01/2017- 12/31/2017	Cimtas Boru Imalatlari ve Ticaret Sirketi	1.18
October 21, 2019, 84 FR 56173	01/01/2017- 12/31/2017	Eksen Makina	1.18
October 21, 2019, 84 FR 56173	01/01/2017- 12/31/2017	Guner Eksport	1.18
October 21, 2019, 84 FR 56173	01/01/2017- 12/31/2017	Guyen Steel Pipe (also known as Guven Celik Born San. Ve Tic. Ltd.)	1.18

Table continued.

Table I-12 Continued

CWP: Administrative reviews of the antidumping duty order for Turkey

Date results published	Period of review	Producer or exporter	Margin (percent)
October 21, 2019, 84 FR 56173	01/01/2017-12/31/2017	MTS Lojistik ve Tasimacilik Hizmetleri TIC A.S. Istanbul	1.18
October 21, 2019, 84 FR 56173	01/01/2017-12/31/2017	Net Boru Sanayi ve Dis Ticaret Koll. Sti	1.18
October 21, 2019, 84 FR 56173	01/01/2017-12/31/2017	Tosçelik Metal Ticaret A.S	1.18
October 21, 2019, 84 FR 56173	01/01/2017-12/31/2017	Umran Celik Born Sanayii A.S., also known as Umran Steel Pipe Inc	1.18
October 21, 2019, 84 FR 56173	01/01/2017-12/31/2017	Yucel Boru ve Profil Endustrisi A.S	1.18
October 21, 2019, 84 FR 56173	01/01/2017-12/31/2017	Yucelboru Ihracat Ithalat ve Pazarlama A.S	1.18
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	Borusan Group, Borusan Holding, A.S. (Borusan Holding), Borusan Mannesmann Boru Sanayi ve Ticaret A.S. (Borusan), Borusan Istikbal Ticaret T.A.S. (Istikbal), (collectively, the Borusan Companies)	0.37 (De minimis)
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	Borusan Ithicat ve Dagitim A.S	0.37 (De minimis)
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	Borusan Mannesmann	0.37 (De minimis)
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	Borusan Mannesmann Pipe US, Inc	0.37 (De minimis)
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	Çagil Makina Sanayi ve Ticaret A.S	0.37 (De minimis)
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	Eksen Makina	0.37 (De minimis)
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	Erbosan Erciyas Boru Sanayi ve Ticaret A.S.	0.37 (De minimis)
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	Guner Eksport	0.37 (De minimis)
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	Guyen Steel Pipe (also known as Guyen Celik Born San. Ve Tic. Ltd.)	0.37 (De minimis)
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	Kalibre Boru Sanayi ve Ticaret AS	0.37 (De minimis)
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	MTS Lojistik ve Tasimacilik Hizmetleri TIC A.S. Istanbul	0.37 (De minimis)
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	Net Boru Sanayi ve Dis Ticaret Koll. Sti	0.37 (De minimis)
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	Noksel Celik Boru Sanayi AS	0.37 (De minimis)
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	Perfektup Ambalaj San. ve Tic. A.S	0.37 (De minimis)
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	Schenker Arkas Nakliyat ve Ticaret A.S	0.37 (De minimis)
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	Umran Celik Born Sanayii A.S., also known as Umran Steel Pipe Inc	0.37 (De minimis)
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	Vespro Muhendislik Mimarlik Danismanlik Sanayi ve Ticaret AS	0.37 (De minimis)

Table continued.

Table I-12 Continued

CWP: Administrative reviews of the antidumping duty order for Turkey

Date results published	Period of review	Producer or exporter	Margin (percent)
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	Yucel Boru ve Profil Endustrisi A.S	0.37 (De minimis)
April 3, 2020, 85 FR 18917	01/01/2018-12/31/2018	Yucelboru Ihracat Ithalat ve Pazarlama A.S	0.37 (De minimis)
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	Borusan Group, Borusan Holding, A.S. (Borusan Holding), Borusan Mannesmann Boru Sanayi ve Ticaret A.S. (Borusan), Borusan Istikbal Ticaret T.A.S. (Istikbal), (collectively, the Borusan Companies)	0.83
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	Borusan Ithicat ve Dagitim A.S	0.83
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	Caçil Makina Sanayi ve Ticaret A.S	0.83
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	Cimtas Boru Imalatlari ve Ticaret Sirketi	0.83
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	Eksen Makina	0.83
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	Erbosan Erciyas Boru Sanayi ve Ticaret A.S.	0.83
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	Guner Eksport	0.83
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	Güven Steel Pipe (also known as Güven Çelik Born San. Ve Tic. Ltd.)	0.83
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	HDM Çelik Boru Sanayi ve Ticaret Ltd. Sti	0.83
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	Kale Bağlantı Teknolojileri San ve Tic. A.S	0.83
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	Kalibre Boru Sanayi ve Ticaret AS	0.83
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	MTS Lojistik ve Tasimacilik Hizmetleri TIC A.S. Istanbul	0.83
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	Net Boru Sanayi ve Dis Ticaret Koll. Sti	0.83
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	Noksel Çelik Boru Sanayi AS	0.83
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	Perfektup Ambalaj San. ve Tic. A.S	0.83
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	Schenker Arkas Nakliyat ve Ticaret A.S	0.83
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	Umran Çelik Born Sanayii A.S., also known as Umran Steel Pipe Inc	0.83
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	Vespro Muhendislik Mimarlik Danismanlik Sanayi ve Ticaret AS	0.83
November 29, 2021, 86 FR 67681	01/01/2019-12/31/2019	Kalibre Boru Sanayi ve Ticaret AS	0.83

Source: Cited Federal Register notices.

Changed circumstances reviews

Commerce has not conducted any changed circumstances reviews with respect to CWP from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey since the completion of the prior five-year reviews.

Scope rulings

Commerce has conducted five scope rulings with respect to tubular products from countries subject to these reviews since the completion of the prior five-year reviews.

On June 18, 2018, pursuant to a request from Maquilacero, S.A. de C.V., Commerce found that the 176 types of non-galvanized tubing produced to ASTM A-513 specifications produced and imported by Maquilacero were not covered by the scope of the antidumping duty order on CWP from Mexico.⁶³ On July 25, 2019, pursuant to a request made by MB Metals, Inc., an importer and distributor of pipes located in Bellevue, Washington, Commerce found that fire protection pipes are within the scope of the antidumping duty order on CWP from Thailand.⁶⁴ On June 30, 2020, Commerce issued its final scope ruling determining that line pipe was not within the scope of the antidumping duty order on CWP from Thailand, however that products that are dual-stenciled as standard pipe and line pipe are within scope.⁶⁵ On November 19, 2021, pursuant to a request made by Mando America Corporation (“Mando”), Commerce determined that the 21 mechanical tubing shells imported by Mando were not covered by the scope of the antidumping duty order on CWP from Mexico and South Korea.⁶⁶

⁶³ Commerce’s scope decision memorandum in Certain Circular Welded Non-Alloy Steel Pipe from Mexico, June 18, 2018.

⁶⁴ Commerce’s scope decision memorandum in Circular Welded Carbon Steel Pipes and Tubes from Thailand, July 25, 2019.

⁶⁵ Commerce’s scope decision memorandum titled “Final Scope Ruling on Line Pipe and Dual-Stenciled Standard and Line Pipe” in Circular Welded Carbon Steel Pipes and Tubes from Thailand, July 25, 2019.

⁶⁶ Commerce’s scope decision memorandum titled “Scope Ruling on Mando America Corporation’s Mechanical Tubing Base Shells” in Certain Circular Welded Non-Alloy Steel Pipe from Mexico and the Republic of Korea, November 19, 2021.

Five-year reviews

Commerce has issued the final results of its expedited/full reviews with respect to all subject countries.⁶⁷ Tables I-13 through I-20 present the countervailable subsidy margins/dumping margins calculated by Commerce in its original investigations and subsequent reviews.

Table I-13
CWP: Commerce's original investigation and five-year reviews dumping margins for producers/exporters in Brazil

Producer/exporter	Original margin (percent)	First five-year review margin (percent)	Second five-year review margin (percent)	Third five-year review margin (percent)	Fourth five-year review margin (percent)	Fifth five-year review margin (percent)
Persico Pizzamiglio S.A.	103.38	103.38	103.38	103.38	103.38	103.38
All others	103.38	103.38	103.38	103.38	103.38	103.38

Source: 57 FR 49453 (November 2, 1992); 64 FR 67854 (December 3, 1999); 70 FR 67662 (November 8, 2005); 76 FR 66899 (October 28, 2011); 82 FR 46761 (October 6, 2017); 88 FR 29880 (May 9, 2023).

Table I-14
CWP: Commerce's original investigation and five-year reviews dumping margins for producers/exporters in India

Producer/exporter	Original margin (percent)	First five-year review margin (percent)	Second five-year review margin (percent)	Third five-year review margin (percent)	Fourth five-year review margin (percent)	Fifth five-year review margin (percent)
Tata Iron and Steel Company, Ltd.	7.08	7.08	7.08	7.08	De minimis	87.93
All others	7.08	7.08	7.08	7.08	De minimis	87.93

Source: 51 FR 17384 (May 12, 1986); 64 FR 67879 (December 3, 1999); 70 FR 67662 (November 8, 2005); 76 FR 66893 (October 28, 2011); 82 FR 46485 (October 5, 2017); 88 FR 29636 (May 8, 2023)

Table I-15
CWP: Commerce's original investigation and five-year reviews dumping margins for producers/exporters in Mexico

Producer/exporter	Original margin (percent)	First five-year review margin (percent)	Second five-year review margin (percent)	Third five-year review margin (percent)	Fourth five-year review margin (percent)	Fifth five-year review margin (percent)
HYLSA S.A. de C.V.	32.62	32.62	32.62	32.62	32.62	7.32
All others	32.62	32.62	32.62	32.62	32.62	7.32

Source: 57 FR 49453 (November 2, 1992); 64 FR 67854 (December 3, 1999); 70 FR 67662 (November 8, 2005); 76 FR 66893 (October 28, 2011); 82 FR 46761 (October 6, 2017); 88 FR 29880 (May 9, 2023).

⁶⁷ 88 FR 24757 (April 24, 2023), 88 FR 29636 (May 8, 2023), and 88 FR 29880 (May 9, 2023).

Table I-16**CWP: Commerce's original investigation and five-year reviews dumping margins for producers/exporters in South Korea**

Producer/exporter	Original margin (percent)	First five-year review margin (percent)	Second five-year review margin (percent)	Third five-year review margin (percent)	Fourth five-year review margin (percent)	Fifth five-year review margin (percent)
Hyundai Steel Pipe Co., Ltd.	7.08	7.08	7.08	7.08	1.20	1.20
Korea Steel Pipe Co., Ltd.	5.60	4.62	6.86	6.86	1.20	1.20
Masan Steel Tube Works Co., Ltd.	11.63	11.63	11.63	11.63	1.20	1.20
Pusan Steel Pipe Co., Ltd. (successor-in-interest to SeAH Steel Corporation)	4.91	5.35	4.91	4.91	1.20	1.20
All others	5.97	4.80	6.37	6.37	1.20	1.20

Source: 57 FR 49453 (November 2, 1992); 64 FR 67854 (December 3, 1999); 70 FR 67662 (November 8, 2005); 76 FR 66893 (October 28, 2011); 82 FR 46761 (October 6, 2017); 88 FR 29880 (May 9, 2023).

Table I-17**CWP: Commerce's original investigation and five-year reviews dumping margins for producers/exporters in Taiwan**

Inv. No.	Producer/exporter	Original margin (percent)	First five-year review margin (percent)	Second five-year review margin (percent)	Third five-year review margin (percent)	Fourth five-year review margin (percent)	Fifth five-year review margin (percent)
731-TA-132	Kao Hsing Chang Iron & Steel Corp.	9.70	9.70	9.70	9.70	27.65	27.65
731-TA-132	Tai Feng Industries, Inc.	43.70	43.70	43.70	43.70	27.65	27.65
731-TA-132	Yieh Phui Enterprise Co, Ltd.	38.50	38.50	38.50	38.50	27.65	27.65
731-TA-132	All others	9.70	9.70	9.70	9.70	27.65	27.65
731-TA-536	Kao Hsing Chang Iron & Steel Corp.	19.46	19.46	19.46	19.46	8.91	8.91
731-TA-536	Yieh Phui Enterprise Co, Ltd.	27.65	27.65	27.65	27.65	8.91	8.91
731-TA-536	All others	23.56	23.56	23.56	23.56	8.91	8.91

Source: 49 FR 19369 (May 7, 1984); 57 FR 49453 (November 2, 1992); 64 FR 67854 and 67873 (December 3, 1999); 70 FR 67662 (November 8, 2005); 76 FR 66899 (October 28, 2011); 82 FR 46761 (October 6, 2017); 88 FR 29880 (May 9, 2023).

Table I-18**CWP: Commerce's original investigation and five-year reviews dumping margins for producers/exporters in Thailand**

Producer/ exporter	Original margin (percent)	First five- year review margin (percent)	Second five-year review margin (percent)	Third five-year review margin (percent)	Fourth five-year review margin (percent)	Fifth five- year review margin (percent)
Saha Thai Steel Pipe Co	15.69	15.69	15.69	15.69	15.60	15.60
Thai Steel Pipe Industry Co	15.60	15.60	15.60	15.69	15.60	15.60
All others	15.67	15.67	15.67	15.69	15.60	15.60

Source: 51 FR 8341 (March 11, 1986); 64 FR 67852 (December 3, 1999); 70 FR 67662 (November 8, 2005); 76 FR 66893 (October 28, 2011); 82 FR 46485 (October 5, 2017).

Table I-19**CWP: Commerce's original investigation and five-year reviews dumping margins for producers/exporters in Turkey**

Producer/ exporter	Original margin (percent)	First five- year review margin (percent)	Second five-year review margin (percent)	Third five- year review margin (percent)	Fourth five-year review margin (percent)	Fifth five- year review margin (percent)
Borusan Ithicat ve Dagitim	1.26	1.26	1.26	1.26	23.12	23.12
Erkboru Profil Sanayi ve Ticaret	23.12	23.12	23.12	23.12	23.12	23.12
Mannesmann- Sumerbank Boru Industrisi	23.12	23.12	23.12	23.12	23.12	23.12
All others	14.74	14.74	14.74	14.74	23.12	23.12

Source: 51 FR 17784 (May 15, 1986); 64 FR 67876 (December 3, 1999); 70 FR 67662 (November 8, 2005); 76 FR 66893 (October 28, 2011); 82 FR 46485 (October 5, 2017).

Table I-20**CWP: Commerce's original investigation and five-year reviews countervailable subsidy rates for producers/exporters in Turkey**

Producer/ exporter	Original margin (percent)	First five- year review margin (percent)	Second five-year review margin (percent)	Third five- year review margin (percent)	Fourth five-year review margin (percent)	Fifth five- year review margin (percent)
Bant Boru Sanayi ve Ticaret A.S	18.81	0.00	0.00	3.01	3.63	4.10
Borusan Group	18.81	0.68	0.68	0.79	1.41	1.80
Erbosan	18.81	2.89	2.89	3.01	3.63	4.10
Yucel Boru Group	18.81	0.84	0.84	0.95	1.57	2.04
All Others	18.81	2.90	2.90	3.01	3.63	4.10

Source: 51 FR 7984 (March 7, 1986); 65 FR 17486, (April 3, 2000); 70 FR 62097 (October 28, 2005); 76 FR 64900 (October 19, 2011); 82 FR 46768 (October 6, 2017); 88 FR 24757 (April 24, 2023).

The subject merchandise

Commerce's scope

Table I-21 presents the imported product subject to the antidumping and countervailing duty orders under review, as defined by Commerce:

Table I-21
CWP: Commerce's scope definitions

Country	Number	Scope definition
Brazil, Mexico, and Korea	731-TA-532, 533, and 534	...circular welded non-alloy steel pipes and tubes, of circular cross-section, not more than 406.4 millimeters (16 inches) in outside diameter, regardless of wall thickness, surface finish (black, galvanized, or painted), or end finish (plain end, beveled end, threaded and coupled). These pipes and tubes are generally known as standard pipes and tubes and are intended for the low pressure conveyance of water, steam, natural gas, and other liquids and gasses in plumbing and heating systems, air conditioning units, automatic sprinkler systems, and other related uses, and generally meets American Society for Testing Materials ("ASTM") A-53 specifications. Standard pipe may also be used for light load-bearing applications, such as for fence tubing, and as structural pipe tubing used for farming and support members for reconstruction or load bearing purposes in the construction, shipbuilding, trucking, farm equipment, and related industries. Unfinished conduit pipe is also included in the orders. All carbon steel pipes and tubes within the physical description outlined above are included within the scope of the orders, except line pipe, oil country tubular goods, boiler tubing, mechanical tubing, pipe and tube hollows for redraws, finished scaffolding, and finished conduit. Standard pipe that is dual or triple certified/stenciled that enters the U.S. as line pipe of a kind used for oil or gas pipelines is also not included in the orders. Imports of the products covered by the orders are currently classifiable under the following Harmonized Tariff Schedule of the United States ("HTS") subheadings: 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090.
India	731-TA-271	...certain welded carbon steel standard pipes and tubes with an outside diameter of 0.375 inch or more but not over 16 inches. These products are commonly referred to in the industry as standard pipes and tubes produced to various specifications, most notably ASTM A-53, A-120, or A-135. This merchandise is currently classifiable under HTS item numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, 7306.30.5090.
Taiwan (1 of 2)	731-TA-132	...certain circular welded carbon steel pipes and tubes from Taiwan, which are defined as: welded carbon steel pipes and tubes, of circular cross section, with walls not thinner than 0.065 inch, and 0.375 inch or more but not over 4.5 inches in outside diameter, currently classified under HTS item numbers 7306.30.5025, 7306.30.5032, 7306.30.5040, and 7306.30.5055.

Table continued.

Table I-21 Continued
CWP: Commerce's scope definitions

Country	Number	Scope definition
Taiwan (2 of 2)	731-TA-536	<p>...(1) circular welded non-alloy steel pipes and tubes, of circular cross section over 114.3 millimeters (4.5 inches), but not over 406.4 millimeters (16 inches) in outside diameter, with a wall thickness of 1.65 millimeters (0.065 inches) or more, regardless of surface finish (black, galvanized, or painted), or end-finish (plain end, beveled end, threaded, or threaded and coupled); and (2) circular welded non-alloy steel pipes and tubes, of circular cross-section less than 406.4 millimeters (16 inches), with a wall thickness of less than 1.65 millimeters (0.065 inches), regardless of surface finish (black, galvanized, or painted) or end-finish (plain end, beveled end, threaded, or threaded and coupled). These pipes and tubes are generally known as standard pipes and tubes and are intended for the low pressure conveyance of water, steam, natural gas, air, and other liquids and gases in plumbing and heating systems, air conditioning units, automatic sprinkling systems, and other related uses, and generally meet ASTM A-53 specifications. Standard pipe may also be used for light loadbearing applications, such as for fence-tubing and as structural pipe tubing used for framing and support members for construction, or load-bearing purposes in the construction, shipbuilding, trucking, farm-equipment, and related industries. Unfinished conduit pipe is also included in the order. All carbon steel pipes and tubes within the physical description outlined above are included within the scope of the order, except line pipe, oil country tubular goods, boiler tubing, mechanical tubing, pipe and tube hollows for redraws, finished scaffolding, and finished conduit. Standard pipe that is dual or triple certified/stenciled that enters the U.S. as line pipe of a kind or used for oil and gas pipelines is also not included in the scope of the order. Imports of the products covered by the order are currently classifiable under the following HTS subheadings, 7306.30.1000, 7306.30.5085, and 7306.30.5090.</p>
Thailand	731-TA-252	<p>...certain welded carbon steel standard pipes and tubes with an outside diameter of 0.375 inch or more but not over 16 inches. These products are commonly referred to in the industry as standard pipes and tubes produced to various ASTM specifications, most notably A-53, A-120, or A-135. This merchandise is currently classifiable under HTS item numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090.</p>
Turkey	701-TA-253	<p>...certain welded carbon steel pipe and tube with an outside diameter of 0.375 inch or more, but not over 16 inches, of any wall thickness (pipe and tube) from Turkey. These products are currently provided for under the HTS as item numbers 7306.30.10, 7306.30.50, and 7306.90.10.¹</p>

Table continued.

Table I-21 Continued
CWP: Commerce's scope definitions

Country	Number	Scope definition
Turkey	731-TA-273	<p>...circular welded non-alloy steel pipes and tubes, of circular cross-section, not more than 406.4 millimeters (16 inches) in outside diameter, regardless of wall thickness, surface finish (black, or galvanized, painted), or end finish (plain end, beveled end, threaded and coupled). Those pipes and tubes are generally known as standard pipe, though they may also be called structural or mechanical tubing in certain applications. Standard pipes and tubes are intended for the low-pressure conveyance of water, steam, natural gas, air, and other liquids and gases in plumbing and heating systems, air conditioner units, automatic sprinkler systems, and other related uses. Standard pipe may also be used for light load-bearing and mechanical applications, such as for fence tubing, and for protection of electrical wiring, such as conduit shells. The scope is not limited to standard pipe and fence tubing, or those types of mechanical and structural pipe that are used in standard pipe applications. All carbon steel pipes and tubes within the physical description outlined above are included in the scope of this order, except for line pipe, oil country tubular goods, boiler tubing, cold-drawn or cold rolled mechanical tubing, pipe and tube hollows for redraws, finished scaffolding, and finished rigid conduit. Imports of these products are currently classifiable under the following HTS subheadings: 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090.</p>

Source: 77 FR 41967, July 17, 2012; see also 83 FR 5402, February 7, 2018.

U.S. tariff treatment

CWP is provided for in Harmonized Tariff Schedule of the United States (“HTS”) subheadings 7306.30.10 and 7306.30.50. The general rate of duty is “free” for HTS subheadings 7306.30.10 and 7306.30.50.⁶⁸ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Effective March 23, 2018, CWP was included in the enumeration of iron and steel articles that became subject to the additional 25 percent ad valorem duty under Section 232 of the Trade Expansion Act of 1962, as amended.⁶⁹ The President also issued subsequent Proclamations to exempt or adjust these duties for selected U.S. trade partners:

- Presidential Proclamation 9711, March 22, 2018 (83 FR 13361, March 28, 2018) exempted iron and steel mill products originating in Argentina, Australia, Brazil, Canada, the EU member states (including the United Kingdom), South Korea, and Mexico, effective March 23, 2018.
- Presidential Proclamation 9740, April 30, 2018 (83 FR 20683, May 7, 2018) continued the duty exemptions for Argentina, Australia, Brazil, but within annual absolute quota limits on iron and steel mill products originating in South Korea, effective May 1, 2018; and did not continue the duty exemptions on iron and steel mill products originating in Canada, Mexico, and the EU member states (including the United Kingdom), effective June 1, 2018.
- Presidential Proclamation 9759, May 31, 2018 (83 FR 25857, June 5, 2018) continued the duty exemptions but within annual absolute quota limits on iron and steel mill products originating in Argentina, Brazil, and South Korea, effective June 1, 2018.
- Presidential Proclamation 9772, August 10, 2018 (83 FR 40429, August 15, 2018) continued the duty exemptions on iron and steel mill products originating in Australia; continued the duty exemptions within annual absolute quota limits on iron and steel mill products originating in Argentina, Brazil, and South Korea, effective June 1, 2018; but doubled the duty rate to 50 percent on such imported products originating in Turkey, effective August 13, 2018.

⁶⁸ USITC, HTS (2023) Revision 11, Publication 5462, September 2023, p. 73-17.

⁶⁹ Section 232 of the Trade Expansion Act of 1962, as amended (19 U.S.C. §1862), authorizes the President, on advice of the Secretary of Commerce, to adjust the imports of an article and its derivatives that are being imported into the United States in such quantities or under such circumstances as to threaten to impair the national security. *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9705, March 8, 2018 (83 FR 11625, March 15, 2018).

- Presidential Proclamation 9886, May 16, 2019 (84 FR 23421, May 21, 2019) restored the original additional duty rate of 25 percent on steel mill products originating from Turkey, effective May 21, 2019.
- Presidential Proclamation 9894, May 19, 2019 (84 FR 23987, May 23, 2019) restored the duty exemptions on steel mill products originating in Canada and Mexico, effective May 20, 2019.
- Presidential Proclamation 10328, December 27, 2021 (87 FR 11, January 3, 2022) provided duty exemptions within annual TRQs on iron and steel mill products originating in EU member countries, effective January 1, 2022.
- Presidential Proclamation 10356, March 31, 2022 (87 FR 63, April 1, 2022) provided duty exemptions within annual TRQs on iron and steel mill products originating in Japan, effective April 1, 2022.
- Presidential Proclamation 10406, May 31, 2022 (87 FR 107, June 3, 2022) provided duty exemptions within annual TRQs on iron and steel mill products originating in the United Kingdom, effective June 1, 2022.

Effective March 23, 2018, CWP originating in India, Taiwan, Thailand, and Turkey became subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended. CWP originating in Mexico is currently exempt from section 232 duties and quotas. Effective March 23, 2018, CWP originating in Brazil and South Korea are exempt from section 232 duties but are instead subject to annual absolute import quotas. Brazil and South Korea were given annual quotas of 2,598,901 kilograms (2,865 short

tons) and 77,907,735 kilograms (85,878 short tons), respectively.^{70,71} The import quota covers CWP and out-of-scope products.^{72 73} Table I-22 summarizes 232 tariff actions for each subject country.

⁷⁰ Annual quota levels have remained unchanged over the period of review. Annual quotas are administered quarterly. Not more than 30 percent of the annual limit can be imported in any one of the first three quarters. Quota exclusion entries are charged against the quarterly limit that is in place at the time of entry and count towards the annual limit. Exclusion entries are exempt from the annual and quarterly quota limit ceilings. These entries “use up” quota limits, but they continue to be accepted until the close of the annual quota period regardless of whether the quarterly or annual limits have been reached. Importers holding Department of Commerce quota exclusions for a particular HTS can enter goods at any time during the quota year, regardless of whether quota thresholds have been met. Any overage above the annual quota limit is due to approved exclusions after the quota limit has been reached.

⁷¹ Korea’s annual quota usage rates for HTS statistical reporting numbers CWP products in 2022: HTS 9903.80.22 (100 percent of 69,469,685 kg filled), HTS 9903.80.24 (64 percent of 8,438,050 kg filled), Brazil’s annual quota usage rates for HTS statistical reporting numbers containing CWP products in 2022: HTS 9903.80.22 (130 percent of 987,756 kg filled), HTS 9903.80.24 (109 percent of 1,611,145 filled). U.S. Customs and Border Protection, 2022 Absolute Steel and Aluminum Quarter Usage, Steel Quarter Usage 2022.

⁷² 83 FR 11625, March 15, 2018. See also HTS heading 9903.80.01 and U.S. notes 16(a) and 16(b) OR HTS heading 9903.85.01 and U.S. notes 19(a) and 19(b) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2023) Revision 1, Publication 5412, February 2023 pp. 99-III-23–99-III-26, 99-III-293. U.S. Customs and Border Protection (“CBP”), “QB 22-604 2022 Fourth Quarter Absolute Quota for Steel Mill Articles of Argentina, Brazil and South Korea,” October 28, 2022, <https://www.cbp.gov/trade/quota/bulletins/qb-22-604-2022>.

⁷³ Section 232 import duties on steel articles currently cover all countries of origin except Argentina, Australia, Brazil, Canada, Mexico, and South Korea. Imports from Australia, Canada, and Mexico are exempt from section 232 duties and quotas on steel articles, while imports originating in Argentina, Brazil, and South Korea are exempt from duties but are instead subject to absolute quotas. EU member countries (effective January 1, 2022), Japan (effective April 1, 2022), and the United Kingdom (effective June 1, 2022) are currently subject to tariff-rate quotas (“TRQs”) for steel articles, and imports that exceed the TRQ limits are subject to the section 232 tariffs. Section 232 import duties on steel articles originating in Turkey were temporarily raised from 25 percent to 50 percent, effective August 13, 2018, but restored to 25 percent effective May 21, 2019. In addition, section 232 duties on steel articles originating in Ukraine are suspended, effective June 1, 2022, to June 1, 2023. 83 FR 11625, March 15, 2018; 83 FR 13361, March 28, 2018; 83 FR 20683, May 7, 2018; 83 FR 25857, June 5, 2018; 83 FR 40429, August 15, 2018; 84 FR 23987, May 23, 2019; 87 FR 11, January 3, 2022; 87 FR 19351, April 1, 2022; 87 FR 33407, June 2, 2022; 87 FR 33591, June 3, 2022.

Table I-22
CWP: Section 232 actions

Subject country	Action	Additional considerations
Brazil	Annual import quota	The annual import quota limit for CWP imports originating in Brazil is 2,865 short tons.
India	25 percent ad valorem	
Mexico	Exempt	
South Korea	Annual import quota	The annual import quota limit for CWP imports originating in South Korea is 85,878 short tons.
Taiwan	25 percent ad valorem	
Thailand	25 percent ad valorem	
Turkey	25 percent ad valorem	Section 232 import duties on steel articles originating in Turkey were temporarily raised from 25 percent to 50 percent, effective August 13, 2018, but restored to 25 percent effective May 21, 2019.

Source: 83 FR 11625, March 15, 2018; 83 FR 13361, March 28, 2018; 83 FR 20683, May 7, 2018; 83 FR 25857, June 5, 2018; 83 FR 40429, August 15, 2018; 84 FR 23987, May 23, 2019; 87 FR 11, January 3, 2022; 87 FR 19351, April 1, 2022; 87 FR 33407, June 2, 2022; 87 FR 33591, June 3, 2022.

Note: Annual quotas are administered quarterly. Not more than 30 percent of the annual limit can be imported in any one of the first three quarters.

Under Section 232, the President authorized the Secretary of Commerce, in consultation with other appropriate federal agency heads, to provide relief from the additional duties for any steel articles determined "not to be produced in the United States in a sufficient and reasonably available amount or of a satisfactory quality and is also authorized to provide such relief based upon specific national security considerations. Such relief shall be provided for any article only after a request for exclusion is made by a directly affected party located in the United States." Commerce reviews all exclusion requests and any objections, rebuttals, and sur-rebuttals to the requests and determines whether the items are warranting an exclusion based on the above criteria.⁷⁴

⁷⁴ U.S. Department of Commerce, "Section 232 National Security Investigation of Steel Imports Information on the Exclusion Process," <https://www.bis.doc.gov/index.php/232-steel>.

If an organization manufactures steel products in the United States and wishes to object to an existing exclusion request, it has 30 days from the posting of an exclusion request to submit an objection. Any individual or organization in the United States may file an objection to an exclusion request.⁷⁵

If objections are submitted during the 30-day comment period, Commerce reviews each objection for conformance with the submission requirements. If the objection meets the requirements, it will be posted. Once an objection is posted, the Commerce will re-open the exclusion request for a rebuttal period of 7 calendar days. Table I-23 displays the number of granted and denied exclusion requests for CWP through Jun 30, 2023.

Table I-23
CWP: Individual product exclusions from the Section 232 steel tariffs granted for requests posted from June 21, 2019 to June 30, 2023, by HTS heading and subheading

HTS subheading	Description	Number of exemptions granted	Number of exemptions denied
7306.30	Other pipe and tube, welded, of circular cross section, of iron or nonalloy steel:	N/A	N/A
7306.30.10	Having a wall thickness of less than 1.65 mm	255	124
7306.30.50	Other	511	789
Total		766	913

Source: BIS, "Section 232 Steel and Aluminum, Published Exclusion Requests," web portal, <https://232app.azurewebsites.net/steelalum>, retrieved June 15, 2022.

Note: Exclusion requests for the particular imported products reported under the HTSUS provisions listed in the opening paragraph of the "Tariff Treatment" section above.

⁷⁵ For an objection filing to be considered, organizations must provide factual information on: 1) The steel products that they manufacture in the United States; 2) The production capabilities at steel manufacturing facilities that they operate in the United States; and 3) The availability and delivery time of the products that they manufacture relative to the specific steel product that is subject to an exclusion request. U.S. Department of Commerce, "Section 232 National Security Investigation of Steel Imports Information on the Exclusion Process," <https://www.bis.doc.gov/index.php/232-steel>.

Commerce's Bureau of Industry and Security ("BIS") granted 766 exclusions from these duties for the particular products (including CWP) currently reported under the HTS provisions listed in the opening paragraph of this section (above) from among the exclusion requests posted between June 2019 to June 30, 2023 (table I-23).⁷⁶ BIS denied 912 of the 1,678 exclusion requests.

The exclusions listed below are not generally applicable to all imports under each HTS or to imports from all countries. Therefore, each exclusion listed below may not cover imports of subject merchandise and/or may only cover a portion of imports of subject merchandise. Each granted exclusion is specific to certain criteria listed below:⁷⁷

A granted exclusion—

- 1) **is only applicant-specific** (*i.e.* can only be used by the applicant who must be a "directly affected individuals or organizations located in the United States" which is generally an importer of record but may also be an end-user);
- 2) **is supplier-specific;**
- 3) **is product-specific** (not only must a single 10-digit HTSUS code, be listed, including its specific dimension, but a full description of the properties of the steel product it seeks to import, including chemical composition, dimensions, strength, toughness, ductility, magnetic permeability, surface finish, coatings, and other relevant data);
- 4) **is country(ies) of origin-specific** (can only cover imports from specific country(ies) listed in a request);

⁷⁶ Under Section 232, the President authorized the Secretary of Commerce, in consultation with other appropriate federal agency heads, to provide relief from the additional duties for any steel articles determined "not to be produced in the United States in a sufficient and reasonably available amount or of a satisfactory quality and is also authorized to provide such relief based upon specific national security considerations. Such relief shall be provided for any article only after a request for exclusion is made by a directly affected party located in the United States." Commerce reviews all exclusion requests and any objections, rebuttals, and sur-rebuttals to the requests and determines whether the items are warranting an exclusion based on the above criteria. U.S. Department of Commerce, "Section 232 National Security Investigation of Steel Imports Information on the Exclusion Process," <https://www.bis.doc.gov/index.php/232-steel>.

⁷⁷ The criteria presented in the list were derived from U.S. Department of Commerce, "Section 232 National Security Investigation of Steel Imports Information on the Exclusion Process," <https://www.bis.doc.gov/index.php/232-steel>; 83 FR 53, March 19, 2018; U.S. Department of Commerce, "Section 232 Frequently Asked Questions," pp. 11–12;

- 5) **is limited by the volume listed in the request** (an applicant must certify that the exclusion “amount requested in a given year is in line with what the organization expects to import based on its current business outlook”); and **is limited to one year** (applicants must re-apply to use the exclusion after a year).

A product exclusion will be granted if the article is not produced in the United States: (1) in sufficient and reasonably available amount, (2) satisfactory quality, or (3) there is a specific national security consideration warranting an exclusion. Applicants must list one of these as a reason for the request and must certify that the reason for the request is correct and accurate to the best of their knowledge.

Description and uses⁷⁸

Steel pipes and tubes are generally produced in various grades of carbon, alloy, or stainless steel. Tubular products frequently are distinguished by the following six end uses as defined by the American Iron and Steel Institute (“AISI”).

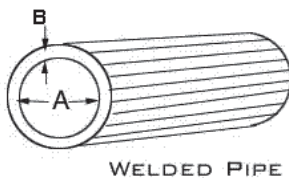
- Standard pipe is ordinarily used for low-pressure conveyance of air, steam, gas, water, oil, or other fluids for mechanical applications. It is used primarily in machinery, buildings, sprinkler systems, irrigation systems, and water wells rather than in pipelines or utility distribution systems. It may carry fluids at elevated temperatures which are not subject to external heat applications. It is usually produced in standard diameters and wall thicknesses to American Society for Testing and Materials (“ASTM”) specifications.
- Line pipe is used for transportation of gas, oil, or water generally in a pipeline or utility distribution system. It is produced to API-5L and American Water Works Association (“AWWA”) specifications.
- Structural pipe and tubing is generally used for structural or loadbearing purposes above ground by the construction industry, as well as for structural purposes in ships, trailers, farm equipment, and other similar uses. It is produced in nominal wall thicknesses and sizes to ASTM specifications in round, square, rectangular, or other cross-sectional shapes.

