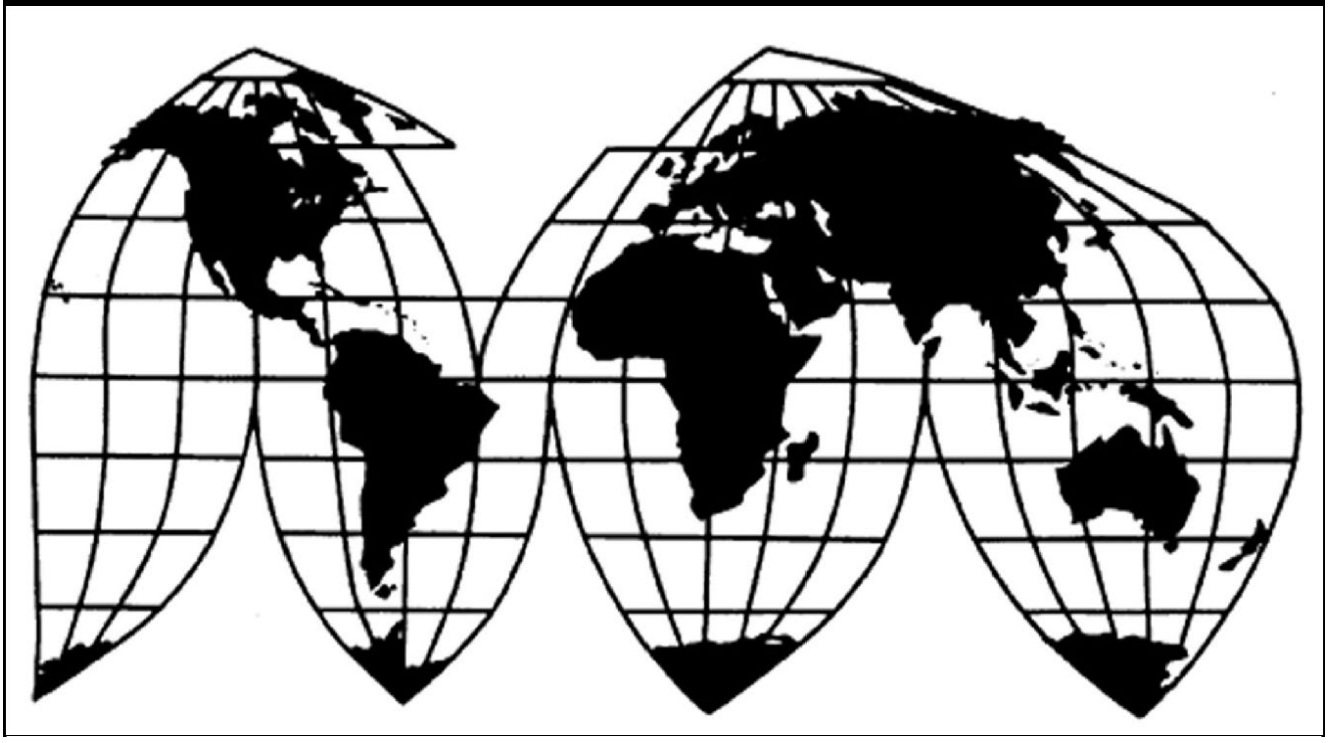
Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine

Investigation Nos. 731-TA-873-875, 878-880, and 882 (Fourth Review)

Publication 5565 **December 2024**

U.S. International Trade Commission



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U.S. International Trade Commission

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UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 731-TA-873-875, 878-880, and 882 (Fourth Review)

Steel Concrete Reinforcing Bar (Rebar) from
Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine

DETERMINATIONS

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

BACKGROUND

The Commission instituted these reviews on November 1, 2023 (88 FR 75033) and determined on February 5, 2024, that it would conduct full reviews (89 FR 13089, February 21, 2024). 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 April 15, 2024 (89 FR 26188). The Commission conducted its hearing on October 3, 2024. All persons who requested the opportunity were permitted to participate.

By order of the Commission.

Lisa R. Barton
Secretary to the Commission

Issued:

[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 David S. Johanson voted in the negative for Latvia and Ukraine.

Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended ("the Tariff Act"), that revocation of the antidumping duty orders on steel concrete reinforcing bar ("rebar") from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.[1]

I. Background

Original Investigations: On June 28, 2000, the Rebar Trade Action Coalition ("RTAC"), representing eight domestic producers of rebar, filed petitions with the Commission and the Department of Commerce ("Commerce") alleging that a regional industry in the United States was materially injured or threatened with material injury by reason of imports of rebar from Austria, Belarus, China, Indonesia, Japan, Korea, Latvia, Moldova, Poland, Russia, Ukraine, and Venezuela that was allegedly sold in the U.S. market at less than fair value. In its preliminary determinations, the Commission conducted a regional industry analysis and reached a negative determination on imports from Japan that it concluded were not sufficiently concentrated in the region.[2] The Commission also had made negative determinations concerning imports from Austria, Russia, and Venezuela that it concluded were negligible. Because Commerce conducted its original investigations on staggered schedules, the Commission issued two sets of final determinations. In May 2001, the Commission made affirmative material injury

[1] Commissioner David S. Johanson determines that revocation of the antidumping duty orders on rebar from Belarus, China, Indonesia, Moldova, and Poland would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time but that revocation of the antidumping duty orders on rebar from Latvia and Ukraine 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. *See* Separate and Dissenting Views of Commission David S. Johanson. He joins, except where indicated, sections I-III.E. and IV of the majority's views. He does not join sections III.F (cumulation based on likely conditions of competition) and III.G. (conclusion).

[2] *Certain Steel Concrete Reinforcing Bars from Austria, Belarus, China, Indonesia, Poland, Ukraine, and Venezuela*, Inv. Nos. 731-TA-872–883 (Preliminary), USITC Pub. 3343 (Aug. 2000) ("*Preliminary Determinations*"). The domestic industry twice attempted to appeal the Commission's negative preliminary determination concerning imports from Japan, but the U.S. Court of International Trade dismissed the first appeal as untimely and the second for lack of jurisdiction. *Rebar Trade Action Coalition v. United States*, 25 CIT 393, 393 (2000) (discussing both dismissals).

determinations regarding rebar from Indonesia, Poland, and Ukraine.[3] In June 2001, the Commission made affirmative material injury determinations concerning imports of rebar from Belarus, Korea, Latvia, and Moldova and an affirmative threat determination concerning imports from China that it had found to be negligible but likely imminently to exceed the negligible imports threshold.[4] Commerce published antidumping duty orders regarding rebar imported from Belarus, China, Indonesia, Korea, Latvia, Moldova, Poland, and Ukraine effective September 7, 2001.[5]

First Reviews. In August 2006, the Commission instituted reviews of the antidumping duty orders on rebar from Belarus, China, Indonesia, Korea, Latvia, Moldova, Poland, and Ukraine. After conducting full reviews, the Commission made affirmative determinations concerning imports from all subject countries except Korea.[6] Commerce revoked the order on rebar from Korea and continued the other orders in August 2007.[7]

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[3] *Certain Steel Concrete Reinforcing Bars from Indonesia, Poland, and Ukraine*, Inv. Nos. 731-TA-875, 880, and 882 (Final), USITC Pub. 3425 at 7–11 (May 2001) ("*Original Determinations I*"). Petitioner RTAC argued for a regional industry analysis, and the Commission evenly split on the issue, with three Commissioners conducting a regional industry analysis and three conducting a national industry analysis. *Original Determinations I*, USITC Pub. 3425 at 7–11 and 23; *see* 19 U.S.C. § 1677(4)(C) (providing that, in "appropriate circumstances, the United States, for a particular product market, may be divided into 2 or more markets and the producers within each market may be treated as if they were a separate industry" if certain conditions are satisfied).

[4] *Certain Steel Concrete Reinforcing Bars from Belarus, China, Korea, Latvia, and Moldova*, Inv. Nos. 731-TA-873–874 and 877–879 (Final), USITC Pub. 3440 at 3–4 (July 2001) ("*Original Determinations II*"). The Commission was again evenly split as to whether to conduct a regional industry analysis. *Original Determinations II*, USITC Pub. 3440 at 3–4 and 10.

[5] *Antidumping Duty Orders: Steel Concrete Reinforcing Bars From Belarus, Indonesia, Latvia, Moldova, People's Republic of China, Poland, Republic of Korea and Ukraine*, 66 Fed. Reg. 46777 (Dep't of Comm. Sept. 7, 2001). There were no appeals of the Commission's final determinations in the original investigations or the prior reviews that resulted in a court decision.

[6] *Certain Steel Concrete Reinforcing Bars from Belarus, China, Korea, Latvia, and Moldova*, Inv. Nos. 731-TA-873–874 and 877–879 (Review), USITC Pub. 3933 (Aug. 2007) ("*First Reviews*"). *First Reviews*, USITC Pub. 3933 at 3 nn.1–3. In the first reviews, RTAC requested that the Commission analyze the industry on a regional basis, but the Commission found that appropriate circumstances did not exist to conduct a regional industry analysis and based its determinations on a national industry analysis. *First Reviews*, USITC Pub. 3933 at 9–11.

[7] *Steel Concrete Reinforcing Bars from Belarus, Indonesia, Latvia, Moldova, the People's Republic of China, Poland, and Ukraine: Continuation of Antidumping Duty Orders*, 72 Fed. Reg. 44830 (Dep't of Comm, Aug. 9, 2007); Steel Concrete Reinforcing Bars from South Korea: Revocation of Antidumping Duty Order, 72 Fed. Reg. 44830 (Dep't of Comm. Aug. 9, 2007).

Second Reviews. In July 2012, the Commission instituted reviews of the antidumping duty orders on rebar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine.[8] After conducting full reviews, the Commission made affirmative determinations concerning imports from all subject countries.[9] Following the review determinations, Commerce published its notice of continuation of the antidumping duty orders on July 22, 2013.[10]

Third Reviews. In June 2018, the Commission instituted reviews of the antidumping duty orders on rebar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine.[11] After conducting expedited reviews, the Commission made affirmative determinations concerning imports from all subject countries.[12] Following the review determinations, Commerce published its notice of continuation of the antidumping duty orders on December 17, 2018.[13]

Current Reviews. The Commission instituted these fourth five-year reviews on November 1, 2023.[14] The Commission received a joint response to its notice of institution from RTAC on behalf of its individual members, Nucor Corporation, Gerdau Ameristeel US Inc., Commercial Metals Company, Byer Steel, and Steel Dynamics, Inc., which are domestic

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[8] *Steel Concrete Reinforcing Bar From Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine; Institution of Five-Year Reviews Concerning the Antidumping Duty Orders on Steel Concrete Reinforcing Bar From Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine,* 77 Fed. Reg. 39254 (Dep't of Comm. July 2, 2012).

[9] *Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine*, Inv. Nos. 731-TA-873–875, 878–880, and 882 (Second Review), USITC Pub. 4409 at 3 and n.1 (July 2013) ("*Second Reviews*"). In the second reviews, no party requested that the Commission analyze the domestic industry on a regional basis, and the Commission based its determinations on a national industry analysis. *Second Reviews*, USITC Pub. 4409 at 6 n.27.

[10] *Steel Concrete Reinforcing Bars From Belarus, Indonesia, Latvia, Moldova, Poland, the People's Republic of China, and Ukraine: Continuation of Antidumping Duty Orders*, 78 Fed. Reg. 43858 (Dep't of Comm. July 22, 2013).

[11] *Steel Concrete Reinforcing Bar From Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine; Institution of Five-Year Reviews*, 83 Fed. Reg. 25490 (Dep't of Comm. June 1, 2018).

[12] *Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine*, Inv. Nos. 731-TA-873-875, 878-880, and 882 (Third Review), USITC Pub. 4838 (Nov. 2018). In the third reviews, no party requested that the Commission analyze the domestic industry on a regional basis, and the Commission based its determinations on a national industry analysis. *Third Reviews*, USITC Pub. 4838 at 6 n.33.

[13] *Steel Concrete Reinforcing Bars From Belarus, the People's Republic of China, Indonesia, Latvia, Moldova, Poland, and Ukraine: Continuation of the Antidumping Duty Orders*, 83 Fed. Reg. 64530 (Dec. 17, 2018).

[14] *Steel Concrete Reinforcing Bar From Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine; Institution of Five-Year Reviews* 88 Fed. Reg. 75033 (Nov. 1, 2023) ("*Notice of Institution*").

producers of rebar.[15] With respect to the antidumping duty order on rebar from Ukraine, the Commission received a response to its notice from PJSC ArcelorMittal Kryvyi Rih ("AMKR"), a Ukrainian producer of rebar. The Commission also received a response from the Ministry of Economy of Ukraine ("Government of Ukraine") (collectively with AMKR, the "Ukrainian Respondents").[16] The Commission did not receive a response from any importers, foreign producers, or exporters of rebar from Belarus, China, Indonesia, Latvia, Moldova, or Poland.[17] On February 5, 2024, the Commission determined to conduct full reviews of the orders on rebar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine.[18]

The Commission received prehearing and posthearing submissions from RTAC on behalf of its individual members.[19] Representatives of Nucor, Byer, CMC, Optimus, and Southwestern Suppliers, Inc., appeared at the Commission's hearing accompanied by counsel.[20] RTAC also filed final comments.[21]

The Commission received prehearing and posthearing submissions from respondent interested party AMKR.[22] The chief executive officer of AMKR appeared at the hearing accompanied by counsel.[23] The Commission received prehearing and posthearing submissions

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[15] Domestic Producers' Response to Notice of Institution, EDIS Doc. 809569 (Nov. 30, 2023).

[16] Ministry of Economy of the Government of Ukraine Prehearing Brief, EDIS Doc. 833313 (Sep. 26, 2024) ("Gov. of Ukraine Prehearing Br."); Ministry of Economy of the Government of Ukraine Posthearing Brief, EDIS Doc. 834497 (Oct. 10, 2024) ("Gov. of Ukraine Posthearing Br.").

[17] *See* RTAC Comments on Adequacy, EDIS Doc. 811869 (Jan. 11, 2024).

[18] The Commission found that the domestic interested party group response and the respondent interested party group response were each adequate with respect to Ukraine. The Commission therefore determined to conduct a full review of the order on rebar from Ukraine. Although the Commission found that the respondent interested party group responses with respect to Belarus, China, Indonesia, Latvia, Moldova, and Poland were inadequate, the Commission nevertheless determined to conduct full reviews of the orders on rebar from Belarus, China, Indonesia, Latvia, Moldova, and Poland to promote administrative efficiency in light of its decision to conduct a full review with respect to the order on rebar from Ukraine. *Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine; Notice of Commission Determination To Conduct Full Five-Year Reviews*, 89 Fed. Reg. 13089 (Feb. 21, 2024).

[19] Domestic Producers' Prehearing Brief, EDIS Doc. 833411 (Sep. 26, 2024) ("RTAC Prehearing Br."); Domestic Producers' Posthearing Brief, EDIS Doc. 834755 (Oct. 15, 2024) ("RTAC Posthearing Br.").

[20] *See generally* Transcript of Commission Hearing, EDIS 834079 (Oct. 3, 2024) ("Hearing Tr.").

[21] RTAC Final Comments, EDIS Doc. 837126 (Nov. 13, 2024).

[22] ArcelorMittal Kryvyi Rih Prehearing Brief, EDIS Doc. 833339 (Sep. 26, 2024) ("AMKR Prehearing Br."); ArcelorMittal Kryvyi Rih Posthearing Brief, EDIS Doc. 834510 (Oct. 10, 2024) ("AMKR Posthearing Br.").

[23] *See* generally Hearing Tr. The Commission received a prehearing letter from PJSC Kamet-Steel, a subsidiary of Metinvest ("Kamet Steel"), a Ukrainian producer of rebar. Letter from Kamet Steel (Continued…)

from the Government of Ukraine.[24] Representatives of the Government of Ukraine appeared at the hearing.

U.S. industry data are based on the questionnaire responses of seven U.S. producers of rebar that estimate that they account for nearly all domestic production of rebar in 2023.[25] The Commission issued questionnaires to 14 firms believed to be importers of rebar and received usable questionnaire responses from three U.S. importers accounting for *** percent of total U.S. imports of rebar, based on official Commerce statistics.[26] The Commission did not receive any usable questionnaire responses from U.S. importers of rebar from subject sources.[27] Because of the low coverage of import questionnaire data, U.S. import data and related information are based on Commerce's official import statistics.[28] Foreign industry data and related information are based on the questionnaire responses of one producer and exporter of rebar in Poland, which accounted for approximately *** percent of rebar production in Poland in 2023, and two producers and exporters of rebar in Ukraine,[29] which accounted for approximately *** percent of rebar production in Ukraine in 2023.[30] No subject producers or exporters in Belarus, China, Indonesia, Latvia or Moldova provided responses to the Commission's questionnaires.[31] Accordingly, information on the rebar industries in those countries is based on information from the original investigations and prior reviews,

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to OINV, EDIS Doc. 832651 (Sep. 19, 2024). Metinvest acquired PJSC Dneprovsky Iron & Steel Integrated Works (DMK) in July 2021, and renamed the company Kamet Steel. Kamet Steel did not appear at the hearing, or file prehearing and posthearing briefs. The Commission also did not receive any submissions on behalf of any producer/exporter of rebar from the remaining countries or from any importer of rebar from the remaining countries.

[24] Ministry of Economy of the Government of Ukraine Prehearing Brief, EDIS Doc. 833313 (Sep. 26, 2024) ("Gov. of Ukraine Prehearing Br."); Ministry of Economy of the Government of Ukraine Posthearing Brief, EDIS Doc. 834497 (Oct. 10, 2024) ("Gov. of Ukraine Posthearing Br.").

[25] Confidential Report, Memorandum INV-WW-137, Nov. 1, 2024 ("CR") at I-27; Public Report, *Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Latvia, Moldova, Poland and Ukraine,* Inv. Nos. 731-TA-873-875, 878-880, and 882 (Fourth Review), USITC Pub. 5565 (Dec. 2024) ("PR"), at I-27.

[26] CR/PR at IV-1.

[27] CR/PR at IV-1. U.S. imports of rebar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine were less than 0.5 percent of total imports throughout the period of review.

[28] CR/PR at IV-1.

[29] CR/PR at IV-33.

[30] CR/PR at IV-43. One responding Ukrainian producer, AMKR, estimates that it accounted for *** percent of production of rebar in Ukraine in 2023; the other responding Ukrainian producer, ***. *Id*. at IV-44.

[31] CR/PR at IV-1.

information submitted by RTAC, and information gathered by Commission staff, including industry research data and publicly available export data.[32]

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."[33] 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."[34] 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.[35]

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

> The product covered by the orders is all steel concrete reinforcing bars sold in straight lengths, currently classifiable in the Harmonized Tariff Schedule of the United States (HTSUS) under item numbers 7214.20.00, 7228.30.8050, 7222.11.0050, 7222.30.0000, 7228.60.6000, 7228.20.1000, or any other tariff item number. Specifically excluded are plain rounds (i.e., non-deformed or smooth bars) and rebar that has been further processed through bending or coating.[36]

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[32] *See generally* CR/PR at IV-17 to IV-55.

[33] 19 U.S.C. § 1677(4)(A).

[34] 19 U.S.C. § 1677(10); *see*, *e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int'l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int'l Trade 1990), *aff'd*, 938 F.2d 1278 (Fed. Cir. 1991); *see also* S. Rep. No. 249, 96th Cong., 1st Sess. 90-91 (1979).

[35] *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).

[36] *Steel Concrete Reinforcing Bars From Belarus, the People's Republic of China, Indonesia, Latvia, Moldova, Poland, and Ukraine: Final Results of the Expedited Fourth Sunset Review of the*
(Continued…)

The construction industry uses rebar extensively to reinforce concrete structures.[37] When embedded in concrete, the surface protrusions (deformations) on a deformed rebar inhibit longitudinal movement relative to the surrounding concrete.[38] By enhancing the concrete's compressional and tensional strength, the rebar controls cracking that would otherwise occur when concrete shrinks during curing or due to temperature fluctuations.[39] In the United States, rebar is available in sizes #3 through #18,[40] as specified by American Society for Testing and Materials ("ASTM") International standards that identify for each size the nominal unit weight, nominal dimensions, and deformation requirements (dimension and spacing of deformations), as well as chemical composition, tensile strength, yield strength (grade), and elongation tolerances.[41]

Rebar mills typically specialize in producing rebar from either (1) billet steel, (2) rail steel or (3) railroad axle steel, with each material involving variations in rolling requirements.[42] The most common manufacturing process to produce deformed rebar from billet steel consists of three stages: (1) melting steel scrap, (2) casting billets, and (3) hot rolling the bar. In contrast, the manufacturing process for rebar produced from scrapped rail or axle steel, or from purchased billets, requires only the rolling stage.[43]

In the original investigations and prior reviews, the Commission defined the domestic like product to be rebar coextensive with Commerce's scope.[44]

In the current reviews, RTAC and AMKR both agree with the Commission's definition in the prior proceedings of a single domestic like product, coextensive with Commerce's scope.[45]

Antidumping Duty Orders. 89 Fed. Reg. 16529 (Dep't of Comm. Mar. 7, 2024) and the accompanying *Issues and Decision Memorandum for the Final Results of the Expedited Fourth Sunset Reviews of the Antidumping Duty Orders on Steel Concrete Reinforcing Bars from Belarus, the People's Republic of China, Indonesia, Latvia, Moldova, Poland, and Ukraine*, EDIS Doc. 836608 ("Commerce I & D Memo").

[37] CR/PR at I-22.

[38] CR/PR at I-22.

[39] CR/PR at I-22.

[40] The size indicators are about eight times the respective nominal diameters in inches, meaning that a 3/8-inch bar is designated as size #3 and a 1-inch rebar is designated as size #8, although the relationship diverges somewhat for rebar larger than size #9. CR/PR at I-23.

[41] CR/PR at I-23.