⁷⁸ Unless otherwise noted, this information is based on Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey, Investigation Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536 (Fourth Review), USITC Publication 4754, January 2018 (“Fourth review publication”), pp. I-14-I-16.

- Mechanical tubing is produced in a large number of shapes of varied chemical composition. It is not normally produced to meet any specification other than that required to meet the end use. It is produced to meet exact O.D. (outer diameter) and decimal wall thicknesses.
- Pressure tubing is used to convey fluids at elevated temperatures or pressures, or both, and is suitable to be subjected to heat applications. It is produced to exact O.D. and decimal wall thicknesses in sizes ranging from 0.5 inch to 6 inches O.D. inclusive, usually to specifications such as ASTM.
- Oil country tubular goods (“OCTG”) are pipe produced to API specifications and used in wells in the oil and gas industries:

Standard pipe of non-alloy steel is the primary product within the scope of these reviews (see figure I-2). Standard pipe is intended for the low-pressure conveyance of water, steam, natural gas, air, and other liquids and gases in plumbing and heating systems, air conditioning units, automatic sprinkler systems, and other related uses. Standard pipe may carry liquids at elevated temperatures but may not be subject to the application of external heat. It is made primarily to ASTM A53, A135, and A795 specifications, but can also be made to other specifications, such as British Standard (“BS”) 1387. Since these standards often specify required engineering characteristics that overlap, a pipe also can be dual stenciled, meaning that the pipe is stamped with monograms signifying compliance with two different specifications, such as ASTM A53 and API 5L.

Figure I-2
CWP: Cross section of welding pipe showing inside diameter “A” and wall thickness “B”



Source: ASA Alloys, Inc., retrieved at <http://www.asaalloys.com/diagrams.html>.

Other uses of CWP include light load-bearing mechanical applications, such as for fence tubing; scaffolding components; and protection of electrical wiring, such as conduit shells. Fence tubing can be produced to ASTM specification F-1083, which covers hot dipped galvanized welded steel pipe used for fence structures. However, fence tubing can also be produced without reference to an ASTM specification, or to a general specification such as ASTM A513.

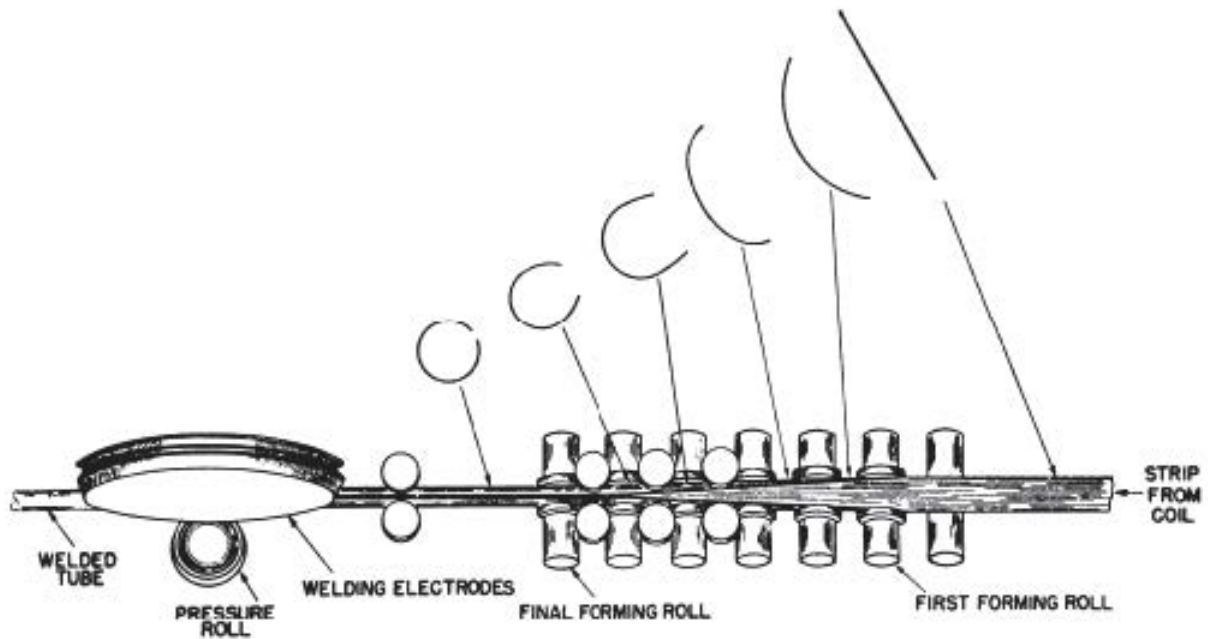
In addition, CWP is used for structural applications in general construction. Structural pipe is generally used for structural or load-bearing purposes above ground by the construction industry, as well as for structural purposes in ships, trailers, farm equipment, and other similar uses. It is produced in nominal wall thicknesses and sizes. These products also are manufactured primarily to standard ASTM specifications (such as A500 or A252), as well as American Society of Mechanical Engineers (“ASME”) specifications. Standard pipe used in light load-bearing, mechanical, and structural applications may be galvanized (zinc-coated by dipping in molten zinc), lacquered (black finish), or painted (black) to provide corrosion resistance, which is important for storage in humid conditions or for ocean transport. End finishes include plain end, which may be either cut, or beveled suitable for welding, or include threaded ends, or threaded or coupled, as well as other special end finishes. Pipe with threaded ends is usually provided “threaded and coupled,” meaning that a coupling is attached to one end of each length of pipe.

Manufacturing process⁷⁹

CWP of the sizes subject to these reviews are manufactured by either the electric resistance-welding (“ERW”) process or the continuous-welding (“CW”) process. The ERW process is a cold-forming process. The raw material input is steel sheet which has been slit into strips of appropriate width that will be consistent with the diameter of the pipe to be welded. The strips, or “skelp,” are formed into a tubular shape by passing them through a series of rollers, which provide the initial shaping into round form, as well as guidance into the welding section (figure I-3)

⁷⁹ Unless otherwise noted, this information is based on the Fourth review publication, pp. I-17-I-18.

Figure I-3
CWP: Operations to make ERW tubes from steel strip



Source: AISI, Steel Products Manual – Steel Specialty Tubular Products, p. 20.

After the strips have been formed to a tubular shape, the edges are heated by electrical resistance and welded by a combination of heat and pressure. The welding pressure causes some of the metal to be squeezed from the joint, forming a bead of metal on both the inside and outside of the tube. While still in the continuous processing line, the tube is then subjected to post-weld heat treatment, as required. This may involve heat treatment of the welded seam only, or treatment of the entire pipe. After heat treatment, sizing rolls shape the tube to the correct diameter. The product is cooled and then cut at the end of the tube mill by a flying shear or saw, synchronized with the tube's movement so that it is not necessary to stop the process. The ERW process can be used to cover the full range of standard pipe diameters pertinent to these investigations.

In the CW process, the entire strip of steel sheet is heated to approximately 2,450 degrees Fahrenheit in a gas-fired, continuous furnace. As the strip leaves the furnace, a blower is normally furnished to provide a blast of air to raise the temperature of the edges to approximately 2,600 degrees Fahrenheit for welding. The strip is formed into tubular shape by a series of rollers, and the edges are butted together under pressure to form the weld. While still hot, the product may be processed through a stretch reduction mill, which simultaneously

reduces the diameter and wall thickness of the pipe. The continuous tube is then cut into predetermined lengths by a flying saw or shear. The CW method can be used to produce pipe up to 4.5 inches in O.D.

Finishing operations on standard pipe and tube may include hydrostatic testing, oiling, and galvanizing. The process of galvanizing involves the application of a zinc coating to steel pipe for protection from atmospheric corrosion. In a hot-dip process of galvanizing, cut lengths of steel pipe are dipped in a bath of molten zinc maintained at a temperature of 820 to 860 degrees Fahrenheit. The combination of the temperature of both the zinc and the steel, as well as the immersion time within the zinc bath, determine the thickness of the coating. The zinc coating may be applied to the outside only, or both the inside and outside of the steel pipe, depending on end-use application and industry specification (e.g., ASTM). In a continuous galvanizing process, the zinc coating may be applied to the outside of the pipe before the steel pipe is cut to length by passing it through a bath of molten zinc.

End finishing may include square cutting, beveling, threading, or grooving. Threaded pipe may be furnished "threaded and coupled," in which case both ends of each length of pipe are threaded and a threaded coupling is applied to one end.

U.S. market participants

U.S. producers

During the final phase of the original Taiwan investigation, the Commission received U.S. producer questionnaires from 28 firms, which accounted for approximately 80-85 percent of production of small diameter CWP and heavy-walled rectangular pipes and tubes in the United States.⁸⁰ During the final phase of the original Thailand and Turkey investigations, the Commission received U.S. producer questionnaires from 20 firms. During the final phase of the original India and Turkey investigations, the Commission received U.S. producer questionnaires from 19 firms. During the final phase of the original Brazil, Mexico, South Korea, and Taiwan investigations, the Commission received U.S. producer questionnaires from 27 firms,⁸¹ which accounted for approximately 97 percent of production of CWP in the United States.⁸² During the first five-year reviews, the Commission received U.S. producer questionnaires from 25 firms.⁸³ During the second five-year reviews, the Commission received U.S. producer questionnaires from 20 firms.⁸⁴ During the third five-year reviews, the Commission received U.S. producer questionnaires from 17 firms, which accounted for the vast majority of CWP production in the United States during 2011.⁸⁵ During the fourth five-year reviews, domestic interested parties provided a list of eight known and currently operating U.S. producers of CWP. Four responding firms accounted for approximately *** percent of production of CWP in the United States during 2016.⁸⁶

⁸⁰ An individual estimate for small diameter CWP is not available. Original Taiwan publication, p. A-17.

⁸¹ The U.S. producer questionnaire counts for these original investigations may include certain firms that produced finished conduit or mechanical tubing that is not cold-drawn or cold-rolled.

⁸² Original Brazil, Mexico, South Korea, and Taiwan publication, p. I-19.

⁸³ Certain Pipe and Tube from Argentina, Brazil, Canada, India, Korea, Mexico, Singapore, Taiwan, Thailand, Turkey, and Venezuela, Inv. Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 276, 277, 296, 409, 410, 532-534, 536, and 537 (Review), USITC Publication 3316, July 200 (“First review publication”), p. CIRC I-20.

⁸⁴ Certain Pipe and Tube from Argentina, Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey, Inv. Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 409, 410, 532-534 and 536 (Second Review), USITC 3867, July 2006 (“Second review publication”), p. CIRCULAR-I-18.

⁸⁵ Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey, Inv. Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534 and 536 (Third Review), USITC Publication 4333, June 2012 (“Third review publication”), p. I-15.

⁸⁶ Investigation Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, 536 (Fourth Review) Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey, (continued...)

In these current proceedings, the Commission issued U.S. producers' questionnaires to 22 firms, five of which provided the Commission with information on their CWP operations. These firms are believed to account for approximately *** percent of U.S. production of CWP in 2022.⁸⁷ Presented in table I-23 is a list of responsive domestic producers of CWP and each company's position on continuation of the orders, production locations, and share of reported production of CWP in 2022.

Table I-23
CWP: U.S. producers, positions on orders, U.S. production locations, and shares of reported U.S. production, 2022

Shares in percent

Firm	Position on orders	Production location(s)	Share of production
Atlas Tube	***	Chicago, IL Plymouth, MI Blytheville, AK Birmingham, AL Kansas City, MO	***
Bull Moose	***	Gerald, MO Chicago Heights, IL Casa Grande, AZ Masury, OH Trenton, GA	***
Maruichi	***	Santa Fe Springs, CA	***
Nucor	***	Birmingham, AL Chicago, IL Marseilles, IL Trinity, AL Decatur, AL	***
Wheatland Tube	***	Wheatland, PA Warren, OH Chicago, IL Long Beach, CA Rochelle, IL	***
All firms	Various	Various	***

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

Table I-24 presents U.S. producers' ownership, related, and/or affiliated firms. ***.

(...continued)

Confidential Report, INV-PP-112, August 23, 2017, as revised in INV-PP-162 December 12, 2017 ("Fourth review confidential report"), p. I-3.

⁸⁷ The coverage figure is based on the responding firms' estimated share of total U.S. production of CWP during 2022. See Part III for additional information.

Table I-24
CWP: U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

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

U.S. importers

During the final phase of the original Taiwan investigations, the Commission received U.S. importer questionnaires from 34 firms, which accounted for approximately 59 percent of total U.S. imports of small diameter CWP from Taiwan during 1983.⁸⁸ During the final phase of the original Thailand and Turkey investigations, the Commission received U.S. importer questionnaires from *** firms, which accounted for approximately *** percent of total U.S. imports of CWP from Thailand and *** percent of total U.S. imports of CWP from Turkey, during January-September 1985.⁸⁹ During the final phase of the original India and Turkey investigations, the Commission received U.S. importer questionnaires from *** firms which accounted for *** percent of U.S. imports of CWP from India and *** percent of U.S. imports of CWP from Turkey in 1985.⁹⁰ During the final phase of the original Brazil, Mexico, South Korea, and Taiwan investigations, the Commission received U.S. importer questionnaires from

⁸⁸ Original Taiwan publication, p. A-35.

⁸⁹ Investigation Nos. 701-TA-253 and 731-TA-252 (Final): Certain Welded Carbon Steel Pipes and Tubes from Turkey and Thailand, Confidential Report, INV-J-020, February 5, 1986, as revised in INV-J-025, February 11, 1986 (“Original Thailand and Turkey confidential report”), p. I-6.

⁹⁰ Original India and Turkey confidential report, pp. I-16-17.

64 firms, which accounted for approximately all U.S. imports of CWP from Brazil, 79.9 percent of U.S. imports of CWP from Mexico, 88.9 percent of U.S. imports of CWP from Taiwan, and 79.5 percent of U.S. imports of CWP from South Korea during 1991.⁹¹

During the first five-year reviews, the Commission received U.S. importer questionnaires from 26 firms which accounted for 27.8 percent of U.S. imports from Mexico, 64.2 percent of U.S. imports from South Korea, 81.7 percent of U.S. imports from Taiwan, 49.2 percent of U.S. imports from Thailand, and 60.8 percent of U.S. imports from Turkey in 1998.⁹² During the second five-year reviews, the Commission received U.S. importer questionnaires from 34 firms, which accounted for 57 percent of total U.S. imports of CWP from all subject countries combined during the period of review.⁹³ During the third five-year reviews, the Commission received U.S. importer questionnaires from 21 firms, which accounted for over 50 percent of total U.S. imports of CWP from subject countries during 2011.⁹⁴

Although the Commission did not receive responses from any respondent interested parties in its fourth five-year reviews, the domestic interested parties provided a list of 22 firms that may have imported CWP.⁹⁵ Import data presented in the fourth reviews were based on official Commerce statistics.

In the current proceedings, the Commission issued U.S. importers' questionnaires to 46 firms believed to be importers of CWP, as well as to all U.S. producers of CWP. Usable questionnaire responses were received from eleven firms. Table I-25 lists all responding U.S. importers of CWP from subject and other sources, their locations, and their shares of U.S. imports in 2022.

⁹¹ Original Brazil, Mexico, South Korea, and Taiwan publication, p. I-23.

⁹² There were no reported imports of CWP from Brazil in 1998. First review publication, p. CIRC-I-22.

⁹³ Second review publication, p. CIRCULAR-I-20.

⁹⁴ Third review publication, p. I-31.

⁹⁵ Fourth review publication, p. I-23.

Table I-25
CWP: U.S. importers, their headquarters, and share of imports within each source, 2022

Share in percent

Firm	Headquarters	Subject sources	Nonsubject sources	All import sources
Atlas Tube	Harrow, ON	***	***	***
Borusan	Istanbul, Turkey	***	***	***
Commercial Steel	Dallas, TX	***	***	***
DRiV	Northville, MI	***	***	***
GS Global	Cerritos, CA	***	***	***
JFE Shoji	Long Beach, CA	***	***	***
Nova Steel and Nova Tube	Delta, OH	***	***	***
Prolamsa	Houston, TX	***	***	***
Regiomontana	Apodaca, NL	***	***	***
Stemcor	Fort Lauderdale, FL	***	***	***
Whirlpool	Benton Harbor, MI	***	***	***
All firms	Various	***	***	***

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

U.S. purchasers

The Commission received 19 usable questionnaire responses from firms that have purchased CWP since January 2017.⁹⁶ Seventeen responding purchasers are distributors, two are end users (one responding purchaser identified itself as a distributor and an end user), and one identified itself as a wholesale distributor. In general, responding U.S. purchasers were located in the Midwest and Southwest. Large purchasers of CWP include ***.

⁹⁶ Of the 19 responding purchasers, 14 purchased the domestic product and 10 purchased imports of the subject merchandise from subject sources (1 from subject Indian producers, 2 from Mexico, 6 from South Korea, 4 from Thailand, and 4 from Turkey) and 7 purchased imports of CWP from other sources.

Apparent U.S. consumption and market shares

Quantity

Table I-26 and figure I-4 present data on apparent U.S. consumption and U.S. market shares by quantity for CWP. During 2020-22, apparent U.S. consumption increased by *** percent, although it was *** percent lower in interim 2023 than in interim 2022. Apparent U.S. consumption was highest in 2022. The share of apparent U.S. consumption for which U.S. producers accounted decreased during 2020-22 by *** percentage points, but was *** percentage points higher in interim 2023 than in interim 2022. The share of apparent U.S. consumption for which subject sources accounted initially decreased from 2020 to 2021, then increased between 2021 and 2022, ending higher overall in 2022 than in 2020 by *** percentage points. The share of apparent U.S. consumption for which subject sources accounted was similarly higher in interim 2023 than in interim 2022 by *** percentage points.

Table I-26

CWP: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in short tons; shares in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers	Quantity	***	***	***	***	***
Brazil	Quantity	***	***	***	***	***
India, subject	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
South Korea	Quantity	60,640	62,057	75,560	33,509	40,531
Taiwan	Quantity	3,220	751	814	227	414
Thailand	Quantity	52,302	9,942	37,299	1,535	64,027
Turkey	Quantity	22,769	43,751	115,583	54,488	16,589
Subject sources	Quantity	***	***	***	***	***
India, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
Brazil	Share	***	***	***	***	***
India, subject	Share	***	***	***	***	***
Mexico	Share	***	***	***	***	***
South Korea	Share	***	***	***	***	***
Taiwan	Share	***	***	***	***	***
Thailand	Share	***	***	***	***	***
Turkey	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
India, nonsubject	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed August 21, 2023, adjusted using data submitted in response to Commission questionnaires to remove reported out-of-scope imports and using data compiled from proprietary, Census edited Customs records using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed October 1, 2023, to remove out-of-scope imports and to allocate India subject vs. India nonsubject imports. Imports are based on the imports for consumption data series.

Note: Due to data availability nonsubject imports, particularly Canada, are likely overstated. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure I-4
CWP: Apparent U.S. consumption based on quantity, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed August 21, 2023, adjusted using data submitted in response to Commission questionnaires to remove reported out-of-scope imports and using data compiled from proprietary, Census edited Customs records using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed October 1, 2023, to remove out-of-scope imports and to allocate India subject vs. India nonsubject imports. Imports are based on the imports for consumption data series.

Note: Due to data availability nonsubject imports, particularly Canada, are likely overstated. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Value

Table I-27 and figure I-5 present data on apparent U.S. consumption and U.S. market shares by value for CWP. During 2020-22, apparent U.S. consumption increased by *** percent, although it was *** percent lower in interim 2023 than in interim 2022. Apparent U.S. consumption was highest in 2022, although the greatest annual increase in apparent U.S. consumption value occurred between 2020 and 2021. The share of apparent U.S. consumption for which U.S. producers accounted decreased during 2020-22 by *** percentage points, but was *** percentage points higher in interim 2023 than in interim 2022. The share of apparent U.S. consumption for which subject sources accounted initially decreased from 2020 to 2021, then increased between 2021 and 2022, ending higher overall in 2022 than in 2020 by *** percentage points. The share of apparent U.S. consumption for which subject sources accounted was similarly higher in interim 2023 than in interim 2022 by *** percentage points.

Table I-27

CWP: Apparent U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; shares in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers	Value	***	***	***	***	***
Brazil	Value	***	***	***	***	***
India, subject	Value	***	***	***	***	***
Mexico	Value	***	***	***	***	***
South Korea	Value	44,087	67,693	115,388	50,293	54,031
Taiwan	Value	3,496	1,625	1,994	798	988
Thailand	Value	42,388	8,558	57,035	2,662	74,422
Turkey	Value	23,082	53,940	173,955	83,990	19,599
Subject sources	Value	***	***	***	***	***
India, nonsubject	Value	***	***	***	***	***
All other sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers	Share of value	***	***	***	***	***
Brazil	Share of value	***	***	***	***	***
India, subject	Share of value	***	***	***	***	***
Mexico	Share of value	***	***	***	***	***
South Korea	Share of value	***	***	***	***	***
Taiwan	Share of value	***	***	***	***	***
Thailand	Share of value	***	***	***	***	***
Turkey	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
India, nonsubject	Share of value	***	***	***	***	***
All other sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	***	***	***	***	***
All sources	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed August 21, 2023, adjusted using data submitted in response to Commission questionnaires to remove reported out-of-scope imports and using data compiled from proprietary, Census edited Customs records using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed October 1, 2023, to remove out-of-scope imports and to allocate India subject vs. India nonsubject imports. Imports are based on the imports for consumption data series.

Note: Due to data availability nonsubject imports, particularly Canada, are likely overstated. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure I-5
CWP: Apparent U.S. consumption based on value, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed August 21, 2023, adjusted using data submitted in response to Commission questionnaires to remove reported out-of-scope imports and using data compiled from proprietary, Census edited Customs records using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed October 1, 2023, to remove out-of-scope imports and to allocate India subject vs. India nonsubject imports. Imports are based on the imports for consumption data series.

Note: Due to data availability nonsubject imports, particularly Canada, are likely overstated. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

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

U.S. market characteristics

CWP is used in various applications including the transmission of air, water, and gas; fencing; and in a variety of structural applications. The demand for circular welded pipe depends on these applications, which in turn depend on the strength of the overall economy, and the level of construction activity. Production of circular welded pipe also has been influenced by changes in demand for products such as line pipe and oil country tubular goods (OCTG) that may be manufactured on some of the same equipment and machinery as circular welded pipe.¹

Two of 5 responding U.S. producers, 1 of 3 responding importers, and 5 of 19 purchasers indicated that the market was subject to distinctive conditions of competition. Specifically, U.S. producer *** reported that “CWP has very few SKUs² so it is an easy product to import” and U.S. producer *** reported that there is more domestic competition. Purchasers reported price fluctuations, highly competitive products, and competition with distributors and mills.

Apparent U.S. consumption of CWP in 2022 was *** percent higher than in 2020. Apparent U.S. consumption was *** percent lower during January-June 2023 than during January-June 2022.

Impact of section 232 tariffs

U.S. producers, importers, and purchasers were asked to report the impact of section 232 tariffs on overall demand, supply, prices, and raw material costs³ for CWP (table II-1). U.S. producers reported that demand and production of CWP has grown since the implementation of section 232 tariffs, allowing for capital investments. Purchasers generally reported that prices have increased, with one purchaser estimating that prices increased by 25 percent.

¹ Third review publication, p. II-1.

² Stock keeping units.

³ Section 232 tariffs also apply to hot-rolled steel, the primary raw material of CWP.

Table II-1
CWP: Count of firms' responses regarding the impact of section 232 tariffs on steel and aluminum imports

Number of firms reporting

Market	Firm type	Steadily increase	Fluctuated up	No change	Fluctuated down	Steadily decreased
Overall demand in market	U.S. producers	1	3	1	0	0
Overall demand in market	Importers	***	***	***	***	***
Overall demand in market	Purchasers	2	3	6	0	0
Domestic supply in market	U.S. producers	0	1	0	2	1
Domestic supply in market	Importers	***	***	***	***	***
Domestic supply in market	Purchasers	0	0	6	5	0
Import supply in market	U.S. producers	1	1	3	0	0
Import supply in market	Importers	***	***	***	***	***
Import supply in market	Purchasers	1	1	8	1	0
Prices of scope merchandise	U.S. producers	0	3	2	0	0
Prices of scope merchandise	Importers	***	***	***	***	***
Prices of scope merchandise	Purchasers	3	7	1	0	0
Raw material costs of scope merchandise	U.S. producers	0	1	4	0	0
Raw material costs of scope merchandise	Importers	***	***	***	***	***
Raw material costs of scope merchandise	Purchasers	1	4	6	0	0

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

Note: Section 232 tariffs also apply to hot-rolled steel, the primary raw material of CWP.

Channels of distribution

U.S. producers and importers sold mainly to distributors, as shown in table II-2. U.S. producers sold more than half of their shipments to distributors, and importers sold the vast majority of their shipments to distributors.

Table II-2
CWP: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent

Source	Channel	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
United States	Distributors	***	***	***	***	***
United States	End users	***	***	***	***	***
Brazil	Distributors	***	***	***	***	***
Brazil	End users	***	***	***	***	***
India, subject	Distributors	***	***	***	***	***
India, subject	End users	***	***	***	***	***
Mexico	Distributors	***	***	***	***	***
Mexico	End users	***	***	***	***	***
South Korea	Distributors	***	***	***	***	***
South Korea	End users	***	***	***	***	***
Taiwan	Distributors	***	***	***	***	***
Taiwan	End users	***	***	***	***	***
Thailand	Distributors	***	***	***	***	***
Thailand	End users	***	***	***	***	***
Turkey	Distributors	***	***	***	***	***
Turkey	End users	***	***	***	***	***
Subject	Distributors	***	***	***	***	***
Subject	End users	***	***	***	***	***
India, nonsubject	Distributors	***	***	***	***	***
India, nonsubject	End users	***	***	***	***	***
All other sources	Distributors	***	***	***	***	***
All other sources	End users	***	***	***	***	***
Nonsubject	Distributors	***	***	***	***	***
Nonsubject	End users	***	***	***	***	***
All imports	Distributors	***	***	***	***	***
All imports	End users	***	***	***	***	***

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

Note: Other U.S. markets includes AK, HI, PR, and VI.

Note: The ***.

Geographic distribution

U.S. producers reported selling CWP to all regions in the contiguous United States since 2017 (table II-3). One importer reported selling CWP from *** and one reported selling CWP from ***. 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.

Table II-3
CWP: Count of U.S. producers' and U.S. importers' geographic markets

Number of firms reporting

Region	U.S. producers	Brazil	India	Mexico	South Korea	Taiwan	Thailand	Turkey	Subject sources
Northeast	4	0	***	0	0	0	0	***	***
Midwest	4	0	***	0	0	0	0	***	***
Southeast	4	0	***	0	0	0	0	***	***
Central Southwest	4	0	***	0	0	0	0	***	***
Mountains	5	0	***	0	0	0	0	***	***
Pacific Coast	5	0	***	0	0	0	0	***	***
Other	2	0	***	0	0	0	0	***	***
All regions (except Other)	4	0	***	0	0	0	0	***	***
Reporting firms	5	0	1	0	0	0	0	1	2

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

Note: Other U.S. markets include AK, HI, PR, and VI.

Supply and demand considerations

U.S. supply

Table II-4 provides a summary of the supply factors regarding CWP from U.S. producers and from Mexico and Turkey. No subject producers from Brazil, India, South Korea, Taiwan, or Thailand submitted questionnaire responses.

Table II-4
CWP: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in short tons; ratio and share in percent

Factor	Measure	United States	Mexico	Turkey	Subject sources
Capacity 2020	Quantity	***	***	***	***
Capacity 2022	Quantity	***	***	***	***
Capacity utilization 2020	Ratio	***	***	***	***
Capacity utilization 2022	Ratio	***	***	***	***
Ending inventories to total shipments 2020	Ratio	***	***	***	***
Ending inventories to total shipments 2022	Ratio	***	***	***	***
Home market 2022	Share	***	***	***	***
Non-US export markets 2022	Share	***	***	***	***
Ability to shift production	Count	***	***	***	***

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

Note: Responding U.S. producers accounted for approximately *** percent of U.S. production of CWP in 2022. No foreign producers from Brazil, India, South Korea, Taiwan, or Thailand responded to the Commission’s questionnaire. Responding foreign producer/exporter firms from Mexico accounted for less than a quarter of U.S. imports of CWP from Mexico in 2022. The one responding foreign producer/exporter firm from Turkey is believed to account for a significant share of subject imports from Turkey. 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.”

Domestic production

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

Domestic producers’ practical CWP production capacity increased during 2020-22 by *** percent, while U.S. production decreased by *** percent during the same period, leading to a decrease in capacity utilization. Practical CWP production capacity was *** percent higher in January-June 2023 than in January-June 2022, and U.S. production was *** percent lower. Other products that producers reportedly can produce on the same equipment as CWP are hollow structural sections (HSS)/ASTM A500 structural square and rectangles, conduit, coupling stock, heavy-walled rectangular tube, light-walled rectangular tube, and solar torque tube.

Factors affecting U.S. producers' ability to shift production include longer changeovers and more equipment to produce certain shapes and dimensions; higher cost of raw materials; market demand drives product mix for existing production; and capital improvements have limited the ability to shift production to other products for U.S. producers ***.

Subject imports from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey

No foreign producers from Brazil, India, South Korea, Taiwan, or Thailand submitted questionnaire responses. Based on available information for these sources from earlier phases in these reviews, subject producers have the ability to respond to changes in demand with large changes in the quantity of shipments of CWP to the U.S. market. The main contributing factors to the high degree of responsiveness of supply is their ability to shift shipments from alternate markets and alternate products.⁴

Two foreign producers from Mexico provided usable questionnaire responses. Based on information from these producers, subject producers in Mexico have the ability to respond to changes in demand with moderate changes in the quantity of shipments of CWP to the U.S. market. The main contributing factors to this degree of responsiveness is some available unused capacity, relatively small inventories, and little ability to shift shipments from alternate markets.

One foreign producer from Turkey provided a response. Based on available information for Turkey, this subject producer has the ability to respond to changes in demand with moderately large changes in the quantity of shipments of CWP to the U.S. market. The main contributing factors to this degree of responsiveness is some available unused capacity, the availability of some inventories, and the ability to shift shipments from alternate markets.

Imports from nonsubject sources

Major nonsubject sources include Canada, Oman, the UAE, and Vietnam. Based on official statistics, these countries combined accounted for 89.4 percent of nonsubject imports by quantity in 2022, and adjusted nonsubject imports accounted for *** percent of U.S. imports in 2022.^{5 6}

⁴ Third review publication, p. II-5.

⁵ Due to data availability, imports of CWP from nonsubject sources, particularly Canada, are likely overstated.

⁶ For additional information regarding imports from nonsubject sources, please see Part IV.

Supply constraints

Four of five U.S. producers and four of five responding importers reported that they had not experienced supply constraints since January 1, 2017. The one U.S. producer reporting supply constraints stated that it experienced periods of limited raw material supplies and the COVID-19 pandemic impacted its ability to fulfill its orders. Most responding purchasers (16 of 18) reported that they had not experienced supply constraints and that no firm had been unable to supply them since January 2017.

New suppliers

Most purchasers (16 of 18) reported that no new suppliers of CWP entered the market since January 2017, and 12 of 17 purchasers reported that they did not expect additional entrants. Purchaser *** reported that Dynamic Tube and Master Halco acquired U.S. Premier Tube Mills in Madison,⁷ Indiana and *** reported numerous smaller, foreign CWP suppliers and that U.S. producers Nucor Tubulars and Zekelman Industries have increased their production capacity. Purchasers anticipating new entrants reported that foreign producers are building plants in the United States and that mills are expanding their capacity.

U.S. demand

Based on available information, the overall demand for CWP is likely to experience moderate changes in response to changes in price. The main contributing factors are the somewhat limited range of substitute products and the wide range of cost shares of CWP in most of its end-use products.

End uses and cost share

U.S. demand for CWP depends on the demand for its various applications including plumbing and heating systems, air conditioning units, automatic sprinkler systems, light load-bearing and mechanical applications, such as for fence tubing; scaffolding components; and protection of electrical wiring like conduit shells, and other structural applications in general construction.⁸ All five responding U.S. producers, five importers, and five responding purchasers (one end user and four distributors) reported no changes in end uses.

CWP accounts for a moderate to large share of the cost of the end-use products in which it is used. The reported cost share of CWP for fencing was approximately 30 percent and

⁷ U.S. Premier Tube Mills, <https://www.usptmills.com/round/>. Accessed November 15, 2023.

⁸ Third review publication, pp. I-24-26.

for gates and temporary fencing was approximately 50 percent. In previous reviews, end user purchasers reported that welded circular pipe accounts for nearly the entire cost of products such as pipe nipples and fittings, approximately 35 percent of the cost of fence panels and gates, and a very small share of the cost of products such as metal buildings and appliances.⁹

Three of four responding purchasers (all distributors) reported that demand for their firms' final products incorporating CWP were constant since January 1, 2017, and that there has been no effect on their own demand. One end user, ***, reported that demand for its products increased, but that there had been no effect on its own demand.

Business cycles

Two of 5 U.S. producers, 2 of 3 responding importers, and 16 of 18 purchasers reported that the CWP market is subject to business cycles. Specifically, demand follows general construction and oilfield cycles and weather. One firm, ***, reported that the CWP market has been impacted by supply chain issues from the COVID-19 pandemic.

Demand trends

Demand for CWP is driven by overall U.S. economic activity and construction spending, in particular nonresidential construction spending and oil and gas industry¹⁰ activity. All of these demand indicators increased over the review period, though the impact of the COVID-19 pandemic beginning in 2020 particularly impacted GDP and construction spending.¹¹

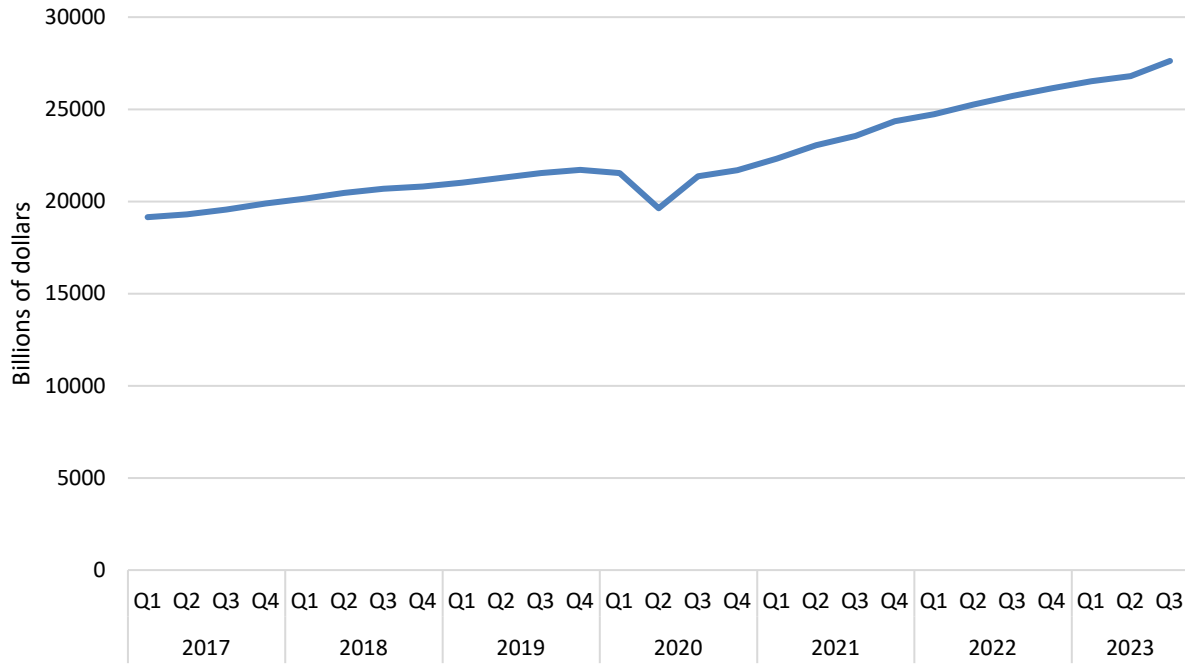
As shown in figure II-1 and table II-5, U.S. gross domestic product increased steadily through the fourth quarter of 2019, then dropped in the first two quarters of 2020 before increasing through the second quarter of 2023, ending at 44.3 percent higher in the third quarter of 2023 compared to the first quarter of 2017.

⁹ Third review publication, p. II-10.

¹⁰ Circular welded pipe may be manufactured on some of the same equipment as line pipe and OCTG.

¹¹ Circular Welded Carbon-Quality Steel Pipe from Oman, Pakistan, and the United Arab Emirates, Inv. Nos. 731-TA-1299, 1300, and 1302 (Review), USITC Publication 5390, December 2022, p. II-9.

Figure II-1
GDP: Gross Domestic Product, billions of dollars, seasonally adjusted annual rate, January 2017-
September 2023, by quarter



Source: Bureau of Economic Analysis, National Income and Product Accounts-Table 1.1.5, Gross Domestic Product, available at <https://www.bea.gov/itable/national-gdp-and-personal-income>, accessed November 15, 2023.

Table II-5
GDP: Gross Domestic Product, billions of dollars, seasonally adjusted annual rate, January 2017-
September 2023, by quarter

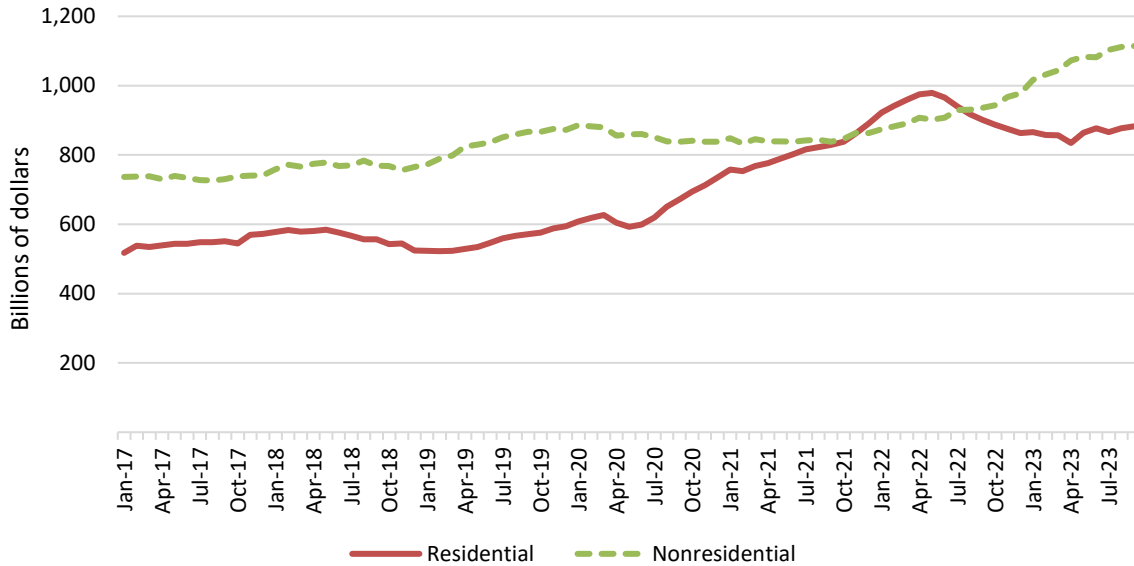
U.S. dollars, billions

Period	GDP
2017 Q1	19,148
2017 Q2	19,305
2017 Q3	19,562
2017 Q4	19,895
2018 Q1	20,156
2018 Q2	20,470
2018 Q3	20,687
2018 Q4	20,819
2019 Q1	21,013
2019 Q2	21,272
2019 Q3	21,532
2019 Q4	21,707
2020 Q1	21,538
2020 Q2	19,637
2020 Q3	21,362
2020 Q4	21,705
2021 Q1	22,314
2021 Q2	23,047
2021 Q3	23,550
2021 Q4	24,349
2022 Q1	24,741
2022 Q2	25,249
2022 Q3	25,724
2022 Q4	26,138
2023 Q1	26,530
2023 Q2	26,799
2023 Q3	27,624

Source: Bureau of Economic Analysis, National Income and Product Accounts-Table 1.1.5, Gross Domestic Product, available at <https://www.bea.gov/itable/national-gdp-and-personal-income>, accessed November 15, 2023.

As shown in figure II-2 and table II-6, construction spending for residential and non-residential applications increased between January 2017 and July 2023. Non-residential construction generally decreased throughout 2020 compared to previous years and remained relatively steady through early 2022, at which point it increased through July 2023. Residential construction spending showed three periods of decline over the review period: May 2018-February 2019, March 2020-May 2020, and May 2022-April 2023. Overall, residential construction spending increased 70.4 percent during January 2017-September 2023 and non-residential construction spending increased by 51.2 percent.

Figure II-2
U.S. construction spending: Value of construction put in place, residential and non-residential construction, seasonally adjusted annual rate, by month, January 2017-September 2023



Source: United States Census Bureau, Construction Spending, available at https://www.census.gov/construction/c30/historical_data.html, accessed November 15, 2023.

Table II-6**U.S. construction spending: Value of construction put in place, residential and non-residential construction, seasonally adjusted annual rate, by month, January 2017-September 2023**

Value in millions of dollars

Year	Month	Residential	Non-residential
2017	January	517,537	737,045
2017	February	538,326	737,584
2017	March	534,162	738,562
2017	April	539,294	729,785
2017	May	543,467	739,459
2017	June	543,501	733,851
2017	July	548,458	727,430
2017	August	548,645	726,329
2017	September	551,170	730,001
2017	October	544,892	738,375
2017	November	569,046	739,850
2017	December	571,985	741,681
2018	January	577,668	758,801
2018	February	583,275	771,830
2018	March	578,850	766,118
2018	April	580,582	774,519
2018	May	583,912	778,452
2018	June	575,560	767,654

Table continued.

Table II-6 Continued

U.S. construction spending: Value of construction put in place, residential and non-residential construction, seasonally adjusted annual rate, by month, January 2017-July 2023

Year	Month	Residential	Non-residential
2018	July	566,435	770,196
2018	August	556,962	783,487
2018	September	556,838	769,273
2018	October	542,596	768,351
2018	November	544,806	755,889
2018	December	524,626	765,304
2019	January	523,358	772,691
2019	February	522,840	789,199
2019	March	523,775	798,757
2019	April	529,221	824,436
2019	May	534,709	829,712
2019	June	546,858	836,451
2019	July	559,252	851,497
2019	August	566,877	859,214
2019	September	571,274	866,845
2019	October	575,523	866,627
2019	November	587,932	875,105
2019	December	594,372	872,044
2020	January	608,167	885,949
2020	February	618,838	882,951
2020	March	626,300	880,035
2020	April	604,385	856,086
2020	May	592,258	859,828
2020	June	599,178	860,009
2020	July	619,700	851,271
2020	August	650,683	838,957
2020	September	672,246	837,936
2020	October	693,884	841,016
2020	November	712,739	838,237
2020	December	734,722	838,038
2021	January	758,072	848,489
2021	February	752,846	832,198
2021	March	767,906	845,139
2021	April	776,420	839,218
2021	May	788,956	839,325
2021	June	801,854	837,926
2021	July	816,412	841,935
2021	August	822,881	843,875
2021	September	828,998	838,334
2021	October	838,559	846,684
2021	November	862,744	863,842
2021	December	891,046	863,380

Table continued.

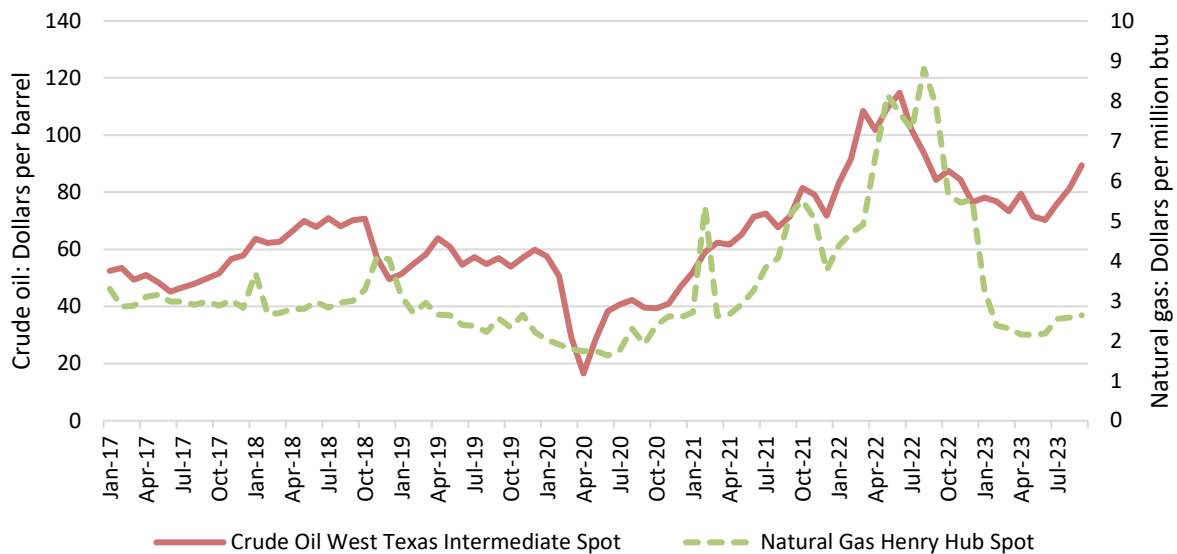
Table II-6 Continued**U.S. construction spending: Value of construction put in place, residential and non-residential construction, seasonally adjusted annual rate, by month, January 2017-July 2023**

Year	Month	Residential	Non-residential
2022	January	922,478	873,982
2022	February	941,637	882,091
2022	March	959,067	890,570
2022	April	975,266	907,487
2022	May	979,044	901,853
2022	June	965,400	907,784
2022	July	939,588	929,674
2022	August	917,150	930,135
2022	September	900,993	935,937
2022	October	887,097	943,380
2022	November	874,829	967,377
2022	December	863,102	977,794
2023	January	865,778	1,016,421
2023	February	857,211	1,032,350
2023	March	856,947	1,044,454
2023	April	834,713	1,073,124
2023	May	864,027	1,082,705
2023	June	876,684	1,082,261
2023	July	889,118	1,083,490
2023	August	877,171	1,111,141
2023	September	882,325	1,114,201

Source: United States Census Bureau, Construction Spending, available at https://www.census.gov/construction/c30/historical_data.html, accessed November 15, 2023.

As shown in figure II-3 and table II-7, crude oil and natural gas prices fluctuated over the review period, but crude oil prices were 70.3 percent higher in September 2023 than in January 2017 and natural gas prices were 20.0 percent lower.

Figure II-3
Crude oil and natural gas prices: Crude oil West Texas Intermediate spot price and Natural gas Henry Hub spot price, by month, January 2017-September 2023



Source: U.S. Energy Information Administration, U.S. Energy Markets Summary, available at <https://www.eia.gov/outlooks/steo/data/browser/#/?v=3&f=M&s=&start=201601&end=202312&linechart=COPRPUS&ctype=linechart&maptype=0&id=>, retrieved November 15, 2023.

Table II-7
Crude oil and natural gas prices: Crude oil West Texas Intermediate spot price and Natural gas Henry Hub spot price, by month, January 2017-September 2023

U.S. dollars

Year	Month	Crude Oil WTI spot price (dollars per barrel)	Natural gas Henry Hub spot price (dollars per million btu)
2017	January	52.50	3.30
2017	February	53.47	2.85
2017	March	49.33	2.88
2017	April	51.06	3.10
2017	May	48.48	3.15
2017	June	45.18	2.98
2017	July	46.63	2.98
2017	August	48.04	2.90
2017	September	49.82	2.98
2017	October	51.58	2.88
2017	November	56.64	3.01
2017	December	57.88	2.82

Table continued.

Table II-7 Continued

Crude oil and natural gas prices: Crude oil West Texas Intermediate spot price and Natural gas Henry Hub spot price, by month, January 2017-September 2023

Year	Month	Crude Oil WTI spot price (dollars per barrel)	Natural gas Henry Hub spot price (dollars per million btu)
2018	January	63.70	3.69
2018	February	62.23	2.67
2018	March	62.73	2.69
2018	April	66.25	2.80
2018	May	69.98	2.80
2018	June	67.87	2.97
2018	July	70.98	2.83
2018	August	68.06	2.96
2018	September	70.23	3.00
2018	October	70.75	3.28
2018	November	56.96	4.09
2018	December	49.52	4.04
2019	January	51.38	3.11
2019	February	54.95	2.69
2019	March	58.15	2.95
2019	April	63.86	2.65
2019	May	60.83	2.64
2019	June	54.66	2.40
2019	July	57.35	2.37
2019	August	54.80	2.22
2019	September	56.95	2.56
2019	October	53.96	2.33
2019	November	57.03	2.65
2019	December	59.88	2.22
2020	January	57.52	2.02
2020	February	50.54	1.91
2020	March	29.21	1.79
2020	April	16.55	1.74
2020	May	28.56	1.75
2020	June	38.31	1.63
2020	July	40.71	1.77
2020	August	42.34	2.30
2020	September	39.63	1.92
2020	October	39.40	2.39
2020	November	40.94	2.61
2020	December	47.02	2.59

Table continued.

Table II-7 Continued

Crude oil and natural gas prices: Crude oil West Texas Intermediate spot price and Natural gas Henry Hub spot price, by month, January 2017-September 2023

Year	Month	Crude Oil WTI spot price (dollars per barrel)	Natural gas Henry Hub spot price (dollars per million btu)
2021	January	52.00	2.71
2021	February	59.04	5.35
2021	March	62.33	2.62
2021	April	61.72	2.66
2021	May	65.17	2.91
2021	June	71.38	3.26
2021	July	72.49	3.84
2021	August	67.73	4.07
2021	September	71.65	5.16
2021	October	81.48	5.51
2021	November	79.15	5.05
2021	December	71.71	3.76
2022	January	83.22	4.38
2022	February	91.64	4.69
2022	March	108.50	4.90
2022	April	101.78	6.59
2022	May	109.55	8.14
2022	June	114.84	7.70
2022	July	101.62	7.28
2022	August	93.67	8.80
2022	September	84.26	7.88
2022	October	87.55	5.66
2022	November	84.37	5.45
2022	December	76.44	5.53
2023	January	78.12	3.27
2023	February	76.83	2.38
2023	March	73.28	2.31
2023	April	79.45	2.16
2023	May	71.58	2.15
2023	June	70.25	2.18
2023	July	76.07	2.55
2023	August	81.39	2.58
2023	September	89.43	2.64

Source: U.S. Energy Information Administration, U.S. Energy Markets Summary, available at <https://www.eia.gov/outlooks/steo/data/browser/#/?v=3&f=M&s=&start=201601&end=202312&linechart=COPRPUS&ctype=linechart&motype=0&id=>, accessed September 18, 2023.

Firms reported mixed trends in U.S. demand for CWP since January 1, 2017 (table II-8). A plurality of purchasers and all responding foreign producers reported that there was no change in U.S. demand, while three of five responding U.S. producers reported that U.S. demand steadily increased or fluctuated upwards, and importers' responses were mixed. Five purchasers reported that U.S. demand steadily increased or fluctuated up, and four reported that demand fluctuated downwards. Three of five responding purchasers reported that demand for CWP end-use products did not change. Firms' responses regarding their expectations for demand over the next two years were mixed (table II-9). A plurality of U.S. producers and purchasers reported that they expect for demand to remain the same, although seven purchasers (of 17) reported that they anticipate some type of increase in demand over the next two years.

Table II-8
CWP: Count of firms' responses regarding overall domestic and foreign demand since January 1, 2017, by firm type

Number of firms reporting

Market	Firm type	Steadily increase	Fluctuated up	No change	Fluctuated down	Steadily decrease
U.S. demand	U.S. producers	1	2	2	0	0
U.S. demand	Importers	0	2	1	1	0
U.S. demand	Purchasers	1	4	10	4	0
U.S. demand	Foreign producers	0	0	3	0	0
Foreign demand	U.S. producers	0	1	2	0	0
Foreign demand	Importers	0	1	1	0	0
Foreign demand	Purchasers	0	3	8	1	0
Demand in subject home market	Foreign producers	1	1	1	0	0
Demand in other export markets	Foreign producers	0	1	1	0	0
Demand for end use products	Purchasers	1	1	3	0	0

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

Table II-9**CWP: Count of firms' responses regarding anticipated overall domestic and foreign demand, by firm type**

Number of firms reporting

Market	Firm type	Steadily increase	Fluctuated up	No change	Fluctuated down	Steadily decreased
U.S. demand	U.S. producers	0	1	3	1	0
U.S. demand	Importers	0	2	1	1	0
U.S. demand	Purchasers	1	6	8	2	0
U.S. demand	Foreign producers	1	0	2	0	0
Foreign demand	U.S. producers	0	0	2	1	0
Foreign demand	Importers	0	2	1	1	0
Foreign demand	Purchasers	0	3	8	1	0
Demand in subject home market	Foreign producers	1	1	1	0	0
Demand in other export markets	Foreign producers	1	0	1	0	0

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

Substitute products

Substitutes for CWP are relatively limited and include seamless pipe, flex tube, poly tube, plastic pipe, PVC pipe, HDPE pipe, and polypropylene pipe in some gas and water applications. All responding U.S. producers, importers, and purchasers reported that there had been changes in substitutes and did not anticipate any future changes in substitutes.

Substitutability issues

This section assesses the degree to which U.S.-produced CWP and imports of CWP from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of CWP from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderate-to-high degree of substitutability between domestically produced CWP and CWP imported from subject sources.¹² Factors contributing to this level of substitutability include similarities between

¹² The degree of substitution between domestic and imported CWP depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced CWP to the CWP imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as relative prices (discounts/rebates), quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

domestically produced CWP and CWP imported from subject sources across multiple purchase factors, interchangeability between domestic and subject sources, limited significant factors other than price, limited domestic content requirements, and the availability of similar types of CWP from both domestic and subject sources. Factors reducing substitutability may include some preference for domestic product due to availability and lead times advantages and/or firm or customer preferences, and some potential quality differences.

Factors affecting purchasing decisions¹³

Purchaser decisions based on source

As shown in table II-10, most purchasers usually or sometimes make purchasing decisions based on producer and country-of-origin and their customers sometimes make purchasing decisions based on the producer or country of origin. Four purchasers reported that they always make decisions based on the manufacturer, citing the following reasons as factors that inform their decision to work with a particular manufacturer: some customers require U.S.-produced product, price, quality, availability, and tariffs and quotas as factors that inform their decision to work with a particular manufacturer. Purchasers that usually or sometimes make purchasing decisions on producer or country of origin, cited familiarity with particular mills, availability, brand loyalty, and preference for U.S.-produced CWP as reasons why they work with particular sources. Purchaser *** reported that it will sometimes make purchasing decisions based on supplier to make sure that its sources are balanced. Purchaser *** reported that “some customers will request material from a specific producer based on factors including but not limited to internal process performance, material characteristics and/or M&M requirements.”

When asked if they or their customers ever prefer to order CWP produced in a specific country or countries over other possible country sources, 15 of 18 purchasers reported that they did. Nine purchasers reported a preference for U.S. product, six reported a preference for Korean product, one purchaser reported a preference for product from Turkey or nonsubject UAE, and one purchaser reported that its preference was for product that was not produced in India or China.¹⁴

¹³ Seventeen purchasers indicated they had marketing/pricing knowledge of domestic product, 3 of CWP from India, 2 of CWP from Mexico, 10 of CWP from South Korea, 5 of CWP from Taiwan, 5 of CWP from Thailand, 5 of CWP from Turkey, and 10 of CWP from other nonsubject sources including Canada (3), Italy (1), Japan (1), Oman (3), the United Arab Emirates (4), and Vietnam (1). There were no purchasers indicating that they had knowledge of CWP from Brazil.

¹⁴ Some purchasers reported preferences for multiple sources.

Table II-10

CWP: Count of purchasers' responses regarding frequency of purchasing decisions based on producer and country of origin

Number of firms reporting

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	4	5	6	4
Customer	Producer	0	1	10	6
Purchaser	Country	4	6	7	2
Customer	Country	1	1	12	3

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

Importance of purchasing domestic product

Twelve of 19 purchasers reported that at least 80 percent of all of their purchases did not require purchasing U.S.-produced product. Ten purchasers reported that at least some domestic product was required by law (for 5 to 40 percent of their purchases), 10 reported it was required by their customers (for 5 to 25 percent of their purchases), and two reported other preferences for domestic product. Reasons cited for preferring domestic product included company preference.

Most important purchase factors

The most often cited top three factors firms consider in their purchasing decisions for CWP were price (18 firms), quality (15 firms), and availability or supply (9 firms) as shown in table II-11. Quality was the most frequently cited first-most important factor (cited by 7 firms), followed by availability or supply (5 firms); price was the most frequently reported second-most important factor (10 firms); and quality was the most frequently reported third-most important factor (6 firms). Three purchasers each reported that product source or price as the first-most important factor in their purchasing decisions.

The majority of purchasers (13 of 19) reported that they usually purchase the lowest-priced product.

Table II-11
CWP: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Number of firms reporting

Factor	First	Second	Third	Total
Price or cost	3	10	5	18
Quality	7	2	6	15
Availability or supply	5	2	1	10
Source	3	1	0	4
All other factors	1	4	6	NA

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

Note: Other factors include logistics/lead time/delivery (7 purchasers), traditional supplier/existing relationships (4), service (2), product range (2), and credit terms (1).

Note: Purchasers reported considering many characteristics when evaluating quality including: meeting industry standards, ovality, end finish and surface protection, steel strength, consistency, reputation, spec compliance, minimal rust, meeting ASTM standards, gauge control, and tight chemistry tolerances.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 15 factors in their purchasing decisions (table II-12). The factors rated as very important by more than half of responding purchasers were quality meets industry standards (19 purchasers), availability (18), product consistency (17), reliability of supply (17), delivery time (16), and price (16).

Table II-12
CWP: Count of purchasers' responses regarding importance of purchase factors, by factor

Number of firms reporting

Factor	Very important	Somewhat important	Not important
Availability	18	1	0
Delivery terms	7	11	1
Delivery time	16	3	0
Discounts offered	8	9	2
Minimum quantity requirements	3	9	7
Packaging	3	8	8
Payment terms	8	10	1
Price	16	3	0
Product consistency	17	2	0
Product range	6	12	0
Quality meets industry standards	19	0	0
Quality exceeds industry standards	5	7	6
Reliability of supply	17	2	0
Technical support/service	5	10	4
U.S. transportation costs	8	8	3

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

Lead times

U.S.-produced CWP is primarily sold from inventory while imported CWP is primarily produced to order. U.S. producers reported that approximately two-thirds of their commercial shipments were sold from inventory. The sole responding subject importer reported that *** of its commercial shipments were produced to order, with lead times averaging 45 days.

Supplier certification

Twelve of 18 responding purchasers do not require their suppliers to become certified or qualified to sell CWP to their firm. Three of six purchasers that provided estimates reported that the time for certification that ranges from one to five days. Purchaser *** reported that it takes 90 days to certify, purchaser *** reported that it takes 180 days to certify, and purchaser *** did not provide an estimate, but reported that the time required “varies.” Purchasers reported a variety of factors considered during the certification process, including trial orders, third-party testing, on-site visits, conflict minerals statements, references, and trial orders. Only one purchaser reported that a supplier had failed in its attempt to qualify CWP, or had lost its approved status since 2017, and cited nonsubject source *** due to a breach of contract.

Minimum quality specifications

As can be seen from table II-13, 14 responding purchasers reported that domestically produced product always met minimum quality specifications. Most responding purchasers reported that the CWP from Brazil, India, Taiwan, Thailand, and Turkey usually met minimum quality specifications, and CWP from South Korea always met minimum quality specifications.

Table II-13
CWP: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source

Number of firms reporting

Source of purchases	Always	Usually	Sometimes	Rarely or never
United States	14	4	0	0
Brazil	0	1	0	0
India subject	0	6	0	0
Mexico	1	3	0	0
South Korea	8	3	0	0
Taiwan	2	5	0	0
Thailand	2	4	0	0
Turkey	3	4	0	0
Nonsubject sources	5	4	0	0

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

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

Responding purchasers reported factors that determined quality includes consistency, end finish and surface protection, gauge control, meeting ASTM standards, meeting industry standards, minimal rust, ovality, reputation, specification compliance, steel strength, and tight chemistry tolerances.

Changes in purchasing patterns

Most responding purchasers (13 of 17) reported that they had not changed suppliers since January 1, 2017. Four purchasers reported that they had changed suppliers. Specifically, firms dropped or reduced purchases from Borusan Mannesmann and added Masterpipe and Dynamic Tube. Others reported continuously evaluating suppliers and making necessary changes. Purchaser *** reported that Dynamic Tube and Master Halco were acquired by U.S. Premier Tube Mills in Madison, Indiana, and *** reported adding numerous smaller foreign CWP suppliers and that there is growing capacity amongst U.S. producers, especially Nucor and Zekelman.

Purchasers were also asked about changes in their purchasing patterns from different countries since January 1, 2017 (table II-14). Purchasers' patterns were mixed. Six purchasers reported increased purchases, five reported no change, and four reported an overall decrease in their purchases of domestic product. Most responding purchasers reported decreased purchases of South Korean CWP, but responses for purchases of CWP from other subject sources were mixed. Increased purchases of U.S.-produced product were because of general growth in business, increased demand, price and availability of U.S.-produced CWP. Purchasers reported decreased purchases of U.S.-produced CWP because of decreased demand or because the firm decreased its available product line.

Table II-14
CWP: Count of purchasers' responses regarding changes in purchase patterns from the United States, subject, and nonsubject sources

Number of firms reporting

Source of purchases	Steadily increase	Fluctuated up	No change	Fluctuated down	Steadily decreased	Did not purchase
United States	4	2	5	3	1	3
Brazil	0	0	0	0	0	13
India subject	0	1	1	0	1	11
Mexico	0	1	1	0	0	11
South Korea	0	1	1	4	2	7
Taiwan	0	0	0	1	1	12
Thailand	1	0	0	2	1	10
Turkey	2	0	1	1	0	11
Nonsubject sources	0	0	4	3	2	6
Sources unknown	0	1	3	0	2	8

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

Purchaser *** reported a decrease in U.S.-produced CWP and an increase in CWP from South Korea because of a relatively higher demand for PED-certified product that it sources from South Korea. Purchaser *** reported that it decreased its purchases of CWP from Taiwan and increased its purchases of CWP from Turkey due to price, and purchaser *** reported that its purchases of CWP from Thailand and Turkey increased due to pricing, quality, and lead time.

Purchase factor comparisons of domestic products, subject imports, and nonsubject imports

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

by-country comparison on the same 15 factors (table II-15) for which they were asked to rate the importance. There were no purchasers that compared U.S.-produced CWP with CWP from Brazil.

A plurality of responding purchasers reported that U.S.-produced CWP was superior to CWP from India on most factors.¹⁵ Purchasers' reported that U.S.-produced CWP is generally comparable or superior to CWP produced in Thailand¹⁶ and Turkey,¹⁷ depending on the factor. Most purchasers reported that when compared to CWP from Mexico,¹⁸ South Korea,¹⁹ and Taiwan,²⁰ U.S.-produced CWP is comparable on most factors. Lastly, when comparing U.S.-produced CWP with CWP from nonsubject sources, most purchasers reported that U.S. CWP was superior in availability and delivery time, comparable in product consistency, quality meets industry standards, and reliability of supply, and inferior in price.

¹⁵ Most or a plurality of purchasers reported that U.S. CWP is superior to Indian CWP on factors including availability, delivery time, product consistency, and reliability, which were ranked as very important to purchasing decisions. All purchasers reported that U.S.-produced CWP is comparable to Indian CWP on meeting industry standards, and U.S. CWP was ranked as comparable or inferior to India CWP on price.

¹⁶ Most purchasers reported that U.S. CWP is superior to Thai CWP regarding availability, delivery time, product consistency, and quality meets industry standards. Regarding price, most purchasers reported that U.S. CWP is inferior to Thai CWP, and two purchasers each reported that U.S. CWP was superior or comparable to CWP from Thailand in reliability of supply.

¹⁷ Most purchasers reported that U.S. CWP is superior to CWP from Turkey regarding availability, delivery time, and reliability of supply. Regarding price, most purchasers reported that U.S. CWP is inferior to Turkish CWP, and comparable in regard to product consistency and quality meets industry standards.

¹⁸ Most purchasers reported that U.S.-produced CWP is comparable to CWP produced in Mexico on all factors except price and reliability of supply (both of which were reported as very important to purchasing decisions) for which purchasers' responses were mixed.

¹⁹ Most purchasers reported that U.S.-produced CWP is comparable to CWP produced in South Korea on most factors (including product consistency and quality meets industry standards). However, the availability, delivery time, and reliability of supply of U.S. CWP were considered to be superior to South Korean product by at least a plurality of purchasers, and the price of U.S. CWP was considered inferior.

²⁰ Most purchasers reported that U.S.-produced CWP is comparable to CWP produced in Taiwan on most factors (including delivery time, product consistency and quality meets industry standards). Two purchasers each reported that U.S. CWP was superior or comparable to product from Taiwan regarding availability and reliability of supply. U.S.-produced CWP was considered to be inferior to product from Taiwan in regard to price by purchasers.

Table II-15**CWP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. India	3	0	1
Delivery terms	U.S. v. India	3	0	1
Delivery time	U.S. v. India	3	0	1
Discounts offered	U.S. v. India	1	2	1
Minimum quantity requirements	U.S. v. India	3	1	0
Packaging	U.S. v. India	2	2	0
Payment terms	U.S. v. India	2	2	0
Price	U.S. v. India	0	2	2
Product consistency	U.S. v. India	2	1	1
Product range	U.S. v. India	0	2	2
Quality meets industry standards	U.S. v. India	0	4	0
Quality exceeds industry standards	U.S. v. India	1	2	1
Reliability of supply	U.S. v. India	2	1	1
Technical support/service	U.S. v. India	3	1	0
U.S. transportation costs	U.S. v. India	1	2	1

Table continued.

Table II-15 Continued**CWP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Mexico	0	2	1
Delivery terms	U.S. v. Mexico	0	2	1
Delivery time	U.S. v. Mexico	0	2	1
Discounts offered	U.S. v. Mexico	0	2	1
Minimum quantity requirements	U.S. v. Mexico	0	3	0
Packaging	U.S. v. Mexico	0	3	0
Payment terms	U.S. v. Mexico	0	2	1
Price	U.S. v. Mexico	1	1	1
Product consistency	U.S. v. Mexico	0	3	0
Product range	U.S. v. Mexico	1	2	0
Quality meets industry standards	U.S. v. Mexico	0	3	0
Quality exceeds industry standards	U.S. v. Mexico	0	3	0
Reliability of supply	U.S. v. Mexico	1	1	1
Technical support/service	U.S. v. Mexico	1	2	0
U.S. transportation costs	U.S. v. Mexico	0	2	1

Table continued.

Table II-15 Continued**CWP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. South Korea	4	3	2
Delivery terms	U.S. v. South Korea	4	4	0
Delivery time	U.S. v. South Korea	5	1	2
Discounts offered	U.S. v. South Korea	2	5	2
Minimum quantity requirements	U.S. v. South Korea	3	4	1
Packaging	U.S. v. South Korea	1	7	0
Payment terms	U.S. v. South Korea	2	6	0
Price	U.S. v. South Korea	2	2	4
Product consistency	U.S. v. South Korea	1	7	0
Product range	U.S. v. South Korea	0	7	1
Quality meets industry standards	U.S. v. South Korea	0	8	0
Quality exceeds industry standards	U.S. v. South Korea	0	8	0
Reliability of supply	U.S. v. South Korea	4	4	0
Technical support/service	U.S. v. South Korea	4	3	1
U.S. transportation costs	U.S. v. South Korea	1	6	1

Table continued.

Table II-15 Continued**CWP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Taiwan	2	2	1
Delivery terms	U.S. v. Taiwan	2	3	0
Delivery time	U.S. v. Taiwan	3	1	1
Discounts offered	U.S. v. Taiwan	1	3	1
Minimum quantity requirements	U.S. v. Taiwan	2	2	1
Packaging	U.S. v. Taiwan	1	4	0
Payment terms	U.S. v. Taiwan	2	3	0
Price	U.S. v. Taiwan	1	1	3
Product consistency	U.S. v. Taiwan	0	5	0
Product range	U.S. v. Taiwan	0	4	1
Quality meets industry standards	U.S. v. Taiwan	0	4	1
Quality exceeds industry standards	U.S. v. Taiwan	0	4	1
Reliability of supply	U.S. v. Taiwan	2	2	1
Technical support/service	U.S. v. Taiwan	2	2	2
U.S. transportation costs	U.S. v. Taiwan	1	3	1

Table continued.

Table II-15 Continued**CWP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Thailand	3	1	1
Delivery terms	U.S. v. Thailand	3	2	0
Delivery time	U.S. v. Thailand	4	0	1
Discounts offered	U.S. v. Thailand	1	3	1
Minimum quantity requirements	U.S. v. Thailand	3	1	1
Packaging	U.S. v. Thailand	2	3	0
Payment terms	U.S. v. Thailand	3	2	0
Price	U.S. v. Thailand	1	0	4
Product consistency	U.S. v. Thailand	1	3	1
Product range	U.S. v. Thailand	1	4	0
Quality meets industry standards	U.S. v. Thailand	0	4	1
Quality exceeds industry standards	U.S. v. Thailand	0	4	1
Reliability of supply	U.S. v. Thailand	2	2	1
Technical support/service	U.S. v. Thailand	2	1	1
U.S. transportation costs	U.S. v. Thailand	0	3	1

Table continued.

Table II-15 Continued**CWP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Turkey	3	2	0
Delivery terms	U.S. v. Turkey	3	2	0
Delivery time	U.S. v. Turkey	4	1	0
Discounts offered	U.S. v. Turkey	0	4	1
Minimum quantity requirements	U.S. v. Turkey	3	1	1
Packaging	U.S. v. Turkey	1	4	0
Payment terms	U.S. v. Turkey	2	3	0
Price	U.S. v. Turkey	0	1	4
Product consistency	U.S. v. Turkey	0	5	0
Product range	U.S. v. Turkey	0	5	0
Quality meets industry standards	U.S. v. Turkey	0	5	0
Quality exceeds industry standards	U.S. v. Turkey	0	5	0
Reliability of supply	U.S. v. Turkey	3	2	0
Technical support/service	U.S. v. Turkey	3	2	0
U.S. transportation costs	U.S. v. Turkey	1	3	1

Table continued.

Table II-15 Continued**CWP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Nonsubject	4	3	1
Delivery terms	U.S. v. Nonsubject	4	4	0
Delivery time	U.S. v. Nonsubject	5	2	1
Discounts offered	U.S. v. Nonsubject	1	6	1
Minimum quantity requirements	U.S. v. Nonsubject	5	3	0
Packaging	U.S. v. Nonsubject	3	5	0
Payment terms	U.S. v. Nonsubject	3	5	0
Price	U.S. v. Nonsubject	0	3	5
Product consistency	U.S. v. Nonsubject	1	7	0
Product range	U.S. v. Nonsubject	0	7	1
Quality meets industry standards	U.S. v. Nonsubject	0	8	0
Quality exceeds industry standards	U.S. v. Nonsubject	0	8	0
Reliability of supply	U.S. v. Nonsubject	3	5	0
Technical support/service	U.S. v. Nonsubject	5	3	0
U.S. transportation costs	U.S. v. Nonsubject	2	5	1

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

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.