[42] CR/PR at I-23.

[43] CR/PR at I-23.

[44] *Original Determinations I*, USITC Pub. 3425 at 5; *First Reviews*, USITC Pub. 3933 at 5; *Second Reviews*, USITC Pub. 4409 at 5; *Third Reviews*, USITC Pub. 4838 at 7.

[45] RTAC Response to NOI at 49; AMKR Response to NOI at 7; *see also* CR/PR at I-26.

No party argues for a different definition.[46] The record in these reviews does not indicate that the pertinent characteristics and uses of rebar have changed since the prior proceedings so as to warrant revisiting the definition of the domestic like product. In light of these considerations, and absent any argument to the contrary, we define a single domestic like product, consisting of rebar that is coextensive with Commerce's scope.

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."[47] In defining the domestic industry, the Commission's general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise, or which are themselves importers.[48] Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.[49]

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[46] *See* CR/PR at I-26. Moreover, no party submitted comments on the Commission's draft questionnaires requesting that the Commission collect data concerning other possible domestic like products. *Id*.

[47] 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.

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

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

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

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

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

(4) the ratio of import shipments to U.S. production for the imported product; and

(Continued…)

In the original investigations and prior reviews, the Commission defined the domestic industry to include all domestic producers of rebar.[50] In these reviews, no party has argued for a different definition of the domestic industry than that described in the Commission's notice of institution.[51] Domestic producer *** may qualify as a related party through its affiliation with ***, a producer of rebar in Poland.[52] There is no evidence on the record, however, that this affiliated foreign producer exported subject merchandise to the United States during the January 2021 to June 2024 period of review. Therefore, we find that *** is not subject to exclusion pursuant to the related parties provision in the current reviews.

Accordingly, we define the domestic industry as all U.S. producers of rebar.

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

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(5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31(Ct. Int'l. Trade 2015); see *also Torrington Co. v. United States*, 790 F. Supp. at 1168.

[50] *Original Investigations I*, USITC Pub. 3425 at 23. In the first reviews, the Commission found that CMC and Border Steel were related parties but did not find appropriate circumstances existed to exclude either domestic producer from the domestic industry. *First Reviews*, USITC Pub. 4409 at 6. In the second reviews, the Commission found that CMC and ArcelorMittal Vinton (formerly Border Steel), were related parties, but did not find that appropriate circumstances existed to exclude either domestic producer from the domestic industry. *Second Reviews*, USITC Pub. 4409 at 6-7. In the third reviews, the Commission found that domestic producer CMC was related to subject producer CMC Poland Sp. z.o.o. ("CMC Poland"), but information in the record indicated that ***. *Third Reviews*, USITC Pub. 4838 at 6; *Third Reviews Confidential Opinion* at 10 n.34 (EDIS Doc. 811397).

[51] *See* RTAC Response to NOI at 49; AMKR Response to NOI at 7.

[52] CR/PR at Table I-16. *** did not import subject merchandise during the period of review. CR/PR at I-28.

that such imports are likely to have no discernible adverse impact on the domestic industry.[53]

Cumulation therefore is discretionary in five-year reviews, unlike original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.[54] 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.

The statutory threshold for cumulation is satisfied in these reviews because they were initiated for each country on the same day: November 1, 2023.[55]

B. The Original Investigations and Prior Reviews

In the original investigations, the Commission found a reasonable overlap of competition between and among the domestic like product and subject imports from Belarus, Indonesia, Latvia, Moldova, Poland, and Ukraine and cumulated subject imports from these six sources for its material injury determinations.[56] Having found imports from China to be negligible but likely to imminently exceed the negligible imports threshold, the Commission

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[53] 19 U.S.C. § 1675a(a)(7).

[54] 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).

[55] *See Notice of Institution,* 88 Fed. Reg. 75033 (Nov. 1, 2023).

[56] *Original Determinations I*, USITC Pub. 3425 at 15–16 and 25–27; *Original Determinations II*, USITC Pub. 3440 at 4 and 10. As noted above, during the preliminary phase in the original investigations, the Commission found imports of rebar from Austria, Russia, and Venezuela to be negligible and made a negative determination regarding imports from Japan. *Preliminary Determinations*, USITC Pub. 3343 at 13–18. In the original investigations, five Commissioners found imports from China were negligible but likely to exceed the negligibility threshold, but none of them exercised their discretion to cumulate imports from China with other imports due to differences in volumes and price trends. *Original Determinations I*, USITC Pub. 3425 at 15-16, 25-27; *Original Determinations II*, USITC Pub. 3440 at 4, 10. In the first reviews, the Commission made a negative determination regarding imports from Korea. *First Review Determinations*, USITC Pub. 3933 at 37–41.

exercised its discretion not to cumulate subject imports from China with imports from any other subject country in its threat analysis.[57]

In the first and second reviews, the majority of the Commissioners exercised their discretion to cumulate imports from all seven countries that are subject to the current reviews.[58] The Commission did not find that revocation of the antidumping duty orders on any of the seven countries would likely have no discernible adverse impact on the domestic industry. The Commission found that subject imports and the domestic like product remained substitutable, that price was an important factor in purchasing decisions and that each country's industry had excess capacity, and noted that subject imports undersold the domestic in the original investigations.[59] In regard to likelihood of reasonable overlap of competition, the Commission found that imports from each subject country were likely to be fungible with each other and the domestic like product, were likely to be sold in the same channels of distribution, serve overlapping geographical markets, and be simultaneously present in the U.S. market.[60] In the second reviews, the Commission found that given the commodity nature of rebar and the fact that the rebar industry supplied the U.S. market with rebar meeting ASTM standards in the original investigations, rebar from each of the seven subject countries would likely compete directly with other subject imports and the domestic like product in the event of revocation.[61]

In the third reviews, the Commission cumulated subject imports from all seven subject countries.[62] The Commission did not find that revocation of the antidumping duty orders on

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[57] *Original Determinations I*, USITC Pub. 3425 at 12–13 and 24–25; *Original Determinations II*, USITC Pub. 3440 at 4–7 and 10–11.

[58] *First Reviews*, USITC Pub. 3933 at 12–20, 43–50, 55–60, 62–63, 65–71, 73–94, and nn.1, 83, 95, and 96; *Second Reviews*, USITC Pub. 4409 at 9–16, 35–40 (separate and dissenting views of Commissioners Pearson and Broadbent) (exercising their discretion to cumulate subject imports from Latvia and Poland and exercising their discretion not to cumulate subject imports from Indonesia with other subject countries); *id.* at 51–52 (separate and concurring views of Commissioner Broadbent) (exercising her discretion to cumulate subject imports from Belarus, China, Moldova, and Ukraine); *id.* at 59–64 (separate and dissenting views of Commissioner Pearson) (exercising his discretion to cumulate subject imports from Belarus and Moldova and exercising his discretion not to cumulate subject imports from China and Ukraine with those of each other or with other subject countries).

[59] *Second Reviews*, USITC Pub. 4409 at 15.

[60] *Second Reviews*, USITC Pub. 4409 at 15,

[61] *Second Reviews*, USITC Pub. 4409 at 15-16.

[62] Although he joined the majority on cumulation, then-Chairman Johanson wrote additional views highlighting relevant considerations for imports from Latvia and Moldova. *Third Reviews*, USITC Pub. 4838 at 33. Commissioner Broadbent dissented and cumulated the seven countries in three groups: (1) Latvia and Poland; (2) Indonesia; and (3) Belarus, China, Moldova, and Ukraine, making negative determinations with respect to the first two groups. *Third Reviews*, USITC Pub. 4838 at 35.

rebar from any of the seven subject countries would likely have no discernible adverse impact on the domestic industry because subject producers in each country had significant capacity and excess capacity, and were export oriented.[63] It determined that the record did not contain any information suggesting a change in the considerations that led the Commission in the prior reviews to conclude that there would be a likely reasonable overlap of competition between and among the imports from the seven subject countries and the domestic like product upon revocation.[64]

C. Arguments of the Parties

1. RTAC's Arguments

RTAC argues that the Commission should cumulate imports from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine in these reviews, as it did in the prior proceedings.

RTAC argues that subject imports from Belarus are not likely to have no discernible adverse impact on the domestic industry upon revocation, emphasizing that Belarus had significant capacity during the original investigations and substantially increased its exports to the United States during the original period of investigation.[65] RTAC asserts that the sole producer of rebar in Belarus, state-owned Byelorussian Iron and Steel Works ("BMZ"), has increased its annual production capacity since the original investigations to *** short tons, and exports 85 percent of its total sales volume to a total of 100 countries.[66] RTAC also contends that Belarus' recent request for a changed circumstances review before Commerce indicates the country's interest in the U.S. market.[67]

RTAC argues that subject imports from China are not likely to have no discernible adverse impact on the domestic industry upon revocation, emphasizing that during the original investigations the Chinese industry was able to produce nearly *** short tons of rebar per year, and that the Chinese industry is one of the largest producers of rebar in the world and has substantial capacity.[68] RTAC also contends that weakening demand in China due to a decline in the construction industry and limitations on the Chinese industry's ability to export to third

[63] *Third Reviews*, USITC Pub. 4838 at 10-14.
[64] *Third Reviews*, USITC Pub. 4838 at 16.
[65] RTAC Prehearing Br. at 27.
[66] RTAC Prehearing Br. at 26-27.
[67] RTAC Prehearing Br. at 27.
[68] RTAC Prehearing Br. at 27,

country markets make the U.S. market attractive to subject producers if the order on subject imports from China is revoked.[69]

RTAC argues that subject imports from Indonesia are not likely to have no discernible adverse impact on the domestic industry upon revocation, asserting that Indonesia was a significant producer and exporter of rebar during the original investigations, and that available data indicate that the rebar industry in Indonesia increased its capacity and production during the current period of review.[70]

RTAC argues that subject imports from Latvia are not likely to have no discernible adverse impact on the domestic industry upon revocation, asserting that Latvia was a significant producer and exporter of rebar during the original investigations.[71] RTAC acknowledges information on the record indicating that the only known producer of rebar in Latvia, JSC Liepajas Metalurgs ("LM"), ceased production during the period of review and that its plant is being demolished.[72] RTAC asserts, however, that Global Trade Atlas ("GTA") data on the record show that Latvia exported rebar during the period of review. RTAC contends that until the dismantling of LM's plant is confirmed, it is possible that the facility could be reopened, and Latvian producers could return to producing rebar. RTAC argues that because data indicate that Latvia continued to export significant quantities of rebar during the period of review, the Commission should find that revocation of the order would have a discernible adverse impact on the U.S. market.[73]

RTAC argues that subject imports from Moldova are not likely to have no discernible adverse impact on the domestic industry upon revocation, asserting that Moldova had significant rebar production and capacity during the original investigations. It emphasizes that in previous reviews, the Commission has found that the Moldovan industry was capable of producing and exporting large volumes of rebar to the U.S. market.[74]

RTAC argues that subject imports from Poland are not likely to have no discernible adverse impact on the domestic industry upon revocation, emphasizing that Polish producers had substantial capacity in the prior proceedings. Moreover, RTAC asserts that available data indicate that Polish producers produced between *** metric tons of rebar per year from 2018

[69] RTAC Prehearing Br. at 28; RTAC Response to NOI at 28.
[70] RTAC Prehearing Br. at 29-30.
[71] RTAC Prehearing Br. at 30.
[72] RTAC Posthearing Br. at 70.
[73] RTAC Posthearing Br. at 71.
[74] RTAC Prehearing BR. at 31.

to 2022, and that the Polish rebar industry added capacity during the period of review.[75] RTAC argues that Polish producers increased their export shipments during the period of review. It further contends that weakening demand in Poland and increased competition from other European producers in the Polish market, along with higher prices in the United States, would make the U.S. market attractive to subject producers if the order on rebar from Poland was revoked.[76]

Regarding Ukraine, RTAC acknowledges that the ongoing war resulting from Russia's invasion in February 2022 has created challenges for Ukrainian producers, but it contends that the rebar industry in Ukraine has substantial installed, practical, and unused capacity, and produces significant volumes of rebar and other steel products on the same machinery, which it could shift to produce more rebar upon revocation.[77] RTAC also asserts that while the war had an initial impact on the Ukrainian industry, its capacity and production are recovering and increasing.[78]

RTAC further argues that Ukrainian producers have significant levels of divertible inventory of rebar, and that even 10,000 to 20,000 short tons of rebar is sufficient to cause a discernible adverse impact due to price sensitivity in the U.S. market.[79] RTAC asserts that the higher prices available in the U.S. market would incentivize AMKR and other Ukrainian producers to increase shipments to the United States. RTAC also disagrees with AMKR's assertion that Ukrainian producers are likely to focus on home market shipments as part of rebuilding efforts due to the war. RTAC contends that the war is ongoing, demand is currently weak in the Ukrainian market, and that it is uncertain when large scale rebuilding efforts will commence in Ukraine.[80] RTAC thus argues that Ukrainian producers will be incentivized to increase rebar exports.[81]

RTAC also asserts that, even with the war ongoing, Ukrainian metal producers already ship large volumes of iron and steel to the United States. It thus argues that Ukrainian producers have the capability and incentive to shift to production of rebar, which has higher profit margins than other steel products, if the orders are revoked.[82] RTAC contends that

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[75] RTAC Prehearing Br. at 32.
[76] RTAC Prehearing Br. at 32-33
[77] RTAC Prehearing Br. at 6-8.
[78] RTAC Prehearing Br. at 10-11.
[79] RTAC Posthearing Br. at 6.
[80] RTAC Posthearing Br. at 14.
[81] RTAC Posthearing Br. at 14-15 (citing *The EBRD expects a slowdown in inflation rates in Ukraine*, The Odessa Journal (Sept. 26, 2024), attached as Exhibit 86).
[82] RTAC Posthearing Br. at 10.

available U.S. pricing and global freight data indicate that the cost to ship steel products from Ukraine to the United States is comparable to the cost to ship to other European markets, even accounting for the risk premium due to the war.[83]

RTAC further disputes AMKR's assertion that shortages of electricity and labor significantly restrict the Ukrainian industry's ability to produce rebar. It asserts that the Ukrainian industry's production of rebar and other steel products was higher in the first half of 2024 than in the first half of 2023.[84] RTAC argues that specific steel long products require different levels of energy to produce, and that all producers' electricity consumption varies day to day, and sometimes hour to hour, depending on the products they make and the price of electricity.[85] RTAC argues that if the orders were revoked, there would be an incentive for AMKR to prioritize production of rebar, which RTAC asserts requires less electricity to produce and offers higher values than other steel products in AMKR's product mix.[86]

Finally, RTAC argues that the European Union's Carbon Border Adjustment Mechanism Policy ("CBAM") will become fully effective in 2026, and that the Ukrainian steel industry's high carbon emissions will significantly limit Ukraine's ability to continue exporting steel products to the EU.[87] RTAC asserts that the EU accounted for *** percent of Ukrainian exports of steel long products in 2023, and Ukrainian producers would need to divert those shipments to other markets upon CBAM becoming effective.[88]

RTAC contends that there would likely be a reasonable overlap of competition between and among subject imports from each country and the domestic like product. It argues that subject imports are highly fungible with each other and the domestic like product, rebar is sold primarily on the basis of price, and there was geographic overlap between subject imports and domestically produced rebar in the prior proceedings. It also asserts that although the orders have restrained subject import volumes, if the orders were revoked, imports from each subject country would return to being simultaneously present in the U.S. market and sold in competing channels of distribution with the domestic like product.[89]

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[83] RTAC Posthearing Br. at 11.

[84] RTAC Posthearing Br. at 12-13.

[85] RTAC Posthearing Br. at 12-13.

[86] RTAC Posthearing Br. at 13. RTAC asserts that due in part to the effects of the order on rebar, AMKR currently prioritizes the production of other products, such as pig iron, and billets that it ships to its affiliate in Poland. *Id*. at 28.

[87] RTAC Prehearing Br. at 22.

[88] RTAC Prehearing Br. at 22-23.

[89] RTAC Prehearing Br. at 33-36.

RTAC also contends that imports from subject countries – including Ukraine – are likely to compete under similar conditions in the U.S. market if the orders are revoked. It acknowledges that the war with Russia has affected the market in Ukraine, but contends that the Ukrainian steel industry nevertheless continued to produce and export significant volumes of steel products, including rebar. It argues that because rebar is standardized and similar to a commodity, there is no indication that rebar from Ukraine would compete differently from rebar from other subject sources in the U.S. market.[90]

2. Ukrainian Respondents' Arguments

AMKR argues that subject imports from Ukraine are likely to have no discernible adverse impact after revocation because Ukrainian producers have faced significant production disruptions due to Russia's invasion of Ukraine in 2022.[91] AMKR contends that rebar production in Ukraine remains unpredictable due to ongoing security concerns, including direct attacks on Ukrainian producers' facilities, supply issues with electricity and water, and lack of available labor.[92] AMKR also argues Ukrainian producers' ability to export rebar by sea has been curtailed due to Russian blockades of Ukrainian ports, and Russian military vessels attacking merchant ships leaving Ukrainian ports.[93] According to AMKR, Ukrainian producers have had to resort to shipping rebar to other European ports via rail, which is slow and unpredictable.[94] AMKR asserts that marine shipping costs have increased significantly to account for the risks of war.[95]

The Government of Ukraine also argues against cumulation, contending in particular that Russia's invasion of Crimea in 2014 has had lingering adverse impacts on the Ukrainian economy, which were exacerbated by Russia's invasion in 2022.[96] It also argues the antidumping orders have been in effect for too long a period of time, and that contrary to when the order was imposed, Ukraine is a market economy. It contends that subject imports from Ukraine have been absent from the U.S. market for 23 years, and that Ukrainian producers have lost their established supply chains. The Government of Ukraine asserts that revocation would

[90] RTAC Prehearing Br. at 37-38.

[91] In response to a question whether AMKR is against cumulation of subject imports from Ukraine based on "no discernible adverse impact" or "differing conditions of competition", AMKR replied that it is arguing for a "no discernible adverse impact" analysis. AMKR Posthearing Br. at 1.

[92] AMKR Prehearing Br. at 2-4.

[93] AMKR Prehearing Br. at 6.

[94] AMKR Prehearing Br. at 6.

[95] AMKR Prehearing Br. at 6.

[96] Gov. of Ukraine Posthearing Br. at 4.

not be likely to lead to a surge in Ukraine imports because Ukrainian producers would need to undertake long-term efforts to establish a presence in the U.S. market.[97]

Finally, both AMKR and the Government of Ukraine argue that Ukrainian producers are likely to focus most of their shipments of rebar on the domestic Ukrainian market for the foreseeable future because rebar will be essential in Ukraine's reconstruction efforts when the war ends.[98]

D. Analysis

1. 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.[99] 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.[100] 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. We consider the data pertinent to each subject country below.

Belarus. During the original investigations, subject imports from Belarus ranged from *** short tons to *** short tons and accounted for *** to *** percent of apparent U.S. consumption.[101] During the first, second, and third five-year reviews, subject imports from Belarus were present in the U.S. market only in 2002 in the amount of 2,620 short tons, accounting for less than 0.05 percent of apparent U.S. consumption that year.[102] In the current reviews, rebar from Belarus was absent from the United States market.[103]

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[97] Gov. of Ukraine Posthearing Br. at 4-5.

[98] *See* AMKR Posthearing Br. at 5; Gov. of Ukraine Prehearing Br. at 11-12; Gov. of Ukraine Posthearing Br. at 13-15.

[99] 19 U.S.C. § 1675a(a)(7).

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

[101] *Third Reviews Confidential Opinion*, EDIS Doc. 811397 at 13.

[102] *Third Reviews Confidential Opinion*, EDIS Doc. 811397 at 13.

[103] *See* CR/PR at Table IV-1.

The Commission issued a foreign producer questionnaire to three firms in Belarus that are believed to produce rebar, and none responded.[104] The record indicates that since the original investigations, Byelorussian Steel Works ("BMZ"), has been the only producer of rebar in Belarus.[105] GTA data for HS subheadings 7214.20, 7222.11, and 7222.30, which include in-scope rebar and small quantities of out-of-scope merchandise, indicate that global exports of rebar from Belarus decreased from 606,156 short tons in 2021, to 180,058 short tons in 2022, and 39,261 short tons in 2023.[106] However, these data are likely significantly understated in 2022 and 2023 because Russia, the primary destination for exports of rebar from Belarus in 2021, stopped reporting all trade data to GTA in 2022.[107] The three largest export markets for rebar from Belarus in 2023 were Kazakhstan, Lebanon, and Azerbaijan.[108] Rebar from Belarus is subject to antidumping orders in Canada, the European Union, and Ukraine.[109]

In the original investigations, subject imports from Belarus undersold the domestic like product in 29 of 32 quarterly comparisons, with underselling margins ranging from 3.5 to 18.3 percent.[110] There were no price comparison data for subject imports from Belarus in this review or in the prior reviews.

In light of the foregoing, including the volume of subject imports from Belarus during the original investigations, the information available regarding the Belarusian industry's significant volumes of exports, and the underselling by subject imports from Belarus in the original investigations, we find that subject imports from Belarus would not likely have no discernible adverse impact on the domestic industry if the pertinent order were revoked.[111]

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[104] CR/PR at I-15; IV-17.

[105] *See* CR/PR at IV-17.

[106] CR/PR at Table IV-7.

[107] CR/PR at IV-19.

[108] CR/PR at Table IV-7. The data for HS subheadings may be overstated to the extent they may include out-of-scope merchandise.

[109] CR/PR at Table IV-34.

[110] CR/PR at V-8, n.10.

[111] We note that in August 2023, the United States Department of the Treasury ("Treasury") imposed sanctions on BMZ and other Belarusian entities because of "the Belarusian regime's continued civil society repression, complicity in the Russian Federation's unjustified war in Ukraine, and enrichment of repressive Belarusian regime leader Alyaksander Lukashenka." *See* CR/PR at IV-62 (citing Press Release, United States Department of the Treasury, *U.S. Expands Sanctions on the Belarusian Regime, Marking the Three-Year Anniversary of the Fraudulent August 2020 Presidential Election* (Aug. 9, 2023), https://home.treasury.gov/news/press-releases/jy1682). RTAC argues that the sanctions are temporary, and that Treasury could lift them in the future, as it has done on occasion for other entities that have been subject to sanctions. RTAC Posthearing Br. at 71. It also argues that because the (Continued…)

China. During the original investigations, subject imports from China increased from 0 short tons in 1998 to 163,124 short tons in 2000, when they accounted for *** percent of apparent U.S. consumption.[112] During the first, second, and third five-year reviews, subject imports from China were present in the U.S. market in 15 of 17 years, with the highest level being 2,953 short tons in 2015.[113] During the current period of review, subject imports from China were 482 short tons in 2021, 668 short tons in 2022, and 1,037 short tons in 2023; they were 527 short tons in interim 2023 and 253 short tons in interim 2024 (January through June).[114] Subject imports from China accounted for less than 0.05 percent of apparent U.S. consumption in each year of these reviews.[115]

The Commission issued a foreign producer questionnaire to sixteen firms in China that are believed to produce rebar, and none responded.[116] GTA data for HS subheadings 7214.20, 7222.11, and 7222.30, which include in-scope rebar and small quantities of out-of-scope merchandise, indicate that global exports of rebar from China increased from 448,749 short tons in 2021, to 751,445 short tons in 2022, and 1.8 million short tons in 2023, an increase overall of 311.7 percent.[117] GTA data also indicate that China was the second largest exporter of rebar in 2023, accounting for 10.6 percent of global exports.[118] The three largest export markets for rebar from China during the current period of review were Hong Kong, Mongolia, and Myanmar.[119] Rebar from China is subject to antidumping duties in Australia, the Dominican Republic, Pakistan, and the United Kingdom, and is subject to antidumping and countervailing duties in Canada.[120]

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sanctions are due in part to Belarus' conduct with regard to Russia's invasion of Ukraine, it would be inappropriate for the Commission to find that the restraining effects of the sanctions would support a finding that subject imports from Belarus would not be likely to have a discernible impact on the U.S. market if the orders were revoked. *Id*. at 71. Given the possibility that the sanctions could be lifted in the future, and the different purpose the sanctions serve from the antidumping duty order under review, Treasury's imposition of sanctions on BMZ and other Belarusian entities does not change our conclusion that subject imports from Belarus would not likely have no discernible adverse impact on the domestic industry if the order were revoked.

[112] *Third Reviews Confidential Opinion*, EDIS Doc. 811397 at 14.
[113] *Third Reviews Confidential Opinion*, EDIS Doc. 811397 at 14.
[114] CR/PR at Table IV-1.
[115] CR/PR at Table I-18.
[116] CR/PR at IV-20.
[117] CR/PR at IV-21.
[118] CR/PR at IV-65.
[119] CR/PR at IV-21.
[120] CR/PR at Table IV-34.

In the original investigations, subject imports from China undersold the domestic like product in 19 of 27 quarterly comparisons, with underselling margins ranging from *** to *** percent.[121] There were no price comparison data for subject imports from China in this review or in the prior reviews.[122]

In light of the foregoing, including the increasing volume of subject imports from China during the original investigations, the continued presence of subject imports from China in the U.S. market during the period of review, the information available regarding the Chinese industry's significant volumes of exports, the fact that rebar from China is subject to third-country trade barriers, and the underselling by subject imports from China in the original investigations, we find that subject imports from China would not likely have no discernible adverse impact on the domestic industry if the pertinent orders were revoked.

Indonesia. During the original investigations, subject imports from Indonesia increased from 44,504 short tons in 1998 to 69,261 short tons in 1999, then decreased to 0 short tons in 2000 and accounted for *** to *** percent of apparent U.S. consumption during that period.[123] In the prior reviews, subject imports from Indonesia were absent from the U.S. market,[124] as they were in the current reviews.[125]

The Commission issued foreign producer questionnaires to four firms in Indonesia that are believed to produce rebar, and none responded.[126] Information available to the Commission indicates that PT Dexin Steel Indonesia, an Indonesian producer of steel products, including rebar, began producing crude steel at one blast furnace in 2020, and another in 2021, and also announced plans to open a third blast furnace.[127]

GTA data for HS subheadings 7214.20, 7222.11, and 7222.30, which include in-scope rebar and small quantities of out-of-scope merchandise, indicate that global exports of rebar from Indonesia increased overall by 89.5 percent from 2021 to 2023, from 37,323 short tons in 2021 to 46,416 short tons in 2022, and 61,412 short tons in 2023.[128] The three largest export markets for rebar from China during the current period of review were Australia, Papua New

[121] *Third Reviews Confidential Opinion*, EDIS Doc. 811397 at 15.
[122] *See* CR/PR at V-8.
[123] *Third Reviews Confidential Opinion*, EDIS Doc. 811397 at 15.
[124] *Third Reviews Confidential Opinion*, EDIS Doc. 811397 at 15.
[125] CR/PR at Table IV-1.
[126] CR/PR at IV-23.
[127] CR/PR at Table IV-9.
[128] CR/PR at IV-24, Table IV-10.

Guinea, and East Timor.[129] Rebar from Indonesia is subject to antidumping duties in Australia and Canada.[130]

In the original investigations, subject imports from Indonesia undersold the domestic like product in all 24 quarterly comparisons, with margins ranging from *** to *** percent.[131] There were no price comparison data for subject imports from Indonesia in this review or in the prior reviews.[132]

In light of the foregoing, including the volume of subject imports from Indonesia during the original investigations, the information available regarding the Indonesian industry's significant volumes of exports, the entry of a new producer in the Indonesia steel industry during the period of review, and the underselling by subject imports from Indonesia in the original investigations, we find that subject imports from Indonesia would not likely have no discernible adverse impact on the domestic industry if the pertinent orders were revoked.

Latvia. During the original investigations, subject imports from Latvia increased from 97,002 short tons in 1998 to 303,997 short tons in 1999, then decreased to 207,705 short tons in 2000 and accounted for *** to *** percent of apparent U.S. consumption during that period.[133] Subject imports from Latvia were 33,662 short tons in 2001, 45,904 short tons in 2002, 50,522 short tons in 2003, 121,881 short tons in 2004, 36,646 short tons during 2005, and 0 in 2006.[134] During the first five-year reviews, subject imports from Latvia accounted for between *** percent of apparent U.S. consumption.[135] Subject imports from Latvia have not been present in the U.S. market since 2006.[136]

The Commission issued a foreign producer questionnaire to LM, the only known producer of rebar in Latvia since the original investigation, using the valid contact information that it identified and received no response.[137] LM reportedly became insolvent in 2013, was sold, and then became insolvent again in 2018 and ceased production.[138] Information available to the Commission indicates that although a Turkish company, ASLANLI Metalurji ve Metal Unrunler Sanayi ve Ticaret A.S. ("ASANLI"), acquired LM in 2020 with the intention of restarting

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[129] CR/PR at IV-24.
[130] CR/PR at Table IV-34.
[131] CR/PR at V-8, n.10.
[132] CR/PR at V-8.
[133] *Third Reviews Confidential Opinion*, EDIS Doc. 811397 at 16.
[134] First Reviews Staff Report, EDIS Doc. 811383 at Table C-1.
[135] First Reviews Staff Report, EDIS Doc. 811383 at Table C-1.
[136] *Third Reviews Confidential Opinion*, EDIS Doc. 811397 at 16.
[137] CR/PR at IV-26.
[138] CR/PR at IV-26.

production at LM's facility in Liepaja, Latvia, the company could not reach a required agreement with the Liepaja City Council to resume operation of the facility.[139] In August 2023, ASANLI announced that it would dismantle the steel plant and relocate the rebar production equipment to Turkey. In September 2024, construction of a new industrial park began on the site where LM's plant was located.[140] Although Latvian press articles on the record indicate that LM has ceased production and its plant is being dismantled, it is unclear whether ASANLI has relocated the rebar production equipment from Latvia to Turkey according to its announced plans, and it is also unclear what operations will take place at the newly constructed industrial park on LM's plant site.

Furthermore, although evidence suggests that LM has ceased production, GTA data indicate that Latvia's global exports of rebar increased overall by 15.6 percent during the period of review. GTA data for HS subheadings 7214.20, 7222.11, and 7222.30, which include in-scope rebar and small quantities of out-of-scope merchandise, indicate that global exports of rebar from Latvia increased from 22,348 short tons in 2021 to 15,504 short tons in 2022, and 24,703 short tons in 2023.[141] The three largest export markets for rebar from Latvia during the current period of review were Estonia, Lithuania, and Poland.[142] Based on the record of this review, we cannot confirm whether Latvia's global exports during the period of review were a sell-off of LM's remaining inventories, and the extent to which inventories remain available for export in the foreseeable future, or if they were shipments by new or existing unknown producers in Latvia.[143] The information available also indicates that there is not a significant domestic market for rebar in Latvia.[144]

In the original investigations, subject imports from Latvia undersold the domestic like product in all 46 quarterly comparisons, with underselling margins ranging from 16.5 to 32.4 percent.[145] In the first five-year reviews, subject imports from Latvia undersold the domestic like product in 17 of 48 quarterly comparisons, with underselling margins ranging from 0.3 to

[139] CR/PR at IV-26.
[140] CR/PR at Table IV-11.
[141] CR/PR at IV-28, Table IV-12.
[142] CR/PR at IV-27.
[143] In the next five-year reviews of the order on Latvia, we will seek additional information regarding the status of production facilities in Latvia.
[144] CR/PR at IV-26.
[145] CR/PR at V-8.

22.8 percent.[146] There were no price comparison data for subject imports from Latvia in the subsequent five-year reviews or in this review.[147]

In light of the foregoing, including the volume of subject imports from Latvia during the original investigations, the underselling by subject imports from Latvia in the original investigations and first reviews, the fact that Latvia's global exports of rebar increased over the period of review, and in the absence of evidence confirming that production of rebar in Latvia has ceased, we find that subject imports from Latvia would not likely have no discernible adverse impact on the domestic industry if the pertinent orders were revoked.[148]

Moldova. During the original investigations, subject imports from Moldova decreased from 187,271 short tons in 1998 to 181,492 short tons in 2000, and accounted for *** to *** percent of apparent U.S. consumption during this period.[149] Subject imports from Moldova have not been present in the U.S. market since 2000,[150] including during the current period of review.[151]

Since the original investigations, JSCC Moldova Steel Works ("MSW") has been the only producer of rebar in Moldova. It did not provide a response to the Commission's foreign producer questionnaire in these reviews.[152]

GTA data for HS subheadings 7214.20, 7222.11, and 7222.30, which include in-scope rebar and small quantities of out-of-scope merchandise, indicate that global exports of rebar from Moldova decreased irregularly from 2021 to 2023, from 30,647 short tons in 2021 to 43,437 short tons in 2022, and 27,849 short tons in 2023.[153] However, these data are likely understated in 2023 because Russia, the second largest destination for exports of rebar from Moldova in 2022, stopped reporting all trade data to GTA in 2022.[154] The largest export market for rebar from Moldova during the current period of review was Ukraine.[155]

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[146] CR/PR at V-8, n.10.

[147] *See* CR/PR at V-8.

[148] Commissioner Johanson does not join this concluding paragraph as he finds that subject imports from Latvia would likely have no discernible adverse impact on the domestic industry if the order was revoked. *See* Separate and Dissenting Views of Commissioner David S. Johanson.

[149] *Third Reviews Confidential Opinion*, EDIS Doc. 811397 at 17.

[150] *See Third Reviews Confidential Opinion*, EDIS Doc. 811397 at 17.

[151] CR/PR at Table IV-1.

[152] CR/PR at IV-30.

[153] CR/PR at IV-32, Table IV-13.

[154] CR/PR at IV-30.

[155] CR/PR at Table IV-13. The data for HS subheadings may be overstated to the extent they include out-of-scope merchandise. *Id*.

In the original investigations, subject imports from Moldova undersold the domestic like product in all 36 comparisons, with underselling margins ranging from 15.2 to 29.2 percent.[156] There were no price comparison data for subject imports from Moldova in these reviews or in the prior reviews.[157]

In light of the foregoing, including the volume of subject imports from Moldova during the original investigations, the information available regarding the Moldovan industry's significant volumes of exports, and the underselling by subject imports from Moldova in the original investigations, we find that subject imports from Moldova would not likely have no discernible adverse impact on the domestic industry if the pertinent orders were revoked.

Poland. During the original investigations, subject imports from Poland increased from 53,231 short tons in 1998 to 69,292 short tons in 2000 and accounted for *** to *** percent of apparent U.S. consumption during this period.[158] Subject imports from Poland were present in the first reviews, absent during the second reviews, and present during the third reviews, consisting of 872 short tons in 2015 and 770 short tons in 2016.[159] Since the imposition of the orders, subject imports from Poland have not accounted for more than 0.3 percent of apparent U.S. consumption in any year.[160] In the current reviews, subject imports from Poland were 28 short tons in 2021, 1,122 short tons in 2022, and 23 short tons in 2023; there were 60 short tons in interim 2024 and 23 short tons in interim 2023.[161]

In the final phase of the original investigations, the Commission received foreign producer/exporter questionnaire response from two rebar producers in Poland, but they were unable to estimate the percent of rebar production that they accounted for in Poland during the final year of the original investigations.[162] In these reviews, one Polish producer, CMC

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[156] CR/PR at V-8, n.10.

[157] *See* CR/PR at V-8.

[158] *Third Reviews Confidential Opinion*, EDIS Doc. 811397 at 18.

[159] *See Third Reviews Confidential Opinion*, EDIS Doc. 811397 at 18.

[160] *Third Reviews Confidential Opinion*, EDIS Doc. 811397 at 14; *see also* CR/PR at Table IV-1 (IV-3).

[161] CR/PR at Table IV-1.

[162] CR/PR at IV-33; *see also* Original Investigations Staff Report, INV-Y-087, EDIS Doc. 811369 at VII-7. In the first five-year reviews, the Commission received a response from one firm, which estimated that it accounted for *** percent of rebar production in Poland during 2005 and ***. *Id*. In the second five-year reviews, the Commission received responses from two Polish producers, which accounted for an estimated *** percent of rebar production in Poland in 2012 and ***. In the third five-year reviews, the Commission received a response from one producer, CMC Poland, which accounted for approximately *** percent of rebar production in Poland in 2017 and *** from Poland to the United States that year. *Id*.

Poland, responded to the Commission's foreign producer questionnaire, and it estimated that it accounted for approximately *** percent of rebar production in Poland in 2023.[163] In 2023, CMC Poland's production of rebar was *** short tons.[164] CMC Poland did not export rebar to the United States during the current period of review.[165] Publicly available information on the record indicates that there were changes in the rebar industry in Poland during the period of review. In December 2023, Polish producer Saralle Group announced plans to construct a rebar and merchant bar plant with annual production capacity of 440,924 short tons.[166]

The Polish industry's reported practical rebar capacity, increased irregularly during the period of review, initially increasing from *** short tons in 2021 to *** short tons in 2022 before decreasing to *** short tons in 2023; it was lower at *** short tons in interim 2024 than in interim 2023 at *** short tons.[167] Polish producers' rebar production declined irregularly over the period of review, increasing initially from *** short tons in 2021 to *** short tons in 2022, before decreasing to *** short tons in 2023; it was lower in interim 2024 at *** short tons than in interim 2023 at *** short tons.[168] Polish producer ***.[169] The Polish rebar industry's reported practical rebar capacity utilization rate declined throughout most of the POR, initially increasing from *** percent in 2021, to *** percent in 2022, and then decreasing to *** percent in 2023; it was lower in interim 2024 at *** percent than in interim 2023 at *** percent.[170] In 2023, the Polish rebar industry's practical rebar capacity of *** short tons was equivalent to *** percent of apparent U.S. consumption, and it possessed excess practical rebar capacity of *** short tons, equivalent to *** percent of apparent U.S. consumption that year.[171] In interim 2024, the Polish rebar industry's practical rebar capacity of *** short tons was equivalent to *** percent of apparent U.S. consumption, and it possessed excess practical rebar capacity of *** short tons, equivalent to *** percent of apparent U.S. consumption that year.[172]

The responding Polish firm also reported producing other products on the same equipment and machinery used to produce rebar. Reported installed overall capacity remained

[163] CR/PR at IV-33.
[164] CR/PR at Table IV-14.
[165] CR/PR at IV-33.
[166] CR/PR at Table IV-14.
[167] CR/PR at Table IV-17.
[168] CR/PR at Table IV-17.
[169] CR/PR at IV-15.
[170] CR/PR at Table IV-17.
[171] *Calculated from* CR/PR at Table IV-17 and C-1.
[172] *Calculated from* CR/PR at Table IV-17 and C-1.

steady throughout the period of review at *** short tons from 2021 to 2023, and *** short tons in interim 2023 and interim 2024.[173] Polish producers' installed overall production declined irregularly over the period of review, increasing initially from *** short tons in 2021 to *** short tons in 2022, before decreasing to *** short tons in 2023; it was lower in interim 2024 at *** short tons than in interim 2023 at *** short tons.[174]

Its installed overall capacity utilization rate declined throughout most of the period of review, initially increasing from *** percent in 2021, to *** percent in 2022, and then decreasing to *** percent in 2023; it was lower in interim 2024 at *** percent than in interim 2023 at *** percent.[175] In 2023, the Polish rebar industry's installed overall capacity of *** short tons was equivalent to *** percent of apparent U.S. consumption, and it possessed excess installed overall capacity of *** short tons, equivalent to *** percent of apparent U.S. consumption that year.[176] In interim 2024, the Polish rebar industry's installed overall capacity of *** short tons was equivalent to *** percent of apparent U.S. consumption, and it possessed excess installed overall capacity of *** short tons, equivalent to *** percent of apparent U.S. consumption that year.[177]

Total shipments of rebar by the subject industry in Poland increased from *** short tons in 2021, to *** short tons in 2022, before decreasing to *** short tons in 2023; they were lower in interim 2024 at *** short tons than in interim 2023 at *** short tons.[178] Exports of rebar from Poland increased irregularly overall during the period of review, from *** short tons in 2021, to *** short tons in 2022, and *** short tons in 2023; they were lower in interim 2024 at *** short tons than in interim 2023 at *** short tons.[179] Polish producers' exports as a share of total shipments of rebar ranged from *** percent to *** percent during each full year of the POR.[180] The average unit values ("AUVs") of responding Polish producers' shipments were $*** in 2021, $*** in 2022, and $*** in 2023; the AUVs were $*** in interim 2024 and $*** in interim 2023.[181]

GTA data for HS subheadings 7214.20, 7222.11, and 7222.30, which include in-scope rebar and small quantities of out-of-scope merchandise, indicate that global exports of rebar

[173] CR/PR at Table III-16.
[174] CR/PR at Table IV-17.
[175] CR/PR at Table IV-17.
[176] *Calculated from* CR/PR at Table IV-17 and C-1.
[177] *Calculated from* CR/PR at Table IV-17 and C-1.
[178] CR/PR at Table IV-18.
[179] CR/PR at Table IV-18.
[180] CR/PR at Table IV-18.
[181] CR/PR at Table IV-19.

from Poland increased irregularly from 2021 to 2023, from 235,520 short tons in 2021 to 371,822 short tons in 2022, and 252,071 short tons in 2023.[182] The largest export markets for rebar from Poland in 2023 were the Czech Republic, Lithuania, and Germany.[183]

In the original investigations, subject imports from Poland undersold the domestic like product in 46 of 48 comparisons, with underselling margins ranging from 17.0 to 28.4 percent.[184] There were no price comparison data for subject imports from Poland in this review or in the prior reviews.[185]

In light of the foregoing, including the volume of subject imports from Poland during the original investigations, the continued presence of subject imports from Poland in the U.S. market during the period of review, the information available regarding the Polish industry's significant volumes of exports, the responding Polish producer's existing capacity and excess capacity, its confirmed ability to shift production from other steel products to rebar, and the underselling by subject imports from Poland in the original investigations, we find that subject imports from Poland would not likely have no discernible adverse impact on the domestic industry if the pertinent orders were revoked.

Ukraine. During the original investigations, subject imports from Ukraine increased from 3,074 short tons in 1998 to 168,054 short tons in 2000, when they accounted for *** percent of apparent U.S. consumption.[186] Subject imports from Ukraine were not present in the U.S. market from 2001 to 2015; they were 1,094 short tons in 2016 and 1,074 short tons in 2017,[187] accounting for no more than 0.05 percent of apparent U.S. consumption in those years. In the current period of review, subject imports from Ukraine were 4,292 short tons in 2021, 2,303 short tons in 2022, and 805 short tons in 2023; they were higher at *** short tons in interim 2024 (January-June) than at 765 short tons in interim 2023.[188]

In the final phase of the original investigations, the Commission received a foreign producer questionnaire from one firm, Krivoi Rog Mining & Metallurgical Integrated Works (Krivorozhtal), which reported that it accounted for ***.[189] In these reviews, two Ukrainian producers, AMKR and Kamet Steel, responded to the Commission's foreign producer

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[182] CR/PR Table IV-21.
[183] CR/PR at IV-41, Table IV-21.
[184] Original Investigations Staff Report, INV-Y-087, EDIS Doc. 811369 at Appendix G.
[185] CR/PR at V-8.
[186] *Third Reviews*, USITC Pub. 4838 at 14; *Third Reviews Confidential Opinion*, EDIS Doc. 811397 at 19.
[187] CR/PR at C-3 and C-9, Table I-3.
[188] CR/PR at Table IV-1.
[189] CR/PR at IV-43.

questionnaires. AMKR estimates it accounted for approximately *** percent of rebar production in Ukraine in 2023 and ***.[190] AMKR and Kamet Steel reported that they did not export rebar to the United States during the period of review.[191]

Ukrainian producers' reported[192] practical rebar capacity decreased irregularly over the period of review from *** short tons in 2021 to *** short tons in 2022, and *** short tons in 2023; it was higher in interim 2024 at *** short tons than at *** short tons in interim 2023.[193] Ukrainian producers' production declined irregularly over the period of review, initially decreasing from *** short tons in 2021 to *** short tons in 2022, before increasing to *** short tons in 2023; it was higher in interim 2024 at *** short tons than in interim 2023 at *** short tons.[194]

Ukrainian producers' reported practical rebar capacity utilization rate increased throughout most of the POR, from *** percent in 2021, to *** percent in 2022, and then *** percent in 2023; it was higher in interim 2024 at *** percent than in interim 2023 at *** percent.[195] In 2023,Ukrainian producers' practical rebar capacity of *** short tons was equivalent to *** percent of apparent U.S. consumption, and it possessed excess practical rebar capacity of *** short tons, equivalent to *** one percent of apparent U.S. consumption that year.[196] In interim 2024, Ukrainian producers' practical rebar capacity of *** short tons was equivalent to *** percent of apparent U.S. consumption, and it possessed excess practical rebar capacity of *** short tons, equivalent to *** percent of apparent U.S. consumption for that period.[197]

Ukrainian producers also reported maintaining significant inventories of rebar, which decreased irregularly from 2021 to 2023 but reached their highest levels in interim 2024.