Comparison of U.S.-produced and imported CWP

In order to determine whether U.S.-produced CWP can generally be used in the same applications as imports from Brazil, India, Mexico, South Korea, Taiwan, Thailand, or Turkey, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables II-16 to II-18, almost all U.S. producers and one responding importer reported that U.S.-produced CWP and CWP from subject sources is always interchangeable. Purchasers reported that U.S.-produced CWP and CWP from India, South Korea, and Taiwan was frequently interchangeable, from Mexico was sometimes interchangeable, and purchasers responses were mixed for comparisons with Brazil, Thailand, and Turkey.

Table II-16**CWP: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Brazil	4	0	0	1
United States vs. India	4	0	1	0
United States vs. Mexico	4	1	0	0
United States vs. South Korea	5	0	0	0
United States vs. Taiwan	5	0	0	0
United States vs. Thailand	4	1	0	0
United States vs. Turkey	4	0	1	0
Brazil vs. India	4	0	0	0
Brazil vs. Mexico	4	0	0	0
Brazil vs. South Korea	4	0	0	0
Brazil vs. Taiwan	4	0	0	0
Brazil vs. Thailand	4	0	0	0
Brazil vs. Turkey	4	0	0	0
India vs. Mexico	4	0	0	0
India vs. South Korea	4	0	0	0
India vs. Taiwan	4	0	0	0
India vs. Thailand	4	0	0	0
India vs. Turkey	4	0	0	0
Mexico vs. South Korea	4	0	0	0
Mexico vs. Taiwan	4	0	0	0
Mexico vs. Thailand	4	0	0	0
Mexico vs. Turkey	4	0	0	0
South Korea vs. Taiwan	4	0	0	0
South Korea vs. Thailand	4	0	0	0
South Korea vs. Turkey	4	0	0	0
Taiwan vs. Thailand	4	0	0	0
Taiwan vs. Turkey	4	0	0	0
Thailand vs. Turkey	4	0	0	0
United States vs. Other	4	0	1	0
Brazil vs. Other	4	0	0	0
India vs. Other	4	0	0	0
Mexico vs. Other	4	0	0	0
South Korea vs. Other	4	0	0	0
Taiwan vs. Other	4	0	0	0
Thailand vs. Other	4	0	0	0
Turkey vs. Other	4	0	0	0

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

Table II-17**CWP: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Brazil	1	0	0	0
United States vs. India	1	0	0	0
United States vs. Mexico	1	0	0	0
United States vs. South Korea	1	0	0	0
United States vs. Taiwan	1	0	0	0
United States vs. Thailand	1	0	0	0
United States vs. Turkey	1	0	1	0
Brazil vs. India	1	0	0	0
Brazil vs. Mexico	1	0	0	0
Brazil vs. South Korea	1	0	0	0
Brazil vs. Taiwan	1	0	0	0
Brazil vs. Thailand	1	0	0	0
Brazil vs. Turkey	1	0	1	0
India vs. Mexico	1	0	0	0
India vs. South Korea	1	0	0	0
India vs. Taiwan	1	0	0	0
India vs. Thailand	1	0	0	0
India vs. Turkey	1	0	1	0
Mexico vs. South Korea	1	0	0	0
Mexico vs. Taiwan	1	0	0	0
Mexico vs. Thailand	1	0	0	0
Mexico vs. Turkey	1	0	1	0
South Korea vs. Taiwan	1	0	0	0
South Korea vs. Thailand	1	0	0	0
South Korea vs. Turkey	1	0	1	0
Taiwan vs. Thailand	1	0	0	0
Taiwan vs. Turkey	1	0	1	0
Thailand vs. Turkey	1	0	1	0
United States vs. Other	1	0	0	0
Brazil vs. Other	1	0	0	0
India vs. Other	1	0	0	0
Mexico vs. Other	1	0	0	0
South Korea vs. Other	1	0	0	0
Taiwan vs. Other	1	0	0	0
Thailand vs. Other	1	0	0	0
Turkey vs. Other	1	0	1	0

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

Table II-18**CWP: Count of purchasers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Brazil	1	0	1	0
United States vs. India	1	3	2	0
United States vs. Mexico	1	1	2	0
United States vs. South Korea	3	5	2	0
United States vs. Taiwan	1	3	1	0
United States vs. Thailand	2	2	1	0
United States vs. Turkey	2	2	2	0
Brazil vs. India	1	0	0	0
Brazil vs. Mexico	1	0	0	0
Brazil vs. South Korea	1	0	0	0
Brazil vs. Taiwan	1	0	0	0
Brazil vs. Thailand	1	0	0	0
Brazil vs. Turkey	1	0	0	0
India vs. Mexico	1	2	0	0
India vs. South Korea	1	3	1	0
India vs. Taiwan	1	4	0	0
India vs. Thailand	1	3	0	0
India vs. Turkey	1	3	1	0
Mexico vs. South Korea	1	2	1	0
Mexico vs. Taiwan	1	2	0	0
Mexico vs. Thailand	1	2	0	0
Mexico vs. Turkey	1	2	0	0
South Korea vs. Taiwan	1	5	0	0
South Korea vs. Thailand	2	4	0	0
South Korea vs. Turkey	2	4	0	0
Taiwan vs. Thailand	1	5	0	0
Taiwan vs. Turkey	1	4	0	0
Thailand vs. Turkey	2	4	0	0
United States vs. Other	3	2	2	0
Brazil vs. Other	0	0	0	0
India vs. Other	0	2	1	0
Mexico vs. Other	0	2	0	0
South Korea vs. Other	1	3	0	0
Taiwan vs. Other	0	3	0	0
Thailand vs. Other	1	3	0	0
Turkey vs. Other	1	4	0	0

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 CWP from the United States, subject, or nonsubject countries. As seen in tables II-19 to II-21, most responding U.S. producers reported that factors other than price were never significant. One importer each reported that differences other than price were sometimes or never significant. A plurality of purchasers reported that differences other than price were sometimes significant when comparing U.S.-produced CWP from the United States and CWP from India, Mexico, South Korea, or Turkey, and responses were mixed when comparing with CWP from Brazil, Taiwan, and Thailand.

Table II-19**CWP: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Brazil	0	0	0	4
United States vs. India	0	0	1	4
United States vs. Mexico	0	1	0	4
United States vs. South Korea	1	0	0	4
United States vs. Taiwan	1	0	0	4
United States vs. Thailand	0	0	1	4
United States vs. Turkey	0	0	1	4
Brazil vs. India	0	0	0	3
Brazil vs. Mexico	0	0	0	3
Brazil vs. South Korea	0	0	0	3
Brazil vs. Taiwan	0	0	0	3
Brazil vs. Thailand	0	0	0	3
Brazil vs. Turkey	0	0	0	3
India vs. Mexico	0	0	0	3
India vs. South Korea	0	0	0	3
India vs. Taiwan	0	0	0	3
India vs. Thailand	0	0	0	3
India vs. Turkey	0	0	0	3
Mexico vs. South Korea	0	0	0	3
Mexico vs. Taiwan	0	0	0	3
Mexico vs. Thailand	0	0	0	3
Mexico vs. Turkey	0	0	0	3
South Korea vs. Taiwan	0	0	0	3
South Korea vs. Thailand	0	0	0	3
South Korea vs. Turkey	0	0	0	3
Taiwan vs. Thailand	0	0	0	3
Taiwan vs. Turkey	0	0	0	3
Thailand vs. Turkey	0	0	0	3
United States vs. Other	0	0	2	3
Brazil vs. Other	0	0	1	2
India vs. Other	0	0	0	3
Mexico vs. Other	0	0	0	3
South Korea vs. Other	0	0	1	2
Taiwan vs. Other	0	0	1	2
Thailand vs. Other	0	0	0	3
Turkey vs. Other	0	0	0	3

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

Table II-20

CWP: Count of importers reporting the significance of differences between product produced in the United States and in other countries, by country pair

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Brazil	0	0	0	1
United States vs. India	0	0	0	1
United States vs. Mexico	0	0	0	1
United States vs. South Korea	0	0	0	1
United States vs. Taiwan	0	0	0	1
United States vs. Thailand	0	0	0	1
United States vs. Turkey	0	0	1	1
Brazil vs. India	0	0	0	1
Brazil vs. Mexico	0	0	0	1
Brazil vs. South Korea	0	0	0	1
Brazil vs. Taiwan	0	0	0	1
Brazil vs. Thailand	0	0	0	1
Brazil vs. Turkey	0	0	1	1
India vs. Mexico	0	0	0	1
India vs. South Korea	0	0	0	1
India vs. Taiwan	0	0	0	1
India vs. Thailand	0	0	0	1
India vs. Turkey	0	0	1	1
Mexico vs. South Korea	0	0	0	1
Mexico vs. Taiwan	0	0	0	1
Mexico vs. Thailand	0	0	0	1
Mexico vs. Turkey	0	0	1	1
South Korea vs. Taiwan	0	0	0	1
South Korea vs. Thailand	0	0	0	1
South Korea vs. Turkey	0	0	1	1
Taiwan vs. Thailand	0	0	0	1
Taiwan vs. Turkey	0	0	1	1
Thailand vs. Turkey	0	0	1	1
United States vs. Other	0	0	0	1
Brazil vs. Other	0	0	0	1
India vs. Other	0	0	0	1
Mexico vs. Other	0	0	0	1
South Korea vs. Other	0	0	0	1
Taiwan vs. Other	0	0	0	1
Thailand vs. Other	0	0	0	1
Turkey vs. Other	0	0	1	1

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

Table II-21**CWP: Count of purchasers reporting the significance of differences between product produced in the United States and in other countries, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Brazil	0	1	1	1
United States vs. India	0	1	3	1
United States vs. Mexico	0	1	3	1
United States vs. South Korea	2	2	4	1
United States vs. Taiwan	1	2	2	1
United States vs. Thailand	1	1	2	2
United States vs. Turkey	0	1	3	2
Brazil vs. India	0	0	1	1
Brazil vs. Mexico	0	0	1	1
Brazil vs. South Korea	0	0	1	1
Brazil vs. Taiwan	0	0	1	2
Brazil vs. Thailand	0	0	1	1
Brazil vs. Turkey	0	0	1	1
India vs. Mexico	0	0	3	1
India vs. South Korea	1	0	4	1
India vs. Taiwan	1	1	3	1
India vs. Thailand	1	0	3	1
India vs. Turkey	0	0	3	1
Mexico vs. South Korea	1	0	4	1
Mexico vs. Taiwan	1	0	3	1
Mexico vs. Thailand	1	0	3	1
Mexico vs. Turkey	0	0	3	1
South Korea vs. Taiwan	1	1	3	1
South Korea vs. Thailand	2	1	3	1
South Korea vs. Turkey	2	1	3	1
Taiwan vs. Thailand	1	1	3	1
Taiwan vs. Turkey	0	1	3	1
Thailand vs. Turkey	1	0	3	2
United States vs. Other	0	2	3	2
Brazil vs. Other	0	0	0	1
India vs. Other	0	0	3	1
Mexico vs. Other	0	0	2	1
South Korea vs. Other	1	1	2	1
Taiwan vs. Other	0	1	2	1
Thailand vs. Other	0	0	2	2
Turkey vs. Other	0	1	2	2

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

Elasticity estimates

This section discusses elasticity estimates. Party comments have been included below.

U.S. supply elasticity

The domestic supply elasticity for CWP measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of CWP. 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 CWP. Analysis of these factors above indicates that the U.S. industry has the ability to greatly increase or decrease shipments to the U.S. market; an estimate in the range of 4 to 8 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for CWP measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of CWP. 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 CWP in the production of any downstream products. Based on the available information, the aggregate demand for CWP is likely to be moderately inelastic; a range of -0.3 to -0.75 is suggested. Domestic interested parties stated that nothing has changed since the third review, when the Commission found that demand "is likely to be somewhat elastic."²¹

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.²² 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 CWP and imported CWP is likely to be in the range of 3 to 5. Factors contributing to this level of substitutability include similarities between

²¹ Domestic interested parties' prehearing brief, p. 29.

²² 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.

domestically produced CWP and CWP imported from subject sources across multiple purchase factors, interchangeability between domestic and subject sources, limited significant factors other than price, limited domestic content requirements, and similar types of CWP being available from both domestic and subject sources. Factors reducing substitutability may include some preference for domestic product due to availability and lead times advantages and/or firm or customer preferences, and some potential quality differences.

Part III: Condition of the U.S. industry

Overview

The information in this section of the report was compiled from responses to the Commission's questionnaires. Five firms, which staff believes accounted for approximately *** percent of U.S. production of CWP during 2022, supplied information on their operations in these reviews.¹

In less than a decade, Nucor Corporation, one of the leading domestic producers of hot-rolled sheet steel, a primary input used to produce CWP, has grown its pipe and tube production capacity substantially through the acquisitions of companies that make up Nucor Tubular Products. Nucor Tubular Products consists of the Independence Tube Corporation (acquired in October 2016), Southland Tube, Inc. (acquired in January 2017), Republic Conduit (acquired in January 2017), and the assets of Century Tube, LLC (acquired in December 2018). Nucor also acquired majority ownership of California Steel Industries, Inc. in February 2022. The

¹ The five responding U.S. producers of CWP, the domestic interested parties, estimated their share of total U.S. production of CWP during 2022 to be *** percent and identified up to five additional U.S. producers. Domestic interested parties' response to the notice of institution, February 2, 2023, p. 48 and exhibit 1. They estimate total 2022 production to be 1,136,048 short tons based on the data reported for the first half of 2022 in the recent five-year review on CWP from Oman, Pakistan, and the UAE. See also Circular Welded Carbon-Quality Steel Pipe from Oman, Pakistan, and the United Arab Emirates, Inv. Nos. 731-TA-1299, 1300, and 1302 (Review), USITC Publication 5390, December 2022, Table C-1.

Of the additional U.S. producers of welded tubular products that staff attempted to contact, *** are included in the operations of responding U.S. producers, while ***. Staff followed up with and requested information from *** as well as with other U.S. producers of welded tubular products that it had identified as possible U.S. producers of CWP. These latter firms are believed to focus primarily on such products as line pipe, casing and tubing, mechanical tubing, and large-diameter or non-round structural pipe, but in many cases also report offering standard and structural pipe for sale, although likely not in the volumes reported by the responding U.S. producers. See, e.g., email from ***, October 4, 2023. Staff did not receive usable questionnaire responses from *** but did receive email responses with estimates for CWP production that amounted to *** percent of total 2022 U.S. CWP production, as presented in this report. Email from ***, November 3, 2023. Email from ***, November 7, 2023. Email from ***, November 6, 2023.

firms acquired since 2016 operate eight pipe and tube mills producing or capable of producing CWP (see table III-1 for details).²

In addition to antidumping and section 232 duties on CWP,³ certain U.S. imports of hot-rolled steel became subject to additional duties or import quotas. Since October 2016, U.S. imports of hot-rolled steel flat products (hot-rolled steel) from Australia, Brazil, Japan, Korea, the Netherlands, the Republic of Turkey, and the United Kingdom, have been subject to antidumping and countervailing duties.⁴ Effective March 23, 2018, U.S. imports of hot-rolled steel originating in certain countries are subject to an additional 25 percent ad valorem duty, to tariff rate quotas, or to quantitative restrictions, under section 232 of the Trade Expansion Act of 1962, as amended. Finally, as of September 1, 2019, U.S. imports of hot-rolled steel originating in China are subject to an additional 7.5 percent ad valorem duty under section 301 of the Trade Act of 1974, as amended.⁵

Table III-1
CWP: Developments in the U.S. industry since 2017

Item	Firm	Event
Acquisition	Zekelman	February 2017— Zekelman acquired Western Tube & Conduit Corp. (Long Beach, California). Western Tube & Conduit Corp. produces electrical, fence and mechanical tubing for customers in the western half of the United States.
Acquisition	Zekelman	February 2017—Zekelman Industries acquired American Tube Manufacturing, Inc., based in Birmingham, Alabama. American Tube Manufacturing, Inc. is a leading producer of round, square, and rectangle shaped hollow structural sections (HSS).
Capital Investment	Maruichi Leavitt	2018— Maruichi Leavitt started operations at a new mechanical tube mill in Chicago, Illinois. The new mill replaced two legacy mills at the same site and is capable of producing a range of pipe and tube products.

Table continued.

² Nucor, “Pipe and Tube,” <https://www.nucor.com/products/Pipe-and-Tube/>. Nucor Tubular Products, “About Us,” <https://www.nucortubular.com/company/about-us/>. Nucor’s 2018 Form 10–K, p. 2 (as filed).

³ For coverage of section 232 duties on CWP, see the Tariff Treatment section in Part I.

⁴ USITC, “Research Tools, Antidumping and Countervailing Duty Orders in Place,” January 18, 2022, https://www.usitc.gov/sites/default/files/trade_remedy/documents/orders.xls.

⁵ As discussed in the section of this report entitled “Tariff treatment” in Part I.

Table III-1 Continued.

CWP: Developments in the U.S. industry since 2017

Item	Firm	Event
Capital Investment	Bull Moose	January 2021— Bull Moose announced completion of major capital investment projects at its two largest tubular facilities in Elkhart, Indiana and Trenton, Georgia. The multi-million-dollar investments in new high-performance equipment were for optimizing both facilities’ operational capabilities. The projects involved upgrades to the drive and automation control system, installation of a new induction unit, upgrades to the sizing section of the mill, and upgraded cutoff quality and length accuracy capabilities. According to the company, the upgrades will enhance product quality, increase production efficiency and reliability, and add operational flexibility.
Expansion (under development)	Nucor	March 2021— Nucor announced that it plans to build a new tube mill on the site of its Nucor Steel Gallatin sheet mill in Kentucky. This location will allow the company to take advantage of its prior investments to expand production capacity of the Gallatin mill. The \$164 million mill is scheduled to be operational by the middle of 2023 and to create more than 70 new full-time jobs. This new tube mill will have the capacity to produce approximately 250,000 short tons of hollow structural section (HSS) steel tubing, mechanical steel tubing, and galvanized solar torque tube.
Capital Investment (under development)	Wheatland	May 2021— Wheatland Tube Co. (a subsidiary of Zekelman) announced plans to build a \$30 million fully automated warehouse at its Wheatland Tube facility in Warren, Ohio. The 83,000-square foot warehouse is scheduled to begin operating in December 2022. The new warehouse will convey pipe from the production lines of the manufacturing facility into the warehouse storage system and “will significantly increase safety and shipping capacity.”
Expansion (under development)	Bull Moose	June 2021— Bull Moose announced plans to build a 350,000 short tons per year hollow structural steel (“HSS”) and sprinkler pipe mill. The mill will be built on Steel Dynamics’ new Sinton, Texas, flat-rolled campus. The new mill will produce square pipe ranging in size from 4 to 14 inches and round pipe ranging from 5 to 18 inches in diameter, up to 80 feet in length, and thicknesses ranging from 0.187 to 0.750 inches. According to Bull Moose, the new plant will allow it to better serve customers in the Southwest, West Coast, and Mexican markets, as well as across the entire business region.

Table continued.

Table III-1 Continued.

CWP: Developments in the U.S. industry since 2017

Item	Firm	Event
Acquisition	Nucor	February 2022—Nucor acquired a majority ownership position in California Steel Industries, Inc. (CSI) by purchasing a 50 percent equity interest in CSI for \$400 million and 1 percent stake from JFE Steel Corporation. CSI is a flat-rolled steel converter with the capability to produce more than two million short tons of finished steel and steel mill products annually. The company has five product lines, including hot-rolled, pickled and oiled, cold rolled, galvanized, and electric resistance welded (ERW) pipe.
Acquisition	Zekelman	December 2022—Zekelman Industries completed its acquisition of EXLTUBE from SPS Companies, Inc. EXLTUBE manufactures hollow structural sections (HSS), mechanical tubing, standard pipe, and specialty products.

Source: Maruichi Leavitt Pipe & Tube, “About Maruichi Leavitt: History,” <https://www.maruichi-leavitt.com/about-maruichi-leavitt.html>. Zekelman Industries, “Zekelman Industries completes acquisition of Western Tube & Conduit Corporation,” February 15, 2017. Al.com, “Zekelman Industries acquires American Tube Manufacturing, Inc,” February 2022, https://www.al.com/press-releases/2017/02/zekelman_industries_acquires_a.html; Bull Moose Tube Company, “Bull Moose Tube Announces Completion of Capital Investment Upgrades at its Two Largest Facilities,” January 12, 2021, <https://www.bullmoosetube.com/bull-moose-tube-announces-completion-of-capital-investment-upgrades-at-its-two-largest-facilities/>. Nucor Corporation, “Nucor to Build New Tube Mill in Kentucky near its Gallatin Sheet Mill,” March 25, 2021, <https://www.nucor.com/news-release/#item=17871>. Zekelman Industries, “Zekelman Industries Plans a Fully Automated Warehouse in Warren, OH, for Wheatland Tube,” May 28, 2021, <https://www.zekelman.com/news/zekelman-industries-plans-a-fully-automated-warehouse-in-warren-oh-for-wheatland-tube/>. Bull Moose Tube Company, “Bull Moose Tube Announces Plans to Construct a New HSS and Sprinkler Pipe Mill in Sinton, Texas,” June 4, 2021, <https://www.bullmoosetube.com/bull-moose-tube-announces-plans-to-construct-a-new-hss-and-sprinkler-pipe-mill-in-sinton-texas/>. Nucor Corporation, “Nucor Completes Acquisition of California Steel Industries,” February 2, 2022. <https://nucor.com/news-release/18746>; Modern Steel Construction, “zekelman industries acquires exltube assets from sps companies,” AISC.org, December 2022, <https://www.aisc.org/modernsteel/>.

Changes experienced by the industry

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of CWP since 2017. Four producers indicated in their questionnaires that they had experienced such changes. Table III-2 presents the changes identified by these producers.

Table III-2
CWP: Reported changes in operations since January 1, 2017

Type of change	Firm name and narrative on changes in operations
Plant openings	***
Plant openings	***
Plant openings	***
Plant closings	***
Production curtailments	***
Production curtailments	***
Expansions	***
Expansions	***
Acquisitions	***
Acquisitions	***
Acquisitions	***
Other	***
Other	***

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

Anticipated changes in operations

The Commission asked domestic producers to report anticipated changes in the character of their operations relating to the production of CWP. Their responses appear in table III-3.

Table III-3
CWP: Anticipated changes in operations

Firm name	Narrative on anticipated changes in operations
***	***
***	***

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

U.S. production, capacity, and capacity utilization

Table III-4 presents U.S. producers' installed capacity, practical overall and CWP-specific capacity, and production of CWP on the same equipment. As discussed below, an increase in all available capacity, coupled with declining levels of production, led to a decrease in capacity utilization during 2020-22 and lower capacity utilization in interim 2023 than in interim 2022.

U.S. producers' installed overall and practical overall capacity increased by *** percent and *** percent, respectively, during 2020-22, and were slightly higher in interim 2023 than in interim 2022. Most of the increase in reported capacity occurred between 2021 and 2022 as ***, which accounted for the largest share of reported overall capacity, ***.⁶

⁶ ***'s U.S. producer questionnaire, question II-2a.

Table III-4**CWP: U.S. producers' installed and practical capacity, production, and utilization on the same equipment as in-scope production, by measure and period**

Capacity and production in short tons; utilization in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical CWP	Capacity	***	***	***	***	***
Practical CWP	Production	***	***	***	***	***
Practical CWP	Utilization	***	***	***	***	***

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

Table III-5 presents U.S. producers' production, capacity, and capacity utilization. Consistent with the capacity trends discussed above, U.S. producers' capacity increased by *** percent during 2020-22. U.S. producers' capacity was *** percent higher in interim 2023 than in interim 2022.

U.S. producers' production, on the other hand, decreased during 2020-22 by *** percent, and was *** percent lower in interim 2023 than in interim 2022. The slight decrease during 2020-22 may be due in part to the different experiences reported among the U.S. producers as well as the shares of production (as opposed to capacity) for which they account. ***, which collectively accounted for *** percent of U.S. production in any given year, reported increases in production during 2020-22, while ***, which accounted for *** of production in any given year, reported decreases in production during 2020-22.

As a result of the increase in capacity and decrease in production, U.S. producers' capacity utilization decreased by *** percentage points during 2020-22, and was *** percentage points lower in interim 2023 than in interim 2022.

Table III-5
CWP: U.S. producers' output, by firm and period

Practical capacity

Capacity in short tons

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-5 Continued
CWP: U.S. producers' output, by firm and period

Production

Production in short tons

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-5 Continued
CWP: U.S. producers' output, by firm and period

Capacity utilization

Capacity utilization in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Note: Capacity utilization ratio represents the ratio of the U.S. producer's production to its production capacity.

Table III-5 Continued
CWP: U.S. producers' output, by firm and period

Share of production

Share in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

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

Figure III-1
CWP: U.S. producers' output, by period

* * * * *

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

Alternative products

As shown in table III-6, between *** percent and *** percent of the product produced during 2020-22 by U.S. producers was CWP. In each year, the majority of products produced on the same machinery were products other than CWP, including line pipe, mechanical tubing, OCTG. *** reported producing products other than CWP on the same machinery.

Table III-6
CWP: U.S. producers' overall production on the same equipment as subject production, by period

Quantity in short tons; ratio and share in percent

Product type	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
CWP	Quantity	***	***	***	***	***
Line pipe <= 16 OD	Quantity	***	***	***	***	***
Line pipe > 16 OD	Quantity	***	***	***	***	***
Mechanical tubing	Quantity	***	***	***	***	***
OCTG	Quantity	***	***	***	***	***
Structural > 16 OD	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
CWP	Share	***	***	***	***	***
Line pipe <= 16 OD	Share	***	***	***	***	***
Line pipe > 16 OD	Share	***	***	***	***	***
Mechanical tubing	Share	***	***	***	***	***
OCTG	Share	***	***	***	***	***
Structural > 16 OD	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All out-of-scope products	Share	***	***	***	***	***
All products	Share	100.0	100.0	100.0	100.0	100.0

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

Constraints on capacity

As shown below in table III-7, *** responding U.S. producers reported constraints in the manufacturing process.

Table III-7
CWP: U.S. producers' reported capacity constraints, by type of constraint and firm

Type of change	Firm name and narrative on constraints to practical overall capacity
Production bottlenecks	***
Production bottlenecks	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Supply of material inputs	***
Supply of material inputs	***
Supply of material inputs	***
Fuel or energy	***
Storage capacity	***
Logistics/transportation	***
Logistics/transportation	***
Other constraints	***
Other constraints	***

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. During 2020-22, although the quantity of U.S. producers' total shipments decreased, the value of total shipments ***, and unit values **. The quantity and value of U.S. producers' total shipments were lower in interim 2023 than in interim 2022.

U.S. shipments accounted for more than *** percent of U.S. producers' total shipments during 2020-22 and in both interim periods. The quantity of U.S. producers' U.S. shipments decreased during 2020-22 by *** percent, and were *** percent lower in interim 2023 than in interim 2022. The value of U.S. producers' U.S. shipments, on the other hand, increased by *** percent during 2020-22, reflecting a *** percent increase in the unit value of U.S. producers' U.S. shipments. The value and unit value of U.S. producers' U.S. shipments were lower in interim 2023 than in interim 2022 by *** percent and *** percent, respectively.

U.S. producers reported export shipments to ***, which accounted for *** percent of total shipments in any given period. The quantity of these export shipments decreased by *** percent during 2020-22, and was *** percent lower in interim 2023 than in interim 2022. Similar to the trend observed in U.S. shipments, the value of export shipments also increased by *** percent during 2020-22, though it was highest in 2021, reflecting a *** percent increase in export shipment unit values. While the value of export shipments was *** percent lower in interim 2023 than in interim 2022, the unit value was higher by *** percent in interim 2023 than in interim 2022.

Table III-8
CWP: U.S. producers' shipments, by destination and period

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

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: ***.

U.S. producers' inventories

As shown below in table III-9, U.S. producers' end-of-period inventories were lowest in 2021, but increased overall during 2020-22 by *** percent, and were *** percent higher in interim 2023 than in interim 2022. As a ratio to U.S. producers' production, U.S. shipments, and total shipments, end-of-period inventories ranged from *** percent to *** percent.

Table III-9
CWP: U.S. producers' inventories and their ratio to select items, by period

Quantity in short tons; ratio are inventories to production and shipments

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
End-of-period inventory	Quantity	***	***	***	***	***
Inventory to U.S. production	Ratio	***	***	***	***	***
Inventory to U.S. shipments	Ratio	***	***	***	***	***
Inventory to total shipments	Ratio	***	***	***	***	***

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

U.S. producers' imports from subject sources

No responding U.S. producer reported importing CWP from subject sources in their questionnaire responses.

U.S. producers' purchases of imports from subject sources

No responding U.S. producer reported purchases of CWP imported from subject sources in their questionnaire responses.

U.S. employment, wages, and productivity

Table III-10 shows U.S. producers' employment-related data. The number of production and related workers ("PRWs") reported by U.S. producers increased by *** percent during 2020-22, and was *** percent higher in interim 2023 than in interim 2022. Total hours worked and wages paid also increased, by *** percent and *** percent, respectively, during 2020-22, and were higher in interim 2023 than in interim 2022 by *** percent and *** percent, respectively. During 2020-22, the average hourly wage increased from \$*** per hour in 2020 to \$*** per hour in 2022. Productivity declined during 2020-22, however, and was lower in interim 2023 than in interim 2022. Declining productivity and rising hourly wages resulted in higher unit labor costs.

Table III-10
CWP: U.S. producers' employment related information, by period

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid (\$1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***
Productivity (short tons per 1,000 hours)	***	***	***	***	***
Unit labor costs (dollars per short ton)	***	***	***	***	***

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

Financial experience of U.S. producers

Background⁷

Atlas Tube, Bull Moose, Maruichi, Nucor, and Wheatland Tube provided usable financial results on their CWP operations. All U.S. producers reported financial data on a calendar year basis.^{8 9} All of the responding U.S. producers provided their financial data on the basis of GAAP.¹⁰

Figure III-2 presents each responding firm's share of the total reported net sales quantity in 2022.

⁷ The following abbreviations are used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development ("R&D"), and return on assets ("ROA").

⁸ Atlas Tube's ***.

⁹ Wheatland Tube's ***.

¹⁰ *** indicated that it purchases CWP from ***. As requested from Commission staff, *** reported the production of the CWP while *** reported the sales only.

Figure III-2
CWP: U.S. producers' share of net sales quantity in 2022, by firm

* * * * *

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

Operations on CWP

Table III-11 presents aggregated data on U.S. producers' operations in relation to CWP, while table III-12 presents corresponding changes in AUVs. Table III-13 presents selected company-specific financial data.

Table III-11
CWP: U.S. producers' results of operations, by item and period

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

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Raw materials	Value	***	***	***	***	***
COGS: Direct labor	Value	***	***	***	***	***
COGS: Other factory	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expense or (income) net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Raw materials	Ratio to NS	***	***	***	***	***
COGS: Direct labor	Ratio to NS	***	***	***	***	***
COGS: Other factory	Ratio to NS	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

Table III-11 Continued
CWP: U.S. producers' results of operations, by item and period

Shares in percent; unit values in dollars per short ton; count in number of firms reporting

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
COGS: Raw materials	Share	***	***	***	***	***
COGS: Direct labor	Share	***	***	***	***	***
COGS: Other factory	Share	***	***	***	***	***
COGS: Total	Share	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
COGS: Raw materials	Unit value	***	***	***	***	***
COGS: Direct labor	Unit value	***	***	***	***	***
COGS: Other factory	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Other expense or (income) net	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	***	***	***	***	***

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

Note: Shares represent the share of COGS. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table III-12
CWP: Changes in AUVs between comparison periods

Changes in percent

Item	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Total net sales	▲ ***	▲ ***	▲ ***	▼ ***
COGS: Raw materials	▲ ***	▲ ***	▲ ***	▼ ***
COGS: Direct labor	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Other factory	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Total	▲ ***	▲ ***	▲ ***	▼ ***

Table continued.

Table III-12 Continued
CWP: Changes in AUVs between comparison periods

Changes in dollars per short ton

Item	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Total net sales	▲ ***	▲ ***	▲ ***	▼ ***
COGS: Raw materials	▲ ***	▲ ***	▲ ***	▼ ***
COGS: Direct labor	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Other factory	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Total	▲ ***	▲ ***	▲ ***	▼ ***
Gross profit or (loss)	▲ ***	▲ ***	▲ ***	▲ ***
SG&A expense	▲ ***	▲ ***	▼ ***	▼ ***
Operating income or (loss)	▲ ***	▲ ***	▲ ***	▲ ***
Net income or (loss)	▲ ***	▲ ***	▲ ***	▲ ***

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

Note: Percentages and unit values shown as "0.0" or "0.00" represent values greater than zero, but less than "0.05" or "0.005," respectively. 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.

Table III-13
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in short tons

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales value

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss)

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss)

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss)

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss) to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss) to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss) to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net sales value

Unit values in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit raw material

Unit values in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit direct labor

Unit values in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit other factory costs

Unit values in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit COGS

Unit values in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit gross profit or (loss)

Unit values in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit SG&A expenses

Unit values in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit operating income or (loss)

Unit values in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
CWP: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net income or (loss)

Unit values in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

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

Net sales

Total revenue consists primarily of commercial sales with a small amount of internal consumption and transfers to related firms. Internal consumption and transfers to related firms are included in the financial data, but not shown separately in this section of the report.¹¹ As shown in table III-11, from 2020 to 2022, total net sales quantity decreased overall by *** percent, while net sales value increased by *** percent during the same period. Total net sales quantity was lower by *** percent in January-June 2023 (“interim 2023”) compared with January-June 2022 (“interim 2022”), while total net sales value was *** percent lower in interim 2023 compared to interim 2022. The average net sales unit value (per short ton) increased substantially from *** in 2020 to \$*** in 2021 and \$*** in 2022, but was lower in interim 2023 at \$*** compared with \$*** in interim 2022. On a company specific basis (table III-13), *** reported an increase in net sales AUV in 2021 ranging from *** percent to *** percent compared to 2020. *** U.S. producers reported a slight increase in net sales AUV in 2022 compared to 2021, but *** reported increases in net sales AUV from 2020 to 2022. *** U.S. producers reported a lower net sales AUV in interim 2023 than in interim 2022.

Cost of goods sold and gross profit or loss

Raw materials accounted for *** percent of COGS in 2022. In contrast, direct labor and other factory costs accounted for *** and *** percent, respectively, of COGS in 2022.

Raw materials increased by *** percent from 2020 to 2021, then decreased by *** percent from 2021 to 2022, but increased overall by *** percent from 2020 to 2022. Raw material costs were *** percent lower in interim 2023 compared to interim 2022. On an average per short ton basis, raw material costs increased by *** percent from \$*** in 2020 to \$*** in 2021, reportedly due to ***, then increased slightly to \$*** in 2022. Raw material costs were lower at \$*** per short ton in interim 2023 compared to \$*** in interim 2022. As shown in table III-13, *** U.S. producers reported an increase in their unit values between 2020 and 2021, and ***

¹¹ Internal consumption, reported by *** only, accounted for *** percent of total revenue in 2022. In response to questions by staff, ***. Email from ***, September 13, 2023. Transfers to related firms accounted for *** percent of total sales in 2022 and were reported by ***.

reported a decrease in 2022. *** U.S. producers except *** reported lower unit values in interim 2023 compared to interim 2022. As a ratio to net sales, raw material costs increased overall from *** percent in 2020 to *** percent in 2022, but were lower at *** percent in interim 2023 compared to *** percent in interim 2022.

Table III-14 presents raw material inputs as a share of total material costs in 2022. Hot-rolled steel accounted for the largest share of raw material costs.¹²

Table III-14
CWP: U.S. producers' raw material costs in 2022

Value in 1,000 dollars; share of value in percent

Item	Value	Share of value
Hot-rolled steel	***	***
Other material inputs	***	***
All raw materials	***	100.0

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

Note: Other material inputs include zinc, paint, and coatings.

Direct labor costs represent the smallest component of COGS and increased by *** percent from 2020 to 2021, then by *** percent from 2021 to 2022, and overall increased by *** percent from 2020 to 2022. Direct labor costs were *** percent higher in interim 2023 compared to interim 2022. On an average per short ton basis, direct labor costs increased from \$*** in 2020 to \$*** in 2022. Direct labor costs were higher at \$*** in interim 2023 compared to interim 2022 at \$***. As shown in table III-13, *** U.S. producers reported an overall increase in the average-per-short ton values of their direct labor costs from 2020 to 2022, and *** but *** reported higher average-per-short ton values in interim 2023 compared with interim 2022.^{13 14} As a ratio to net sales, direct labor costs

¹² *** reported raw material inputs purchased from related firms. ***. Purchases were reported in a manner consistent with the company's accounting books and records. U.S. producers' questionnaire responses sections III-6, III-7a, and III-7b.

¹³ ***. Email from ***, August 31, 2023.

¹⁴ ***. Emails from ***, September 13 and September 14, 2023.

decreased from *** percent in 2020 to *** percent in 2022 and were higher in interim 2023 at *** percent compared with *** percent in interim 2022.

Other factory costs represent the second largest component of COGS and increased by *** percent from 2020 to 2021, then by *** percent from 2021 to 2022, and increased overall by *** percent from 2020 to 2022. Other factory costs were *** percent higher in interim 2023 compared to interim 2022. On an average per short ton basis, other factory costs increased from \$*** in 2020 to \$*** in 2022 and were higher in interim 2023 at \$*** compared to \$*** in interim 2022. As shown in table III-13, *** firms reported an overall increase in per-unit other factory costs from 2020 to 2022. *** reported a consistent increase during this time, while *** reported a decrease in 2021 and *** reported a decrease in 2022.^{15 16 17} *** U.S. producers *** reported higher unit values in interim 2023 compared with interim 2022. As a ratio to net sales, other factory costs decreased overall from *** percent in 2020 to *** percent in 2022, but were higher in interim 2023 at *** percent compared to *** percent in interim 2022.

Total COGS increased by *** percent from 2020 to 2021 then slightly decreased by *** percent from 2021 to 2022. Overall, total COGS increased by *** percent from 2020 to

¹⁵ ***. Email from ***, September 13, 2023.

¹⁶ ***. Email from ***, September 13, 2023.

¹⁷ ***. Email from ***, September 13, 2023.

2022, but was lower by *** percent in interim 2023 compared to interim 2022. These changes mostly reflected the changes in raw material costs. On an average per short ton basis, total COGS increased from \$*** in 2020 to \$*** in 2022, but was lower in interim 2023 at \$*** compared to \$*** in interim 2022. As a ratio to net sales, total COGS increased slightly from *** percent in 2020 to *** percent in 2022, but was lower in interim 2023 at *** percent compared to *** percent in interim 2022.

As shown in table III-11, gross profit increased from \$*** in 2020 to \$*** in 2022 and was higher in interim 2023 at \$*** compared to \$*** in interim 2022. As a ratio to net sales, gross profit decreased from *** percent in 2020 to *** percent in 2022, but was higher in interim 2023 at *** percent compared to *** percent in interim 2022. As shown in table III-13, ***'s gross profit increased continuously from 2020 to 2022. The other *** U.S. producers reported an increase from 2020 to 2022 but reported a decrease from 2021 to 2022. *** reported a lower gross profit in interim 2023 compared to interim 2022, while *** reported a higher gross profit during the same comparable periods.

SG&A expenses and operating income or loss

U.S. producers' SG&A expenses increased by *** percent from 2020 to 2022 but were *** percent lower in interim 2023 compared to interim 2022. *** U.S. producers reported an overall increase in their SG&A expenses from 2020 to 2022. *** reported an increase from 2020 to 2021, then a decrease from 2021 to 2022, while all other firms reported a consistent increase during this time. *** reported higher SG&A expenses in interim 2023 compared to interim 2022 while *** reported lower SG&A expenses for the same comparable periods. The SG&A expense ratio (SG&A expenses divided by total net sales) decreased from *** percent in 2020 to ***

percent in 2022 but was higher in interim 2023 at *** percent compared to *** percent in interim 2022.^{18 19}

U.S. producers' operating income increased from \$*** in 2020 to \$*** in 2022 and was higher in interim 2023 at \$*** compared to \$*** in the same period one year earlier. As a ratio to net sales, operating income increased from *** percent in 2020 to *** percent in 2022 and was higher in interim 2023 at *** percent compared to *** percent in interim 2022. As displayed in table III-13, *** reported an increase in operating income from 2020 to 2021 followed by a decrease from 2021 to 2022. *** reported a decrease in operating profit from 2020 to 2021 and an increase from 2021 to 2022. ***'s operating profits were lower in interim 2023 compared to interim 2022, while ***'s operating profits were higher in interim 2023 compared to interim 2022.²⁰

¹⁸ ***. Email from ***. ***'s U.S. producers' questionnaire response, section III-10. ***. Email from ***, September 12, 2023.

¹⁹ ***. Email from ***, September 13, 2023.

²⁰ ***. Email from ***, September 19, 2023.

All other expenses and net income or loss

Classified below the operating income level are interest expenses, other expenses, and other income. Interest expense, other expenses, and other income (***) were combined and only the net amount is shown. Interest expense represented the majority of the combined category in all years. *** reported the majority of other expenses.²¹ Total net other expenses/income increased overall from \$*** in 2020 to \$*** in 2022 and were higher in interim 2023 at \$*** compared to \$*** in interim 2022.

Given the foregoing changes, net income increased steadily by \$*** or *** percent between 2020 (\$***) and 2022 (\$***) and was \$*** greater in interim 2023 (at \$***) than in the same period one year earlier (when it was \$***) (table III-11). Directionally, *** reported higher net income between the three full yearly periods although *** reported lower net income, ***, in 2021 compared with 2020, and *** between 2021 and 2022 (table III-11). *** reported higher net income in interim 2023 compared to interim 2022.

Variance analysis

A variance analysis for the operations of U.S. producers of CWP is presented in table III-15.²² The information for this variance analysis is derived from table III-11. As shown in the analysis, the increase in operating income from 2020 to 2022 was due to an increase in unit

²¹ ***. Email from ***, September 12, 2023.

²² The Commission's variance analysis is calculated in three parts: Sales variance, cost of sales variance (COGS variance), and SG&A expense 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 expense 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. 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 expense variances. The overall volume component of the variance analysis is generally small.

sales value which outweighed an increase in unit costs and expenses. Between the comparable interim periods, the increase in operating income was due to a greater decline in unit costs and expenses compared to unit sales value.

Table III-15
CWP: Variance analysis on the operations of U.S. producers between comparison periods

Value in 1,000 dollars

Item	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Net sales price variance	***	***	***	***
Net sales volume variance	***	***	***	***
Net sales total variance	***	***	***	***
COGS cost variance	***	***	***	***
COGS volume variance	***	***	***	***
COGS total variance	***	***	***	***
Gross profit variance	***	***	***	***
SG&A cost variance	***	***	***	***
SG&A volume variance	***	***	***	***
SG&A total variance	***	***	***	***
Operating income price variance	***	***	***	***
Operating income cost variance	***	***	***	***
Operating income volume variance	***	***	***	***
Operating income total variance	***	***	***	***

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

Note: These data are derived from the data in table III-11. Unfavorable variances (which are negative) are shown in parentheses, all others are favorable (positive).

Capital expenditures and R&D expenses

Table III-16 presents capital expenditures, by firm. Table III-17 presents the firms' narrative explanations of the nature, focus, and significance of their capital expenditures. None of the firms reported R&D expenses. Total capital expenditures increased overall from 2020 to 2022 and were higher in interim 2023 compared to interim 2022. As seen in table III-16, *** the majority of capital expenditures in 2020 and 2021 and ***'s capital expenditures increased substantially from 2020 to 2022. ***.²³

²³ Email from ***, September 13, 2023.

Table III-16
CWP: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland Tube	***	***	***	***	***
All firms	***	***	***	***	***

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

Table III-17
CWP: U.S. producers' narrative descriptions of their capital expenditures, by firm

Firm	Narrative on capital expenditures
Atlas Tube	***
Bull Moose	***
Maruichi	***
Nucor	***
Wheatland Tube	***

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

Assets and return on assets

Table III-18 presents data on the U.S. producers' total net assets, while table III-19 presents their operating ROA.²⁴ Table III-20 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. Total assets increased from \$*** in 2020 to \$*** in 2022. Return on assets increased from *** percent in 2020 to *** percent in 2022.

Table III-18
CWP: U.S. producers' total net assets, by firm and period

Value 1,000 dollars

Firm	2020	2021	2022
Atlas Tube	***	***	***
Bull Moose	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland Tube	***	***	***
All firms	***	***	***

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

Table III-19
CWP: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2020	2021	2022
Atlas Tube	***	***	***
Bull Moose	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland Tube	***	***	***
All firms	***	***	***

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

²⁴ The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

Table III-20

CWP: U.S. producers' narrative descriptions of their total net assets, by firm

Firm	Narrative on assets
Atlas Tube	***
Bull Moose	***
Maruichi	***
Nucor	***
Wheatland Tube	***

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

Part IV: U.S. imports and the foreign industries

U.S. imports

Overview

The Commission issued questionnaires to 46 firms that have potentially imported CWP since 2017. Eleven firms provided data and information in response to the questionnaires, and ten firms indicated that they had not imported CWP since 2017.¹ Based on adjusted official Commerce statistics for imports of CWP, importers' questionnaire data accounted for *** percent of subject imports, *** percent of nonsubject imports and *** percent of total imports during 2022.² Firms responding to the Commission's questionnaire accounted for the following shares of individual subject country's subject imports (as a share of official import statistics, as adjusted to remove out-of-scope merchandise, by quantity) during 2022:³

¹ *** submitted certified responses stating that they have not imported CWP since January 1, 2017.

² Questionnaire data for U.S. imports of CWP were compared to official U.S import statistics of the U.S. Department of Commerce using the seven primary HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, adjusted using data submitted in response to Commission questionnaires to remove reported out-of-scope imports and using data compiled from proprietary, Census edited Customs records using the seven primary HTS statistical reporting numbers, accessed October 1, 2023, to remove out-of-scope imports and to allocate India subject vs. India nonsubject imports.

³ As noted in Part I, none of the major foreign producers nor U.S. importers of CWP from India, South Korea, Taiwan, or Thailand provided responses to the Commission's questionnaires, despite multiple requests and attempts by staff to obtain their data. ***.

- No responses received reporting imports of CWP from Brazil,⁴ India,⁵ Mexico, South Korea, Taiwan, or Thailand;
- *** percent of U.S. imports from Turkey.

In light of the data coverage by the Commission’s questionnaires, import data in this report are based on a combination of questionnaire responses and official Commerce statistics for CWP, adjusted using data submitted in response to Commission questionnaires and data compiled from proprietary, Census edited Customs records, accessed October 1, 2023. Due to data availability, imports of CWP from nonsubject sources, particularly Canada, may be overstated, even after adjustments, due to incomplete reporting.^{6 7}

⁴ ***. ***. Email from ***.

⁵ Imports of CWP from India by Gujarat Steel Tubes, Ltd. and Zenith Steel Pipes and Industries, which did not provide a response to the Commission’s questionnaires, are considered nonsubject as they were excluded from the original order on CWP from India. ***.

⁶ While 17 HTS statistical reporting numbers are provided in the scope as the numbers under which the subject merchandise is “currently classifiable”, official import statistics presented in this report are based on 7 “primary HTS numbers” which are believed to account for the majority of imports of CWP: 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090

⁷ Staff note that while official U.S. import statistics presented in this report are based on the primary HTS numbers identified above, data shown for these primary HTS numbers are overstated to varying degrees with respect to subject and nonsubject imports, particularly from Canada. Staff worked closely with questionnaire recipients to minimize the degree of overstatement.

***. ***. ***, a foreign producer and U.S. importer from Mexico ***. U.S. imports from Mexico exclude out-of-scope merchandise ***. *** and ***, foreign producers and U.S. importers from Mexico ***. ***.

Imports from subject and nonsubject countries

Table IV-1 present information on U.S. imports of CWP from the subject countries and all other sources. By quantity, imports from subject sources accounted for between *** percent of total imports during 2020-22, and were *** in 2021. Overall, imports from subject sources increased by *** percent during 2020-22, and were *** percent higher in interim 2023 than in interim 2022.

***.⁸ Subject import volume from India increased during 2020-22 by *** percent, and was *** percent higher in interim 2023 compared to interim 2022. Similarly, subject import volume from Mexico increased during 2020-22 by *** percent and was *** percent higher in interim 2023 than in interim 2022. In 2020 and 2021, subject imports from South Korea accounted for the largest share of quantity of imports from subject sources. The quantity of these imports increased during 2020-22 by 24.6 percent, and were 21.0 percent higher in interim 2023 than in interim 2022. Imports from Taiwan decreased during 2020-22 by 74.7 percent, but were 82.7 percent higher in interim 2023 than in interim 2022. Similarly, imports from Thailand decreased during 2020-22 by 28.5 percent, but were more than 4,000.0 percent higher in interim 2023 than in interim 2022. In 2022, subject imports from Turkey accounted for the largest share of quantity of imports from subject sources. Imports from Turkey increased during 2020-22 by nearly four-fold, but were lower in interim 2023 than in interim 2022 by 69.6 percent.

⁸ ***.

Table IV-1
CWP: U.S. imports by source and period

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

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Brazil	Quantity	***	***	***	***	***
India, subject	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
South Korea	Quantity	60,640	62,057	75,560	33,509	40,531
Taiwan	Quantity	3,220	751	814	227	414
Thailand	Quantity	52,302	9,942	37,299	1,535	64,027
Turkey	Quantity	22,769	43,751	115,583	54,488	16,589
Subject sources	Quantity	***	***	***	***	***
India, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
Brazil	Value	***	***	***	***	***
India, subject	Value	***	***	***	***	***
Mexico	Value	***	***	***	***	***
South Korea	Value	44,087	67,693	115,388	50,293	54,031
Taiwan	Value	3,496	1,625	1,994	798	988
Thailand	Value	42,388	8,558	57,035	2,662	74,422
Turkey	Value	23,082	53,940	173,955	83,990	19,599
Subject sources	Value	***	***	***	***	***
India, nonsubject	Value	***	***	***	***	***
All other sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***

Table continued.

Table IV-1 Continued
CWP: U.S. imports by source and period

Unit value in dollars per short ton; share in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Brazil	Unit value	***	***	***	***	***
India, subject	Unit value	***	***	***	***	***
Mexico	Unit value	***	***	***	***	***
South Korea	Unit value	727	1,091	1,527	1,501	1,333
Taiwan	Unit value	1,086	2,164	2,450	3,517	2,385
Thailand	Unit value	810	861	1,529	1,734	1,162
Turkey	Unit value	1,014	1,233	1,505	1,541	1,181
Subject sources	Unit value	***	***	***	***	***
India, nonsubject	Unit value	***	***	***	***	***
All other sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***
Brazil	Share of quantity	***	***	***	***	***
India, subject	Share of quantity	***	***	***	***	***
Mexico	Share of quantity	***	***	***	***	***
South Korea	Share of quantity	***	***	***	***	***
Taiwan	Share of quantity	***	***	***	***	***
Thailand	Share of quantity	***	***	***	***	***
Turkey	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
India, nonsubject	Share of quantity	***	***	***	***	***
All other sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0

Table continued.

Table IV-1 Continued
CWP: U.S. imports by source and period

Shares and ratios in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Brazil	Share of value	***	***	***	***	***
India, subject	Share of value	***	***	***	***	***
Mexico	Share of value	***	***	***	***	***
South Korea	Share of value	***	***	***	***	***
Taiwan	Share of value	***	***	***	***	***
Thailand	Share of value	***	***	***	***	***
Turkey	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
India, nonsubject	Share of value	***	***	***	***	***
All other sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
Brazil	Ratio	***	***	***	***	***
India, subject	Ratio	***	***	***	***	***
Mexico	Ratio	***	***	***	***	***
South Korea	Ratio	***	***	***	***	***
Taiwan	Ratio	***	***	***	***	***
Thailand	Ratio	***	***	***	***	***
Turkey	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
India, nonsubject	Ratio	***	***	***	***	***
All other sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed August 21, 2023, adjusted using data submitted in response to Commission questionnaires to remove reported out-of-scope imports and using data compiled from proprietary, Census edited Customs records using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed October 1, 2023, to remove out-of-scope imports and to allocate India subject vs. India nonsubject imports. Imports are based on the imports for consumption data series and import value data reflect landed duty-paid values.

Note: Due to data availability, imports of CWP from nonsubject sources, particularly Canada, are likely overstated. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-1
CWP: U.S. imports by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed August 21, 2023, adjusted using data submitted in response to Commission questionnaires to remove reported out-of-scope imports and using data compiled from proprietary, Census edited Customs records using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed October 1, 2023, to remove out-of-scope imports and to allocate India subject vs. India nonsubject imports. Imports are based on the imports for consumption data series and import value data reflect landed duty-paid values.

Note: Due to data availability, imports of CWP from nonsubject sources, particularly Canada, are likely overstated. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Cumulation considerations

In assessing whether U.S. imports from the subject countries are likely to compete with each other and with the domestic like product, the Commission 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

Tables IV-2 through IV-4 and figures IV-2 through IV-4 present U.S. producers' and importers' detailed U.S. shipment data for 2022 by wall thickness, nominal pipe size, standards, grade of steel, and various product attributes.⁹

Table IV-2 and figure IV-2 present detailed U.S. shipment data on CWP by wall thickness in 2022. The largest category of U.S. producers' U.S. shipments and U.S. shipments of imports from subject sources were ***, followed by ***.

Table IV-2
CWP: U.S. producers' and U.S. importers' U.S. shipments by source and wall thickness, 2022

Quantity in short tons

Source	Schedules 5s, 5, 10s, and 10	Schedules 20s and 20	Schedules 30s and 30	Schedules 40s and 40	All other wall thicknesses	All wall thicknesses
U.S. producers	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
India, subject	***	***	***	***	***	***
Mexico	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***
Thailand	***	***	***	***	***	***
Turkey	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
India, nonsubject	***	***	***	***	***	***
All other sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import sources	***	***	***	***	***	***
All sources	***	***	***	***	***	***

Table continued.

⁹ Nominal pipe size (NPS) is a dimensionless designator of pipe size. It indicates standard pipe size when followed by the specific size designation number without an inch symbol. Schedule is an indicator of pipe wall thickness. Schedule is expressed in numbers and the higher the schedule number, the thicker the pipe is. Schedule numbers followed by the letter S are per ASME B36.19M and are primarily intended for use with stainless steel pipe. Grade refers to the chemical composition of the steel used to produce the pipe and is typically determined by the ASTM specifications.

Table IV-2 Continued
CWP: U.S. producers' and U.S. importers' U.S. shipments by source and wall thickness, 2022

Share across in percent

Source	Schedules 5s, 5, 10s, and 10	Schedules 20s and 20	Schedules 30s and 30	Schedules 40s and 40	All other wall thicknesses	All wall thicknesses
U.S. producers	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
India, subject	***	***	***	***	***	***
Mexico	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***
Thailand	***	***	***	***	***	***
Turkey	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
India, nonsubject	***	***	***	***	***	***
All other sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import sources	***	***	***	***	***	***
All sources	***	***	***	***	***	***

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

Note: Subject imports data only reflect U.S. imports of CWP reported by ***, by quantity, in 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-2

CWP: U.S. producers' and U.S. importers' U.S. shipments by source and wall thickness, 2022

* * * * *

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

Note: Subject imports data only reflect U.S. imports of CWP reported by ***, by quantity, in 2022.

Table IV-3 and figure IV-3 present detailed U.S. shipment data by source and nominal pipe size (NPS). The largest category of U.S. shipments reported by U.S. producers and subject imports were of NPS ***, whereas imports from nonsubject sources were ***.

Table IV-3
CWP: U.S. producers' and U.S. importers' U.S. shipments by source and nominal pipe size (NPS), 2022

Quantity in short tons

Source	NPS <=2	NPS >2 to <=3 1/2	NPS 4 to 8	NPS 9 to 12	NPS 14 to 16	All NPS
U.S. producers	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
India, subject	***	***	***	***	***	***
Mexico	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***
Thailand	***	***	***	***	***	***
Turkey	***	***	***	***	***	***
Subject	***	***	***	***	***	***
India, nonsubject	***	***	***	***	***	***
All other	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import sources	***	***	***	***	***	***
All sources	***	***	***	***	***	***

Table continued.

Table IV-3 Continued

CWP: U.S. producers' and U.S. importers' U.S. shipments by source and nominal pipe size (NPS), 2022

Share across in percent

Source	NPS <=2	NPS >2 to <=3 1/2	NPS 4 to 8	NPS 9 to 12	NPS 14 to 16	All NPS
U.S. producers	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
India, subject	***	***	***	***	***	***
Mexico	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***
Thailand	***	***	***	***	***	***
Turkey	***	***	***	***	***	***
Subject	***	***	***	***	***	***
India, nonsubject	***	***	***	***	***	***
All other	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import sources	***	***	***	***	***	***
All sources	***	***	***	***	***	***

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

Note: Subject imports data only reflect U.S. imports of CWP reported by ***, by quantity, in 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-3
CWP: U.S. producers' and U.S. importers' U.S. shipments by source and nominal pipe size (NPS), 2022

* * * * *

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

Note: Subject imports data only reflect U.S. imports of CWP reported by ***, by quantity, in 2022.

Table IV-4 and figure IV-4 present detailed U.S. shipment data by standard/stenciling. The largest category of U.S. shipments by standards reported by U.S. producers were of ASTM A135/A795, followed by ASTM A500/A252, then ASTM A53. For importers from subject sources (namely, ***), most shipments were ASTM A53, followed by ASTM A135/A795. No subject source importers reported shipments of CWP of ***. For importers of CWP from nonsubject sources, ***. The next highest share was attributable to ***. No nonsubject source importers reported shipments of CWP of ***.

Table IV-4
CWP: U.S. producers' and U.S. importers' U.S. shipments by source and standard/stenciling, 2022

Quantity in short tons

Source	ASTM A53	ASTM A135/A795	ASTM A500/A252	Fence tubing standards	Other standards	No standards	All standards
U.S. producers	***	***	***	***	***	***	***
Brazil	***	***	***	***	***	***	***
India, subject	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***
South Korea	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	***
India, nonsubject	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***
All import sources	***	***	***	***	***	***	***
All sources	***	***	***	***	***	***	***

Table continued.

Table IV-4 Continued
CWP: U.S. producers' and U.S. importers' U.S. shipments by source and standard/stenciling, 2022

Share across in percent

Source	ASTM A53	ASTM A135/A795	ASTM A500/A252	Fence tubing standards	Other standards	No standards	All standards
U.S. producers	***	***	***	***	***	***	***
Brazil	***	***	***	***	***	***	***
India, subject	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***
South Korea	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	***
India, nonsubject	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***
All import sources	***	***	***	***	***	***	***
All sources	***	***	***	***	***	***	***

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

Note: Subject imports data only reflect U.S. imports of CWP reported by ***, by quantity, in 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--".

Figure IV-4
CWP: U.S. producers' and U.S. importers' U.S. shipments by source and standard/stenciling, 2022

* * * * *

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

Note: Subject imports data only reflect U.S. imports of CWP reported by ***, by quantity, in 2022.

The Commission requested U.S. producers and U.S. importers to report the end finish, surface finish, and length on the CWP sold in the United States. For both U.S. producers and U.S. importers the most common finish was plain end, the most common surface finish was black, and the most common lengths were single and double random lengths (approximately 20 and 40 feet).

Geographical markets

Table IV-5 presents data on U.S. imports of CWP by border of entry in 2022. According to official U.S. import statistics, U.S. imports of welded pipe from Brazil¹⁰ entered through ports located in the Northern region only, while imports from all other subject sources entered through ports located in every region, with most of the import volume entering through ports located in the Southern region of the United States. Official U.S. import statistics presented in table IV-5 are based on primary HTS numbers and do not distinguish between subject and nonsubject sources with respect to India and are overstated to varying degrees with respect to subject imports (particularly Mexico) and nonsubject imports (particularly Canada).

Table IV-5
CWP: U.S. imports by source and border of entry, 2022

Quantity in short tons

Source	East	North	South	West	All borders
Brazil	---	20	---	---	20
India	4,937	586	10,316	1,291	17,129
Mexico	1,536	20	59,808	525	61,889
South Korea	3,899	111	36,813	34,736	75,560
Taiwan	410	175	9	220	814
Thailand	165	38	17,735	19,438	37,375
Turkey	11,593	869	101,120	2,000	115,583
Subject sources	22,540	1,818	225,801	58,210	308,370
Nonsubject sources	102,782	154,077	158,080	88,355	503,293
All import sources	125,322	155,895	383,881	146,565	811,663

Table continued.

Table IV-5 Continued
CWP: U.S. imports by source and border of entry, 2022

Share across in percent

Source	East	North	South	West	All borders
Brazil	---	100.0	---	---	100.0
India	28.8	3.4	60.2	7.5	100.0
Mexico	2.5	0.0	96.6	0.8	100.0
South Korea	5.2	0.1	48.7	46.0	100.0
Taiwan	50.4	21.6	1.1	27.0	100.0
Thailand	0.4	0.1	47.5	52.0	100.0
Turkey	10.0	0.8	87.5	1.7	100.0
Subject sources	7.3	0.6	73.2	18.9	100.0
Nonsubject sources	20.4	30.6	31.4	17.6	100.0
All import sources	15.4	19.2	47.3	18.1	100.0

Table continued.

¹⁰ As noted earlier in this section, ***.

Table IV-5 Continued
CWP: U.S. imports by source and border of entry, 2022

Share down in percent

Source	East	North	South	West	All borders
Brazil	---	0.0	---	---	0.0
India	3.9	0.4	2.7	0.9	2.1
Mexico	1.2	0.0	15.6	0.4	7.6
South Korea	3.1	0.1	9.6	23.7	9.3
Taiwan	0.3	0.1	0.0	0.1	0.1
Thailand	0.1	0.0	4.6	13.3	4.6
Turkey	9.3	0.6	26.3	1.4	14.2
Subject sources	18.0	1.2	58.8	39.7	38.0
Nonsubject sources	82.0	98.8	41.2	60.3	62.0
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed August 21, 2023. Imports are based on the imports for consumption data series. Data in this figure are unadjusted official statistics and therefore include out-of-scope products and do not distinguish between subject and nonsubject sources with respect to India.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Data in this table are unadjusted official statistics and therefore include out-of-scope products.

Presence in the market

Table IV-6 and figures IV-5 and IV-6 present monthly data for U.S. imports based on official statistics during January 2020-June 2023 (a period of 42 months).¹¹ U.S. imports from India, Mexico, South Korea, and Turkey were present in each month during January 2020-June 2023, as were imports from nonsubject sources. U.S. imports from Taiwan and Thailand were present in all but two months during January 2020-June 2023. U.S. imports of welded pipe from Brazil were present in only 8 of the 42 months during January 2020-June 2023 ***.¹²

¹¹ As noted earlier in this section, official U.S. import statistics are based on primary HTS numbers and do not distinguish between subject and nonsubject sources with respect to India and are overstated to varying degrees with respect to subject imports (particularly Mexico) and nonsubject imports (particularly Canada).

¹² As noted earlier in this section, ***.

Table IV-6
CWP: U.S. imports, by source and month

Quantity in short tons

Year	Month	Brazil	India	Mexico	South Korea	Taiwan	Thailand	Turkey
2020	January	---	749	3,952	4,283	122	721	7,266
2020	February	---	437	4,718	2,843	65	---	180
2020	March	---	385	3,694	8,400	55	1,473	68
2020	April	30	1,429	3,944	2,521	40	5,508	452
2020	May	---	441	4,313	8,140	1,625	18,594	1,645
2020	June	---	153	4,698	7,916	626	1,209	1,079
2020	July	---	624	5,632	8,971	19	2,292	1,195
2020	August	---	691	5,169	2,941	568	8,261	2,418
2020	September	---	336	2,022	6,954	54	950	1,156
2020	October	---	402	655	4,931	---	1,186	870
2020	November	---	376	428	1,425	18	11,701	1,258
2020	December	---	702	2,949	1,315	27	407	5,180
2021	January	0	1,030	3,023	868	---	---	1,612
2021	February	18	717	3,113	1,025	55	4,367	143
2021	March	---	703	5,383	4,119	59	2,727	643
2021	April	---	1,298	4,643	4,172	108	549	2,392
2021	May	---	657	4,151	5,893	51	34	4,560
2021	June	15	767	5,209	8,582	26	253	3,604
2021	July	---	691	5,094	6,066	39	263	3,098
2021	August	---	817	3,242	4,814	53	1,133	4,272
2021	September	---	604	3,489	10,315	62	616	5,233
2021	October	---	982	3,746	3,457	241	55	5,231
2021	November	---	1,070	3,523	5,536	22	45	2,347
2021	December	---	864	3,417	7,211	34	25	10,615

Table continued.

Table IV-6 Continued
CWP: U.S. imports, by source and month

Quantity in short tons

Year	Month	Brazil	India	Mexico	South Korea	Taiwan	Thailand	Turkey
2022	January	10	882	3,341	2,758	34	19	7,388
2022	February	---	623	3,933	898	55	528	82
2022	March	---	1,211	7,350	7,468	6	478	14,540
2022	April	10	1,727	5,943	5,894	23	66	15,669
2022	May	---	2,333	5,787	7,330	22	498	11,071
2022	June	---	2,486	5,094	9,160	86	22	5,738
2022	July	---	2,135	5,155	3,132	43	8,067	15,323
2022	August	---	1,167	6,185	6,254	92	1,259	9,604
2022	September	---	1,341	4,787	11,895	90	6,521	13,021
2022	October	---	1,528	5,534	8,253	122	16,366	9,253
2022	November	---	529	3,782	3,535	47	1,378	4,366
2022	December	---	1,168	4,997	8,983	193	2,172	9,528
2023	January	10	778	3,968	6,973	53	21,913	1,984
2023	February	---	510	3,332	3,150	90	11,704	5,976
2023	March	---	889	4,793	8,141	62	9,033	1,880
2023	April	0	1,009	3,374	7,143	80	3,284	44
2023	May	---	1,142	3,574	3,567	66	15,748	2,472
2023	June	---	1,456	5,571	11,558	64	2,345	4,233

Table continued.

Table IV-6 Continued
CWP: U.S. imports, by source and month

Quantity in short tons

Year	Month	Subject sources	Nonsubject sources	All import sources
2020	January	17,094	35,787	52,881
2020	February	8,243	36,508	44,751
2020	March	14,076	35,892	49,967
2020	April	13,925	29,078	43,002
2020	May	34,758	30,751	65,509
2020	June	15,682	33,724	49,406
2020	July	18,734	34,937	53,671
2020	August	20,048	33,561	53,609
2020	September	11,472	36,699	48,172
2020	October	8,044	31,374	39,418
2020	November	15,205	33,793	48,998
2020	December	10,581	28,380	38,961
2021	January	6,532	32,930	39,463
2021	February	9,438	27,611	37,049
2021	March	13,635	32,938	46,573
2021	April	13,161	37,790	50,951
2021	May	15,345	38,818	54,163
2021	June	18,456	40,712	59,168
2021	July	15,250	40,988	56,238
2021	August	14,331	40,157	54,488
2021	September	20,321	43,519	63,840
2021	October	13,712	31,371	45,083
2021	November	12,542	40,316	52,859
2021	December	22,166	41,037	63,203

Table continued.

Table IV-6 Continued
CWP: U.S. imports, by source and month

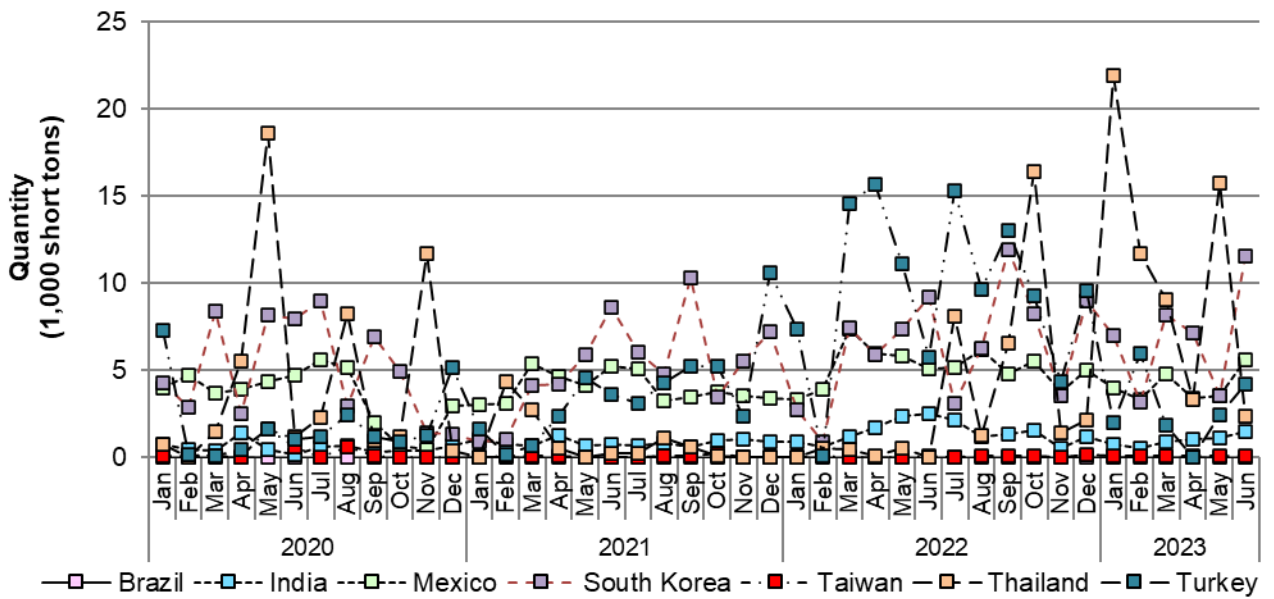
Quantity in short tons

Year	Month	Subject sources	Nonsubject sources	All import sources
2022	January	14,434	45,895	60,329
2022	February	6,118	36,857	42,975
2022	March	31,054	53,463	84,517
2022	April	29,333	28,644	57,977
2022	May	27,040	54,090	81,130
2022	June	22,586	50,218	72,804
2022	July	33,855	39,340	73,195
2022	August	24,561	36,092	60,653
2022	September	37,655	39,528	77,183
2022	October	41,055	36,803	77,858
2022	November	13,637	55,083	68,719
2022	December	27,041	27,283	54,324
2023	January	35,677	37,248	72,925
2023	February	24,761	28,953	53,714
2023	March	24,798	43,045	67,843
2023	April	14,935	48,005	62,941
2023	May	26,569	39,165	65,734
2023	June	25,228	41,084	66,312

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed August 21, 2023. Imports are based on the imports for consumption data series.