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[190] CR/PR at IV-44.

[191] CR/PR at IV-44.

[192] Because the Commission received responses to its questionnaires from only two rebar producers in Ukraine, reported data appear to be understated. Specifically, these data do not include information from rebar producers that did not respond to the Commission's questionnaires. This is particularly noteworthy because the imports of subject rebar from Ukraine that were present in the U.S. market throughout the POR are believed to have been manufactured by PRJSC Dnipropestsstal, which did not return a questionnaire or respond to staff inquiries. CR/PR at IV-1 n.2. Additionally, another apparent rebar producer in Ukraine, AB Metal Group, which also did not return a questionnaire, publicly announced that it would expand production by installing new lines for the production of rebar and rebar mesh. CR/PR at Table IV-23.

[193] CR/PR at Table IV-25.

[194] CR/PR at Table IV-25.

[195] CR/PR at Table IV-25.

[196] *Calculated from* CR/PR at Table IV-25 and C-1.

[197] *Calculated from* CR/PR at Table IV-25 and C-1.

Reported end-of-period inventories were *** short tons in 2021, *** short tons in 2022, and *** short tons in 2023; they were *** short tons in interim 2023 and *** short tons in interim 2024.[198] In interim 2024, end-of-period inventories equaled approximately *** percent of apparent U.S. consumption.[199]

The two Ukrainian producers reported producing other products on the same equipment and machinery used to produce rebar, and both responding Ukrainian producers confirmed that they could shift capacity to produce in-scope merchandise.[200] Ukrainian producers' practical overall capacity for production on the same equipment as in-scope production was *** short tons in 2021, *** short tons in 2022, and *** short tons in 2023; it was *** short tons in interim 2023 and *** short tons in interim 2024.[201] Its production of products on the same equipment as in-scope production was *** short tons in 2021, *** short tons in 2022, and *** short tons in 2023; it was *** short tons in interim 2023 and *** short tons in interim 2024. Its practical overall capacity utilization was *** percent in 2021, *** percent in 2022, *** percent in 2023, *** percent in interim 2023, and *** percent in interim 2024.[202] In 2023, Ukrainian producers' practical overall capacity of *** short tons was equivalent to *** percent of apparent U.S. consumption, and it possessed excess practical overall capacity of *** short tons, equivalent to *** percent of apparent U.S. consumption that year.[203] In interim 2024, Ukrainian producers' practical overall capacity of *** short tons was equivalent to *** percent of apparent U.S. consumption, and it possessed excess practical overall capacity of *** short tons, equivalent to *** percent of apparent U.S. consumption for that period.[204]

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[198] CR/PR at Table IV-27.

[199] CR/PR at Tables IV-27, C-1.

[200] CR/PR at Table II-3.

[201] CR/PR at Table IV-25. Reported installed overall capacity was *** short tons in 2021, *** short tons in 2022, and *** in 2023; it was *** in interim 2023 and *** in interim 2024. *Id.*

[202] CR/PR at Table IV-25. Reported installed overall capacity utilization was *** percent in 2021, *** percent in 2022, *** percent in 2023, *** percent in interim 2023, and *** percent in interim 2024. *Id.*

[203] *Calculated from* CR/PR at Table IV-25 and C-1. In 2023, the Ukrainian rebar industry's installed overall capacity of *** short tons was equivalent to *** percent of apparent U.S. consumption, and it possessed excess installed overall capacity of *** short tons, equivalent to *** percent of apparent U.S. consumption that year. *Id.*

[204] *Calculated from* CR/PR at Table IV-25 and C-1. In interim 2024, the Ukrainian rebar industry's installed overall capacity of *** short tons was equivalent to *** percent of apparent U.S. consumption, and it possessed excess installed overall capacity of *** short tons, equivalent to *** percent of apparent U.S. consumption for that period. *Id.*

Reported total shipments of rebar by the responding Ukrainian producers decreased from *** short tons in 2021, to *** short tons in 2022, before increasing to *** short tons in 2023; they were higher in interim 2024 at *** short tons than in interim 2023 at *** short tons.[205] Exports of rebar from the responding Ukrainian producers decreased overall during the period of review, from *** short tons in 2021, to *** short tons in 2022, and *** short tons in 2023; they were lower in interim 2024 at *** short tons than in interim 2023 at *** short tons.[206] The responding Ukrainian producers' exports as a share of total shipments of rebar ranged from *** percent to *** percent over the course of the period of review.[207]

GTA data for HS subheadings 7214.20, 7222.11, and 7222.30, which include in-scope rebar and small quantities of out-of-scope merchandise, indicate that global exports of rebar from Ukraine decreased from 705,918 short tons in 2021 to 156,764 short tons in 2022, and 131,335 short tons in 2023.[208] The largest export markets for rebar from Ukraine in 2023 were Iraq and Moldova.[209]

In the original investigations, subject imports from Ukraine undersold the domestic like product in 23 of 24 quarterly comparisons, with underselling margins ranging from 16.2 to 29.0 percent.[210] There were no price comparison data for subject imports from Ukraine in this review or in the prior reviews.[211]

As discussed above, the Ukrainian Respondents argue that the Commission should find that revocation of the order on rebar from Ukraine is not likely to have a discernible adverse impact on the domestic industry because the war with Russia has significantly reduced the Ukrainian industry's capacity and production, and has limited Ukrainian producers' ability to ship rebar by sea. The Ukrainian Respondents also argue that Ukrainian producers of rebar will likely focus most of their shipments to their domestic market because rebar will be essential for reconstruction efforts when the war with Russia ends.

The record establishes that Russia's invasion of Ukraine has disrupted Ukrainian production and negatively impacted Ukraine's ability to produce and export rebar. In 2022, AMKR idled its steel production from March to July, when it restarted rebar production at one

[205] CR/PR at Table IV-27.
[206] CR/PR at Table IV-27.
[207] CR/PR at Table IV-18.
[208] CR/PR at Table IV-30.
[209] CR/PR at IV-55, Table IV-30.
[210] Original Investigations Staff Report, INV-Y-087, EDIS Doc. 811369 at Appendix G.
[211] CR/PR at V-8.

unit of its plant.[212] In November 2022, AMKR halted all production due to electricity loss caused by Russian missile strikes on Ukraine's energy infrastructure.[213] In February 2023, available information indicates that AMKR was operating at 25 percent of its capacity utilization for rebar and other steel product production.[214] Since the beginning of the war, Kamet Steel has also reported having to curtail production.[215] AMKR also reported that its energy consumption has dropped sharply since the start of the war with consequent impacts on its ability to produce.[216] Both companies further reported that they have faced difficulties in shipping their products, including rebar, due to Russia's blockade of several Ukrainian ports.[217] Ukrainian producers have also reported damage to their production facilities from the war, water supply issues, and labor shortages because workers left for safer areas, joined Ukraine's military defense, or were killed or wounded by Russian attacks.[218]

Despite the hardships caused by Russia's invasion and the resulting war, the Ukrainian industry retains significant capacity to produce rebar as well as other steel products on the same equipment. Ukrainian producers' practical capacity for rebar has declined since 2021 but, as discussed above, its practical rebar capacity of *** short tons in 2023 was still equivalent to *** percent of apparent U.S. consumption that year, and its practical rebar capacity of *** short tons in interim 2024 was equivalent to *** percent of apparent U.S. consumption that period.[219] [220] Ukrainian producers reported rebar production of *** short tons in 2023 (equivalent to *** percent of apparent U.S. consumption that year) and *** short tons in

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[212] CR/PR at Table IV-23; *see also* AMKR Prehearing Br. at 1-4; AMKR Posthearing Br. at 2-5.

[213] CR/PR at Table IV-23; *see also* AMKR Prehearing Br. at 1-4; AMKR Posthearing Br. at 2-5, Attachment at 2-3, Exhibit 2.

[214] CR/PR at Table IV-26; *see also* AMKR Prehearing Br. at 4, 12.

[215] CR/PR at Table IV-23.

[216] *See* AMKR Posthearing Br., Attachment at 3 (asserting that severe declines and volatility of electricity supply correlates to reduced production of rebar) and Exhibit 1.

[217] CR/PR at Table IV-23; AMKR Prehearing Br. at 5-9; AMKR Posthearing Br. at 2, 4, Exhibit 2.

[218] CR/PR at Table IV-24; AMKR Prehearing Br. at 10-12.

[219] Ukraine's practical capacity for rebar was *** short tons in 2021, *** short tons in 2022, and *** short tons in 2023; it was *** short tons in interim 2023 and *** short tons in interim 2024. CR/PR at Table IV-25. Its production of rebar was *** short tons in 2021, *** short tons in 2022, and *** short tons in 2023; it was *** short tons in interim 2023 and *** short tons in interim 2024. *Id.*

[220] AMKR also reported that at its "peak month of July 2023," it produced *** short tons of rebar; although AMKR indicates that this figure is not sustainable due to ongoing war, it estimates that this would amount to about *** short tons annually. AMKR Posthearing Br., Response to Commission Questions at 2. Even assuming for the sake of argument that this is not sustainable, it shows that AMKR can quickly increase its rebar production beyond what it reported to be its practical rebar capacity figure.

interim 2024 (equivalent to *** short tons in interim 2024, which equaled approximately *** percent of apparent U.S. consumption.[221] Further, although the reported practical rebar capacity utilization rate was high in 2023, at *** percent and in interim 2024 at *** percent,[222] the record confirms that Ukrainian producers reported much lower capacity utilization rates on equipment that can also be used to produce rebar.[223] As discussed above, the Ukrainian industry's overall practical capacity was *** short tons in 2023 (equivalent to *** percent of apparent U.S. consumption that year), and it had reported an overall practical capacity utilization rate of *** percent, meaning it possessed excess practical overall capacity of *** short tons (equivalent to *** percent of apparent U.S. consumption that year).[224] Thus, although the Ukrainian industry reported high capacity utilization rates for its rebar production capacity, the record in these reviews indicates that it maintains considerable inventories of rebar and has substantial overall capacity as well as significant excess overall capacity that it could use to increase rebar production and exports upon revocation of the orders.

In addition, from 2022 to 2023, and in interim 2024 as compared to interim 2023, the Ukrainian industry's rebar capacity and production increased, as did its overall practical capacity and production. Both responding Ukrainian producers indicated that their practical capacity data accounted for disruptions caused by the war, including ***.[225] Thus, these data indicate that even in spite of the immense challenges caused by the war, including utility blackouts, air strikes, and labor shortages, the Ukrainian industry has been able to maintain

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[221] CR/PR at Tables IV-25, C-1.

[222] CR/PR at Table IV-25.

[223] Ukraine's capacity utilization for rebar was *** percent in 2023, *** percent in 2022, and *** percent in 2023; it was *** percent in interim 2023 and *** percent in interim 2024. CR/PR at Table IV-25.

[224] *Calculated from* CR/PR at Table IV-25 and C-1. In 2023, the Ukrainian rebar industry's installed overall capacity of *** short tons was equivalent to *** percent of apparent U.S. consumption, and it possessed excess installed overall capacity of *** short tons, equivalent to *** percent of apparent U.S. consumption that year. *Id.*

[225] CR/PR at IV-49. In its foreign producer questionnaire response, AMKR initially reported practical rebar capacity of *** short tons in 2021, *** short tons in 2022, *** short tons in 2023, and *** in January to June 2023 and 2024. CR/PR at IV-49 n.38. After the hearing, AMKR revised its practical capacity data to *** short tons in 2022, *** short tons in 2023, and *** short tons in interim 2023 and interim 2024. AMKR asserts that the revision reflected unscheduled downtimes due to ***. *Id.* Commission staff recognized this discrepancy and revised AMKR's 2023 practical capacity to match its actual production of *** short tons. CR/PR at IV-49.

Kamet reported that its practical rebar capacity considers "***." CR/PR at I-49.

significant capacity for and production of rebar and other steel products on the same equipment.[226] [227]

With respect to Ukrainian producers' access to maritime transport, although the majority of Ukraine's exports during the period of review were to nearby countries such as Moldova, Poland, Romania, and Lithuania, the record also shows shipments after the war began to more distant countries, such as Iraq and Senegal.[228] Indeed, according to GTA data, Iraq was the largest export market for Ukrainian rebar in 2023.[229] Available data show that Ukrainian merchant ships have returned to operating some shipping routes in the Black Sea Corridor.[230] In an interview in September 2024, Metinvest's CEO stated that since shipping routes reopened, "the Black Sea ports are pretty much working at the normal kind of way. Of course, you still have Russian attacks once in a while, but other than that, the operations are uninterrupted, and we've been able to ship our products via seaborne route since the end of 2023."[231] In September 2024, 2,577 ships sailed from Ukrainian ports carrying 46 million tons of

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[226] We note that AMKR provided a graph showing its monthly electricity consumption compared to its month rebar production from January 2021 to September 2024. *See* AMKR Posthearing Br., Exhibit 2. While the graph demonstrates that AMKR's electricity consumption and rebar production declined sharply from February to May 2022, in the beginning months of the war, the exhibit shows that AMKR's electricity consumption and production fluctuated in the subsequent months. AMKR highlights three months of decreased production: December 2022 to January 2023, June 2023, and January to February 2024. AMKR attributes the December 2022 to January 2023 and January to February 2024 declines to "seasonal electricity instability/restriction" and it attributes the decline in June 2023 to a war-related incident, the destruction of the Kakhovka dam. *Id*. Notably, AMKR's exhibit shows that rebar production was increasing at the time that the dam was destroyed and continued to increase despite the dam's destruction, with rebar production subsequently reaching its highest level since the war began in July 2023 at *** short tons. AMKR Posthearing Br., Response to Commission Questions at 2 and Exhibit 2.

In the same vein, the record indicates that Ukrainian rebar producers are able to produce significant quantities of rebar despite frequent air alerts. Indeed, AMKR was able to produce *** short tons of rebar despite evidence showing high levels of air alerts during that time. AMKR Posthearing Br., Response to Commission Questions at 2 and Exhibit 2.

[227] Based on the preceding discussion, Commissioner Johanson finds that there would be no likelihood of no discernible adverse impact on the domestic industry in the event of revocation of the order on subject imports from Ukraine. He does not join the remainder of this section.

[228] CR/PR at IV-30. The GTA data indicate that Ukraine exported 17,819 short tons of rebar to Senegal in 2022, and 2,011 short tons in 2023.

[229] CR/PR at IV-30.

[230] *See* CR/PR at IV-45.

[231] Annalisa Villa, INTERVIEW: Ukrainian steelmaker Metinvest looking for new opportunities: CEO, S&P Global (Sept. 27, 2024) (attached to RTAC Posthearing Br. as Exhibit 9).

grain and food, and 23 million tons of other goods, including metal exports.[232] Although these data do not specify the quantity of rebar, if any, that was shipped, they do suggest that Ukraine's ability to export products by maritime shipping is improving. Furthermore, the record indicates that from January to August 2024, Ukrainian companies, including ***,[233] exported 500,000 tons of pig iron to the United States.[234] AMKR acknowledges that some Ukrainian ports have reopened and that it exported rebar from these ports, albeit at lower volumes and higher costs than before the war.[235] Thus, the record evidence shows that the Ukrainian industry retains the ability to ship rebar exports through maritime routes.

Additionally, the record shows that the U.S. market has higher prices than other export markets available to Ukrainian producers, which makes it an attractive export destination and creates an incentive to maximize shipments to this market.[236] The AUVs of responding Ukrainian producers export shipments were $*** in 2021, $*** in 2022, and $*** in 2023, $*** in interim 2023, and $*** in interim 2024.[237] In contrast the AUVs of subject imports from Ukraine were $4,405 in 2021, $5,867 in 2022, $6,287 in 2023, $6,314 in interim 2023, and *** in interim 2024, and the AUVs of U.S. producers' U.S. shipments were $*** in 2021, $*** in 2022, $*** in 2023, $*** in interim 2023, and $*** in interim 2024.[238] Moreover, AMKR has recently stated that it intends to sell one million metric tons per year of steel long products, which includes rebar, to markets in North America.[239]

Finally, as to the argument that the Ukrainian industry will focus its shipments of rebar to its home market for the foreseeable future to aid in Ukraine's recovery efforts, the war with

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[232] CR/PR at IV-45.

[233] According to ***, provided by RTAC, ***. *See* RTAC Posthearing Br., Exhibit 8.

[234] *See* Vadim Kolisnichenko, *Ukraine increased pig iron exports by 11.8% m-m in August*, GMK (Sept. 16, 2024), attached to RTAC Prehearing Br. as Exhibit 30.

[235] AMKR reports that prior to the war, ***. AMKR Posthearing Br. at Exhibit 2.

[236] CR/PR at D-5. AMKR's CEO also testified that rebar prices in the United States tend to be higher in the United States than in other markets, although he also testified that AMKR would incur higher costs in trying to ship products to the United States. Hearing Tr. at 203 (Longobardo). Notably, however, the AUVs of subject imports from Ukraine and U.S. producers' U.S. shipments are substantially higher than the AUVs of responding Ukrainian producers export shipments to other markets, even with the higher reported average shipping costs added, discussed above.

[237] CR/PR at Table IV-27.

[238] CR/PR at Table IV-27; CR/PR at Table C-1.

[239] Dominic Culverwell, *Ukraine's steel industry is maxed out as Russia's war grinds on*, Kyiv Independent (Sept. 2, 2024), attached to RTAC Prehearing Br. as Exhibit 2 ("ArcelorMittal's old market, largely the Middle East, Africa, and Asia, is no longer an option. Instead, new markets have opened up in Europe and North America and Longobardo hopes to sell 1 million metric tons of products to each region this year.").

Russia is ongoing and there is no certainty as to when full-scale reconstruction efforts will begin.[240] The Government of Ukraine itself acknowledges that exports will be an important source of revenue for the Ukrainian industry in the foreseeable future, and it specifically confirms the attractiveness of the U.S. market.[241]

In light of the Ukrainian industry's production capacity, its reported inventories, its ability to shift production from out-of-scope products to subject merchandise, demonstrated ability to produce and export rebar and other steel products despite the ongoing war, and the attractiveness of the U.S. market, we find that revocation of the antidumping duty order on rebar from Ukraine is not likely to have no discernible adverse impact on the domestic industry in the event of revocation.

2. 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.[242] Only a "reasonable overlap" of competition is required.[243] In five-year reviews, the

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[240] *See, e.g.*, RTAC Prehearing Br., Exhibit 2, Dominic Culverwell, Ukraine's steel industry is maxed out as Russia's war grinds on, Kyiv Independent (Sept. 2, 2024) ("There is very little domestic demand for steel as war continues to ravage the country. Reconstruction remains a distant prospect for many Ukrainians.").

[241] *See* Gov. of Ukraine Posthearing Br. at 18. Indeed, the Government of Ukraine contends that "revocation of the antidumping duty orders would have a positive impact on Ukrainian exporters, as this option would help sustain the country's metallurgical industry, increase revenue to the state budget, guarantee jobs for people in Ukraine, and currency workflow to the country." *Id.* It also argued that "the ability of Ukrainian metallurgical enterprises to export is crucial not only for their continued survival and operational viability but also for the broader economic and national security of Ukraine. Successfully maintaining and expanding export activities is essential for these enterprises to remain competitive and financially stable, which directly impacts that their capacity to contribute to the national economy." Gov. of Ukraine Prehearing Br. at 15-16.

[242] 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).

[243] *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*

(Continued…)

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.[244]

Fungibility. In the original investigations and prior reviews, the Commission found a high degree of substitutability between imports from each subject country and the domestic like product.[245] During the original investigations, the rebar industries in the United States and all subject countries sold rebar meeting ASTM standards in the U.S. market.[246] A majority of market participants in the original investigations and prior reviews found imports from the various subject sources to be interchangeable.[247] During the second reviews, many market participants reported rebar made in each of the subject countries to be always interchangeable with rebar made in the United States and with rebar made in each of the other subject countries.[248] In those reviews, some purchasers expressed a preference for U.S. products, but others reported that as long as products met ASTM standards, they were interchangeable with rebar from other countries.[249] In the third reviews, the Commission found that there was no new information in the record indicating that the fungibility of subject imports with each other or the domestic like product had changed.[250]

In these reviews, there is no new information on the record to indicate that the fungibility of subject imports with each other or the domestic like product has changed.[251] All responding U.S. producers, and most purchasers, reported that subject imports from each subject country were either always or frequently interchangeable with each other as well as

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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).

[244] *See generally*, *Chefline Corp. v. United States*, 219 F. Supp. 2d 1313, 1314 (Ct. Int'l Trade 2002).

[245] *Original Determinations I*, USITC Pub. 3425 at 15 and 26; *First Reviews*, USITC Pub. 3933 at 15–16; *Second Reviews*, USITC Pub. 4409 at 14; *Third Reviews*, USITC Pub. 4838 at 15.

[246] *Original Determinations I*, USITC Pub. 3425 at 15 and 26.

[247] *Original Determinations I*, USITC Pub. 3425 at 15 and 26; *First Reviews*, USITC Pub. 3933 at 15–16; *Second Reviews*, USITC Pub. 4409 at 14.

[248] *Second Reviews*, USITC Pub. 4409 at 14.

[249] *Second Reviews*, USITC Pub. 4409 at 14.

[250] *Third Reviews*, USITC Pub. 4838 at 15.

[251] CR/PR at I-16 to I-18.

with the domestic like product.[252] Furthermore, witnesses at the hearing, including representatives of domestic producers and the CEO of AMKR, testified that rebar is a commodity-like product sold almost exclusively on the basis of price.[253] For these reasons, we find that there is a high degree of fungibility between and among subject imports from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine, and the domestic like product, for purposes of cumulation.[254]

Geographic Overlap. In the original investigations and first and second five-year reviews, the Commission found a likely geographic overlap on the basis that many domestic producers sold their products nationwide and importers of subject merchandise were located throughout the United States.[255] In the third five-year reviews, the Commission found that the domestic industry had production facilities throughout the United States. It also found that subject imports from China entered the U.S. market through Gulf, East Coast, or Great Lakes points of entry; subject imports from Poland entered through the Gulf and South Atlantic ports; and subject imports from Ukraine entered through Gulf ports.[256]

In the current reviews, the domestic industry maintains production facilities throughout the United States and sells to all regions in the United States.[257] In 2023, subject imports from China entered the U.S. market through all four borders of entry; subject imports from Poland entered through the north border of entry; subject imports from Ukraine entered through all four borders of entry.[258]

Channels of Distribution. In the original investigations and first and second reviews, the Commission found that rebar, regardless of source, was sold to distributors, fabricators, and

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[252] CR/PR at II-25. *** U.S. producers indicated for all country pair comparisons that rebar is always interchangeable. CR/PR at Table II-15. *** of *** U.S. purchasers indicated for all country pair comparisons that rebar is always interchangeable, with the exception of the comparison of rebar from the United States and "Other" countries. CR/PR at Table II-16. For that country comparison, *** purchasers indicated that rebar is frequently interchangeable, and *** purchaser indicated that it is sometimes interchangeable. *Id.*

[253] Hearing Tr. at 13 (Price); Hearing Tr. at 31 (Simpson); Hearing Tr. at 205 (Longobardo).

[254] Commissioner Johanson joins the majority's discussion of the likelihood of a reasonable overlap of competition, but excludes from consideration subject imports from Latvia, which he has found would likely have no discernible adverse impact on the domestic industry if the order was revoked. *See* Separate and Dissenting Views of Commissioner David S. Johanson.

[255] *Original Determinations I*, USITC Pub. 3425 at 26 (national industry analysis); *First Reviews*, USITC Pub. 3933 at 17; *Second Reviews*, USITC Pub. at 14.

[256] *Third Reviews*, USITC Pub. 4838 at 16.

[257] *See* CR/PR at Table I-15.

[258] CR/PR at Table IV-3.

end users.[259] In the third reviews, the Commission found that there was no new information in the record indicating that the channels of distribution of rebar in the U.S. market had changed or were likely to change upon revocation of the orders.[260]

In the current reviews, domestic producers sold most of their shipments to fabricators (ranging from *** to *** percent between 2021 and 2023). Domestic producers also sold to distributors (ranging from *** to *** percent of U.S. shipments between 2021 and 2023), and to end users (ranging from *** to *** percent between 2021 and 2023).[261] The record does not contain any data regarding the channels of distribution of subject imports during the period of review. Nonsubject imports were sold *** during each year of the period of review.[262]

Simultaneous Presence in Market. In the original investigations, the Commission found that the domestic like product and rebar imported from each subject country were present in the U.S. market throughout the POI. In the subsequent five-year reviews, the Commission found that imports from some subject countries had been absent from the U.S. market, or had been present only sporadically, due to the disciplining effects of the orders.[263]

In these reviews, imports from Belarus, Indonesia, Latvia, and Moldova were not present in any month during the period of review. Imports of rebar from China were reported in 77 of 78 months, imports of rebar from Ukraine were reported in 72 of 78 months, and imports from Poland were reported in 8 of 78 months.[264] Domestically produced rebar was present in the U.S. market throughout the period of review.[265]

Conclusion. The record in these reviews indicates that there have been no significant changes in the considerations that led the Commission to conclude in the original investigations that there was a reasonable overlap of competition between and among subject imports from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine, and the domestic like product. In particular, the domestic like product and subject imports remain highly fungible, as both

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[259] *First Reviews*, USITC Pub. 3933 at 16; *Second Reviews*, USITC Pub. at 14.

[260] *Third Reviews*, USITC Pub. 4383 at 22.

[261] CR/PR at Table II-1.

[262] CR/PR at Table II-1.

[263] *Original Determinations I*, USITC Pub. 3425 at 16 (regional industry analysis) and 27 (national industry analysis); *First Reviews*, USITC Pub. 3933 at 17 (noting during first period of review, China, Poland and Latvia were only sources of subject imports) *Second Reviews*, USITC Pub. 4409 at 14 (noting China was only source of subject imports during second period of review); *Third Reviews*, USITC Pub. 4838 at 16 (subject imports from China, Poland, and Ukraine were present during third period of review).

[264] CR/PR at IV-9.

[265] CR/PR at Table V-4.

RTAC and AMKR agree that rebar is similar to a commodity. Subject imports from China, Ukraine, and Poland, as well as the domestic like product, were present in the U.S. market during the period of review, and they shipped through similar channels of distribution and overlapped in terms of geographic markets with each other and the domestic like product.

Although subject imports from Belarus, Indonesia, Latvia, and Moldova were absent from the U.S. market during the period of review, likely due to the disciplining effects of the orders, the record supports that upon revocation, subject imports from each source and the domestic like product would likely be shipped through similar channels of distribution, overlap in terms of geographic markets, and be simultaneously present in the U.S. market, as the Commission has found in the prior reviews. In light of these considerations, we find that there would likely be a reasonable overlap in competition between and among subject imports from all seven subject countries and the domestic like product if the orders were revoked.

3. Likely Conditions of Competition[266]

We also find that the record in these reviews does not indicate that there would likely be significant differences in the conditions of competition in the U.S. market between subject imports from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine if the orders were revoked. As discussed in section III.D.1 above, in the original investigations, each of these subject sources exported rebar to the United States that, undersold the domestic like product in the majority of comparisons. The record indicates that the orders had a disciplining effect on exports from subject sources with exports declining from each of the countries since the imposition of the orders. We have also found that subject producers in all seven countries under review have an incentive to compete in the U.S. market and the ability to export substantial quantities of rebar. As discussed in section III.D.2, we have also found that there would likely be a reasonable overlap of competition between and among imports from each subject country, including those from Ukraine, and the domestic like product if the orders were revoked.

The Ukrainian Respondents have not explained how, in the event of revocation of the orders, rebar from Ukraine would compete under different conditions in the United States than subject imports from the other countries under review.[267] Both AMKR and the Government of

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[266] Commissioner Johanson does not join the remainder of section III. *See* Separate and Dissenting Views of Commissioner David S. Johanson.

[267] AMKR asserted that the Commission should decline to cumulate imports from Ukraine with subject imports from the other countries under review because subject imports from Ukraine would (Continued…)

Ukraine explain the significant challenges that Russia's invasion has caused Ukrainian producers, particularly with respect to production and exports. While we have acknowledged that the ongoing war has affected the Ukrainian industry's production and export volumes of rebar, we also have found that the rebar industries in each subject country, including Ukraine, exported significant volumes of rebar to the global market during the period of review. Furthermore, we have found that rebar is a commodity-like product sold on the basis of price,[268] and producers in all subject countries produce rebar to the ASTM standards that domestic purchasers require.[269] Thus, nothing in the record indicates that rebar from Ukraine would compete under different conditions of competition from the other subject countries, or the domestic like product, once it enters the United States.[270]

Accordingly, we find that subject imports from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine would likely compete under similar conditions of competition in the United States if the orders were to be revoked.

E. Conclusion

In sum, we determine that if the orders were revoked, subject imports from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine are not likely to have no discernible adverse impact on the domestic industry. We also find that there would likely be a reasonable overlap of competition between and among subject imports from each country and the domestic like product if the orders were revoked. Finally, we find that subject imports from each subject country would be likely to compete in the U.S. market under similar conditions of competition should the orders be revoked. Accordingly, we exercise our discretion to cumulate subject imports from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine for purposes of our analysis in these reviews.

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have no discernible adverse impact on the U.S. industry. AMKR Posthearing Br. at 1. AMKR did not argue that the Commission should decline to cumulate imports from Ukraine because they would compete under differing conditions of competition in the U.S. market compared to subject imports from each other country under review. *Id*.

[268] *See* Hearing Tr. at 46 (Webb) ("Rebar is a commodity product and we all work on extraordinarily tight margins."); *see also* Hearing Tr. at 205 (Longobardo) ("The standard rebars, yes, they are a commodity product.").

[269] *See* CR/PR at II-16.

[270] Rather, the record indicates that, even if shipments of rebar from Ukraine were delayed, rebar is a highly substitutable, commodity-like product that would compete under the same conditions of competition in the U.S. market once it arrives. *See, e.g.*, *Hearing* Tr. at 22, 80-81 (Spicer), 61 (Price), 80 (Goettl), 80-81 (Webb), 207-8 (Longobardo).

IV. Revocation of the Antidumping 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."[271] 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."[272] Thus, the likelihood standard is prospective in nature.[273] The U.S. Court of International Trade has found that "likely," as used in the five-year review provisions of the Act, means "probable," and the Commission applies that standard in five-year reviews.[274]

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

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[271] 19 U.S.C. § 1675a(a).

[272] 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.

[273] 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.

[274] *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."[275] 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."[276]

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."[277] 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).[278] 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.[279]

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.[280] 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

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[275] 19 U.S.C. § 1675a(a)(5).

[276] 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*.

[277] 19 U.S.C. § 1675a(a)(1).

[278] 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings. *See* Commerce I & D Memo

[279] 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

[280] 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.[281]

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.[282]

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.[283] 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.[284]

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

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[281] 19 U.S.C. § 1675a(a)(2)(A-D).

[282] *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.

[283] 19 U.S.C. § 1675a(a)(4).

[284] 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."[285] The following conditions of competition inform our determinations.

1. The Original Investigations and Prior Reviews

In the original investigations and prior reviews, the Commission found the following competitions relevant to its analysis: (1) rebar is primarily used to reinforce concrete structures, and demand for rebar is tied to construction trends; (2) there are at best limited substitutes for rebar; (3) rebar, which is produced to standard specifications, is generally regarded as a commodity, with rebar of the same grade and dimension interchangeable regardless of origin; (4) differing rebar sizes and lengths tend to predominate in different uses, with smaller sizes used in light construction applications (*e.g.*, in residences, swimming pools, patios, and walkways) and larger sizes and longer lengths used exclusively in heavy construction applications; (6) domestic rebar and imported rebar are sold through distributors, service centers, and fabricators; (7) scrap raw material costs and the cost to transport rebar are important considerations in the final cost of the product; and (8) price is an important factor in purchasing decisions.[286]

As to demand, apparent U.S. consumption of rebar increased overall during the original investigations, and increased almost every year during the period covered by the first reviews. After a substantial decline following the 2008 economic downturn, rebar demand recovered steadily, but not completely, during the second review period.[287] The domestic industry continued to maintain the predominant share of the U.S. market during the first and second reviews, as it had during the original investigations, but the rate of industry consolidation and acquisition slowed in the second reviews.[288] Nonsubject imports' share of the U.S. market grew between the original investigations and first reviews but generally declined during the second review period.[289] In the third reviews, apparent U.S. consumption was *** short tons in 2017,

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[285] 19 U.S.C. § 1675a(a)(4).

[286] *Original Determinations I*, USITC Pub. 3425 at 18–19 and 27; *First Reviews*, USITC Pub. 3933 at 24–30; *Second Reviews*, USITC Pub. 4409 at 18–19, 21–22, and 26; *Third Reviews*, USITC Pub. 4838 at 23.

[287] *Original Determinations I*, USITC Pub. 3425 at 18; *First Reviews*, USITC Pub. 3933 at 25; *Second Reviews*, USITC Pub. 4409 at 20.

[288] *Original Determinations I*, USITC Pub. 3425 at 20; *First Reviews*, USITC Pub. 3933 at 27–28; *Second Reviews*, USITC Pub. 4409 at 20.

[289] *First Reviews*, USITC Pub. 3933 at 28; *Second Reviews*, USITC Pub. 4409 at 21.

which was higher than the last year of the second reviews and each year during the original investigations, but below the peak of the first reviews.[290]

As to supply, in 2000, the final year of the original investigations, the domestic like product accounted for *** percent of apparent U.S. consumption, and subject merchandise accounted for *** percent of apparent U.S. consumption.[291] The domestic industry supplied between 75.1 and 88.1 percent of the U.S. market during the first reviews and between 80.9 and 92.5 percent during the second reviews.[292] The market share of subject imports in the first reviews declined from 2.3 percent in 2001 to 0 percent in 2006 and was 0 percent or less than 0.05 percent each year during the second reviews.[293] In the third reviews, the domestic industry was the largest source of supply in 2017, accounting for *** percent of apparent U.S. consumption.[294] In 2017, subject imports accounted for *** percent of apparent U.S. consumption in 2017, and nonsubject imports accounted for *** percent of apparent U.S. consumption.[295]

2. Demand Conditions

In the current reviews, the main drivers of demand for rebar remain the same as in the prior proceedings. Rebar is primarily used to reinforce concrete structures, and demand for rebar is derived from demand trends in the construction industry.[296]

Several U.S. producers indicated that demand declined at the beginning of the period of review due to COVID-19, began to rebound in 2021, and then remained flat from 2022 through the remainder of the period of review.[297] Most U.S. purchasers anticipate demand in the United States market to fluctuate up, while U.S. producer and importer responses regarding demand projections were mixed.[298] According to the Portland Cement Association, U.S. rebar

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[290] *Third Reviews Confidential Opinion*, EDIS Doc. 811397 at 31. Apparent U.S. consumption was *** short tons in 2000, 9.9 million short tons in 2007, and 7.0 million short tons in 2012. CR/PR at Table I-3.

[291] *See* CR/PR at Table I-3.

[292] CR/PR at Table I-3.

[293] CR/PR at Table I-3.

[294] *Third Reviews Confidential Opinion*, EDIS Doc. 811397 at 33.

[295] *Third Reviews Confidential Opinion*, EDIS Doc. 811397 at 33.

[296] CR/PR at II-9.

[297] CR/PR at Table III-3.

[298] CR/PR at II-11. One U.S. producer indicated that it anticipates demand to steadily increase, while one U.S. producer expects demand to fluctuate down. *** importer expects demand to steadily increase, while *** importers do not expect demand to change. *** U.S. purchase expects demand to steadily increase, *** U.S. purchasers expect demand to fluctuate up, *** U.S. purchasers do not expect demand to change, and *** U.S. purchasers expect demand to fluctuate down. CR/PR at Table II-6.

consumption is projected to *** in 2024, and increase by *** percent in 2025 and *** percent in 2026.[299]

In these reviews, apparent U.S. consumption decreased by *** percent from 2021 to 2023, from *** short tons in 2021 to *** short tons in 2022, and to *** short tons in 2023.[300] Apparent U.S. consumption in interim 2024, at *** short tons, was *** percent lower than in interim 2023, at *** short tons.[301]

3. Supply Conditions

During the current period of review, the domestic industry was the largest supplier to the U.S. market, although its share of apparent U.S. consumption decreased irregularly from 2021 to 2023. Specifically, the industry's share of apparent U.S. consumption decreased *** percentage points from 2021 to 2023, from *** percent in 2021, to *** percent in 2022, and then increased to *** percent in 2023. The domestic industry's share of apparent U.S. consumption was *** percent higher in interim 2024, at *** percent, as opposed to *** percent in interim 2023.[302]

The domestic industry consists primarily of seven domestic producers,[303] and experienced several changes during the period of review. In March 2020, *** reported idling its ***, and that same year, *** ceased operations at its *** facility.[304] In 2020, *** opened a *** and in 2023, and *** began production ***.[305] *** expanded capacity at its *** mill, *** invested in ***, *** expanded capacity at its *** mill, and *** expanded capacity at its ***.[306]

The domestic industry's practical rebar capacity increased *** percentage points from 2021 to 2023, from *** short tons in 2021, to *** short tons in 2022, and to *** short tons in 2023; it was *** short tons in interim 2024 compared to *** short tons in interim 2023, an increase of *** percentage points.[307] Rebar production decreased slightly by *** percentage

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[299] CR/PR at II-9. Regarding the war in Ukraine's effect on demand, three of 7 responding U.S. producers, all three responding imports, *** of 17 purchasers, and *** foreign producers reported that it had an impact. However, all 6 responding U.S. producers, all 3 U.S. importers, *** of 17 purchasers, and *** foreign producers reported that they did not anticipate the war in Ukraine to cause changes or issues in the U.S. market in the foreseeable future. CR/PR at II-12.

[300] CR/PR at Table I-18, Table C-1.

[301] CR/PR at Table I-18, Table C-1.

[302] CR/PR at Table I-18, Table C-1.

[303] CR/PR at Table I-15.

[304] CR/PR at Table III-2.

[305] CR/PR at Table III-2.

[306] CR/PR at Table III-2.

[307] CR/PR at Table III-4, Table C-1.

points from *** short tons in 2021, to *** short tons in 2022, and to *** short tons in 2023; production was *** short tons in interim 2024 compared to *** short tons in interim 2023, a decrease of *** percentage points.[308] Rebar capacity utilization decreased *** percentage points from 2021 to 2023, from *** percent in 2021, to *** percent in 2022, and to *** percent in 2023; it was *** percent in interim 2024 compared to *** percent in interim 2024, a decrease of *** percentage points.[309] All seven responding domestic producers reported constraints in their manufacturing capacity during the period of review.[310]

Cumulated subject imports were the smallest supply source throughout the period of review, accounting for *** percent of apparent U.S. consumption in 2021, and *** percent for the rest of the period of review.[311]

Nonsubject imports were the second largest source of supply throughout the period of review and their share of apparent U.S. consumption by quantity increased overall by *** percentage points from 2021 to 2023, from *** percent in 2021, to *** percent in 2022] and decreasing to *** percent in 2023.[312] Nonsubject imports' share of apparent U.S. consumption was lower in interim 2024 at *** percent compared to *** percent in interim 2023, a difference of *** percentage points.[313] The largest sources of nonsubject imports were Turkey, Mexico, and Algeria.[314]

4. Substitutability and Other Conditions

As in the prior proceedings, we find that there remains a high degree of substitutability between subject imports and domestically produced rebar. All domestic producers and most U.S. purchasers reported that rebar from all the United States is always interchangeable with rebar from each subject country.[315] Most purchasers reported that domestically produced and

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[308] CR/PR at Table III-4, Table C-1.

[309] CR/PR at Table III-4, Table C-1.

[310] CR/PR at III-5. One U.S. producer reported supply constraints due to labor and some domestic producers reported supply constraints due to equipment, but the majority of domestic producers reported that production constraints were related to weak demand and low prices in the U.S. market. CR/PR at Table III-4.

[311] CR/PR at Table I-18, Table C-1.

[312] CR/PR at Table I-18, Table C-1.

[313] CR/PR at Table I-18, Table C-1.

[314] CR/PR at II-8.

[315] CR/PR at Tables II-15, II-16. All *** responding U.S. producers reported that rebar is always interchangeable regardless of source. With the exception of the comparison of rebar from the United States with rebar from other sources, in which one purchaser rated the products as "sometimes" interchangeable, all responding purchasers reported that rebar from all country pairs was always or (Continued…)

subject rebar were comparable across sources with respect to 16 factors that influence purchasing decisions, except for price, which most responding producers indicated was inferior for domestically produced rebar.[316] The factors contributing to finding a high degree of substitutability include that rebar from all sources always meets minimum quality specifications and is produced to ASTM standards.[317]

We also find that price is an important factor in purchasing decisions for rebar. All responding U.S. producers indicated that factors other than price were never significant in their purchasing decisions, while most U.S. purchasers reported that factors other than price were sometimes or never significant.[318] Purchasers were asked to rate the importance of 16 factors in their purchasing decisions, and more than half of responding purchasers rated the following factors as very important: price and quality meets industry standards (*** firms each), ability to meet specified grades/specifications and availability (*** purchasers), reliability of supply ***, product consistency ***, and delivery time ***.[319] Furthermore, as discussed above, both RTAC and AMKR agree that rebar is a commodity-like product sold primarily on the basis of price.[320]

U.S. importers reported that *** percent of their commercial shipments were produced to order, with lead times averaging *** days.[321] The remaining *** percent of their commercial shipments came from inventories, with lead times averaging *** days.[322] *** were available for subject imports. U.S. importers reported that *** percent of their nonsubject commercial shipments were produced to order, with lead times averaging *** days.[323]

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frequently interchangeable. *Id*. at Table II-16. The sole responding importer, ***, reported that rebar can always be used interchangeably across sources.

[316] CR/PR at II-21; Table II-14.

[317] CR/PR at II-16. In the prior proceedings, the Commission has found that domestic producers and producers in all subject countries produced and sold rebar meeting the ASTM standards. *See Original Determinations I*, USITC Pub. 3425 at 15 (regional industry analysis) and 26 (national industry analysis; *see also Third Reviews*, USITC Pub. 4838 at 15-16.

[318] CR/PR at II-28. The sole responding importer, *** reported the significance of differences other than price between source, and reported that they were sometimes important. *Id*.