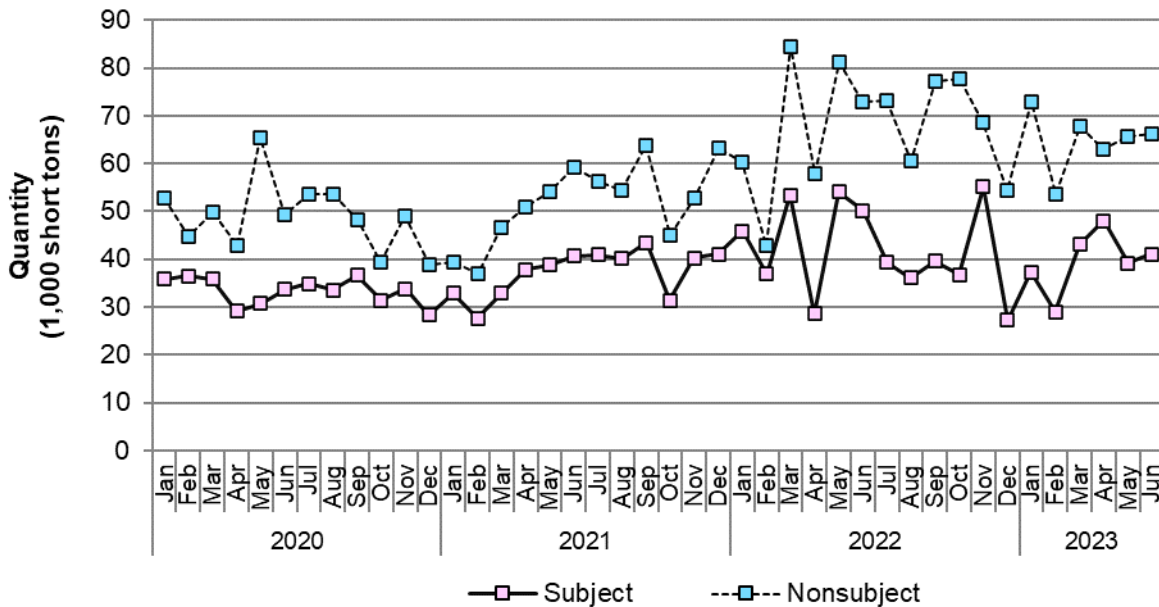
Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Data in this table are unadjusted official statistics and therefore include out-of-scope products and do not distinguish between subject and nonsubject sources with respect to India.

Figure IV-5
CWP: U.S. imports from individual subject sources, by month, January 2020 through June 2023



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed August 21, 2023. Imports are based on the imports for consumption data series. Data in this figure are unadjusted official statistics and therefore include out-of-scope products and do not distinguish between subject and nonsubject sources with respect to India.

Figure IV-6
CWP: U.S. aggregated subject and nonsubject sources, by month, January 2020 through June 2023



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed August 21, 2023. Imports are based on the imports for consumption data series. Data in this figure are unadjusted official statistics and therefore include out-of-scope products and do not distinguish between subject and nonsubject sources with respect to India.

U.S. inventories of imported merchandise

Table IV-7 presents data for the responding U.S. importers' end-of-period inventories held in the United States. Most U.S. importers ***. ***,¹³

¹³ ***/s U.S. importer questionnaire, question II-13a.

Table IV-7
CWP: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in short tons; ratio in percent

Measure	Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Inventories quantity	Brazil	***	***	***	***	***
Ratio to imports	Brazil	***	***	***	***	***
Ratio to U.S. shipments of imports	Brazil	***	***	***	***	***
Ratio to total shipments of imports	Brazil	***	***	***	***	***
Inventories quantity	India, subject	***	***	***	***	***
Ratio to imports	India, subject	***	***	***	***	***
Ratio to U.S. shipments of imports	India, subject	***	***	***	***	***
Ratio to total shipments of imports	India, subject	***	***	***	***	***
Inventories quantity	Mexico	***	***	***	***	***
Ratio to imports	Mexico	***	***	***	***	***
Ratio to U.S. shipments of imports	Mexico	***	***	***	***	***
Ratio to total shipments of imports	Mexico	***	***	***	***	***
Inventories quantity	South Korea	***	***	***	***	***
Ratio to imports	South Korea	***	***	***	***	***
Ratio to U.S. shipments of imports	South Korea	***	***	***	***	***
Ratio to total shipments of imports	South Korea	***	***	***	***	***
Inventories quantity	Taiwan	***	***	***	***	***
Ratio to imports	Taiwan	***	***	***	***	***
Ratio to U.S. shipments of imports	Taiwan	***	***	***	***	***
Ratio to total shipments of imports	Taiwan	***	***	***	***	***
Inventories quantity	Thailand	***	***	***	***	***
Ratio to imports	Thailand	***	***	***	***	***
Ratio to U.S. shipments of imports	Thailand	***	***	***	***	***
Ratio to total shipments of imports	Thailand	***	***	***	***	***

Table continued.

Table IV-7 Continued

CWP: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in short tons; ratio in percent

Measure	Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Inventories quantity	Turkey	***	***	***	***	***
Ratio to imports	Turkey	***	***	***	***	***
Ratio to U.S. shipments of imports	Turkey	***	***	***	***	***
Ratio to total shipments of imports	Turkey	***	***	***	***	***
Inventories quantity	Subject	***	***	***	***	***
Ratio to imports	Subject	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject	***	***	***	***	***
Ratio to total shipments of imports	Subject	***	***	***	***	***
Inventories quantity	India, nonsubject	***	***	***	***	***
Ratio to imports	India, nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	India, nonsubject	***	***	***	***	***
Ratio to total shipments of imports	India, nonsubject	***	***	***	***	***
Inventories quantity	All other sources	***	***	***	***	***
Ratio to imports	All other sources	***	***	***	***	***
Ratio to U.S. shipments of imports	All other sources	***	***	***	***	***
Ratio to total shipments of imports	All other sources	***	***	***	***	***
Inventories quantity	Nonsubject	***	***	***	***	***
Ratio to imports	Nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***	***	***
Inventories quantity	All	***	***	***	***	***
Ratio to imports	All	***	***	***	***	***
Ratio to U.S. shipments of imports	All	***	***	***	***	***
Ratio to total shipments of imports	All	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

U.S. importers' imports subsequent to June 30, 2023

No responding U.S. importer reported imports arranged on or after June 30, 2023.

The industry in Brazil

Overview

During the final phase of the original Brazil, Mexico, South Korea, and Taiwan investigations, the Commission received foreign producer/exporter questionnaires from three firms, which accounted for approximately *** percent of production of CWP in Brazil, and *** exports from Brazil to the United States.¹⁴

During the first five-year reviews, the Commission received no foreign producer/exporter questionnaires from firms in Brazil, however the domestic interested parties provided a list of two possible producers of CWP in Brazil in that proceeding.¹⁵ During the second five-year reviews, the Commission received no foreign producer/exporter questionnaires from firms in Brazil.¹⁶ During the third five-year reviews, the Commission received no foreign producer/exporter questionnaires from firms in Brazil.¹⁷ Although the Commission did not receive responses from any respondent interested parties in its fourth five-year reviews, the domestic interested parties for those reviews provided a list of seven possible producers of CWP in Brazil in that proceeding.¹⁸ For these current five-year reviews, the Commission issued questionnaire responses to 10 firms believed to possibly produce and/or export CWP to the United States. None of these firms submitted a response.

There were no major developments in the Brazilian industry since the continuation of the order identified by interested parties in the proceeding and no relevant information from outside sources was found.

¹⁴ In the original investigations the Commission received responses from Apolo Produtos de Aço S.A., Fornasa S.A., and Persico Pizzamiglio S.A. Original Brazil, Mexico, South Korea, and Taiwan confidential report, p. I-57. In its response to the Commission's written questions to respondents in lieu of a hearing, the Government of Brazil stated that Persico Pizzamiglio S.A., though still technically an active company, is in judicial recovery (post-bankruptcy - business continuity), carrying out the sale of its assets with judicial monitoring. After declaring bankruptcy in 1997, the company currently only provides small labor services for bending welded tubes. The Government of Brazil's Response to Questions from Hearing, p.4.

¹⁵ First review publication, p. CIRC-IV-4.

¹⁶ Second review publication, p. CIRCULAR-IV-12.

¹⁷ Third review publication, p. IV-11.

¹⁸ Fourth review publication, p. I-29.

Exports

Table IV-8 presents export data for welded tubes, pipes, and hollow profiles, a category that includes CWP and out-of-scope products, from Brazil. During 2022, Uruguay was the top export market for welded tubes, pipes, and hollow profiles from Brazil, accounting for 23.0 percent, followed by Paraguay, accounting for 21.5 percent.

Table IV-8
Pipes, tubes, and hollow profiles, NESOI, welded, of circular cross section, of iron or nonalloy steel: Exports from Brazil, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2020	2021	2022
United States	Quantity	729	724	1,186
Uruguay	Quantity	3,208	3,196	4,121
Paraguay	Quantity	3,487	3,157	3,852
Bolivia	Quantity	2,118	2,149	3,311
Argentina	Quantity	2,266	3,629	2,403
Mexico	Quantity	1,109	1,328	1,272
Colombia	Quantity	1,067	1,691	877
Chile	Quantity	97	115	251
Angola	Quantity	238	497	211
All other destination markets	Quantity	571	298	438
Non-U.S. destination markets	Quantity	14,161	16,059	16,735
All destination markets	Quantity	14,890	16,784	17,921
United States	Value	1,003	2,308	2,982
Uruguay	Value	2,323	3,805	4,879
Paraguay	Value	3,159	4,269	5,180
Bolivia	Value	1,503	2,427	3,849
Argentina	Value	2,754	5,750	5,687
Mexico	Value	1,537	2,487	3,024
Colombia	Value	1,176	3,211	1,689
Chile	Value	107	212	441
Angola	Value	432	1,161	711
All other destination markets	Value	872	883	1,271
Non-U.S. destination markets	Value	13,863	24,205	26,732
All destination markets	Value	14,866	26,513	29,714

Table continued.

Table IV-8 Continued**Pipes, tubes, and hollow profiles, NESOI, welded, of circular cross section, of iron or nonalloy steel: Exports from Brazil, by period**

Unit value in dollars per short ton; share in percent

Destination market	Measure	2020	2021	2022
United States	Unit value	1,375	3,186	2,514
Uruguay	Unit value	724	1,191	1,184
Paraguay	Unit value	906	1,352	1,345
Bolivia	Unit value	710	1,129	1,162
Argentina	Unit value	1,216	1,584	2,367
Mexico	Unit value	1,386	1,874	2,378
Colombia	Unit value	1,102	1,899	1,927
Chile	Unit value	1,108	1,848	1,758
Angola	Unit value	1,816	2,335	3,367
All other destination markets	Unit value	1,527	2,962	2,903
Non-U.S. destination markets	Unit value	979	1,507	1,597
All destination markets	Unit value	998	1,580	1,658
United States	Share of quantity	4.9	4.3	6.6
Uruguay	Share of quantity	21.5	19.0	23.0
Paraguay	Share of quantity	23.4	18.8	21.5
Bolivia	Share of quantity	14.2	12.8	18.5
Argentina	Share of quantity	15.2	21.6	13.4
Mexico	Share of quantity	7.4	7.9	7.1
Colombia	Share of quantity	7.2	10.1	4.9
Chile	Share of quantity	0.7	0.7	1.4
Angola	Share of quantity	1.6	3.0	1.2
All other destination markets	Share of quantity	3.8	1.8	2.4
Non-U.S. destination markets	Share of quantity	95.1	95.7	93.4
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7306.30 as reported by SECEX in the Global Trade Atlas Suite database, accessed August 23, 2023.

Note: United States is shown at the top. All remaining top export destinations are shown in descending order of 2022 data.

The industry in India

Overview

During the final phase of the original India and Turkey investigations, the Commission received data for two foreign producers/exporters, which accounted for *** CWP exports from India to the United States during 1982-1985.¹⁹

During the first five-year reviews, the Commission received a foreign producer/exporter questionnaire from one firm in India.²⁰ During the second five-year reviews, the Commission received a foreign producer/exporter questionnaire from one firm in India,²¹ which accounted for approximately *** percent of production of CWP in India.²² During the third five-year reviews, the Commission received no foreign producer/exporter questionnaire from firms in India.²³ The Commission did not receive responses from any respondent interested parties in its fourth five-year reviews.²⁴ For these current five-year reviews, the Commission issued questionnaire responses to 28 firms believed to possibly produce and/or export CWP to the United States. None of these firms submitted data in response to the questionnaire.²⁵

There were no major developments in the Indian industry since the continuation of the order identified by interested parties in the proceeding and no relevant information from outside sources was found.

¹⁹ Original India and Turkey confidential report, pp. A-4-A-6

²⁰ First review publication, p. CIRC-IV-5.

²¹ Second review publication, p. CIRCULAR-IV-16.

²² Second review confidential report, p. CIRCULAR-IV-22.

²³ Third review publication, p. IV-13.

²⁴ Fourth review publication, p. I-2.

²⁵ GVN Fuels ***. Imports of CWP from India by Gujarat Steel Tubes, Ltd. and Zenith Steel Pipes and Industries would be nonsubject as they were excluded from the original order on CWP from India.

Exports

According to GTA, the leading export markets for welded tubes, pipes, and hollow profiles, a category that includes CWP and out-of-scope products from India are Australia, the United States, Belgium, and the United Arab Emirates (table IV-9). During 2022, the United States was the top export market for welded tubes, pipes, and hollow profiles from India, accounting for 12.2 percent, followed by Australia, accounting for 11.2 percent.

Table IV-9
Pipes, tubes, and hollow profiles, NESOI, welded, of circular cross section, of iron or nonalloy steel: Exports from India, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2020	2021	2022
United States	Quantity	17,310	39,321	38,638
Australia	Quantity	29,668	39,937	35,301
Belgium	Quantity	24,622	37,340	29,716
United Arab Emirates	Quantity	23,191	41,930	28,876
United Kingdom	Quantity	22,451	57,671	20,919
Canada	Quantity	8,971	7,719	16,215
Netherlands	Quantity	2,821	7,941	11,004
Germany	Quantity	10,809	10,618	9,966
Poland	Quantity	4,502	7,214	8,759
All other destination markets	Quantity	78,330	116,832	116,480
Non-U.S. destination markets	Quantity	205,364	327,202	277,237
All destination markets	Quantity	222,674	366,523	315,874
United States	Value	17,350	48,779	52,759
Australia	Value	25,710	40,753	38,974
Belgium	Value	20,482	39,761	31,178
United Arab Emirates	Value	25,643	40,211	26,041
United Kingdom	Value	17,781	60,310	25,324
Canada	Value	6,386	7,394	16,501
Netherlands	Value	2,241	8,659	11,506
Germany	Value	8,126	12,980	11,768
Poland	Value	4,318	8,010	10,268
All other destination markets	Value	80,222	132,998	148,947
Non-U.S. destination markets	Value	190,911	351,077	320,505
All destination markets	Value	208,261	399,856	373,264

Table continued.

Table IV-9 Continued**Welded tubes, pipes, and hollow profiles of iron or nonalloy steel: Exports from India, by period**

Unit value in dollars per short ton; share in percent

Destination market	Measure	2020	2021	2022
United States	Unit value	1,002	1,241	1,365
Australia	Unit value	867	1,020	1,104
Belgium	Unit value	832	1,065	1,049
United Arab Emirates	Unit value	1,106	959	902
United Kingdom	Unit value	792	1,046	1,211
Canada	Unit value	712	958	1,018
Netherlands	Unit value	795	1,090	1,046
Germany	Unit value	752	1,222	1,181
Poland	Unit value	959	1,110	1,172
All other destination markets	Unit value	1,024	1,138	1,279
Non-U.S. destination markets	Unit value	930	1,073	1,156
All destination markets	Unit value	935	1,091	1,182
United States	Share of quantity	7.8	10.7	12.2
Australia	Share of quantity	13.3	10.9	11.2
Belgium	Share of quantity	11.1	10.2	9.4
United Arab Emirates	Share of quantity	10.4	11.4	9.1
United Kingdom	Share of quantity	10.1	15.7	6.6
Canada	Share of quantity	4.0	2.1	5.1
Netherlands	Share of quantity	1.3	2.2	3.5
Germany	Share of quantity	4.9	2.9	3.2
Poland	Share of quantity	2.0	2.0	2.8
All other destination markets	Share of quantity	35.2	31.9	36.9
Non-U.S. destination markets	Share of quantity	92.2	89.3	87.8
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7306.30 as reported by the Ministry of Commerce in the Global Trade Atlas Suite database, accessed August 23, 2023.

Note: United States is shown at the top. All remaining top export destinations are shown in descending order of 2022 data.

The industry in Mexico

Overview

During the final phase of the original Brazil, Mexico, South Korea, and Taiwan investigations, the Commission received foreign producer/exporter questionnaires from three firms, which accounted for approximately *** percent of production of CWP in Mexico.²⁶

During the first five-year reviews, the Commission received foreign producer/exporter questionnaires from two firms in Mexico.²⁷ During the second five-year reviews, the Commission received foreign producer/exporter questionnaires from three firms in Mexico.²⁸ During the third five-year reviews, the Commission received a foreign producer/exporter questionnaire from one firm, which accounted for approximately *** percent of production of CWP in Mexico and approximately *** percent of CWP exports from Mexico to the United States in 2011.²⁹ The Commission did not receive responses from any respondent interested parties in its fourth five-year reviews.³⁰

Table IV-10 presents information on the CWP operations of the responding producers and exporters in Mexico.³¹ The two responding foreign producer firms from Mexico are estimated to account for *** of U.S. imports of CWP from Mexico in 2022.

²⁶ Original Brazil, Mexico, South Korea, and Taiwan confidential report, p. I-60.

²⁷ First review publication, p. CIRC-IV-6.

²⁸ Second review publication, p. CIRCULAR-IV-20.

²⁹ Third review publication, p. IV-32.

³⁰ Fourth review publication, p. I-2.

³¹ ***. The Commission issued foreign producers' or exporters' questionnaires to 12 firms believed to produce and/or export CWP from Mexico.

Table IV-10
CWP: Summary data for producers in Mexico, 2022

Quantity in short tons

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)
Productos Especializados	***	***	***	***	***	***
Productos Laminados	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Table IV-11 presents recent developments in the Mexican industry since the last reviews.

Table IV-11
CWP: Recent developments in the Mexican industry

Item	Firm	Event
Plant expansion	Ternium	In February 2022, Ternium announced a \$1 billion investment to expand its plant located in Pesqueria near Monterrey. The announcement did not specify further details on whether the expansion would impact CWP production.

Sources: (no author identified), Ternium Says to Invest \$1 Billion In Mexico Expansion, Reuters (Feb. 17, 2022). Domestic interested parties' response to the notice of institution, exh 30.

Changes in operations

Producers in Mexico were asked to report any change in the character of their operations or organization relating to the production of CWP since 2017. One firm indicated in its questionnaire that it had experienced such changes. Table IV-12 presents this change.

Table IV-12
CWP: Reported changes in operations in Mexico, since January 1, 2017, by firm

Item	Firm name and narrative on changes in operations
Production curtailments	*** **

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

Operations on CWP

Table IV-13 presents data on Mexico producers' installed capacity, practical capacity, and production on the same equipment. Installed overall capacity remained steady throughout 2020-22 and between both interim periods while practical overall capacity decreased in 2021 before increasing in 2022 and was lower in interim 2023 compared to interim 2022. Overall production in Mexico decreased in 2021, then increased in 2022, resulting in a *** percent decrease during 2020-22. As a result, installed overall capacity utilization decreased by *** percentage points and practical overall capacity utilization increased by *** percentage points during 2020-22. Production (and, by extension, capacity utilization,) was higher in interim 2023 than in interim 2022.

Practical CWP capacity and production decreased during 2020-22 by *** percent and *** percent, respectively. Although capacity and production were at their lowest levels overall in 2021, capacity utilization was at its highest in 2021, reflecting uneven decreases between practical CWP capacity and production. Practical CWP capacity was *** lower in interim 2022 than in interim 2023 while production was higher in interim 2023 than in interim 2022. Practical CWP capacity utilization was higher by *** percentage points in interim 2023 than in interim 2022.

Table IV-13

CWP: Mexico producers' overall capacity and production on the same equipment as subject production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical CWP	Capacity	***	***	***	***	***
Practical CWP	Production	***	***	***	***	***
Practical CWP	Utilization	***	***	***	***	***

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

Table IV-14 presents Mexico producers’ reported narratives regarding practical capacity constraints.

Table IV-14
CWP: Producers’ in Mexico reported capacity constraints since January 1, 2020

Item	Firm name and narrative on constraints to practical overall capacity
Production bottlenecks	***. ***.
Production bottlenecks	***
Existing labor force	***
Supply of material inputs	***. ***.
Supply of material inputs	***

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

Table IV-15 presents data on the operations of the responding Mexican producers. As noted above in table IV-13, practical CWP capacity and production decreased during 2020-22 by *** percent and *** percent, respectively. Capacity was *** lower while production *** higher in interim 2023 compared to interim 2022. Mexican producers’ end-of-period inventories increased overall during 2020-22 by *** percent and were *** percent higher in interim 2023 than in interim 2022. Total shipments, inclusive of exports to all markets and home market shipments, decreased during 2020-22 by *** percent, but were higher by *** percent in interim 2023 compared to interim 2022. The majority of reported total shipments were commercial home market shipments, which decreased by *** percent overall during 2020-22, but were *** percent higher in interim 2023 than in interim 2022. Export shipments (inclusive of exports to the United States) also decreased by *** percent during 2020-22 but were *** percent higher in interim 2023 than in interim 2022.

Table IV-15
CWP: Data on industry in Mexico, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-15 Continued
CWP: Data on industry in Mexico by destination market and period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	100.0	100.0	100.0	100.0	100.0

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

As shown in table IV-16, exports to the United States accounted for *** Mexican producers' total export shipments.

Table IV-16
CWP: Producers' exports from Mexico, by period

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

Destination market	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
United States	Quantity	***	***	***	***	***
Americas	Quantity	***	***	***	***	***
European Union	Quantity	***	***	***	***	***
Asia	Quantity	***	***	***	***	***
All other destination markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
Americas	Value	***	***	***	***	***
European Union	Value	***	***	***	***	***
Asia	Value	***	***	***	***	***
All other destination markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
Americas	Unit value	***	***	***	***	***
European Union	Unit value	***	***	***	***	***
Asia	Unit value	***	***	***	***	***
All other destination markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***
United States	Share of quantity	***	***	***	***	***
Americas	Share of quantity	***	***	***	***	***
European Union	Share of quantity	***	***	***	***	***
Asia	Share of quantity	***	***	***	***	***
All other destination markets	Share of quantity	***	***	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	100.0	100.0	100.0	100.0	100.0
United States	Ratio	***	***	***	***	***
Americas	Ratio	***	***	***	***	***
European Union	Ratio	***	***	***	***	***
Asia	Ratio	***	***	***	***	***
All other destination markets	Ratio	***	***	***	***	***
Non-U.S. destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Alternative products

As shown in table IV-17, responding firms produced other products on the same equipment and machinery used to produce CWP. Throughout 2020-22 and in both interim periods, *** production was of out-of-scope products including ***. CWP accounted for *** percent of total production in any given period.

Table IV-17
CWP: Producers' in Mexico overall production on the same equipment as subject production, by product type and period

Quantity in short tons; share in percent

Product type	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Production: CWP	Quantity	***	***	***	***	***
Production: Line pipe <= 16 OD	Quantity	***	***	***	***	***
Production: Line pipe > 16 OD	Quantity	***	***	***	***	***
Production: Mechanical tubing	Quantity	***	***	***	***	***
Production: OCTG	Quantity	***	***	***	***	***
Production: Structural > 16 OD	Quantity	***	***	***	***	***
Production: Other products	Quantity	***	***	***	***	***
Production: Out-of-scope products	Quantity	***	***	***	***	***
Production: Total same machinery	Quantity	***	***	***	***	***
Production: CWP	Share	***	***	***	***	***
Production: Line pipe <= 16 OD	Share	***	***	***	***	***
Production: Line pipe > 16 OD	Share	***	***	***	***	***
Production: Mechanical tubing	Share	***	***	***	***	***
Production: OCTG	Share	***	***	***	***	***
Production: Structural > 16 OD	Share	***	***	***	***	***
Production: Other products	Share	***	***	***	***	***
Production: Out-of-scope products	Share	***	***	***	***	***
Production: Total same machinery	Share	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Exports

According to GTA, the United States is the leading export market for welded tubes, pipes, and hollow profiles, a category that includes CWP and out-of-scope products from Mexico (table IV-18).

Table IV-18
Pipes, tubes, and hollow profiles, NESOI, welded, of circular cross section, of iron or nonalloy steel: Exports from Mexico, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2020	2021	2022
United States	Quantity	84,747	68,332	89,434
Guatemala	Quantity	64	10	321
Brazil	Quantity	---	32	248
Canada	Quantity	1,069	589	171
Costa Rica	Quantity	336	393	99
China	Quantity	51	---	40
El Salvador	Quantity	14	---	16
Colombia	Quantity	69	---	---
All other destination markets	Quantity	---	---	---
Non-U.S. destination markets	Quantity	1,603	1,025	895
All destination markets	Quantity	86,350	69,356	90,328
United States	Value	100,566	128,440	164,274
Guatemala	Value	147	23	943
Brazil	Value	---	123	873
Canada	Value	1,599	882	460
Costa Rica	Value	390	670	237
China	Value	115	---	143
El Salvador	Value	25	---	43
Colombia	Value	78	---	---
All other destination markets	Value	---	---	---
Non-U.S. destination markets	Value	2,355	1,697	2,699
All destination markets	Value	102,920	130,137	166,974

Table continued.

Table IV-18 Continued**Welded tubes, pipes, and hollow profiles of iron or nonalloy steel: Exports from Mexico, by period**

Unit value in dollars per short ton; share in percent

Destination market	Measure	2020	2021	2022
United States	Unit value	1,187	1,880	1,837
Guatemala	Unit value	2,303	2,262	2,942
Brazil	Unit value	---	3,783	3,523
Canada	Unit value	1,496	1,496	2,685
Costa Rica	Unit value	1,160	1,705	2,398
China	Unit value	2,267	---	3,592
El Salvador	Unit value	1,831	---	2,669
Colombia	Unit value	1,124	---	---
All other destination markets	Unit value	---	---	---
Non-U.S. destination markets	Unit value	1,469	1,656	3,018
All destination markets	Unit value	1,192	1,876	1,849
United States	Share of quantity	98.1	98.5	99.0
Guatemala	Share of quantity	0.1	0.0	0.4
Brazil	Share of quantity	---	0.0	0.3
Canada	Share of quantity	1.2	0.8	0.2
Costa Rica	Share of quantity	0.4	0.6	0.1
China	Share of quantity	0.1	---	0.0
El Salvador	Share of quantity	0.0	---	0.0
Colombia	Share of quantity	0.1	---	---
All other destination markets	Share of quantity	---	---	---
Non-U.S. destination markets	Share of quantity	1.9	1.5	1.0
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7306.30 as reported by INEGI in the Global Trade Atlas Suite database, accessed August 23, 2023.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top followed by the top exporting countries in descending order of 2022 data.

The industry in South Korea

Overview

During the final phase of the original Brazil, Mexico, South Korea, and Taiwan investigations, the Commission received foreign producer/exporter questionnaires from five firms, which accounted for *** production of CWP in South Korea.³²

During the first five-year reviews, the Commission received foreign producer/exporter questionnaires from nine firms in South Korea.³³ During the second five-year reviews, the Commission received foreign producer/exporter questionnaires from one firm in South Korea.³⁴

During the third five-year reviews, the Commission received no foreign producer/exporter questionnaire from firms in South Korea.³⁵ The Commission did not receive responses from any respondent interested parties in its fourth five-year reviews.³⁶

For these current five-year reviews, the Commission issued questionnaire responses to 14 firms believed to possibly produce and/or export CWP to the United States. None of these firms submitted data in response to the questionnaire. There were no major developments in the South Korean industry since the continuation of the order identified by interested parties in the proceeding and no relevant information from outside sources was found.

³² Original Brazil, Mexico, Taiwan, and South Korea confidential report, p. I-59.

³³ First review publication, p. CIRC-IV-6.

³⁴ Second review publication, p. CIRCULAR-IV-18.

³⁵ Third review publication, p. IV-17.

³⁶ Fourth review publication, p. I-2.

Exports

According to GTA, the leading export markets for welded tubes, pipes, and hollow profiles, a category that includes CWP and out-of-scope products from South Korea are the United States and Japan (table IV-19). During 2022, the United States was the largest export market for these products from South Korea, accounting for 27.0 percent, followed closely by Japan, accounting for 26.9 percent. In 2020 and 2021, Japan accounted for a larger share of total exports than the United States.

Table IV-19
Pipes, tubes, and hollow profiles, NESOI, welded, of circular cross section, of iron or nonalloy steel: Exports from South Korea, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2020	2021	2022
United States	Quantity	57,619	67,283	77,847
Japan	Quantity	104,050	73,328	77,379
Canada	Quantity	25,593	21,782	43,881
Mexico	Quantity	9,821	13,744	12,766
India	Quantity	4,389	7,304	9,661
Thailand	Quantity	6,127	10,836	10,078
China	Quantity	31,268	32,240	8,281
Taiwan	Quantity	11,093	16,700	10,700
Vietnam	Quantity	7,686	7,109	8,154
All other destination markets	Quantity	43,317	28,948	29,189
Non-U.S. destination markets	Quantity	243,344	211,991	210,089
All destination markets	Quantity	300,963	279,274	287,936
United States	Value	41,420	76,012	112,908
Japan	Value	76,325	69,855	77,978
Canada	Value	14,283	20,570	40,940
Mexico	Value	13,463	19,966	21,461
India	Value	7,763	12,116	17,476
Thailand	Value	7,591	14,828	15,591
China	Value	36,743	43,506	14,322
Taiwan	Value	7,701	15,120	11,249
Vietnam	Value	6,198	6,898	10,693
All other destination markets	Value	42,139	43,265	48,743
Non-U.S. destination markets	Value	212,206	246,124	258,452
All destination markets	Value	253,626	322,135	371,360

Table continued.

Table IV-19 Continued**Welded tubes, pipes, and hollow profiles of iron or nonalloy steel: Exports from South Korea, by destination market and by period**

Unit value in dollars per short ton; share in percent

Destination market	Measure	2020	2021	2022
United States	Unit value	719	1,130	1,450
Japan	Unit value	734	953	1,008
Canada	Unit value	558	944	933
Mexico	Unit value	1,371	1,453	1,681
India	Unit value	1,769	1,659	1,809
Thailand	Unit value	1,239	1,368	1,547
China	Unit value	1,175	1,349	1,729
Taiwan	Unit value	694	905	1,051
Vietnam	Unit value	806	970	1,311
All other destination markets	Unit value	973	1,495	1,670
Non-U.S. destination markets	Unit value	872	1,161	1,230
All destination markets	Unit value	843	1,153	1,290
United States	Share of quantity	19.1	24.1	27.0
Japan	Share of quantity	34.6	26.3	26.9
Canada	Share of quantity	8.5	7.8	15.2
Mexico	Share of quantity	3.3	4.9	4.4
India	Share of quantity	1.5	2.6	3.4
Thailand	Share of quantity	2.0	3.9	3.5
China	Share of quantity	10.4	11.5	2.9
Taiwan	Share of quantity	3.7	6.0	3.7
Vietnam	Share of quantity	2.6	2.5	2.8
All other destination markets	Share of quantity	14.4	10.4	10.1
Non-U.S. destination markets	Share of quantity	80.9	75.9	73.0
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7306.30 as reported by Korea Trade Statistics Promotion Institute (KTSPI) in the Global Trade Atlas Suite database, accessed August 23, 2023.

Note: United States is shown at the top. All remaining top export destinations are shown in descending order of 2022 data.

The industry in Taiwan

Overview

During the final phase of the original Taiwan investigation, the Commission received foreign producer/exporter questionnaires from three firms, which accounted for approximately *** percent of Taiwan's capacity of small diameter CWP production in 1983,³⁷ and approximately 95.0 percent of small diameter CWP exports from Taiwan to the United States during 1982-1983.³⁸ During the final phase of the original Brazil, Mexico, South Korea, and Taiwan investigations, the Commission received foreign producer/exporter questionnaires from three firms, which accounted for approximately *** percent of production of CWP in Taiwan during 1991.³⁹

During the first five-year reviews, the Commission received no foreign producer/exporter questionnaires from firms in Taiwan.⁴⁰ During the second five-year reviews, the Commission received no foreign producer/exporter questionnaires from firms in Taiwan.⁴¹ During the third five-year reviews, the Commission received one foreign producer/exporter questionnaire from one firm in Taiwan, which accounted for approximately *** percent of CWP exports from Taiwan to the United States in 2011.⁴² The Commission did not receive responses from any respondent interested parties in its fourth five-year reviews.⁴³

For these current five-year reviews, the Commission issued questionnaire responses to five firms believed to possibly produce and/or export CWP to the United States. None of these firms submitted data in response to the questionnaire. There were no major developments in the Taiwanese industry since the continuation of the order identified by interested parties in the proceeding and no relevant information from outside sources was found.

³⁷ Original Taiwan confidential report, p. A-23.

³⁸ Original Taiwan publication, p. A-8.

³⁹ Original Brazil, Mexico, Taiwan, and South Korea confidential report, p. I-62.

⁴⁰ Counsel provided no information on producers in Taiwan. First review publication, p. CIRC-IV-4.

⁴¹ Second review publication, p. CIRCULAR-IV-22.

⁴² Third review confidential report, p. IV-38.

⁴³ Fourth review publication, p. I-2.

Exports

According to GTA, the leading export markets for welded tubes, pipes, and hollow profiles, a category that includes CWP and out-of-scope products from Taiwan are Canada and Thailand (table IV-20). During 2022, the United States accounted for 5.3 percent of exports of these products from Taiwan, while Canada accounted for 37.3 percent, and Thailand accounted for 17.8 percent.

Table IV-20
Pipes, tubes, and hollow profiles, NESOI, welded, of circular cross section, of iron or nonalloy steel: Exports from Taiwan, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2020	2021	2022
United States	Quantity	2,787	3,318	1,965
Canada	Quantity	6,034	6,993	13,873
Thailand	Quantity	6,335	9,624	6,622
China	Quantity	5,957	6,686	5,367
New Zealand	Quantity	1,829	2,447	2,005
Vietnam	Quantity	3,297	3,209	1,845
Japan	Quantity	3,379	2,315	1,738
South Korea	Quantity	668	844	693
Mexico	Quantity	405	1,119	686
All other destination markets	Quantity	3,140	4,598	2,447
Non-U.S. destination markets	Quantity	31,043	37,835	35,276
All destination markets	Quantity	33,830	41,153	37,242
United States	Value	2,946	4,940	4,412
Canada	Value	3,939	6,676	16,994
Thailand	Value	6,504	12,708	9,366
China	Value	8,443	11,179	10,218
New Zealand	Value	1,273	2,195	2,560
Vietnam	Value	3,023	4,814	2,668
Japan	Value	2,732	2,365	2,320
South Korea	Value	1,057	1,492	1,357
Mexico	Value	535	1,624	1,132
All other destination markets	Value	4,118	8,139	5,240
Non-U.S. destination markets	Value	31,625	51,192	51,855
All destination markets	Value	34,570	56,132	56,267

Table continued.