[319] CR/PR at Table II-18.

[320] *See* Hearing Tr. at 46 (Webb); Hearing Tr. at 205 (Longobardo).

[321] CR/PR at II-19.

[322] CR/PR at II-19.

[323] CR/PR at II-19.

Domestic producers sold primarily to fabricators, but also sold significant volumes of their shipments to distributors and end users.[324] Imports of nonsubject imports sold *** percent of their U.S. shipments to distributors, and ***.[325]

*** of 17 responding purchasers reported that they require their suppliers to undergo a certification or qualification process.[326] Six purchasers reported that they require compliance with ASTM standards, and two purchasers responded that suppliers could meet ASTM standards through a mill test report. Purchasers reported that the time to qualify a new supplier ranged from 30 to 90 days, and that no domestic or foreign suppliers had failed to qualify, or lost qualified status, since 2018.[327]

Rebar is generally produced from steel scrap, which is the largest component of the total cost of goods sold ("COGS"). Raw material costs as a share of total COGS declined by *** percentage points from 2021 to 2023,[328] decreasing from *** percent in 2021, to *** percent in 2022, and to *** percent in 2023.[329] They were *** percent of the domestic industry's COGS in interim 2024, compared to *** percent of COGS in interim 2023.[330] On a per unit basis, raw material costs decreased irregularly overall by *** percent from 2021 to 2023, from $*** per short ton in 2021, to $*** in 2022, and $*** in 2023.[331] Raw material costs were lower in interim 2024, at $*** per short ton, than in interim 2023 at $***.[332]

Effective March 23, 2018, rebar originating in Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine is subject to an additional 25 percent *ad valorem* duty under section 232 of the Trade Expansion Act of 1962, as amended ("Section 232"). The Section 232 duties on steel articles original in Ukraine were suspended, effective June 1, 2022, to June 1, 2025.[333] Effective September 1, 2019, rebar originating in China was subject to an additional 15

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[324] CR/PR at II-3. In 2023, domestic producers sold *** percent of their U.S. shipments to distributors, *** percent to fabricators, and *** percent to end users. CR/PR at Table II-1.

[325] CR/PR at II-3.

[326] CR/PR at II-19.

[327] CR/PR at II-19.

[328] CR/PR at Table III-12.

[329] CR/PR at Table III-11.

[330] CR/PR at Table III-11.

[331] CR/PR at Table III-13.

[332] CR/PR at Table III-13. Steel billet price indices decreased overall between January 2018 and July 2024. The Black Sea steel billet index decreased irregularly by *** percent from January 2018 to July 2024, reaching a peak during March 2022 that was *** percent higher in January 2018. CR/PR at V-1. Tangshan billet prices reached a peak in May 2021 before fluctuating downwards, to end at *** percent lower than in January 2018. CR/PR at V-1.

[333] CR/PR at I-21.

percent *ad valorem* duty under section 301 of the Trade Act of 1974 ("Section 301"). Effective February 14, 2020, the Section 301 duty for rebar from China was reduced to 7.5 percent.[334]

Most market participants reported that the Section 301 duties did not have an impact on the U.S. rebar market in 2023, or that they did not know if the duties had an impact.[335]

A majority of market participants reported that the Section 232 duties had an impact on the U.S. rebar market in 2023. Firms that reported that the Section 232 duties had an impact on the U.S. market reported that rebar prices increased due to the imposition the tariffs, with one purchaser reporting that the duties increased rebar prices by 25 percent immediately.[336]

C. Likely Volume of Cumulated Subject Imports

1. The Original Investigations and Prior Reviews

In the original investigations, the Commission found the volume of cumulated subject imports from Belarus, Indonesia, Korea, Latvia, Moldova, Poland, and Ukraine to be significant. Noting that the cumulated volume increased between 1998 and 1999, it found that the decline in the cumulated volume between 1999 and 2000 to be attributable to the June 2000 filing of the petitions.[337] The Commission found that subject imports from China entered the U.S. market very rapidly, despite their relatively late appearance in the market in the original investigation period.[338]

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[334] CR/PR at I-21.

[335] CR/PR at II-2. Three U.S. producers reported that the Section 301 duties had an impact on the U.S. market for rebar, while four reported that they did not. One importer reported that the 301 tariffs had an impact, while two reported that they did not know. *** purchasers reported that section 301 tariffs had an impact, while *** reported no impact, and *** reported that they did not know. The purchasers reporting an impact indicated that prices increased. U.S. producers and purchasers reported that, due to the existing antidumping duties, there was not much Chinese rebar in the U.S. market before imposition of the Section 301 tariffs. One purchaser, ***, reported that it was difficult to isolate the impact of the 301 tariffs due to the COVID-19 pandemic.

[336] CR/PR at II-2. Four U.S. producers, all three importers, and *** purchasers reported that the Section 232 duties had an impact, while one U.S. producer and *** purchasers reported no impact, and one purchaser reported that it did not know. *Id*.

[337] In the original investigations, the Commission cumulated imports from Korea with other subject imports. *Original Determinations I,* USITC Pub. 3425 at 15–16 (regional industry analysis) and 25–27 (national industry analysis). Imports from Korea are no longer subject to an order.

[338] *Original Determinations II*, USITC Pub. 3440 at 8 (regional industry analysis) and 12 (national industry analysis). In the original investigations, three Commissioners found that cumulated subject imports from Belarus, Indonesia, Korea, Latvia, Moldova, Poland, and Ukraine in the national market were *** short tons in 1998, *** short tons in 1999, and *** short tons in 2000.[338] Subject imports' share of apparent U.S. consumption was *** percent in 1998, decreased to *** percent in 1999, and (Continued…)

In the first reviews, the Commission found that if the orders were revoked, subject imports were likely to increase significantly based on the substantial increase in cumulated subject imports during the original investigations, subject producers' reliance on export markets, their substantial cumulated export volumes, their substantial cumulated production capacity, and the attractiveness and accessibility of the U.S. market.[339]

In the second reviews, the Commission found that the volume of cumulated subject imports would be significant relative to production and consumption in the United States if the orders were revoked, based on the substantial increase in cumulated subject imports during the original investigations, subject producers' significant cumulated capacity, their substantial unused capacity, their export orientation, their ability to shift exports between markets, weak demand in their domestic or other existing markets, and the attractiveness and accessibility of the U.S. market.[340]

In the third reviews, the Commission found that the volume of cumulated subject imports would be significant, both in absolute terms and relative to U.S. consumption, if the orders were revoked, based on the cumulated subject industries' substantial production capacity, export orientation, and the attractiveness of the U.S. market. The Commission also considered that prices for rebar were generally higher in the United States than other markets, and trade measures in third countries, including antidumping duty orders, on rebar from Belarus, China, Indonesia, and Ukraine, would provide further incentive for producers to export subject merchandise to the United States upon revocation.[341]

*** percent in 2000. *Original Determinations II*, Confidential Opinion, EDIS Doc. 811381 at 38. The three Commissioners who analyzed material injury on a national basis did not cumulate subject imports from China. Three Commissioners found that cumulated subject imports from Belarus, Indonesia, Korea, Latvia, Moldova, Poland, and Ukraine in the regional market were *** short tons in 1998, *** short tons in 1999, and *** short tons in 2000. *Id*. at 26. Cumulated subject imports' share of apparent U.S. consumption in the regional market was *** percent in 1998, *** percent in 1999, and *** percent in 2000. In 2000, the cumulated volume of imports from countries subject to the current reviews was *** short tons, which accounted for *** percent of apparent U.S. consumption that year. CR/PR at Table I-3.

[339] *First Reviews*, USITC Pub. 3933 at 30–34.

[340] *Second Reviews*, USITC Pub. 4409 at 24–25.

[341] *Third Reviews*, USITC Pub. 4838 at 25-26.

2. The Current Reviews[342]

Cumulated subject imports maintained a presence in the U.S. market throughout the period of review, though at much lower levels than during the original investigations. We find that the limited presence of cumulated subject imports in the U.S. market during the period of review, which continues the trend from prior reviews, is likely due to the disciplining effects of the orders. Specifically, cumulated subject import volumes were 4,803 short tons in 2021, decreased to 4,093 short tons in 2022, and decreased to 1,865 short tons in 2023; they were *** short tons in interim 2024 compared to 1,315 short tons in interim 2023.[343] Cumulated subject imports' share of apparent U.S. consumption remained flat throughout the POR, at *** percent in 2021, *** percent in 2022, and *** percent in 2023; *** percent in interim 2023 and *** percent in interim 2024.[344]

There is limited information on the record regarding capacity, production, and shipments by subject producers during the period of review because we did not receive questionnaire responses from any subject producers in Belarus, China, Indonesia, Latvia, or Moldova, and we received questionnaire responses from only one subject producer in Poland and two subject producers in Ukraine. Nevertheless, the available information on the record shows that cumulated subject producers have the ability and incentive to export significant volumes of subject merchandise to the United States in the event of revocation of the orders. Based on the questionnaire responses from only three responding subject producers, cumulated subject producers had both significant production capacity and excess capacity when compared to apparent U.S. consumption. Responding subject producers' rebar capacity decreased overall from 2021 to 2023, decreasing from *** short tons in 2021 to *** short tons in 2022, and increasing slightly to *** short tons in 2023; it was *** short tons in interim 2024 compared to 834,781] short tons in interim 2023.[345] Responding subject producers in Poland and Ukraine reported rebar capacity utilization rates of *** percent in 2021, *** percent in

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[342] Commissioner Johanson joins the following section of the majority's views on likely volume but cumulates only subject imports from Belarus, China, Indonesia, Moldova, and Poland in his analysis.

[343] CR/PR at Table C-1. For Commissioner Johanson's analysis, cumulated subject imports were 511 short tons in 2021, decreased to 179 short tons in 2022, and increased to 1,060 short tons in 2023; they were *** short tons in interim 2024 compared to 550 short tons in interim 2023. *Id*.

[344] CR/PR at Table C-1. For Commissioner Johanson's analysis, cumulated subject imports as a share of apparent U.S. consumption were *** in each year of the period. *Id*.

[345] CR/PR at II-3; Table IV-32. For Commissioner Johanson's analysis, data on capacity, capacity utilization, and end-of-period inventories for the only responding subject country can be obtained directly from the table for Poland. CR/PR at Table IV-19.

2022, and *** percent in 2023; their capacity utilization was *** percent in interim 2024 compared to *** percent in interim 2023.[346] These three subject producers' reported excess rebar capacity was *** short tons in 2023, and *** in interim 2024, equivalent to *** percent and *** percent of apparent U.S. consumption, respectively, during those periods.[347] Responding subject producers' end of period inventories were *** short tons in 2021, *** short tons in 2022, *** short tons in 2023; they were *** short tons in interim 2024 compared to *** short tons in interim 2023.[348] Furthermore, *** responding subject foreign producers indicated that they could produce other steel products on the equipment and machinery used to produce rebar,[349] and would therefore have the ability to increase production of rebar by shifting production from out-of-scope merchandise produced on the same equipment.

The information available indicates that the cumulated subject industries are significant exporters. According to GTA data, subject countries' cumulated global exports increased irregularly from 2021 to 2023. They were 2.1 million short tons in 2021, 1.6 million short tons in 2022, and 2.4 million short tons in 2023.[350] Subject countries, on a cumulated basis, accounted for 7.0 percent of global rebar exports in 2021, 7.6 percent of global rebar exports in 2022, and 14.0 percent of global rebar exports in 2023.[351] China was the world's second largest exporter in 2023 and accounted for 10.6 percent of global exports by quantity that year.[352]

The U.S. market also remains attractive to the cumulated subject producers, providing them with the incentive to export significant volumes of subject merchandise to the United States in the event of revocation. The limited information available on the record indicates that

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[346] CR/PR at Table IV-32.

[347] Derived from CR/PR at Table IV-32 and Table C-1. RTAC argues that volumes of even 10,000 to 20,000 short tons of rebar are sufficient to cause adverse price effects on the domestic industry. *See* RTAC Posthearing Br. at 64. At the hearing, witnesses testified that distributors can stockpile imports of rebar in significant quantities when prices are low, because rebar can be stored outside without any protective measures like other metal products require, and that stockpiled rebar can continue to affect prices after it is imported. *See* Hearing Tr. at 28 (Simpson); Hearing Tr. at 47-49 (Webb); *see also* RTAC Prehearing Br. at 44.

[348] CR/PR at Table IV-32.

[349] CR/PR at Table II-3.

[350] CR/PR at Table IV-36. For the five countries that Commissioner Johanson is cumulating for his analysis, global exports were 1.4 million short tons in 2021 and 2022, increasing to 2.3 million short tons in 2023. *Id*.

[351] CR/PR at Table IV-36 (mislabeled on continuation pages as Table IV-34). For the five countries that Commissioner Johanson is cumulating for his analysis, the share of global rebar exports was 4.6 percent in 2021, 6.8 percent in 2022, and 13.1 percent in 2023. *Id*.

[352] CR/PR at IV-65. GTA data indicate that Poland was the tenth largest global exporter of rebar by quantity in 2023. *See* CR/PR at Table IV-36.

the AUVs of subject producers' exports to all countries were lower than the AUVs of domestic producers' U.S. shipments.[353] Moreover, the CEO of AMKR, the only participating subject producer, agreed when asked at the hearing that the U.S. market generally has higher prices than other available export markets.[354] As noted above, cumulated subject imports also maintained a presence in the U.S. market during the period of review, indicating that subject producers retain access to U.S. distribution networks and customers that could be used to expand the presence of subject imports in the U.S. market if the orders were revoked. Furthermore, the existence of multiple third country trade barriers on steel products, including rebar, from Belarus, China, and Indonesia would further enhance the relative attractiveness of the U.S. market to subject producers in the event of revocation.[355]

Accordingly, based on the significant volume and market share of cumulated subject imports during the original investigations, the continued 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, including excess capacity, subject countries' substantial exports of rebar to the global market, and the attractiveness of the U.S. market, we

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[353] According to UN Comtrade Data provided by RTAC, in 2023, the AUVs for subject country exports under HS code 7214.20 were $*** per short ton for ***, $*** per short ton for ***, $*** per short ton for Latvia, $*** per short ton for ***, and $*** per short ton for Ukraine. In interim 2024, the AUVs for subject country exports under HS code 7214.20 were $*** per short ton for ***, $*** per short ton for ***, $*** per short ton for Latvia, $*** per short ton for ***, and $*** per short ton for Ukraine. *See* RTAC Prehearing Br., Exhibit 40 (Subject Country Exports Under 7214.20). The AUVs for domestic producers' U.S. shipments in 2023 was $*** per short ton in 2023, and $*** per short ton in interim 2024. CR/PR at C-1. We recognize that the comparative value of these data may be limited somewhat by the differences in product mix for the AUVs for subject countries' exports, which are based on data for a single HS subheading, versus AUVs for domestic producers' shipments, which are based on data for several HTS statistical reporting numbers. *Compare* RTAC Prehearing Br., Ex. 40 with Table C-1. Nevertheless, we find these data to be the most probative information available on the record for comparing the prices of subject imports and domestic producers' U.S. shipments during these time periods.

[354] Hearing Tr. at 203 (Longobardo).

[355] Rebar from Belarus is subject to antidumping duty orders in Canada, the European Union, and Ukraine. CR/PR at Table IV-34. Rebar from China is subject to antidumping duty orders in Australia, Canada, the Dominican Republic, Pakistan, and the United Kingdom, and is subject to a countervailing duty in Canada. *Id.* Rebar from Indonesia is subject to countervailing duty orders in Australia and Canada. Certain steel products, including rebar, are subject to tariff rate quota safeguard measures in the European Union, although the safeguard measures do not apply to Belarus, China, or Indonesia. CR/PR at Table IV-35. Certain steel products, including rebar, are also subject to safeguard measures in the form of tariff rate quotas in the United Kingdom. *Id*.

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.

D. Likely Price Effects

1. The Original Investigations and Prior Five-Year Reviews

In the original investigations, the Commission found that rebar was a commodity product, and that price was an important factor in purchasing decisions. It found that cumulated subject imports from Belarus, Indonesia, Korea, Latvia, Moldova, Poland, and Ukraine undersold the domestic like product in virtually all price comparisons and depressed or suppressed prices to a significant degree.[356] AUVs for subject imports were lower than for the domestic like product, price declines for the domestic like product exceeded declines in raw material costs, and several firms confirmed lost sales and lost revenue allegations based on the lower prices of the subject imports.[357] In its affirmative threat determinations with respect to China, the Commission found that subject imports from China were likely to have significant depressing or suppressing effects on domestic prices, given the significant underselling by these imports throughout the period of investigation, the commodity nature of rebar, and the importance of price in purchasing decisions.[358]

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[356] *Original Determinations I*, USITC Pub. 3425 at 20. Imports from countries subject to the original investigations, which also included Korea, undersold the domestic like product in the regional market in 258 out of 265 quarterly comparisons involving the four pricing products selected by the Commission. *Id*. at 20. The margins of underselling ranged from *** to *** percent. *Original Determinations II*, Confidential Opinion, EDIS Doc. 811381 at 28. Subject imports from the seven countries under review undersold the domestic like product in 224 of 238 price comparisons in the national market in the original investigations, with underselling margins that ranged from 3.5 percent to 32.4 percent. *See Second Reviews*, USITC Pub. 4409 at 27. In the original investigations, subject imports from Belarus were priced lower than domestic product in 29 of 32 comparisons, with underselling margins ranging from 3.5 to 18.3 percent; subject imports from China were priced lower than domestic product in all 20 comparisons, with underselling margins ranging from 20.5 to 32.2 percent; subject imports from Indonesia were priced lower than domestic product in all 24 comparisons, with underselling margins ranging from 18.1 to 30.9 percent; subject imports from Latvia were priced lower than domestic product in all 46 comparisons, with underselling margins ranging from 16.5 to 32.4 percent; subject imports from Moldova were priced lower than domestic product in all 36 comparisons, with underselling margins ranging from 15.2 to 29.2 percent; subject imports from Poland were priced lower than domestic product in 46 of 48 comparisons, with underselling margins ranging from 17.0 to 28.4 percent; and subject imports from Ukraine were priced lower than domestic product in 23 of 24 comparisons, with underselling margins ranging from 16.2 to 29.0 percent. *See* CR/PR at V-8 (citing *Original Investigations Staff Report*, INV-Y-087, EDIS Doc. 811369 at Appendix G).

[357] *Original Determinations I*, USITC Pub. 3425 at 20–21 and 28–29.

[358] *Original Determinations II*, USITC Pub. 3440 at 8 and 13.

In the first and second reviews, the Commission found that the likely significant volume of cumulated subject imports from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine would likely undersell the domestic like product at significant margins to gain market share and would likely have significant depressing or suppressing effects on prices of the domestic like product within a reasonably foreseeable time. It based its conclusions on the importance of price in purchasing decisions, the fungible nature of rebar, the pervasive underselling and price effects of subject imports in the original investigations, and the incentive for subject producers to make sales and to obtain market share in the relatively high-priced, large, stable, and accessible U.S. market.[359]

In the third reviews, although there was no new information on the record regarding pricing comparisons, the Commission found that there would likely be considerable adverse price effects if the orders were revoked.[360] The Commission recognized the high degree of substitutability between the domestic like product and subject imports, the continued importance of price in purchasing decisions, and the attractiveness of the U.S. market.[361] The Commission concluded that the likely significant volume of cumulated subject imports from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine would likely undersell the domestic like product at significant margins, as they did in the original investigations, and would likely have significant depressing or suppressing effects on prices of the domestic like product within a reasonably foreseeable time.[362]

2. The Current Reviews[363]

In the current reviews, as discussed above, the record indicates a high degree of substitutability, and that price is an important factor in purchasing decisions. Given that only U.S. producers, and no importers, responded to the Commission's request for pricing data, there are no price comparison data available for the current period of review.[364]

We find that there would likely be significant underselling by cumulated subject imports

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[359] *First Reviews*, USITC Pub. 3993 at 34–35; *Second Reviews*, USITC Pub. 4409 at 26–28. In the first reviews, subject imports from Latvia oversold the domestic like product in most available price comparisons. *First Reviews*, USITC Pub. 3993 at 35.

[360] *Third Reviews*, USITC Pub. 4838 at 27-28.

[361] *Third Reviews*, USITC Pub. 4838 at 27.

[362] *Third Reviews*, USITC Pub. 4838 at 27-28.

[363] Commissioner Johanson joins the following section of the majority's views on likely price effects but cumulates only subject imports from Belarus, China, Indonesia, Moldova, and Poland in his analysis.

[364] CR/PR at V-5-V-6.

if the orders were revoked, based on the significant underselling in the original investigations, the high degree of substitutability between subject imports and the domestic like product, and the importance of price in purchasing decisions. The attractiveness of the U.S. market increases the likelihood of underselling, as subject producers would likely use low prices to gain market share. Absent the discipline of the orders, the likely significant volume of low-priced cumulated subject imports would likely force the domestic industry to either reduce its prices, forego price increases that would otherwise have occurred, or risk losing market share to subject imports, as occurred in the original investigations. Thus, we find that if the orders were revoked, the significant volume of low-priced cumulated subject imports would likely have significant price effects within a reasonably foreseeable time.

E. Likely Impact[365]

1. The Original Investigations and Prior Five-Year Reviews

In the original investigations, the Commission found the pertinent regional or national industry to be materially injured by reason of cumulated subject imports from Belarus, Indonesia, Korea, Latvia, Moldova, Poland, and Ukraine based on the volume of cumulated subject imports, their relatively high market share, their adverse price effects, and their resulting effect on the domestic industry's condition. Despite increased apparent U.S. consumption, the domestic industry lost market share and experienced declines in sales values, operating income, operating margin, and capital expenditures.[366] In making an affirmative threat determination for subject imports from China, the Commission found that the likely significant volume of these imports would cause the industry to lose additional market share and would suppress or depress prices to a significant degree, precipitating further declines in the domestic industry's already deteriorating condition.[367]

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[365] Commerce found that revocation of the antidumping duty orders would be likely to lead to continuation or recurrence of dumping margins up to 114.53 percent for subject imports from Belarus, 133.00 percent for subject imports from China, 77.01 percent for subject imports from Indonesia, 16.99 percent for subject imports from Latvia, 232.86 percent for subject imports from Moldova, 52.07 percent for subject imports from Poland, and 41.69 percent for subject imports from Ukraine. *Steel Concrete Reinforcing Bars From Belarus, the People's Republic of China, Indonesia, Latvia, Moldova, Poland, and Ukraine: Final Results of the Expedited Fourth Sunset Review of the Antidumping Duty Orders*. 89 Fed. Reg. 16529, 16530 (Dep't of Comm. Mar. 7, 2024).

[366] *Original Determinations I*, USITC Pub. 3425 at 21–23 (regional industry analysis) and 29–30 (national industry analysis).

[367] *Original Determinations II*, USITC Pub. 3440 at 9–10 (regional industry analysis) and 13–14 (national industry analysis).

In the first reviews, the Commission observed that the improvement in the domestic industry's condition after the antidumping duty orders were imposed in July 2001 was inhibited somewhat by a decline in demand between 2000 and 2002. The domestic industry's condition improved substantially after 2003, as demand in the U.S. market increased dramatically and the domestic industry was able to increase its prices in line with significant increases in raw material costs. The Commission did not find the domestic industry to be vulnerable at the time of the first reviews, but found that, if the orders were revoked, cumulated subject imports would enter the U.S. market in such increased quantities and at such price levels as to cause price suppression or depression, thus causing a significant impact on the domestic industry within a reasonably foreseeable time.[368]

In the second reviews, the Commission found that many of the domestic industry's performance indicators declined overall during the period of review, with substantial declines between 2008 and 2009 consistent with the severe economic downturn and related decrease in demand for rebar. The Commission found some improvement thereafter, but that financial performance indicators in 2012 still were generally lower than the peak levels observed in 2007 and 2008.[369] It found further that the domestic industry's operating results between 2007 and 2012 reflected several plant shutdowns, curtailments, and closures.[370] The Commission considered that the record evidence was mixed as to whether the domestic industry was in a vulnerable condition. It concluded that if the orders were revoked, cumulated subject imports would enter the U.S. market in such increased quantities and at such price levels as to cause price suppression or depression, thus causing a significant impact on the domestic industry within a reasonably foreseeable time.[371] In its non-attribution analysis, the Commission found that although nonsubject imports were present in the U.S. market, their declining levels over the period of review would not preclude cumulated subject imports from taking market share from the domestic industry or forcing the industry to lower prices to compete. It also observed that moderate increases in U.S. demand likely in the foreseeable future would not preclude the domestic industry from incurring an adverse impact because of likely increased subject imports.[372]

In the expedited third five-year reviews, the Commission found that the limited information on the record indicated that revocation of the orders would likely lead to

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[368] *First Reviews*, USITC Pub. 3993 at 35–36.
[369] *Second Reviews*, USITC Pub. 4409 at 29.
[370] *Second Reviews*, USITC Pub. 4409 at 30.
[371] *Second Reviews*, USITC Pub. 4409 at 30.
[372] *Second Reviews*, USITC Pub. 4409 at 30–31.

significant volumes of low-priced subject imports that would likely cause the domestic industry to lose market share and/or depress prices, with a corresponding adverse impact on financial performance.[373] In its non-attribution analysis, the Commission found that although nonsubject imports' volume and market share increased overall from 2012 to 2017, they would not prevent cumulated subject imports from significantly increasing their market share in the U.S. market. It observed that given the substitutability of subject imports, regardless of source, and the fact that the domestic industry was the largest supplier to the U.S. market, any increase in cumulated subject import volume and market penetration was likely to come, at least in substantial proportion, at the expense of the domestic industry.[374]

2. The Current Reviews[375]

In the current reviews, the domestic industry's trade indicators generally declined, as the domestic industry's production and capacity utilization both decreased during the period of review.

Domestic producers' capacity increased by *** from 2021 to 2023, increasing from *** short tons in 2021 to *** short tons in 2022, and *** short tons in 2023; it was *** percent higher in interim 2024 at *** short tons than in interim 2023 at *** short tons.[376] The domestic industry's production volume, however, decreased *** percent from 2021 to 2023, decreasing from *** short tons in 2021 to *** short tons in 2022, and to *** short tons in 2023; it was *** percent lower in interim 2024 at *** short tons than in interim 2023 at *** short tons.[377] Domestic producers' capacity utilization rate decreased from *** percent in 2021 to *** percent in 2022, and to *** percent in 2023; it was lower in interim 2024 at *** percent than in interim 2023 at *** percent.[378] The domestic industry's U.S. shipments decreased *** percent by quantity from 2021 to 2023, and were *** percent lower in interim 2023 than in interim 2024.[379] The domestic industry's share of the U.S. market decreased irregularly overall by *** percentage points from 2021 to 2023, but increased *** percentage points from interim 2023

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[373] *Third Reviews*, USITC Pub. 4838 at 30.

[374] *Third Reviews*, USITC Pub. 4838 at 30.

[375] Commissioner Johanson joins the following section of the majority's views on likely impact but cumulates only subject imports from Belarus, China, Indonesia, Moldova, and Poland in his analysis.

[376] CR/PR at Table III-4, Table C-1.

[377] CR/PR at Table III-4, Table C-1.

[378] CR/PR at Table III-4, Table C-1.

[379] CR/PR at Table III-7, Table C-1. The domestic industry's U.S. shipments were *** short tons in 2021, *** in 2022, and *** short tons in 2023; they were *** short tons in interim 2023 and *** short tons in interim 2024.

to interim 2024.[380] Ending inventories increased irregularly overall by *** percent from 2021 to 2023, and were *** percent higher in interim 2024 than in interim 2023.[381]

The domestic industry's employment indicators generally increased. The number of production-related workers ("PRWs") and total hours worked increased by *** percent and 6.3 percent, respectively, overall from 2021 to 2023; they were *** and *** percent higher in interim 2024 compared to interim 2023.[382] Total wages paid increased by *** percent from 2021 to 2023, and they were *** percent higher in interim 2024 than in interim 2024.[383] Hourly wages increased overall by *** percent from 2021 to 2023 but were *** percent lower in interim 2024 than in interim 2023.[384] Productivity decreased overall by *** percent from 2021 to 2023; it was *** percent lower in interim 2024 than in interim 2023.[385]

The domestic industry's financial performance indicia generally improved during the period of review, with profits in each year of the period of review and in the interim period. Net sales by quantity decreased *** percent from 2021 to 2023; they were *** percent lower in interim 2024 than in interim 2023.[386] Net sales value, however, increased *** percent from 2021 to 2023, although it was *** percent lower in the interim 2024 than in interim 2023.[387] U.S. producers had a gross *** in 2021, a gross *** in 2022, and a gross *** in 2023; they had a gross profit of $*** in interim 2024 compared to $*** in interim 2023.[388] Operating income

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[380] CR/PR at Table I-18, Table C-1. The domestic industry's share of apparent U.S. consumption was *** percent in 2021, *** percent in 2022, and *** percent in 2023; it was *** percent in interim 2024 compared to *** percent in interim 2023. *Id.*

[381] CR/PR at Table III-9, Table C-1. Ending period inventories were *** short tons in interim 2021, *** short tons in interim 2022, and *** short tons in interim 2023; they were *** short tons in interim 2024 compared to *** short tons in interim 2023. Id.

[382] CR/PR at Tables III-10, Table C-1. The number of PRWs was *** in 2021, *** in 2022, and *** in 2023; there were *** PRWs in interim 2024 compared to *** in interim 2023. Id. The number of hours worked was *** hours in 2021, *** hours in 2022, and *** hours in 2023; it was *** hours in interim 2024 compared to *** hours in interim 2023. *Id*.

[383] CR/PR at Table III-10, Table C-1. Total wages paid were $*** in 2021, $*** in 2022, and $*** in 2023; they were $*** in interim 2023 and $*** in interim 2024. *Id*.

[384] CR/PR at Table III-10, Table C-1. Hourly wages were $*** in 2021, $*** in 2022, and $*** in 2023; they were $*** in interim 2024 compared to $*** in interim 2023.

[385] CR/PR at Table III-10, Table C-1. Productivity in short tons per hour was *** in 2021, *** in 2022, and *** in 2023; it was *** in interim 2024 compared to *** in interim 2023. *Id*.

[386] CR/PR at Table C-1. The domestic industry's net sales by quantity were *** short tons in 2021, *** short tons in 2022, and *** short tons in 2023; they were *** short tons in interim 2023 and *** short tons in interim 2024. CR/PR at Table III-11.

[387] CR/PR at Table C-1. The domestic industry's net sales by value were $*** in 2021, $*** in 2022, and $*** in 2023; they were $*** in interim 2023 and $*** in interim 2024. CR/PR at Table III-11.

[388] CR/PR at Table III-11, Table C-1.

increased overall from 2021 to 2023, going from $ *** in 2021, to $ *** in 2022, and to $*** in 2023; although it was lower in interim 2024 at $*** than in interim 2023, at $***. U.S. producers' net income was also positive at *** in 2021, *** in 2022, *** in 2023, with $*** in interim 2023 and $*** in interim 2024.[389] The ratio of operating income to net sales *** percent from 2021 to 2023, although it was *** percent lower in interim 2023 than in interim 2024.[390] Domestic producers' ratio of net income to sales increased *** percentage points from 2021 to 2023, although it was *** percent lower in interim 2024 than in interim 2023.[391] Capital expenditures, however, decreased *** percent from 2021 to 2023, and were *** percent lower in interim 2024 than in interim 2023.[392] R & D expenses increased *** percent from 2021 to 2023; they were *** percent lower in interim 2024 than in interim 2023.[393]

In assessing the vulnerability of the domestic industry, we observe that despite a slight decrease in apparent U.S. consumption, most of the domestic industry's financial indicators, including its operating and net income values and margins, were positive or improved over the period of review. In light of the foregoing, including the domestic industry's profitability throughout the period of review, we find that the domestic industry is not in a vulnerable condition.

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 likely 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. Consequently, we conclude that if the orders were revoked,

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[389] CR/PR at Tables III-11, Table C-1.

[390] CR/PR at Table C-1. The domestic industry's operating margin was *** percent in 2021, *** percent in 2022, *** percent in 2023; it was *** percent in interim 2023 and *** percent in interim 2024. CR/PR at Table III-11.

[391] CR/PR at Table C-1. The domestic industry's net margin was *** percent in 2021, *** percent in 2022, *** percent in 2023; it was *** percent in interim 2023 and *** percent in interim 2024. CR/PR at Table III-11.

[392] CR/PR at Table C-1. The domestic industry's capital expenditures were $*** in 2021, $*** in 2022, and $*** in 2023; they were *** in interim 2023 and $*** in interim 2024. CR/PR at Table III-16.

[393] CR/PR at Table C-1. The domestic industry's R&D expenses were $*** in 2021, $*** in 2022, and $*** in 2023; they were $*** in interim 2023 and $*** in interim 2024. CR/PR at Table III-18.

cumulated subject imports would be likely to have a significant impact on the domestic industry within a reasonably foreseeable time.

We have also considered the role of factors other than subject imports so as not to attribute likely injury from other factors to the subject imports. Nonsubject imports as a share of apparent U.S. consumption increased irregularly overall from 2021 to 2023, increasing from *** percent in 2021 to *** percent in 2022, and then decreasing to *** percent in 2023, an increase overall of *** percentage points.[394] Their share of apparent U.S. consumption, however, was lower in interim 2024, at *** percent, than in interim 2023, at *** percent, a decrease of *** percentage points.[395] Given that the domestic industry was the largest source of supply of rebar to the U.S. market during the period of review, as well as the high degree of substitutability of the domestic like product and subject imports and the importance of price in purchasing decisions,[396] the presence of nonsubject imports in the U.S. market would likely not prevent the significant volume of low-priced cumulated subject imports that is likely after revocation from taking market share from the domestic industry or from forcing domestic producers to lower their prices or forgo price increases in order to retain market share.

We have also considered the likely effects of demand trends on the domestic rebar industry. Apparent U.S. consumption declined by *** percent from 2021 to 2023, decreasing from *** short tons in 2021 and to *** short tons in 2023; it was *** percent lower in interim 2024, at *** short tons than in interim 2023, at *** short tons.[397] The majority of reporting firms expect demand for rebar to either experience no change or fluctuate up in the reasonably foreseeable future.[398] Consequently, the significant volume of low-priced cumulated subject imports that would be likely after revocation would exacerbate any injury caused in the event demand decreases or remains stagnant, by further reducing the domestic industry's sales and placing downward pressure on domestic rebar prices.

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[394] CR/PR at Table C-1. The volume of nonsubject imports was *** short tons in 2021, *** short tons in 2022, and *** short tons in 2023.

[395] CR/PR at Table C-1. The volume of nonsubject imports was *** short tons in interim 2024, compared to *** short tons in interim 2023. CR/PR at Table C-1.

[396] We note in this regard that the available information indicates that the AUV of nonsubject imports was $*** per short ton in 2023 and $*** per short ton in interim 2024, while, as discussed above, AUVs for subject sources ranged from $*** to $*** per short ton in 2023 and from $*** to $*** per short ton in interim 2023. CR/PR at Table C-1 and RTAC Prehearing Br., Ex. 40.

[397] CR/PR at Table C-1.

[398] CR/PR at II-11.

In sum, we conclude that if the orders were revoked, cumulated subject imports from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

V. Conclusion

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

Separate and Dissenting Views of Commissioner David S. Johanson

I. Introduction

Based on the record in these five-year reviews, I determine, under section 751(c) of the Tariff Act of 1930, as amended,[1] that revocation of the antidumping duty order on steel concrete reinforcing bar ("rebar") from Belarus, China, Indonesia, Moldova, and Poland would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. I further determine that revocation of the antidumping duty order on rebar from Latvia and Ukraine 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. I therefore concur with the majority with respect to the orders on subject imports from Belarus, China, Indonesia, Moldova, and Poland and dissent with respect to the orders on Latvia and Ukraine. I explain below my reasoning for declining to exercise my discretion to cumulate subject imports from Latvia and Ukraine – premised on my conclusion that subject imports from Latvia would likely have no discernible adverse impact on the domestic industry if the order were revoked and that subject imports from Ukraine would likely compete under different conditions of competition given the effects of the ongoing war in Ukraine during the period of review. I then proceed to explain why I have made negative determinations with respect to these two countries when considered individually. Except as otherwise noted, I join sections I-III.E and IV of the majority's views.

II. Cumulation

A. Likelihood of No Discernible Adverse Impact

I join with the majority's analysis of the likelihood of no discernible adverse impact with respect to subject imports from Belarus, China, Indonesia, Moldova, Poland, and Ukraine. While I also join the descriptive portion of the majority's analysis of Latvia in Section III.D.1 of those views, I differ with the majority in my determination with respect to subject imports from Latvia. In 2018, in making my determinations for the third reviews of these orders, I wrote additional views that explained my earlier adequacy phase determination that full reviews should have been conducted.[2] I wrote that, based on public information provided by domestic

[1] 19 U.S.C. § 1675(c).

[2] *Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine*, Inv. Nos. 731-TA-873-875, 878-880, and 882 (Third Review), 33 (Additional Views of Chairman David S. Johanson).

interested parties in the adequacy phase, the only identified producer of rebar in Latvia, Liepājas Metalurgs ("LM"), had been idle since 2016 and before that had been through various shutdowns, bankruptcies, and changes of ownership.[3] A full review at that time would have enabled a closer examination of whether LM continued in operation.

The record of these full fourth reviews provides further confirmation that LM, the only identified producer of rebar in Latvia, is no longer viable and therefore incapable of exporting rebar to the U.S. market within a reasonably foreseeable time. The last information available on the record of the previous reviews was that the firm had been sold in late 2014 to a Ukrainian investor, KVV Group, but that the restart of production was short-lived, ceasing in September 2016.[4] An article from May 2021 indicated that the state had to intervene after the sale to the Ukrainian group turned into a "disaster" and that a subsequent agreement had been reached for sale of the LM to a Turkish company, ASLANLI Metalürji ve Metal Ürünleri Sanayi ve Ticaret A.Ş.[5] Another article from August 2023 stated that the Turkish company had decided to abandon any plans to produce steel in Latvia and instead decided to move the "steel melting furnace" to Turkey. The city council reaffirmed plans to remediate the 120-hectare site and develop a modern industrial park.[6] In September 2024, a press release from the Liepaja Special Economic Zone ("SEZ") Authority stated that demolition had begun on one of the buildings at the LM site, beginning the transformation of the site to a "modern, green industrial park," and noting that a lease was concluded between the LM and the SEZ in 2023 to allow for dismantling of the steel making equipment, terminating at the end of 2025.[7] Taken as a whole, these articles lead me to conclude that any possibility of further rebar production by LM within a reasonably foreseeable time has been extinguished.

Nevertheless, as pointed out by RTAC,[8] there remained exports of rebar from Latvia over this period of review.[9] LM, which participated in the original investigations and the first and second reviews, which were both full reviews, consistently asserted that it was the only

[3] *Id*. at 33.

[4] *Id*. at 33.

[5] Latvian Public Broadcasting, Liepāja Steelworks Site Faces New Ownership Wrangle, EDIS Doc. 833925 (May 1, 2021).

[6] Baltic Times, Turkish Investors Lose Hope to Revive Metallurgy in Liepaja, EDIS Doc. 833925 (Aug. 29, 2023).

[7] Liepaja Special Economic Zone Authority, Construction of the Infrastructure of the Liepaja Industrial Park Begins, EDIS Doc. 833925 (Sept. 23, 2024).

[8] RTAC Responses to Commissioners' Questions at 70.

[9] CR/PR at Table IV-12. Exports from Latvia were 16,101 short tons in 2021, 14,106 short tons in 2022, and 15,206 short tons in 2023. *Id*.

producer of rebar in Latvia.[10] The source of these exports, therefore, is not readily apparent. During the final phase of the original investigations, the Commission noted that the American embassy in Riga, Latvia, had discovered that there were two other exporters of rebar in Latvia other than LM.[11] What is clear for present purposes, however, is that the volume of exports from Latvia is much lower than it was during the first and second reviews.[12] From 2013 to 2021, exports from Latvia declined by more than 98 percent.[13] Further, the pattern of destinations for Latvian export has changed; while leading export destinations previously included Algeria, Russia, and Peru, the leading destinations on the record of these reviews were all close neighbors, particularly the Baltic and Scandinavian countries.[14]

In conclusion, I find that, in the event of revocation of the orders, subject imports from Latvia are likely to be miniscule for the reasonably foreseeable time and so would have no discernible adverse impact on the domestic industry in the United States producing rebar.

B. Likelihood of a Reasonable Overlap of Competition

I adopt the analysis of the majority (see Section III.D.2 in the majority's views) with respect to this factor, but cumulating the countries of Belarus, China, Indonesia, Moldova, Poland, and Ukraine.[15]

C. Likely Conditions of Competition

In determining whether to exercise my discretion to cumulate subject imports from Belarus, China, Indonesia, Moldova, Poland, and Ukraine,[16] I assess whether they would likely

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[10] *Certain Steel Concrete Reinforcing Bars from Indonesia, Poland, and Ukraine*, Inv. Nos. 731-TA-875, 880, and 882 (Final), USITC Pub. 3425 (May 2001), VII-6. *Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Korea, Latvia, Moldova, Poland, and Ukraine*, Inv. Nos. 731-TA-873-875, 877-880, and 882 (Review), USITC Pub. 3933 (July 2007), IV-28. *Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine*, Inv. Nos. 731-TA-873-875, 878-880, and 882 (Second Review), USITC Pub. 4409 (July 2013), IV-22.

[11] USITC Pub. 3425, VII-6 n.13.

[12] The volume of exports from Latvia increased from 608,872 short tons in 2001 to 668,415 short tons in 2006. USITC Pub. 3933, Table IV-23. Exports from Latvia increased irregularly from 709,696 short tons in 2007 to 878,880 short tons in 2012. *Second Review*, USITC Pub. 4409, Table IV-20.

[13] Compare CR/PR at Table IV-12 with *Second Review*, USITC Pub. 4409, Table IV-20.

[14] Compare CR/PR at Table IV-12.

[15] I have found that subject imports from Latvia would likely have no discernible adverse impact on the domestic industry if the order were revoked and, therefore, subject imports from Latvia are not eligible for cumulation. 19 U.S.C. § 1675a(a)(7).

[16] I have found that subject imports from Latvia would likely have no discernible adverse impact on the domestic industry if the order were revoked and, therefore, subject imports from Latvia are not eligible for cumulation. 19 U.S.C. § 1675a(a)(7).

compete under similar or different conditions of competition.[17] Ukrainian producer PJSC ArcelorMittal Kryvyi Rih ("AMKR") urged the Commission to exercise its discretion and analyze subject imports from Ukraine separately within the framework of likelihood of no discernible adverse impact.[18] I have joined, however, the majority's analysis of Ukraine under this factor (in Section III.D.1 of the majority's views, except as otherwise noted) but exercise my discretion to not cumulate subject imports from Ukraine with the other five eligible countries, finding instead that there would be likely differing conditions of competition between subject imports from Ukraine and from those of the other five.

In the last full review in 2013, I joined with the majority in finding that "rebar from each of the seven subject countries would likely compete directly with one another and the domestic like product in the event of revocation."[19] In reaching that conclusion, the majority determined that the rebar industry in each of the subject countries "has shipped rebar to multiple export markets during the period of review" and that "each of these subject countries has ready access to the U.S. market, particularly with the assistance of global trading companies in this industry."[20] While I now find that the preceding conditions continue to hold true for subject imports from Belarus, China, Indonesia, Moldova, and Poland, those conditions no longer apply to subject imports from Ukraine, and I accordingly exercise my discretion to not cumulate subject imports from Ukraine, finding that they would compete under different conditions of competition.[21]

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[17] *See, e.g., 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 41, *aff'd*, *Cleveland-Cliffs Inc. v. United States*, 693 F. Supp. 3d 1341 (Ct. Int'l Trade 2024); *Nucor Corp. v. United States*, 601 F.3d 1291, 1293 (Fed. Cir. 2010); *Silicomanganese from Brazil, China, and Ukraine*, Inv. Nos. 731-TA-671-673 (Third Review), USITC Pub. 4354 (Oct. 2012) at 16.

[18] Hearing Tr. at 208-09 (Slater); AMKR posthearing brief at 1-5.

[19] *Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine*, Inv. Nos. 731-TA-873-875, 878-880, and 882 (Second Review), USITC Pub. 4409, July 2013, 16.

[20] *Second Review Majority Views*, USITC Pub. 4409, 15-16.

[21] There are two other subject countries that are geographically proximate to the Russia-Ukraine conflict, but I do not find that they have been impacted in the same manner as has Ukraine, especially in regard to exports of rebar. As pointed out by domestic interested parties, while exports from Belarus, as measured by GTA data (CR/PR at Table IV-7), also declined substantially from 2021 to 2023, this is primarily due to Belarus having "stopped self-reporting its exports to Global Trade Atlas, UN Comtrade, and similar outlets." Other evidence suggests that, despite the war, exports from Belarus remain substantial. RTAC Responses to Commissioners' Questions at 71-72. Moldova, another neighbor of Ukraine, showed consistent exports from 2021 to 2023, even with data on Moldovan exports to Russia, Moldova's second largest destination in 2022, not reported in 2023. CR/PR at Table IV-13. I find, therefore, that there is no evidence that the rebar industries in either of these two countries do not remain export oriented.

The primary basis for my current finding is that, on February 24, 2022, Russia launched a military invasion of Ukraine.[22] The resulting war has had a significant effect on the operations of the rebar industry in Ukraine.[23] Two of Ukraine's three major steel mills producing rolled products, Azovstal Iron and Steel Works and Illych Iron and Steel Works, have either been destroyed or are no longer under the control of the Ukrainian government.[24] Although production challenges related to electricity, water, and labor were detailed by AMKR (and which I analyze in detail below in the likely injury section), a change of particular significance in my cumulation analysis is that I find that because of war conditions, especially in the Black Sea, the rebar industry in Ukraine is significantly constrained in exporting to markets other than the European Union ("EU") and that, in the event of revocation of the order on subject imports from Ukraine, imports from Ukraine would no longer have the same ready access to the U.S. market as would imports from the other five countries. In the expedited third reviews, the Commission put emphasis on the fact that GTA data showed the Ukrainian industry to be the second largest global exporter of rebar;[25] in 2023, Ukraine was no higher ranked than twelfth.[26] In contrast to the period of the first review, when the export orientation of the Ukrainian industry declined steadily from *** percent in 2001 to *** percent in 2006,[27] in 2023, the export orientation of the Ukrainian rebar industry was *** percent and was lower in interim 2024, at *** percent, than it had been in interim 2023.[28]

D. Conclusion

In sum, I determine that if the orders were revoked, subject imports from Belarus, China, Indonesia, Moldova, Poland, and Ukraine are not likely to have no discernible adverse impact on the domestic industry; there would likely be a reasonable overlap of competition between the subject imports from each of these countries and the domestic like product and

[22] CR/PR at IV-44.

[23] Even prior to the outbreak of hostilities in 2022, the Ukrainian rebar industry had already been disrupted by Russian military aggressions dating back to 2014, when Russia invaded the Crimean Peninsula and the Luhansk and Donetsk regions. Several Ukrainian steel producers were located in that occupied territory and, as a result of that invasion, the Metinvest Group lost control over Yenakiieve Iron and Steel Works which had been one of the largest producers of rebar in Ukraine. AMKR prehearing brief at 2-3, exhibit 1; Ukrainian Embassy statement at 2-3.

[24] Ukrainian Embassy statement at 3; Hearing Tr. at 128 (Longobardo).

[25] *Third Reviews*, USITC Pub. 4838 at 14.

[26] CR/PR at Table IV-36. Due to statistical cutoffs, it is unclear the exact rank of Ukraine in the table for 2023, but it is no higher than twelfth.

[27] First Review confidential report, Memo INV-EE-061 (June 12, 2007) at Table IV-33.

[28] CR/PR at Table IV-27.

among the subject imports from these countries; and while subject imports from Belarus, China, Indonesia, Moldova, and Poland would be likely to compete under similar conditions of competition, subject imports from Ukraine would likely compete under differing conditions of competition. Accordingly, for the reasons discussed above, I do not exercise my discretion to cumulate subject imports from Ukraine for purposes of these reviews. I also determine that subject imports from Latvia are likely to have no discernible adverse impact on the domestic industry if the order were revoked. Therefore, I do not cumulate imports from Latvia with imports from any of the other subject countries.

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

I join the majority's analysis on continuation or recurrence of material injury (Sections IV.C on likely volume, IV.D on likely price effects, and IV.E on likely impact), with appropriate caveats for my alternate set of countries to be cumulated and their associated data, in finding that revocation of the antidumping duty orders with respect to subject imports from Belarus, China, Indonesia, Moldova, and Poland would likely lead to continuation or recurrence of material injury within a reasonably foreseeable time.

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

As discussed in my likely no discernible adverse impact finding above, the volume of subject imports from Latvia on revocation of the order would likely be miniscule, limited by a lack of identifiable production and by small and highly localized exports and would likely be zero for the reasonably foreseeable future. Therefore, the likely volume of subject imports from Latvia would be too small to have a significant effect on the domestic industry's prices and would not likely lead to a significant impact on the domestic industry.[29] For all of these reasons, I conclude that revocation of the antidumping duty order on subject imports of stainless steel bar from Latvia 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.

[29] In evaluating the likely impact of subject imports from Latvia on the domestic industry, I reiterate my finding that the domestic industry is not in a vulnerable condition. *See* section IV.E.2 of the majority's views.

B. Revocation of the Antidumping Order on Subject Imports from Ukraine 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

Since the order on subject imports went into effect in 2001, there have only been reports of small volumes of imports of rebar from Ukraine in 2002 (134 short tons), 2016 (1,088 short tons), and 2017 (1,074 short tons).[30] While a small volume of imports from Ukraine to the United States were reported over this period of review by Census data, it appears this is likely rebar from Bulgaria,[31] as neither Ukrainian company reported exports to the United States.[32]

AMKR reports that the disruption of traditional logistics through the Black Sea ports has been its most significant barrier to export, resulting in considerable increases in costs, which rose from $20-40/ton in the pre-war period to $140/ton during the first months of the war, and then decreased somewhat to $100/ton by May 2023, still greater than costs during the pre-war period.[33] Prior to the war, more than about 65 percent of all metal exports from Ukraine were conducted via ports on the Black Sea.[34] Given the compromised seaport situation, AMKR asserts that its main export market now is the EU and that it plans to export 50 percent of its production to the EU in 2024.[35] This corresponds to data on the record showing that exports to the EU as a share of total shipments increased from *** percent in 2021 to *** percent in 2023 and was higher in interim 2024 (at *** percent) than it was in interim 2023 (*** percent).[36] AMKR states that, due to the high cost of transportation, it can only export its finished products by land to the closest EU countries, such as Poland, Romania, and the Baltic States.[37] This also accords with the record of these reviews showing that the destinations of Ukrainian exports under the relevant six-digit subheadings (which include out-of-scope merchandise) became more concentrated, with the share of total exports going to EU partners and Moldova rising from 12.3 percent in 2021 to 72.1 percent in 2023.[38]

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[30] *First Reviews*, USITC Pub. 3933, at Table IV-35; *Third Reviews*, USITC Pub. 4838 at Table I-17.

[31] Hearing Tr. at 181-82 (Sim).

[32] CR/PR at IV-44.

[33] AMKR prehearing brief at 12; AMKR prehearing exhibit 15.

[34] AMKR prehearing exhibits 1 and 2. For AMKR, the share exported via Black Sea ports was higher, about 80 percent. Hearing Tr. at 128, 155 (Longobardo).

[35] AMKR prehearing brief at 13; RTAC prehearing brief at exhibit 17.

[36] CR/PR at Table IV-28.

[37] AMKR prehearing brief at 13.

[38] CR/PR at Table IV-30.

AMKR also argues that the Ukrainian industry was forced to employ new transport routes by railway and truck and through shipping through ports of the EU—primarily in Romania, Poland, and Lithuania (but also Bulgaria, Croatia, and Germany)—rather than continuing to use the traditional Ukrainian ports of Mariupol, Odesa, and Mykolaiv.[39] In July 2022, AMKR reports, Ukrzaliznytsia (the Ukrainian railway system) increased rail rates by 70 percent.[40] Thus, in comparison with such costs in 2021, AMKR notes, logistical expenses for metals industries increased by four to six times; the average distance to a reliable port of export for Ukrainian exporters increased by five times and the associated shipping costs to the port of destination raised by three to four times on average.[41] The railroad tracks in Europe have different widths than the railroad tracks in Ukraine, and so rail cars are not compatible, raising costs further for the foreseeable future.[42] AMKR relates that the pressure on the Ukrainian railway system was the highest in April-May 2023 when other demands connected with grain shipments to the EU resulted in massive traffic jams in the Ukrainian railway system and wait times of up to 60 days, citing studies by the Ukraine-based GMK Center.[43]

A temporary export corridor began in August 2023, allowing for the export of iron and steel products from three Ukrainian sea ports despite Russian air attacks.[44] AMKR claims that some ports have not resumed the operation because of location in the occupied territory (Mariupol Sea Commercial Port) or due to proximity to active hostilities (Mykolaiv Sea Commercial Port).[45] The precariousness in the region has elevated the risk profile of shipping operations, resulting in increased war risk insurance premiums for vessels operating in the Black Sea.[46] Nevertheless, exports in 2023 from Ukraine (under the overinclusive six-digit HS subheadings) were down by 81.4 percent, as compared to 2021.[47] AMKR estimates that the share of rebar Ukraine exported that year through ports was only 28 percent of Ukraine's rebar exports, less than half of the share pre-war.[48] Before the war, AMKR exported *** MT of rebar through five Ukrainian ports in 2021 and in the first two months of 2022, AMKR exported ***

[39] AMKR prehearing brief at 6, 13; exhibits 1, 2, 8, and 9.
[40] AMKR prehearing brief at 6, exhibits 1 and 2.
[41] AMKR prehearing brief at 6, exhibits 2 and 8.
[42] AMKR prehearing brief at 7, exhibits 2 and 8; Hearing Tr. at 192 (Longobardo).
[43] AMKR prehearing brief at 7-8, exhibits 8 and 9; AMKR posthearing brief at 4.
[44] CR/PR at IV-45; AMKR prehearing brief at 7-8, exhibit 9; AMKR posthearing brief at 4, exhibit 4; Hearing Tr. at 153-54 (Longobardo).
[45] AMKR prehearing brief at 8.
[46] AMKR prehearing brief at 9, exhibit 9; AMKR posthearing brief at 4; Hearing Tr. at 154-57 (Longobardo).
[47] CR/PR at Table IV-30.
[48] AMKR prehearing brief at 8.

MT of rebar through four Ukrainian ports. Then, after the invasion, AMKR states that its rebar exports ceased entirely until the end of 2023. In January-October 2024, AMKR reported that only *** MT of rebar was exported through just two ports, a small fraction of what was exported in 2021.[49] AMKR notes that of the 14 Ukrainian seaports open before the Russian invasion, only seven are currently operational, and all seven have restrictions on their usage, and only three are deepwater ports, with much reduced capacities.[50]

Domestic interested parties stated that the trend of increasing exports by the Ukrainian rebar industry "is only likely to grow as the recent reopening of the Mykolaiv ports is expected to 'reduce the cost of logistics for domestic exporters and significantly strengthen the export potential of Ukraine.'"[51] However, this assessment ignores, as was pointed out by the Ukrainian Embassy, that the same article cited by RTAC explained that Russia controls access to the Black Sea from Mykolaiv ports and exports are thereby "severely limited."[52] In fact, the trend may be quite the opposite of that asserted by RTAC. An article from October 10, 2024, describes recent Russian attacks on two foreign-flagged ships carrying grain exports in the Black Sea, one of which resulted in fatalities to the crew.[53] A security analyst interviewed for the article stated that the repeated attacks suggest the implicit bargain behind a period of relative calm in the Black Sea "may be coming to an end."[54]

The second most important factor cited by AMKR to account for its reduction in exports has been sporadic, but substantial, deficits in domestically generated electricity forced AMKR to seek alternatives to keep production lines up and running.[55] Both at the start of the war and then again in November 2022, attacks on electrical infrastructure led to the forced shutdown of main production processes.[56] Rolling blackouts across the country from repeated Russian strikes on energy infrastructure have interrupted work or forced businesses to invest in costly generators.[57] The impact of blackouts on production is evident in production figures and led to increased equipment wear and tear, necessitating further investment in repairs.[58] AMKR claims

[49] AMKR posthearing brief at 3.

[50] AMKR Responses to Commissioners' questions at 4, exhibit 2.

[51] RTAC prehearing brief at 15.

[52] Ukrainian Embassy statement at 4.

[53] AMKR posthearing brief at 4, exhibit 4.

[54] AMKR posthearing brief at exhibit 4.

[55] CR/PR at Table IV-23; AMKR prehearing brief at 12.

[56] CR/PR at Table IV-23; AMKR prehearing brief at 9, exhibit 1.

[57] AMKR prehearing brief at 10; exhibit 14. The generators were used to keep machinery powered-up during blackouts and not for production. AMKR Responses to Commissioners' Questions, at 3; Hearing Tr. at 134, 185-86 (Longobardo); RTAC prehearing brief at exhibit 2.

[58] AMKR prehearing brief at 10; AMKR Responses to Commissioners' Questions at 2, 3, and 5, exhibit 1; Hearing Tr. at 134 (Longobardo). AMKR mothballed its third blast furnace, which accounted

that since the beginning of 2024, over 400 missiles and drones have targeted power generation plants and high-voltage transmission networks in the country; several waves of attacks hit energy infrastructure in March, April, and again in August 2024.[59] The relationship between the availability of electricity and AMKR's production is clearly visible in AMKR's data.[60] AMKR asserts that Ukraine faces a severe reduction in generating capacity: instead of 18 GW, only 12-13 GW will be available at best – even with an additional 1.7 GW of potential imports from Europe, the shortfall is significant.[61] AMKR sources 80 percent of its electricity via importation.[62]

A third new challenge experienced by AMKR because of the war is a deficit in water as the result of the Russian military's destruction of the Kakhovka Dam in June 2023.[63] AMKR stated that the loss of water behind the dam halted a vast majority of production and drove utilization of capacities down to the level of 15-20 percent.[64] Not only did the AMKR have to dig a new water pipeline to access water after the destruction of the dam,[65] but the destruction of the dam closed the Kakhovka Hydroelectric Power Plant, upon which both rebar producers (AMKR and Metinvest) relied as a public utility provider of electricity.[66]

Finally, AMKR emphasized that its plant is located near the front line and has been directly exposed to shelling, which poses a threat to both production assets and personnel.[67] The AMKR plant itself was struck by a missile in December 2022 as part of hostilities and a rolling mill and warehouse were damaged and have yet to be repaired.[68] AMKR asserts that frequent air alerts cause disruptions to its production.[69] AMKR assesses that it is currently impossible to eliminate the risk from shelling, and the company continues to operate with security measures, which introduce inefficiency.[70] AMKR states that more than 3,000 of its

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for 9,000 tons of AMKR's pre-war capacity of 17,000 tons, stating that "it will never restart after the war." Hearing Tr. at 133-34 and 190 (Longobardo).

[59] AMKR prehearing brief at 10.

[60] AMKR Responses to Commissioners' Questions at 3; AMKR posthearing brief at exhibit 1; AMKR hearing slide 17.

[61] AMKR prehearing brief at 10; Hearing Tr. at 135 (Longobardo).

[62] AMKR prehearing brief at 13; Hearing Tr. at 186 (Longobardo).

[63] AMKR prehearing brief at 5, 11, 12, and exhibit 6; AMKR hearing slides 9, 10, and 14.

[64] AMKR prehearing brief at 12.

[65] Hearing Tr. at 136-38 (Longobardo); AMKR hearing slide 10.

[66] AMKR prehearing brief at 5.

[67] Ukrainian Embassy statement at 4.

[68] Hearing Tr. at 140 and 150 (Longobardo); AMKR hearing slide 15; RTAC prehearing brief at exhibit 2.

[69] Hearing Tr. at 138-39, 141 (Longobardo); AMKR hearing slides 12 and 18; AMKR Responses to Commissioners Questions at 4, exhibit 2.

[70] AMKR prehearing brief at 13.

employees serve in the Armed Forces of Ukraine, and 230 have been killed or are missing while defending Ukraine.[71] Ukraine has lost a quarter of its workforce since the start of the Russian invasion, according to the Ukrainian central bank.[72] Moreover, AMKR relates, nearly 60 percent of businesses have said that finding skilled workers is their main challenge, as an economy ministry survey of over 3,000 companies recently showed.[73]

While I have highlighted above the full range of challenges identified by the respondent Ukrainian industry as impacting their ability to export to the U.S. market, I assign primary importance—as does AMKR—to the industry's transport difficulties. AMKR has sporadically been able to produce rebar at appreciable levels, for example in June 2023, when annualized production reached *** short tons, *** of what was produced in Ukraine in 2021;[74] however, the Ukrainian industry is no longer export oriented, having exported only *** percent of its total shipments in 2023, *** percentage points lower than in 2021, and the share exported in interim 2024 was lower, at *** percent, than it had been in interim 2023, when it was *** percent.[75] In contrast, during the period of the first review, the export orientation of the Ukrainian rebar industry ranged from *** to *** percent.[76] Not only has the Ukrainian industry become much less export oriented, but it now sends its rebar exports to a highly concentrated group of neighboring countries.[77] AMKR, while it agreed that rebar prices were higher in the U.S. market than other countries, countered with its view that the "expenses to reach the market are higher than other countries."[78] Until open hostilities cease and a stable maritime environment returns to the Black Sea, the likelihood of which—despite the assurances of domestic interested parties[79]—no party presented record evidence of occurring within a reasonably foreseeable time, I find that the Ukrainian rebar industry's exports will not likely compete under the same conditions as those from the other five eligible subject countries.

Even if the war in Ukraine were to end within a reasonably foreseeable time, it would still take a significant amount of time for Ukrainian port operations to overcome the damage caused by the war. While RTAC was able to find a quote from Metinvest CEO that "{a}fter the

[71] Hearing Tr. at 140 (Longobardo); AMKR hearing slide 16; AMKR prehearing brief at 13.

[72] Hearing Tr. at 131-33 (Longobardo); AMKR prehearing brief at 11 and exhibit 13.

[73] AMKR prehearing brief at 11; AMKR Responses to Commissioners' Questions at 4. *See also* Hearing Tr. at 132, 160 (Longobardo).

[74] AMKR Responses to Commissioners' Questions at 1.

[75] CR/PR at Table IV-27.

[76] First Review confidential report, Memo INV-EE-061 (June 12, 2007) at Table IV-33.

[77] CR/PR at Table IV-30.

[78] Hearing Tr. at 203.

[79] RTAC final comments at 1, 4, and 6.

restoration, the Black Sea ports are pretty much working at the normal kind of way,"[80] they did not include the following clause of his statement: "Of course, you still have Russian attacks once in a while."[81] A *New York Times* article published just days before the Metinvest CEO's quote stated that "{r}epeated airstrikes by Russian forces since July on Ukraine's port of Odesa after the Kremlin's withdrawal from a deal that had allowed Ukraine to export its food crops directly across the waters to Turkey had forced Ukraine to stop using its three Black Sea ports as an export route and work to establish an alternative."[82] The alternative described was to export "on the Danube River through much smaller ports — which have also come under attack in recent weeks — and aboard much smaller vessels."[83] Of course, the Danube River leads upstream into the European Union, and does not facilitate easy access to overseas markets.

As was recounted by the Ukrainian embassy, due to regular shelling of port infrastructure, traditional sea export routes to foreign markets including those to the U.S., remain restricted, severely limiting Ukrainian enterprises' ability to export at the pre-war levels.[84] A study by the Center for Strategic and International Studies highlights the damage to Ukraine's port infrastructure:

> With the start of Russia's full-scale invasion, commerce through the Black Sea was significantly interrupted. Grain exports via the Black Sea were subject to constant Russian attacks (the heaviest period being February to July of 2022), including aerial (missile and drone) attacks on port infrastructure and sea mines destroying cargo ships. Due to the invasion, Ukraine fully lost control of the port of Mariupol in May 2022 after Russia brutally invaded it on February 24, 2022. Of the other four important ports, Mykolaiv became inoperative due to Russia's full-scale invasion, while the ports of Chornomorsk, Pivdennyi, and Odesa have operated at partial capacity since February 2022.[85]

I do not disagree with RTAC's assessment that a Ukrainian construction boom will not occur immediately upon the war's end, however such an armistice might occur.[86] Nevertheless, the arguments regarding how long it may be before starting reconstruction, and the eventual increase in home market demand for Ukrainian rebar, also apply to reconstruction of the port facilities necessary to export Ukrainian rebar overseas. In other words, the necessary funding

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[80] RTAC hearing slide 10; Hearing Tr. at 99, 215-16 (Shane).

[81] RTAC posthearing brief at exhibit 9.

[82] RTAC prehearing brief at exhibit 25.

[83] RTAC prehearing brief at exhibit 25.

[84] Ukrainian Embassy statement at 10.

[85] RTAC prehearing brief at exhibit 24 (CSIS).

[86] RTAC final comments at 1-2; Hearing