Table IV-20 Continued**Welded tubes, pipes, and hollow profiles of iron or nonalloy steel: Exports from Taiwan, by period**

Unit value in dollars per short ton; share in percent

Destination market	Measure	2020	2021	2022
United States	Unit value	1,057	1,489	2,245
Canada	Unit value	653	955	1,225
Thailand	Unit value	1,027	1,320	1,414
China	Unit value	1,417	1,672	1,904
New Zealand	Unit value	696	897	1,277
Vietnam	Unit value	917	1,500	1,446
Japan	Unit value	809	1,021	1,334
South Korea	Unit value	1,583	1,767	1,958
Mexico	Unit value	1,323	1,452	1,651
All other destination markets	Unit value	1,311	1,770	2,141
Non-U.S. destination markets	Unit value	1,019	1,353	1,470
All destination markets	Unit value	1,022	1,364	1,511
United States	Share of quantity	8.2	8.1	5.3
Canada	Share of quantity	17.8	17.0	37.3
Thailand	Share of quantity	18.7	23.4	17.8
China	Share of quantity	17.6	16.2	14.4
New Zealand	Share of quantity	5.4	5.9	5.4
Vietnam	Share of quantity	9.7	7.8	5.0
Japan	Share of quantity	10.0	5.6	4.7
South Korea	Share of quantity	2.0	2.1	1.9
Mexico	Share of quantity	1.2	2.7	1.8
All other destination markets	Share of quantity	9.3	11.2	6.6
Non-U.S. destination markets	Share of quantity	91.8	91.9	94.7
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7306.30 as reported by Taiwan Directorate General of Customs in the Global Trade Atlas Suite database, accessed August 23, 2023.

Note: United States is shown at the top. All remaining top export destinations are shown in descending order of 2022 data.

The industry in Thailand

Overview

During the final phase of the original Thailand and Turkey investigations, the Commission received foreign producer/exporter questionnaires from five firms, which accounted for approximately all CWP exports from Thailand to the United States.⁴⁴

During the first five-year reviews, the Commission received no foreign producer/exporter questionnaires from firms in Thailand.⁴⁵ During the second five-year reviews, the Commission received a foreign producer/exporter questionnaire from one firm in Thailand.⁴⁶ During the third five-year reviews, the Commission received a foreign producer/exporter questionnaire from one firm, accounting for approximately *** percent of production of CWP in Thailand and *** percent of CWP exports from Thailand to the United States during 2011.⁴⁷ The Commission did not receive responses from any respondent interested parties in its fourth five-year reviews.⁴⁸

For these current five-year reviews, the Commission issued questionnaire responses to five firms believed to possibly produce and/or export CWP to the United States. None of these firms submitted data in response to the questionnaire. There were no major developments in the Thai industry since the continuation of the order identified by interested parties in the proceeding and no relevant information from outside sources was found.

⁴⁴ Original Thailand and Turkey publication, p. A-7.

⁴⁵ Counsel provided no information on producers in Thailand. First review publication, p. CIRC-IV-4.

⁴⁶ Second review publication, p. CIRCULAR-IV-23.

⁴⁷ Third review confidential report, p. IV-42.

⁴⁸ Fourth review publication, p. I-2.

Exports

According to GTA, the leading export markets for welded tubes, pipes, and hollow profiles, a category that includes CWP and out-of-scope products from Thailand are the United States, Canada, and Cambodia (table IV-21). During 2022, the United States was the top export market for these products from Thailand, accounting for 69.3 percent, followed by Canada, accounting for 11.6 percent.

Table IV-21
Pipes, tubes, and hollow profiles, NESOI, welded, of circular cross section, of iron or nonalloy steel: Exports from Thailand, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2020	2021	2022
United States	Quantity	94,338	154,408	112,921
Canada	Quantity	1,701	13,379	18,988
Cambodia	Quantity	6,015	7,843	12,119
Myanmar	Quantity	3,938	2,801	2,698
Laos	Quantity	1,621	553	2,568
Indonesia	Quantity	2,514	2,738	2,478
Mexico	Quantity	2,010	2,085	2,299
Korea, South	Quantity	269	1,297	2,011
Vietnam	Quantity	1,673	1,403	1,322
All other destination markets	Quantity	7,550	7,987	5,639
Non-U.S. destination markets	Quantity	27,290	40,087	50,123
All destination markets	Quantity	121,629	194,495	163,044
United States	Value	65,257	140,387	122,967
Canada	Value	1,300	12,801	17,919
Cambodia	Value	6,017	8,117	15,911
Myanmar	Value	3,178	2,796	2,737
Laos	Value	1,846	693	3,593
Indonesia	Value	5,035	6,618	6,269
Mexico	Value	3,622	4,122	4,641
Korea, South	Value	358	2,373	4,037
Vietnam	Value	2,752	2,468	2,866
All other destination markets	Value	11,213	12,547	9,561
Non-U.S. destination markets	Value	35,322	52,537	67,535
All destination markets	Value	100,579	192,924	190,501

Table continued.

Table IV-21 Continued**Welded tubes, pipes, and hollow profiles of iron or nonalloy steel: Exports from Thailand, by period**

Unit value in dollars per short ton; share in percent

Destination market	Measure	2020	2021	2022
United States	Unit value	692	909	1,089
Canada	Unit value	765	957	944
Cambodia	Unit value	1,000	1,035	1,313
Myanmar	Unit value	807	998	1,014
Laos	Unit value	1,139	1,252	1,399
Indonesia	Unit value	2,003	2,417	2,530
Mexico	Unit value	1,802	1,977	2,019
Korea, South	Unit value	1,332	1,829	2,007
Vietnam	Unit value	1,645	1,759	2,168
All other destination markets	Unit value	1,485	1,571	1,696
Non-U.S. destination markets	Unit value	1,294	1,311	1,347
All destination markets	Unit value	827	992	1,168
United States	Share of quantity	77.6	79.4	69.3
Canada	Share of quantity	1.4	6.9	11.6
Cambodia	Share of quantity	4.9	4.0	7.4
Myanmar	Share of quantity	3.2	1.4	1.7
Laos	Share of quantity	1.3	0.3	1.6
Indonesia	Share of quantity	2.1	1.4	1.5
Mexico	Share of quantity	1.7	1.1	1.4
Korea, South	Share of quantity	0.2	0.7	1.2
Vietnam	Share of quantity	1.4	0.7	0.8
All other destination markets	Share of quantity	6.2	4.1	3.5
Non-U.S. destination markets	Share of quantity	22.4	20.6	30.7
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7306.30 as reported by Thai Customs Department in the Global Trade Atlas Suite database, accessed August 23, 2023.

Note: United States is shown at the top. All remaining top export destinations are shown in descending order of 2022 data.

The industry in Turkey

Overview

During the final phase of the original Thailand and Turkey investigations, the Commission received foreign producer/exporter questionnaires from three firms.⁴⁹ During the final phase of the original India and Turkey investigations, the Commission received foreign producer/exporter questionnaires from three firms, which accounted for *** CWP exports from Turkey to the United States during 1985.⁵⁰

During the first five-year reviews, the Commission received a foreign producer/exporter questionnaire from one firm in Turkey.⁵¹ During the second five-year reviews, the Commission received foreign producer/exporter questionnaires from four firms in Turkey.⁵² During the third five-year reviews the Commission received foreign producer/exporter questionnaires from three firms accounting for approximately *** percent of production of CWP in Turkey and *** percent of exports of CWP from Turkey to the United States in 2011.⁵³ The Commission did not receive responses from any respondent interested parties in its fourth five-year reviews.⁵⁴

For these current five-year reviews, the Commission issued questionnaire responses to three firms believed to possibly produce and/or export CWP to the United States. One firm, Borusan Mannesmann Boru San. Tic. A.Ş. (“Borusan”), believed to account for a substantial share of subject imports from Turkey, provided a response. Table IV-22 presents information on its CWP operations.

There were no major developments in the Turkish industry since the continuation of the order identified by interested parties in the proceeding and no relevant information from outside sources was found.

⁴⁹ Original Thailand and Turkey confidential report, p. A-6.

⁵⁰ Original India and Turkey confidential report, p. A-8.

⁵¹ First review publication, p. CIRC-IV-7.

⁵² Second review publication, p. CIRCULAR-IV-25.

⁵³ Third review confidential report, pp. IV-49-IV-50.

⁵⁴ Fourth review publication, p. I-2.

Table IV-22
CWP: Summary data for producers in Turkey, 2022

Quantity in short tons

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)
Borusan Mannesmann Boru San. Tic. A.Ş.	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Note: ***.

Changes in operations

As shown below in table IV-23, Borusan *** since January 1, 2017.

Table IV-23
CWP: Reported changes in operations by firms in Turkey, since January 1, 2020

Item	Firm name and narrative on changes in operations
Other	***

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

Operations on CWP

Table IV-24 presents data on Borusan’s installed capacity, practical capacity, and production on the same equipment. Borusan’s installed overall and practical overall capacity *** percent and *** percent, respectively, during 2020-22, with ***. Borusan’s installed overall and practical overall capacity *** between the two interim periods. Borusan’s installed and practical overall production similarly *** percent and was *** in interim 2023 than in interim 2022. The *** in installed and practical overall capacity and production during 2020-22, followed by *** in the latter interim period, resulted in *** capacity utilization during 2020-22, followed by *** capacity utilization in interim 2023 than in interim 2022.

Table IV-24
CWP: Turkey producers’ overall capacity and production on the same equipment as subject production, by period

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical CWP	Capacity	***	***	***	***	***
Practical CWP	Production	***	***	***	***	***
Practical CWP	Utilization	***	***	***	***	***

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

Table IV-25 presents Borusan’s reported narratives regarding practical capacity constraints.

Table IV-25
CWP: Producers’ in Turkey reported capacity constraints since January 1, 2020

Item	Firm name and narrative on constraints to practical overall capacity
Production bottlenecks	***
Other constraints	***

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

Table IV-26 presents data on Borusan’s CWP operations, including production, shipments, and end-of-period inventories. While its capacity ***, its production *** percent, though was *** in interim 2023 than in interim 2022. Borusan’s end-of period inventories *** percent but were *** in interim 2023 than in interim 2022. *** of Borusan’s total shipments in 2020, but by 2022, export shipments accounted for ***. Borusan’s commercial home market *** percent but were *** in interim 2022 than in interim 2023. Borusan’s total export shipments (inclusive of exports to the United States) *** during 2020-22 and were *** in interim 2022 than in interim 2023.

Table IV-27 presents more detailed data on Borusan’s exports. While during 2020-22 exports of CWP to the United States ***, by quantity, exports to non-U.S. destination markets ***. During the same period, the share of quantity of exports to the U.S. *** percent while the share of quantity of exports to the European Union *** percent.

Table IV-26
CWP: Data on industry in Turkey, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-26 Continued
CWP: Data on industry in Turkey, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	100.0	100.0	100.0	100.0	100.0

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

Table IV-27**CWP: Producers' and resellers' exports from Turkey, by destination market and period**

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

Destination market	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
United States	Quantity	***	***	***	***	***
Americas	Quantity	***	***	***	***	***
European Union	Quantity	***	***	***	***	***
Asia	Quantity	***	***	***	***	***
All other destination markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
Americas	Value	***	***	***	***	***
European Union	Value	***	***	***	***	***
Asia	Value	***	***	***	***	***
All other destination markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
Americas	Unit value	***	***	***	***	***
European Union	Unit value	***	***	***	***	***
Asia	Unit value	***	***	***	***	***
All other destination markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***
United States	Share of quantity	***	***	***	***	***
Americas	Share of quantity	***	***	***	***	***
European Union	Share of quantity	***	***	***	***	***
Asia	Share of quantity	***	***	***	***	***
All other destination markets	Share of quantity	***	***	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	100.0	100.0	100.0	100.0	100.0
United States	Ratio	***	***	***	***	***
Americas	Ratio	***	***	***	***	***
European Union	Ratio	***	***	***	***	***
Asia	Ratio	***	***	***	***	***
All other destination markets	Ratio	***	***	***	***	***
Non-U.S. destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

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

Alternative products

As shown in table IV-28, Borusan reported producing other products, including *** on the same machinery as CWP. ***.

Table IV-28

CWP: Producers' in Turkey overall production on the same equipment as subject production, by product type and period

Quantity in short tons; share in percent

Product type	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
CWP	Quantity	***	***	***	***	***
Line pipe <= 16 OD	Quantity	***	***	***	***	***
Line pipe > 16 OD	Quantity	***	***	***	***	***
Mechanical tubing	Quantity	***	***	***	***	***
OCTG	Quantity	***	***	***	***	***
Structural > 16 OD	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
CWP	Share	***	***	***	***	***
Line pipe <= 16 OD	Share	***	***	***	***	***
Line pipe > 16 OD	Share	***	***	***	***	***
Mechanical tubing	Share	***	***	***	***	***
OCTG	Share	***	***	***	***	***
Structural > 16 OD	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All out-of-scope products	Share	***	***	***	***	***
All products	Share	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Exports

According to GTA, the leading export markets for welded tubes, pipes, and hollow profiles, a category that includes CWP and out-of-scope products from Turkey are the United States, Romania, the United Kingdom, and Italy (table IV-29). During 2022, the United States was the top export market for these products from Turkey, accounting for 14.1 percent, followed by Romania, accounting for 10.8 percent.

Table IV-29
Pipes, tubes, and hollow profiles, NESOI, welded, of circular cross section, of iron or nonalloy steel: Exports from Turkey, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2020	2021	2022
United States	Quantity	16,179	51,863	103,944
Romania	Quantity	79,767	76,349	79,280
United Kingdom	Quantity	46,588	85,430	76,666
Italy	Quantity	39,309	52,373	54,760
Canada	Quantity	23,599	47,657	45,553
Germany	Quantity	32,706	34,439	41,477
Belgium	Quantity	48,623	61,181	38,310
Israel	Quantity	27,419	27,551	35,897
Iraq	Quantity	47,584	32,908	34,065
All other destination markets	Quantity	216,732	239,597	226,940
Non-U.S. destination markets	Quantity	562,327	657,484	632,948
All destination markets	Quantity	578,506	709,347	736,892
United States	Value	11,144	58,217	135,792
Romania	Value	47,263	71,121	79,516
United Kingdom	Value	30,636	85,180	84,393
Italy	Value	26,827	50,384	57,174
Canada	Value	19,641	52,222	62,660
Germany	Value	26,255	39,632	52,931
Belgium	Value	27,776	54,957	37,960
Israel	Value	17,298	28,051	38,059
Iraq	Value	26,446	28,193	32,088
All other destination markets	Value	168,733	270,642	274,466
Non-U.S. destination markets	Value	390,875	680,382	719,248
All destination markets	Value	402,019	738,599	855,040

Table continued.

Table IV-29 Continued**Welded tubes, pipes, and hollow profiles of iron or nonalloy steel: Exports from Turkey, by period**

Unit value in dollars per short ton; share in percent

Destination market	Measure	2020	2021	2022
United States	Unit value	689	1,123	1,306
Romania	Unit value	593	932	1,003
United Kingdom	Unit value	658	997	1,101
Italy	Unit value	682	962	1,044
Canada	Unit value	832	1,096	1,376
Germany	Unit value	803	1,151	1,276
Belgium	Unit value	571	898	991
Israel	Unit value	631	1,018	1,060
Iraq	Unit value	556	857	942
All other destination markets	Unit value	779	1,130	1,209
Non-U.S. destination markets	Unit value	695	1,035	1,136
All destination markets	Unit value	695	1,041	1,160
United States	Share of quantity	2.8	7.3	14.1
Romania	Share of quantity	13.8	10.8	10.8
United Kingdom	Share of quantity	8.1	12.0	10.4
Italy	Share of quantity	6.8	7.4	7.4
Canada	Share of quantity	4.1	6.7	6.2
Germany	Share of quantity	5.7	4.9	5.6
Belgium	Share of quantity	8.4	8.6	5.2
Israel	Share of quantity	4.7	3.9	4.9
Iraq	Share of quantity	8.2	4.6	4.6
All other destination markets	Share of quantity	37.5	33.8	30.8
Non-U.S. destination markets	Share of quantity	97.2	92.7	85.9
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7306.30 as reported by State Institute of Statistics in the Global Trade Atlas Suite database, accessed August 23, 2023.

Note: United States is shown at the top. All remaining top export destinations are shown in descending order of 2022 data.

Subject countries combined

Table IV-30 presents summary data on CWP operations of the reporting subject producers in the subject countries (namely, Mexico and Turkey).

Table IV-30
CWP: Data on the industry in subject countries, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-30 Continued
CWP: Data on the industry in subject countries, by period

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

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	100.0	100.0	100.0	100.0	100.0

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

Third-country trade actions

CWP, including that from India, South Korea, Taiwan, Thailand, and Turkey has been subject to antidumping duty investigations and orders in Canada.⁵⁵ Effective December 2012, CWP imported into Canada under HS subheadings 7306.30.00.10, 7306.30.00.20, and 7306.30.00.30 from multiple countries, including India, South Korea, Taiwan, and Thailand, is subject to antidumping duty orders.⁵⁶ For imports of subject merchandise originating in or exported from India, South Korea, Taiwan, and Thailand for which the exporter had not been issued specific normal values, the antidumping duty is equal to 54.2 percent of the export price.⁵⁷ These orders were continued on October 10, 2018.

On February 15, 2019, Canada implemented antidumping duty orders on CWP imported under HS subheadings 7306.30.00.10, 7306.30.00.20, and 7306.30.00.30 from Pakistan, Philippines, Turkey, and Vietnam.⁵⁸ For imports of subject merchandise, the antidumping duties were 45.8 percent for Turkey.⁵⁹

⁵⁵ Subject product defined as “Carbon steel welded pipe, commonly identified as standard pipe, in the nominal size range from 1/2 inch up to and including 6 inches (12.7 mm to 168.3 mm in outside diameter) inclusive, in various forms and finishes, usually supplied to meet ASTM A53, ASTM A135, ASTM A252, ASTM A589, ASTM A795, ASTM F1083 or Commercial Quality, or AWWA C200-97 or equivalent specifications, including water well casing, piling pipe, sprinkler pipe and fencing pipe, but excluding oil and gas line pipe made to API specifications exclusively...” [Carbon Steel Welded Pipe 2 \(CSWP 2\) - Measures in Force \(cbsa-asfc.gc.ca\)](#).

⁵⁶ Carbon Steel Welded Pipe, Inquiry No. NQ-2012-003 (Dec. 2012), Canada International Trade Tribunal, available at <https://decisions.citt-tcce.gc.ca/citt-tcce/a/en/item/353558/index.do>.

⁵⁷ Certain Carbon Steel Welded Pipe 2 (CSWP 2) Dumping (Chinese Taipei, India, Oman, South Korea, Thailand and United Arab Emirates) & subsidizing (India) <https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/cswp2-eng.html?wbdisable=true>; Canada, "Semi-Annual Report Under Article 16.4 of the Agreement," WTO, G/ADP/N/357/CAN, October 15, 2021, p. 25, <https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/ADP/N357CAN.pdf&Open=True>.

⁵⁸ Subject product defined as “Carbon steel welded pipe, commonly identified as standard pipe, in the nominal size range from ½ inch up to and including 6 inches (12.7 mm to 168.3 mm in outside diameter) inclusive, in various forms and finishes, usually supplied to meet ASTM A53, ASTM A135, ASTM A252, ASTM A589, ASTM A795, ASTM F1083 or Commercial Quality, or AWWA C200-97 or equivalent specifications, including water well casing, piling pipe, sprinkler pipe and fencing pipe, but excluding oil and gas line pipe made to API specifications exclusively...” <https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/cswp3-eng.html>.

⁵⁹ Carbon Steel Welded Pipe 3 (CSWP 3) Dumping (Pakistan, Philippines, Turkey, Vietnam), [Carbon steel welded pipe 3 \(CSWP 3\) - Measures in Force \(cbsa-asfc.gc.ca\)](#); Canada, "Semi-Annual Report Under Article 16.4 of the Agreement," WTO, G/ADP/N/357/CAN, October 15, 2021, p. 26, <https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/ADP/N357CAN.pdf&Open=True>.

In addition, Australia has antidumping orders on hollow structural steel sections imported under HS 7306.30 from South Korea and Taiwan.⁶⁰ Also, on February 2, 2019, the EU imposed safeguard measures on steel products, including hollow structural steel, standard pipe, and other welded pipes, from all countries, as specified, for an initial period of three years, until June 30, 2021. Products were subject, as specified, to a tariff rate quota (“TRQ”) based on historical import levels for each of 26 product categories. Imports above the TRQ levels are subject to an additional duty of 25 percent. On June 10, 2021, the European Commission announced the extension of the safeguard measures on imports of steel products until June 30, 2024.⁶¹ Table IV-31 summarizes the third country trade actions against the subject countries.

Table IV-31
Summary of third country trade actions

Implementing country	Subject countries	Products	Details
Canada	India, South Korea, Taiwan, Thailand, Turkey	CWP	Antidumping duties ranging from 45.8-54.2 percent
Australia	South Korea, Taiwan	Hollow structural steel sections	Antidumping duties (rates not specified)
European Union	All countries	hollow structural steel, standard pipe, and other welded pipes	Safeguard/TRQ; Imports over TRQ receive additional 25 percent duty

Source: See footnotes 52-58, pp. IV-61-IV-62.

⁶⁰ Australia, “Semi-Annual Report under Article 16.4 of the Agreement,” G/ADP/N/370/AUS (Oct. 4, 2022) attached as exhibit 26 in the domestic interested parties’ response to the notice of institution.

⁶¹ Global Trade Alert, “EU: Extension of definitive safeguard measure on imports of steel products,” <https://www.globaltradealert.org/intervention/61213/safeguard/eu-extension-of-definitive-safeguard-measure-on-imports-of-steel-products>. Official Journal of the European Union, Case No. Safe009: Commission Implementing Regulation (EU) 2019/159 of January 31, 2019. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0159&from=EN>. Official Journal of the European Union, June 25, 2021, Commission Implementing Regulation 2021/1029: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R1029&from=EN>.

Global market

Table IV-32 presents global export data for welded tubes, pipes, and hollow profiles, a category that includes CWP and out-of-scope products (by source with the United States shown at the top followed by the countries under order (in alphabetical order) and remaining top exporting countries in descending order of quantity for 2022). Brazil was the smallest-volume export source among the subject countries. In contrast, China, Italy, and subject source Turkey were the leading global exporters, accounting for 19.4 percent, 16.0 percent, and 12.1 percent of total exports in 2022, respectively. Global exports decreased by 10.0 percent, by quantity, from 2021 to 2022.

Table IV-32**Pipes, Tubes And Hollow Profiles Nesoi, Welded, Of Circular Cross Section, Of Iron Or Nonalloy Steel: Global exports, by reporting country and by period**

Quantity in short tons; Value in 1,000 dollars

Exporting country	Measure	2020	2021	2022
United States	Quantity	213,855	248,565	235,708
Brazil	Quantity	14,890	16,784	17,921
India	Quantity	222,674	366,523	315,874
Mexico	Quantity	86,350	69,356	90,328
South Korea	Quantity	300,963	279,274	287,936
Taiwan	Quantity	33,830	41,153	37,242
Thailand	Quantity	121,629	194,495	163,044
Turkey	Quantity	623,295	764,266	793,943
Subject exporters	Quantity	1,403,631	1,731,851	1,706,288
China	Quantity	1,106,196	1,217,931	1,275,021
Italy	Quantity	1,015,213	1,043,011	1,053,173
Spain	Quantity	251,972	280,248	273,829
Germany	Quantity	280,423	306,750	270,797
Canada	Quantity	169,265	192,423	212,255
Poland	Quantity	162,483	200,947	180,789
Netherlands	Quantity	113,157	126,150	135,399
All other exporters	Quantity	1,751,587	2,204,356	1,468,409
Nonsubject exporters	Quantity	4,850,298	5,571,816	4,869,673
All reporting exporters	Quantity	6,253,928	7,303,667	6,575,961
United States	Value	357,320	606,595	645,672
Brazil	Value	14,866	26,513	29,714
India	Value	208,261	399,856	373,264
Mexico	Value	102,920	130,137	166,974
South Korea	Value	253,626	322,135	371,360
Taiwan	Value	34,570	56,132	56,267
Thailand	Value	100,579	192,924	190,501
Turkey	Value	402,019	738,599	855,040
Subject exporters	Value	1,116,841	1,866,298	2,043,120
China	Value	928,721	1,682,037	2,355,263
Italy	Value	907,779	1,438,165	1,661,087
Spain	Value	260,905	429,004	450,526
Germany	Value	419,350	554,004	551,908
Canada	Value	173,939	338,626	386,190
Poland	Value	134,577	247,619	258,583
Netherlands	Value	123,361	199,238	215,340
All other exporters	Value	1,977,930	3,236,963	2,640,210
Nonsubject exporters	Value	4,926,562	8,125,656	8,519,108
All reporting exporters	Value	6,043,403	9,991,954	10,562,228

Table continued.

Table IV-32 Continued
Pipes, Tubes And Hollow Profiles NesoI, Welded, Of Circular Cross Section, Of Iron Or Nonalloy Steel: Global exports, by reporting country and by period

Unit values in dollars per short ton; Shares in percent

Exporting country	Measure	2020	2021	2022
United States	Unit value	1,671	2,440	2,739
Brazil	Unit value	998	1,580	1,658
India	Unit value	935	1,091	1,182
Mexico	Unit value	1,192	1,876	1,849
South Korea	Unit value	843	1,153	1,290
Taiwan	Unit value	1,022	1,364	1,511
Thailand	Unit value	827	992	1,168
Turkey	Unit value	645	966	1,077
Subject exporters	Unit value	796	1,078	1,197
China	Unit value	840	1,381	1,847
Italy	Unit value	894	1,379	1,577
Spain	Unit value	1,035	1,531	1,645
Germany	Unit value	1,495	1,806	2,038
Canada	Unit value	1,028	1,760	1,819
Poland	Unit value	828	1,232	1,430
Netherlands	Unit value	1,090	1,579	1,590
All other exporters	Unit value	1,129	1,468	1,798
Nonsubject exporters	Unit value	1,016	1,458	1,749
All reporting exporters	Unit value	966	1,368	1,606
United States	Share of quantity	3.4	3.4	3.6
Brazil	Share of quantity	0.2	0.2	0.3
India	Share of quantity	3.6	5.0	4.8
Mexico	Share of quantity	1.4	0.9	1.4
South Korea	Share of quantity	4.8	3.8	4.4
Taiwan	Share of quantity	0.5	0.6	0.6
Thailand	Share of quantity	1.9	2.7	2.5
Turkey	Share of quantity	10.0	10.5	12.1
Subject exporters	Share of quantity	22.4	23.7	25.9
China	Share of quantity	17.7	16.7	19.4
Italy	Share of quantity	16.2	14.3	16.0
Spain	Share of quantity	4.0	3.8	4.2
Germany	Share of quantity	4.5	4.2	4.1
Canada	Share of quantity	2.7	2.6	3.2
Poland	Share of quantity	2.6	2.8	2.7
Netherlands	Share of quantity	1.8	1.7	2.1
All other exporters	Share of quantity	28.0	30.2	22.3
Nonsubject exporters	Share of quantity	77.6	76.3	74.1
All reporting exporters	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7306.30 reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed August 23, 2023.

Note: United States is shown at the top followed by the countries under order (in alphabetical order) and all remaining top exporting countries in descending order of 2022 data. Because of rounding, figures may not add to total shown.

Part V: Pricing data

Factors affecting prices

Raw material costs

Hot-rolled steel in coils (known as “skelp” when slit to width) is the primary raw material for the production of CWP. U.S. producers’ raw material costs as a share of the cost of goods sold (COGS) increased from 75.0 percent in 2020 to 82.5 percent in 2022. U.S. producers’ raw material costs as a share of COGS was lower at *** percent in January-June 2023 compared with *** percent in January-June 2022.

As shown in figure V-1 and table V-1, hot-rolled coil prices increased during the first half of 2018, and steadily declined through July 2020, at which point prices sharply increased, more than doubling by October 2021. Since then, prices have fluctuated downwards, declining by *** percent through June 2023, and by *** percent between June 2023 and September 2023. Three of five responding U.S. producers reported that prices of raw materials had fluctuated up since 2017. U.S. producers’ responses regarding anticipated changes in raw materials were mixed, with two of five reporting that they expect no change, while one producer each reported expecting a steady increase, fluctuating upwards, and fluctuating downwards. All importers reported fluctuating prices of raw materials and anticipated continuation of these trends (with two each reporting upward fluctuations and downward fluctuations).

Sixteen of 18 responding purchasers reported having familiarity with raw material costs, and 9 of 18 responding purchasers reported that raw material costs affected their contracts, noting that raw material prices are commonly discussed during negotiations. Purchaser *** reported that raw material price is a factor in mill price fluctuations and {its} purchases are based on the effective price at the time of shipment. Purchaser *** reported that raw material price data demonstrate macro trends which informs discussion on when to buy CWP and how much to buy.

Figure V-1
Hot-rolled coil: ***

* * * * *

Source: ***, various monthly issues.

Table V-1**Hot-rolled coil: *****

Prices in U.S. dollars per short ton

Year	Month	Domestic transaction price
2017	January	***
2017	February	***
2017	March	***
2017	April	***
2017	May	***
2017	June	***
2017	July	***
2017	August	***
2017	September	***
2017	October	***
2017	November	***
2017	December	***
2018	January	***
2018	February	***
2018	March	***
2018	April	***
2018	May	***
2018	June	***
2018	July	***
2018	August	***
2018	September	***
2018	October	***
2018	November	***
2018	December	***
2019	January	***
2019	February	***
2019	March	***
2019	April	***
2019	May	***
2019	June	***
2019	July	***
2019	August	***
2019	September	***
2019	October	***
2019	November	***
2019	December	***
2020	January	***
2020	February	***
2020	March	***
2020	April	***
2020	May	***
2020	June	***
2020	July	***

Table continued.

Table V-1 Continued**Hot-rolled coil: *****

Prices in U.S. dollars per short ton

Year	Month	U.S. dollars per short ton
2020	August	***
2020	September	***
2020	October	***
2020	November	***
2020	December	***
2021	January	***
2021	February	***
2021	March	***
2021	April	***
2021	May	***
2021	June	***
2021	July	***
2021	August	***
2021	September	***
2022	October	***
2022	November	***
2022	December	***
2022	January	***
2022	February	***
2022	March	***
2022	April	***
2022	May	***
2022	June	***
2022	July	***
2022	August	***
2022	September	***
2023	October	***
2023	November	***
2023	December	***
2023	January	***
2023	February	***
2023	March	***
2023	April	***
2023	May	***
2023	June	***
2023	July	***
2023	August	***
2023	September	***

Source: ***, various monthly issues.

Transportation costs to the U.S. market

Transportation costs for welded pipe shipped from subject countries to the United States under the primary HTS numbers averaged 14.3 percent for Brazil, 12.4 percent for India, 1.1 percent for Mexico, 9.5 percent for South Korea, 10.9 percent for Taiwan, 22.4 percent for Thailand, and 4.2 percent for Turkey during 2022. These estimates were derived from official import data and represent the transportation and other charges on imports.¹

U.S. inland transportation costs

Four of five responding U.S. producers reported that they typically arrange transportation to their customers while one U.S. producer and two importers reported that their customers do. Most U.S. producers reported that their U.S. inland transportation costs ranged from 5.4 to 6.0 percent.² Two of three responding importers reported that transport is arranged by their customers, while the other reported arranging transportation itself. Three of four responding importers reported that imported CWP was shipped from the point of importation, and the other reported shipping imported CWP from storage.

Pricing practices

Pricing methods

U.S. producers and importers reported setting prices using transaction-by-transaction negotiations, contracts, and price lists (table V-2). U.S. producers reported selling the vast majority of their CWP in the spot market followed by sales under short-term contract and *** (table V-3). With respect to short term contracts, three of five U.S. producers reported fixing price and two reporting fixing both price and quantity, three reported not allowing price renegotiation, and four index to raw materials. Subject importer Borusan Mannesmann reported that it ***. *** responding importers reported that their short-term contracts fix both price and quantity.

¹ The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2022 and then dividing by the customs value based on the HTS statistical reporting numbers 7306.30.10.00, 7306.30.50.25, 7306.30.50.32, 7306.30.50.40, 7306.30.50.55, 7306.30.50.85, and 7306.30.50.90.

² No importers reported their average inland transportation cost.

Table V-2
CWP: Count of U.S. producers' and importers' reported price setting methods

Number of firms reporting

Method	U.S. producers	U.S. importers
Transaction-by-transaction	4	3
Contract	4	2
Set price list	3	1
Other	0	0
Responding firms	5	5

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

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.

Table V-3
CWP: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2022

Share in percent

Item	U.S. producers	Subject U.S. importers
Long-term contracts	***	***
Annual contract	***	***
Short-term contracts	***	***
Spot sales	***	***

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

Note: Because of rounding, figures may not add to the totals shown. Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

Three purchasers reported that they purchase product daily, seven purchase weekly, two purchase monthly, and two purchase quarterly. Purchasers generally contact 1 to 5 suppliers before making a purchase.³

Sales terms and discounts

Three U.S. producers reported typically quoting prices on a delivered basis and two reported they typically quote prices on an f.o.b. basis. Two importers typically quote prices on an f.o.b. basis and one on a delivered basis. Four U.S. producers offer quantity discounts and total volume discounts; one does not have a discount policy. One importer offers total volume discounts while four do not have a discount policy.

³ Purchaser *** was the only purchaser to report that it contacts up to 10 suppliers.

Price leadership

Most purchasers reported at least one price leader in the CWP market, including Wheatland Tube (reported by six purchasers), Atlas Tube (reported by five purchasers), Nucor (reported by three purchasers); one purchaser each reported Alpha Steel, Conares, United Pipe & Steel, and Dynamic Tube. Purchasers indicating the presence of price leaders indicated that Atlas Tube, Nucor, and Wheatland Tube led by publishing a letter to the industry with price changes and being the leading or largest suppliers in the 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 CWP products shipped to unrelated U.S. customers during January 2020-June 2023.

Product 1.--ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 2-4 inches inclusive

Product 2.--ASTM A53 schedule 40 galvanized plain-end, with nominal outside diameter of 2-4 inches inclusive

Product 3.--ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 6-8 inches inclusive

Product 4.—ASTM A53 and/or F1083 schedule 40 galvanized fence tube, with nominal outside diameter of 1-1/4-3 inches, inclusive

Three U.S. producers (***) provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.⁴ One importer, ***, reported pricing data. Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. commercial shipments of CWP in 2022.⁵ Pricing data reported for Turkey accounted for *** percent of U.S. commercial shipments in 2022. Price data for products 1-4 are presented in tables V-4 through V-7 and figures V-2 through V-5.

⁴ 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.

⁵ Pricing coverage is based on U.S. shipments reported in questionnaires.

Table V-4
CWP: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by quarter

Price in dollars per short ton, quantity in short tons, margin in percent

Period	U.S. price	U.S. quantity	Turkey price	Turkey quantity	Turkey margin
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***

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

Note: Product 1: ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 2-4 inches inclusive.

Table V-5
CWP: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by quarter

Price in dollars per short ton, quantity in short tons, margin in percent

Period	U.S. price	U.S. quantity	Turkey price	Turkey quantity	Turkey margin
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***

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

Note: Product 2: ASTM A53 schedule 40 galvanized plain-end, with nominal outside diameter of 2-4 inches inclusive.

Table V-6**CWP: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by quarter**

Price in dollars per short ton, quantity in short tons, margin in percent

Period	U.S. price	U.S. quantity	Turkey price	Turkey quantity	Turkey margin
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***

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

Note: Product 3: ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 6-8 inches inclusive.

Table V-7**CWP: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by quarter**

Price in dollars per short ton, quantity in short tons, margin in percent

Period	U.S. price	U.S. quantity	Turkey price	Turkey quantity	Turkey margin
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***

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

Note: Product 4: ASTM A53 and/or F1083 schedule 40 galvanized fence tube, with nominal outside diameter of 1-1/4-3 inches, inclusive.

Figure V-2
CWP: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by quarter

Price of domestic and imported product

* * * * *

Volume of domestic and imported product

* * * * *

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

Note: Product 1: ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 2-4 inches inclusive.

Figure V-3
CWP: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by quarter

Price of domestic and imported product

* * * * *

Volume of domestic and imported product

* * * * *

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

Note: Product 2: ASTM A53 schedule 40 galvanized plain-end, with nominal outside diameter of 2-4 inches inclusive.

Figure V-4
CWP: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by quarter

Price of domestic and imported product

* * * * *

Volume of domestic and imported product

* * * * *

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

Note: Product 3: ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 6-8 inches inclusive.

Figure V-5
CWP: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by quarter

Price of domestic and imported product

* * * * *

Volume of domestic and imported product

* * * * *

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

Note: Product 4: ASTM A53 and/or F1083 schedule 40 galvanized fence tube, with nominal outside diameter of 1-1/4-3 inches, inclusive.

Price trends

In general, prices increased during January 2020-June 2023. Table V-8 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from *** percent to *** percent during this period.

Table V-8
CWP: Summary of price data, by product and source, January 2020-June 2023

Quantity in short tons, price in dollars per short ton

Product	Source	Number of quarters	Quantity	Low price	High price	First quarter price	Last quarter price	Change over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	Turkey	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 2	Turkey	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	Turkey	***	***	***	***	***	***	***
Product 4	United States	***	***	***	***	***	***	***
Product 4	Turkey	***	***	***	***	***	***	***

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

Note: Change over period is percentage change in price from the first quarter 2020 to the last quarter in 2023.

Price comparisons

As shown in table V-9, prices for CWP imported from Turkey were below those for U.S.-produced product in 45 of 50 instances; margins of underselling ranged from *** percent to *** percent. In the remaining five instances, prices for CWP from Turkey were between *** and *** percent above prices for the domestic product.

Table V-10 presents reported instances of underselling and overselling from each of the subject countries for the original investigations, and the first, second, and third reviews. Price data were available for subject imports from all countries in each of the three prior full reviews, with the exception of imports from Brazil (no observations in any of the three prior full reviews) and Thailand (no observations in the second review but more than 100 observations in the third review). The fourth review was expedited and did not have price data for analysis.

Table V-9
CWP: Instances of underselling and overselling and the range and average of margins, by product

Quantity in short tons; margin in percent

Item	Type	Number of quarters	Quantity	Average margin	Minimum margin	Maximum margin
Product 1	Underselling	***	***	***	***	***
Product 2	Underselling	***	***	***	***	***
Product 3	Underselling	***	***	***	***	***
Product 4	Underselling	***	***	***	***	***
All products	Underselling	***	***	***	***	***
Product 1	Overselling	***	***	***	***	***
Product 2	Overselling	***	***	***	***	***
Product 3	Overselling	***	***	***	***	***
Product 4	Overselling	***	***	***	***	***
All products	Overselling	***	***	***	***	***

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table V-10
CWP: Instances of underselling and overselling, by country, for the original investigation and subsequent reviews

Number of quarters

Source	Original		First reviews		Second reviews		Third reviews	
	Under	Over	Under	Over	Under	Over	Under	Over
Brazil	33	3	0	0	0	0	0	0
India	22	0	33	15	41	2	46	7
South Korea	110	14	42	15	149	37	41	4
Mexico	19	3	7	0	13	2	15	0
Taiwan	32	4	39	8	6	0	125	12
Thailand	12	2	24	20	0	0	101	19
Turkey	37	0	28	22	68	5	124	5

Source: *Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey*, Investigation Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534 and 536 (Third Review), Publication 4333, June 2012, p. V-4, and tables V-9 and V-10.

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
88 FR 107 January 3, 2023	<i>Circular Welded Pipe and Tube from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey; Institution of Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2023-01-03/pdf/2022-28479.pdf
88 FR 63 January 3, 2023	<i>Initiation of Five-Year (Sunset) Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2023-01-03/pdf/2022-28522.pdf
88 FR 23687, April 18, 2023	<i>Circular Welded Pipe and Tube From Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey; Notice of Commission Determination To Conduct Full Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2023-04-18/pdf/2023-08159.pdf
88 FR 24757, April 24, 2023	<i>Circular Welded Carbon Steel Pipes and Tubes From Turkey: Final Results of the Expedited Sunset Review of the Countervailing Duty Order</i>	https://www.govinfo.gov/content/pkg/FR-2023-04-24/pdf/2023-08605.pdf
88 FR 29636, May 8, 2023	<i>Certain Welded Carbon Steel Pipes and Tubes From India, Thailand, and Republic of Turkey: Final Results of the Expedited Sunset Review of the Antidumping Duty Orders</i>	https://www.govinfo.gov/content/pkg/FR-2023-05-08/pdf/2023-09730.pdf
88 FR 29880, May 9, 2023	<i>Certain Circular Welded Non-Alloy Steel Pipe From Brazil, Mexico, the Republic of Korea, and Taiwan and Certain Circular Welded Carbon Steel Pipes and Tubes From Taiwan: Final Results of Expedited Fifth Sunset Reviews of the Antidumping Duty Orders</i>	https://www.govinfo.gov/content/pkg/FR-2023-05-09/pdf/2023-09855.pdf

Citation	Title	Link
88 FR 39475, June 16, 2023	<i>Circular Welded Pipe and Tube From Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey; Scheduling of Full Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2023-06-16/pdf/2023-12971.pdf
88 FR 73378, October 25, 2023	<i>Circular Welded Pipe and Tube From Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey; Cancellation of Hearing for Full Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2023-10-25/pdf/2023-23620.pdf

APPENDIX B

REQUEST TO CANCEL HEARING

Inv. Nos. 701-TA-253 and
731-TA-132, 252, 271, 273, 532-
534, and 536 (Fifth Review)

PUBLIC DOCUMENT

October 18, 2023

FILED BY EDIS

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E St. SW, Room 112
Washington, DC 20436

**Re: Circular Welded Pipe and Tube from Brazil, India, Mexico, South Korea,
Taiwan, Thailand, and Turkey: Domestic Producers' Request to Appear at
Hearing/Request to Cancel the Hearing**

Dear Secretary Barton:

Pursuant to the scheduling notice issued by the U.S. International Trade Commission (“Commission”) for the above-captioned reviews,¹ and on behalf of Bull Moose Tube Company, Maruichi American Corporation, Nucor Tubular Products Inc., and Zekelman Industries (collectively, “Domestic Producers”), domestic producers of circular welded pipe and tube and interested parties pursuant to 19 U.S.C. § 1677(9)(C), we hereby submit the following requests to appear at the Commission’s October 26, 2022 hearing:

Roger B. Schagrin
Counsel, Schagrin Associates

Jake R. Frischknecht
Counsel, Wiley Rein LLP

Elizabeth J. Drake
Counsel, Schagrin Associates

Theodore P. Brackemyre
Counsel, Wiley Rein LLP

¹ See *Circular Welded Pipe and Tube From Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey; Scheduling of Full Five-Year Reviews*, 88 Fed. Reg. 39475, 39476 (USITC June 16, 2023).

Joseph A. Laroski, Jr.
Counsel, Schagrin Associates

Domestic Producers request one hour for our presentation, and we will share that time with other witnesses in support of continuation of the antidumping orders.

In the event that no other interested party requests to appear, Domestic Producers respectfully request that the Commission cancel the currently scheduled hearing. If no respondent interested parties file a request to appear at the hearing, we submit that it is in the interest of all parties to conserve time and resources by cancelling the hearing and instead answering any written questions from the Commission in parties' posthearing briefs.

Domestic Producers indicated their willingness to fully participate in these reviews in their response to the notice of institution, submitted a prehearing brief, and, by this letter, filed requests to appear at the Commission's hearing.² In contrast, respondent interested parties have not fully participated in these reviews. No subject foreign producer or exporter responded to the Commission's notice of institution or filed a prehearing brief. The Government of Brazil has submitted a one and one-half page "pre-hearing brief in lieu of testimony for the October 26, 2023 hearing."³ The Government of Turkey filed an entry of appearance in which it indicated its intent "to file briefs with the Commission,"⁴ but has made no such submissions.

² See Domestic Producers' Response to the Notice of Institution (February 2, 2023); Domestic Producers' Prehearing Brief (Oct. 17, 2023).

³ Letter from Aluisio de Lima-Campos, Economic Advisor, Embassy of Brazil, to Secretary Barton re: *Circular Welded Pipe and Tube from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey; Inv. Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536 (Fifth Review): Prehearing Brief* (Oct. 17, 2023).

⁴ Letter from Barak Güresci to Secretary Barton re: *Circular Welded Pipe and Tube From Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey; Institution of Full Five-Year Reviews [Investigation Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536 (Fifth Review)]* (Jul. 17, 2023).

To conduct a hearing without any participation from respondent interested parties would necessitate the expenditure of significant additional time and resources by the Commission, its staff, and Domestic Producers with little apparent benefit. If the Commissioners do have questions for the parties, we would be happy to respond to them in writing in our posthearing brief. Domestic Producers, of course, remain willing to participate in the hearing if one is held given the importance of maintaining the orders under review. However, given the lack of participation by respondents, we believe cancelling the hearing would be in the best interest of all concerned.

* * *

Please do not hesitate to contact the undersigned should you have any questions regarding this submission.

Respectfully submitted,

/s/ Roger B. Schagrín
Roger B. Schagrín
Elizabeth J. Drake
Joseph A. Laroski, Jr.

/s/ Alan H. Price
Alan H. Price
Robert E. DeFrancesco, III
Jake R. Frischknecht
Theodore P. Brackemyre

SCHAGRIN ASSOCIATES
*Counsel to Bull Moose Tube Company,
Maruichi American Corporation, and
Zekelman Industries*

WILEY REIN LLP
Counsel to Nucor Tubular Products Inc.

CERTIFICATE OF SERVICE

Circular Welded Pipe and Tube from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey

Inv. Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536 (Fifth Review)

I, Brittney Allen, hereby certify that copies of the attached PUBLIC DOCUMENT were served today, October 18, 2023, via File Transfer Protocol (FTP):

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/s/ Brittney Allen
Brittney Allen, *Paralegal*
SCHAGRIN ASSOCIATES

APPENDIX C
SUMMARY DATA

Table C-1

CWP: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Reported data					Period changes			
	Calendar year		2022	Jan-Jun		Calendar year		Jan-Jun	
	2020	2021		2022	2023	2020-22	2020-21	2021-22	2022-23
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
Brazil.....	***	***	***	***	***	***	***	***	***
India, subject.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Mexico.....	***	***	***	***	***	▲***	▲***	▲***	▲***
South Korea.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Taiwan.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Thailand.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Turkey.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources.....	***	***	***	***	***	▲***	▼***	▲***	▲***
India, nonsubject.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. consumption value:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▲***
Importers' share (fn1):									
Brazil.....	***	***	***	***	***	***	***	***	***
India, subject.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Mexico.....	***	***	***	***	***	▼***	▼***	▲***	▲***
South Korea.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Taiwan.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Thailand.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Turkey.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources.....	***	***	***	***	***	▲***	▼***	▲***	▲***
India, nonsubject.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▼***	▲***	▼***
All import sources.....	***	***	***	***	***	▲***	▼***	▲***	▼***
U.S. imports from:									
Brazil:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
India, subject:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Mexico:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
South Korea:									
Quantity.....	60,640	62,057	75,560	33,509	40,531	▲24.6	▲2.3	▲21.8	▲21.0
Value.....	44,087	67,693	115,388	50,293	54,031	▲161.7	▲53.5	▲70.5	▲7.4
Unit value.....	\$727	\$1,091	\$1,527	\$1,501	\$1,333	▲110.0	▲50.0	▲40.0	▼(11.2)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Taiwan:									
Quantity.....	3,220	751	814	227	414	▼(74.7)	▼(76.7)	▲8.4	▲82.7
Value.....	3,496	1,625	1,994	798	988	▼(43.0)	▼(53.5)	▲22.7	▲23.9
Unit value.....	\$1,086	\$2,164	\$2,450	\$3,517	\$2,385	▲125.6	▲99.3	▲13.2	▼(32.2)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Thailand:									
Quantity.....	52,302	9,942	37,299	1,535	64,027	▼(28.7)	▼(81.0)	▲275.2	▲4,071.3
Value.....	42,388	8,558	57,035	2,662	74,422	▲34.6	▼(79.8)	▲566.4	▲2,696.2
Unit value.....	\$810	\$861	\$1,529	\$1,734	\$1,162	▲88.7	▲6.2	▲77.6	▼(33.0)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***

Table continued.

Table C-1 Continued

CWP: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Reported data					Period changes			
	Calendar year		2022	Jan-Jun		Calendar year		Jan-Jun	
	2020	2021		2022	2023	2020-22	2020-21	2021-22	2022-23
U.S. imports from: Continued									
Turkey:									
Quantity.....	22,769	43,751	115,583	54,488	16,589	▲407.6	▲92.2	▲164.2	▼(69.6)
Value.....	23,082	53,940	173,955	83,990	19,599	▲653.6	▲133.7	▲222.5	▼(76.7)
Unit value.....	\$1,014	\$1,233	\$1,505	\$1,541	\$1,181	▲48.5	▲21.6	▲22.1	▼(23.4)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Subject sources:									
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
India, nonsubject:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All other sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	***	▲***	***
Nonsubject sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	***	▲***	***
All import sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	***	▲***	***
U.S. producers:									
Practical 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.....	***	***	***	***	***	▲***	▲***	▲***	▲***

Table continued.

Table C-1 Continued

CWP: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Reported data					Period changes			
	Calendar year		2022	Jan-Jun		Calendar year		Jan-Jun	
	2020	2021		2022	2023	2020-22	2020-21	2021-22	2022-23
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).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Capital expenditures.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Research and development expenses.....	***	***	***	***	***	***	***	***	***
Total assets.....	***	***	***	***	***	▲***	▲***	▲***	***

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed August 21, 2023, adjusted using data submitted in response to Commission questionnaires to remove reported out-of-scope imports and using data compiled from proprietary, Census edited Customs records using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed October 1, 2023, to remove out-of-scope imports and to allocate India subject vs. nonsubject imports. Imports are based on the imports for consumption data series and import value data reflect landed duty-paid values.

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.

SUMMARY DATA COMPILED IN PRIOR PROCEEDINGS

Table I-4

CWP: Trade and financial data submitted by U.S. producers, 2001, 2006, 2011, and 2016

* * * * *

Table I-6**Product: U.S. producers' U.S. shipments, U.S. imports, and apparent U.S. consumption, 2001, 2006, 2011, and 2016**

Item	2001	2006	2011	2016
	Quantity (Short Tons)			
U.S. producers' U.S. shipments	1,674,000	1,230,000	966,000	671,581
U.S. imports from—				
Brazil (subject)	0	1,000	401	310
India (subject)	***	***	***	***
Korea (subject)	218,000	44,000	48,054	87,668
Mexico (subject)	1,000	75,000	66,017	61,038
Taiwan (subject)	7,000	43,000	22,966	14,487
Thailand (subject)	62,000	78,000	47,696	58,348
Turkey (subject)	5,000	32,000	31,723	50,293
Total subject imports	***	***	***	***
All other	***	***	***	***
Total imports	843,306	1,180,000	506,620	783,303
Apparent U.S. consumption	2,517,306	2,410,000	1,472,620	1,454,884

Table continued on next page.

Table I-6--Continued

CWP: U.S. producers' U.S. shipments, U.S. imports, and apparent U.S. consumption, 2001, 2006, 2011, and 2016

Item	2001	2006	2011	2016
	Value (1,000 dollars)			
U.S. producers' U.S. shipments	892,797	1,216,918	1,043,584	561,767
U.S. imports from—				
Brazil (subject)	0	841	1,041	1,196
India (subject)	***	***	***	***
Korea (subject)	82,564	35,399	51,190	53,583
Mexico (subject)	783	61,461	63,670	49,114
Taiwan (subject)	2,468	26,302	20,989	8,511
Thailand (subject)	26,622	52,738	46,507	32,953
Turkey (subject)	1,863	21,087	30,124	31,231
Total subject imports	***	***	***	***
All other	***	***	***	***
Total imports	373,422	741,190	505,746	687,593
Apparent U.S. consumption	1,266,219	1,958,108	1,549,330	1,249,360

Source: For the years 2001, 2006, and 2011, data are compiled using data submitted in the Commission's prior five-year reviews. *See app. C.* For the year 2016, U.S. producers' U.S. shipments are compiled from the domestic interested parties' response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics and confidential Customs data under HTS numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, 7306.30.5090.

Table I-7

CWP: Apparent U.S. consumption and U.S. market shares, 2001, 2006, 2011, and 2016

Item	2001	2006	2011	2016
	Quantity (Short Tons)			
Apparent U.S. consumption	2,517,306	2,410,000	1,472,620	1,454,884
	Value (1,000 dollars)			
Apparent U.S. consumption	1,266,219	1,958,108	1,549,330	1,249,360
	Share of consumption based on quantity (percent)			
U.S. producer's share	66.5	51.0	65.6	46.2
U.S. imports from--				
Brazil (subject)	0.0	0.04	0.03	0.0
India (subject)	***	***	***	***
Korea (subject)	8.66	1.83	3.26	6.0
Mexico (subject)	0.04	3.11	4.48	4.2
Taiwan (subject)	0.28	1.78	1.56	1.0
Thailand (subject)	2.46	3.24	3.24	4.0
Turkey (subject)	0.20	1.33	2.15	3.5
Total subject imports	***	***	***	***
All other	***	***	***	***
Total imports	33.50	48.96	34.4	53.8
	Share of consumption based on value (percent)			
U.S. producer's share	70.5	62.1	67.4	45.0
U.S. imports from--				
Brazil (subject)	0.0	0.0	0.1	0.1
India (subject)	***	***	***	***
Korea (subject)	6.5	1.8	3.3	4.3
Mexico (subject)	0.1	3.1	4.1	3.9
Taiwan (subject)	0.2	1.3	1.4	0.7
Thailand (subject)	2.1	2.7	3.0	2.6
Turkey (subject)	0.1	1.1	1.9	2.5
Total subject imports	***	***	***	***
All other	***	***	***	***
Total imports	29.5	37.9	32.6	55.0

Source: For the years 2001, 2006, and 2011, data are compiled using data submitted in the Commission's prior five-year reviews. *See app. C.* For the year 2016, U.S. producers' U.S. shipments are compiled from the domestic interested parties' response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics and confidential Customs data under HTS numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, 7306.30.5090.

Table I-1

Circular welded pipe: Comparative data from the original investigations and subsequent reviews, 1983, 1984, 1985, 1991, 1998, 2005, and 2006-11

(Quantity in 1,000 short tons, value in 1,000 dollars, shares/ratios in percent)

Item	1983	1984	1985	1991	1998	2005
U.S. consumption quantity:						
Amount	1,968	2,422	2,433	1,920	2,996	2,339
U.S. producers' share	52.5	36.3	41.1	63.1	73.0	56.0
U.S. importers' share						
Brazil	(¹)	(¹)	(¹)	2.8	(²)	***
India (subject)	(¹)	(¹)	0.9	(¹)	0.4	***
Korea	(¹)	(¹)	(¹)	16.9	5.8	***
Mexico	(¹)	(¹)	(¹)	2.5	0.5	***
Taiwan	6.6	(¹)	2.4	2.0	1.4	***
Thailand	(¹)	(²)	(¹)	(¹)	0.9	***
Turkey	(¹)	0.1	1.5	(¹)	0.2	***
Subtotal, subject sources ³	6.6	0.1	4.8	24.2	9.4	7.5
All other sources ³	39.5	63.6	54.1	12.7	17.7	36.5
Total imports	46.2	63.7	58.9	36.9	27.0	44.0
U.S. imports from:						
Brazil:						
Quantity	(¹)	(¹)	(¹)	54	(⁴)	***
Value	(¹)	(¹)	(¹)	26,715	82	***
Average unit value	(¹)	(¹)	(¹)	\$490	\$1,808	***
India:						
Quantity	(¹)	(¹)	22	(¹)	12	***
Value	(¹)	(¹)	7,834	(¹)	6,211	***
Average unit value	(¹)	(¹)	\$351	(¹)	\$512	***
Korea:						
Quantity	(¹)	(¹)	(¹)	325	175	***
Value	(¹)	(¹)	(¹)	172,590	79,702	***
Average unit value	(¹)	(¹)	(¹)	\$532	\$456	***
Mexico:						
Quantity	(¹)	(¹)	(¹)	48	16	***
Value	(¹)	(¹)	(¹)	25,268	8,262	***
Average unit value	(¹)	(¹)	(¹)	\$524	\$507	***

Table continued on next page.

Table I-1--Continued

Item	2006	2007	2008	2009	2010	2011
U.S. consumption quantity:						
Amount	2,410	2,267	1,928	1,237	1,406	1,473
U.S. producers' share	51.1	56.2	64.3	71.3	65.6	65.6
U.S. importers' share						
Brazil	0.0	0.0	0.0	0.0	0.0	0.0
India (subject)	***	***	***	***	***	***
Korea	1.8	1.4	6.4	3.1	5.4	3.3
Mexico	3.1	2.9	2.7	5.4	4.5	4.5
Taiwan	1.8	1.5	3.9	0.6	2.0	1.6
Thailand	3.2	2.1	4.4	2.5	2.0	3.2
Turkey	1.3	0.1	2.8	2.1	2.6	2.2
Subtotal, subject sources ³	***	***	***		***	***
All other sources ³	***	***	***	***	***	***
Total imports	48.9	43.8	35.7	28.7	34.4	34.4
U.S. imports from:						
Brazil:						
Quantity	1	0	1	0	1	0
Value	841	696	1,288	1,059	1,394	1,041
Average unit value	\$1,475	\$1,803	\$2,321	\$2,161	\$2,241	\$2,596
India (subject):						
Quantity	***	***	***	***	***	***
Value	***	***	***	***	***	***
Average unit value	***	***	***	***	***	***
Korea:						
Quantity	44	31	124	39	76	48
Value	35,399	29,031	126,895	33,714	68,178	51,190
Average unit value	\$798	\$923	\$1,024	\$868	\$899	\$1,065
Mexico:						
Quantity	75	65	52	67	63	66
Value	61,461	52,858	58,380	49,111	52,473	63,670
Average unit value	\$822	\$814	\$1,117	\$735	\$831	\$964

Table I-1--Continued

Circular welded pipe: Comparative data from the original investigations and subsequent reviews, 1983, 1984, 1985, 1991, 1998, 2005, and 2006-11

(Quantity in 1,000 short tons, value in 1,000 dollars, shares/ratios in percent)

Item	1983	1984	1985	1991	1998	2005
Taiwan:						
Quantity	131	(¹)	59	39	41	***
Value	38,760	(¹)	19,207	18,295	18,144	***
Average unit value	\$297	(¹)	\$325	\$475	\$442	***
Thailand:						
Quantity	(¹)	(⁴)	(¹)	(¹)	28	***
Value	(¹)	15	(¹)	(¹)	13,996	***
Average unit value	(¹)	\$291	(¹)	(¹)	\$499	***
Turkey:						
Quantity	(¹)	3	36	(¹)	7	***
Value	(¹)	821	12,389	(¹)	3,334	***
Average unit value	(¹)	\$318	\$341	(¹)	\$451	***
Subtotal, subject sources:						
Quantity	131	2.6	118	466	280	176
Value	38,760	836	39,430	242,868	129,731	129,786
Average unit value	\$297	\$318	\$335	\$521	\$464	\$739
All other sources:						
Quantity	777	1,542	1,316	242	530	853
Value	270,565	574,027	512,354	148,065	301,272	651,863
Average unit value	\$348	\$372	\$389	\$611	\$568	\$764
Total:						
Quantity	909	1,544	1,434	708	810	1,028
Value	309,325	574,863	551,784	390,933	431,002	781,648
Average unit value	\$340	\$372	\$385	\$552	\$532	\$760

Table continued on next page.

Table I-1--Continued

Item	2006	2007	2008	2009	2010	2011
Taiwan:						
Quantity	43	33	75	8	28	23
Value	26,302	22,296	70,947	7,871	22,370	20,989
Average unit value	\$611	\$669	\$946	\$1,036	\$810	\$914
Thailand:						
Quantity	78	48	86	31	29	48
Value	52,738	36,736	89,600	30,594	26,785	46,507
Average unit value	\$678	\$770	\$1,045	\$974	\$932	\$975
Turkey:						
Quantity	32	3	54	26	37	32
Value	21,087	3,295	58,346	23,731	30,399	30,124
Average unit value	\$663	\$1,047	\$1,089	\$912	\$817	\$950
Subtotal, subject sources:						
Quantity	***	***	***	***	***	***
Value	***	***	***	***	***	***
Average unit value	***	***	***	***	***	***
All other sources:						
Quantity	***	***	***	***	***	***
Value	***	***	***	***	***	***
Average unit value	***	***	***	***	***	***
Total:						
Quantity	1,179	992	689	356	484	507
Value	741,189	672,368	709,014	312,059	434,328	505,746
Average unit value	\$628	\$678	\$1,029	\$877	\$898	\$998

Table I-1--Continued

Circular welded pipe: Comparative data from the original investigations and subsequent reviews, 1983, 1984, 1985, 1991, 1998, 2005, and 2006-11

(Quantity in 1,000 short tons, value in 1,000 dollars, shares/ratios in percent)

Item	1983	1984	1985	1991	1998	2005
U.S. producers:						
Capacity quantity	3,606	1,718	1,824	1,887	3,039	2,629
Production quantity	1,032	908	1,003	1,202	2,227	1,325
Capacity Utilization	28.4	52.9	55.0	62.5	73.3	50.9
U.S. shipments:						
Quantity	1,032	878	999	1,212	2,186	1,310
Value	(⁵)	532,209	584,602	709,494	1,296,421	1,212,496
Unit value	(⁵)	\$606	\$585	\$585	\$593	\$925
Export shipments:						
Quantity	***	***	***	***	48	***
Value	(⁵)	***	***	***	28,862	***
Unit value	(⁵)	***	***	***	\$596	***
Ending inventory quantity	136	130	129	151	270	152
Inventory/total shipments	13.3	14.3	13.0	12.5	12.1	11.3
Production workers	4,080	2,860	2,874	2,605	2,996	2,046
Hours worked (1,000)	(⁵)	5,339	5,553	4,634	6,160	4,097
Wages paid (1,000 dollars)	(⁵)	71,537	78,969	95,320	102,421	79,992
Hourly wages	(⁵)	\$13	\$14	\$21	\$16	\$20
Productivity (tons per 1,000 hours)	(⁵)	168	177	259	324	323
Net sales:						
Quantity	(⁵)	(⁵)	(⁵)	(⁵)	2,140	1,348
Value	514,014	484,187	494,814	673,332	1,301,467	1,245,783
Unit value	(⁵)	(⁵)	(⁵)	(⁵)	\$608	\$924
Cost of goods sold	484,553	446,312	445,346	58,041	1,106,748	1,063,038
Gross profit or (loss)	29,461	37,875	49,468	(⁵)	194,719	182,745
SG&A	40,919	41,673	44,233	(⁵)	77,188	73,528
Operating income or (loss) (value)	(11,458)	(3,798)	5,235	38,324	117,531	109,217
Unit cost of goods sold	(⁵)	(⁵)	(⁵)	(⁵)	\$517	\$788
Unit operating income or (loss)	(⁵)	(⁵)	(⁵)	(⁵)	\$55	\$81
Cost of goods sold/sales (percent)	94.3	92.2	90.0	86.2	85.0	85.3
Operating income or (loss)/sales	(2.2)	(0.8)	1.1	5.7	9.0	8.8

¹ Nonsubject country in the applicable original investigation.

² Less than 0.05 percent.

³ Varies based on investigation period. Also differs from first reviews, in that Venezuela is no longer a subject source in these reviews.

⁴ Fewer than 500 short tons.

⁵ Not applicable/available.

Table I-1--Continued

Item	2006	2007	2008	2009	2010	2011
U.S. producers:						
Capacity quantity	2,088	2,010	1,945	1,939	2,010	2,054
Production quantity	1,282	1,282	1,212	899	968	1,024
Capacity Utilization	61.4	63.8	62.3	46.4	48.2	49.8
U.S. shipments:						
Quantity	1,230	1,275	1,240	881	922	966
Value	1,216,918	1,204,071	1,521,473	787,540	898,256	1,043,584
Unit value	\$989	\$944	\$1,227	\$893	\$974	\$1,080
Export shipments:						
Quantity	33	47	38	39	46	55
Value	30,728	43,305	49,907	33,390	42,215	58,615
Unit value	\$920	\$919	\$1,307	\$849	\$925	\$1,074
Ending inventory quantity	193	168	152	139	143	151
Inventory/total shipments	15.3	12.7	11.9	15.1	14.7	14.8
Production workers	2,192	2,032	1,906	1,589	1,451	1,549
Hours worked (1,000)	4,555	4,191	4,343	2,893	3,074	3,397
Wages paid (1,000 dollars)	99,169	96,098	101,721	73,328	80,361	96,222
Hourly wages	\$22	\$23	\$23	\$25	\$26	\$28
Productivity (tons per 1,000 hours)	282	306	279	310	315	301
Net sales:						
Quantity	1,362	1,321	1,425	900	950	1,016
Value	1,281,582	1,218,151	1,719,099	858,849	914,734	1,075,973
Unit value	\$941	\$922	\$1,206	\$954	\$963	\$1,059
Cost of goods sold	1,076,829	1,103,506	1,351,533	900,451	806,893	950,989
Gross profit or (loss)	204,753	114,645	367,566	(41,602)	107,841	124,984
SG&A	61,301	74,710	96,564	84,972	73,543	93,915
Operating income or (loss) (value)	143,452	39,935	271,002	(126,574)	34,298	31,069
Unit cost of goods sold	\$791	\$835	\$948	\$1,000	\$850	\$936
Unit operating income or (loss)	\$105	\$30	\$190	\$(140)	\$36	\$30
Cost of goods sold/sales (percent)	84.0	90.6	78.6	104.8	88.2	88.4
Operating income or (loss)/sales	11.2	3.3	15.8	(14.7)	3.7	2.9

Note.—Historical data are presented as originally reported. Import data in the third reviews and the second reviews are not based on the same methodology as the import data from the first reviews and the original investigations. The data in the former removed imports of nonsubject material from Canada and nonsubject Indian producer Zenith's exports to the United States. In addition, in the second reviews "duty" import data were used. Because of the large number of administrative and new shipper reviews over the life of the orders, however, Staff did not replicate this approach. Finally, data for unit values for imports from India between 1983 and 1985 do not appear reconcile with the quantities and values reported, however, these data were published in the first reviews with a footnote indicating that the quantities reflected only LTFV imports as reported by the Engineering Export Promotion Council.

Source: Compiled from data presented in original staff report and subsequent reviews, official Commerce import statistics, Customs data, data compiled from responses to Commission questionnaires, and Cansim (Canada) data.

APPENDIX D

FIRM NARRATIVES ON IMPACT OF ORDERS

Table D-1

CWP: Firms' narratives on the impact of the orders and the likely impact of revocation

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***

Table continued.

Table D-1 Continued

CWP: Firms' narratives on the impact of the orders and the likely impact of revocation

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	*** ***
Likely impact of revocation	U.S. producers	***

Table continued.

Table D-1 Continued

CWP: Firms' narratives on the impact of the orders and the likely impact of revocation

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Foreign producers	***
Effect of order	Foreign producers	*** **
Effect of order	Foreign producers	***

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

APPENDIX E

U.S. AND FOREIGN PRODUCERS' SHIPMENTS BY ATTRIBUTE

Table E-1**CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2022, source and wall thickness**

Quantity in short tons

Source	Schedules 5s, 5, 10s, and 10	Schedules 20s and 20	Schedules 30s and 30	Schedules 40s and 40	All other wall thicknesses	All wall thicknesses
U.S. producers	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
India, subject	***	***	***	***	***	***
Mexico	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***
Thailand	***	***	***	***	***	***
Turkey	***	***	***	***	***	***
Subject foreign producers	***	***	***	***	***	***

Table continued.

Table E-1 Continued**CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2022, source and wall thickness**

Share across in percent

Source	Schedules 5s, 5, 10s, and 10	Schedules 20s and 20	Schedules 30s and 30	Schedules 40s and 40	All other wall thicknesses	All wall thicknesses
U.S. producers	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
India, subject	***	***	***	***	***	***
Mexico	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***
Thailand	***	***	***	***	***	***
Turkey	***	***	***	***	***	***
Subject foreign producers	***	***	***	***	***	***

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

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

Figure E-1

CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2022, by source and wall thickness

* * * * *

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

Table E-2**CWP: U.S. producers' U.S. shipments and subject foreign producers' total shipments by source and nominal pipe size (NPS), 2022**

Quantity in short tons

Source	NPS <=2	NPS >2 & <=3 1/2	NPS 4 to 8	NPS 9 to 12	NPS 14 to 16	All NPS
U.S. producers	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
India, subject	***	***	***	***	***	***
Mexico	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***
Thailand	***	***	***	***	***	***
Turkey	***	***	***	***	***	***
Subject foreign producers	***	***	***	***	***	***

Table continued.

Table E-2 Continued**CWP: U.S. producers' U.S. shipments and subject foreign producers' total shipments by source and nominal pipe size (NPS), 2022**

Share across in percent

Source	NPS <=2	NPS >2 & <=3 1/2	NPS 4 to 8	NPS 9 to 12	NPS 14 to 16	All NPS
U.S. producers	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
India, subject	***	***	***	***	***	***
Mexico	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***
Thailand	***	***	***	***	***	***
Turkey	***	***	***	***	***	***
Subject foreign producers	***	***	***	***	***	***

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

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

Figure E-2

CWP: U.S. producers' U.S. shipments and subject foreign producers' total shipments by source and nominal pipe size (NPS), 2022

* * * * *

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

Table E-3**CWP: U.S. producers' U.S. shipments and subject foreign producers' total shipments by source and standard, 2022**

Quantity in short tons

Source	ASTM A53	ASTM A135/A795	ASTM A500/A252	Fence tubing standards	Other standards	No standards	All standards
U.S. producers	***	***	***	***	***	***	***
Brazil	***	***	***	***	***	***	***
India, subject	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***
South Korea	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
Subject foreign producers	***	***	***	***	***	***	***

Table continued.

Table E-3 Continued**CWP: U.S. producers' U.S. shipments and subject foreign producers' total shipments by source and standard, 2022**

Share across in percent

Source	ASTM A53	ASTM A135/A795	ASTM A500/A252	Fence tubing standards	Other standards	No standards	All standards
U.S. producers	***	***	***	***	***	***	***
Brazil	***	***	***	***	***	***	***
India, subject	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***
South Korea	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
Subject foreign producers	***	***	***	***	***	***	***

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

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

Figure E-3

CWP: U.S. producers' U.S. shipments and subject foreign producers' total shipments by source and standard, 2022

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

APPENDIX F

U.S. PRICES FOR ELECTRIC RESISTANCE WELDED (ERW) PIPE

Table F-1
ERW standard pipe: Prices, by grade and month, January 2020 through September 2023

Unit values in dollars per short ton

Period	Grade A	Grade B
Jan-20	***	***
Feb-20	***	***
Mar-20	***	***
Apr-20	***	***
May-20	***	***
Jun-20	***	***
Jul-20	***	***
Aug-20	***	***
Sep-20	***	***
Oct-20	***	***
Nov-20	***	***
Dec-20	***	***
Jan-21	***	***
Feb-21	***	***
Mar-21	***	***
Apr-21	***	***
May-21	***	***
Jun-21	***	***
Jul-21	***	***
Aug-21	***	***
Sep-21	***	***
Oct-21	***	***
Nov-21	***	***
Dec-21	***	***

Table continued.

Table F-1 Continued

ERW standard pipe: Prices, by grade and month, January 2020 through September 2023

Unit values in dollars per short ton

Period	Grade A	Grade B
Jan-22	***	***
Feb-22	***	***
Mar-22	***	***
Apr-22	***	***
May-22	***	***
Jun-22	***	***
Jul-22	***	***
Aug-22	***	***
Sep-22	***	***
Oct-22	***	***
Nov-22	***	***
Dec-22	***	***
Jan-23	***	***
Feb-23	***	***
Mar-23	***	***
Apr-23	***	***
May-23	***	***
June-23	***	***
July-23	***	***
August-23	***	***
September-23	***	***

Source: ***.

Figure F-1
ERW standard pipe: Prices, by grade and month, January 2020 through September 2023

* * * * *

Source: ***.

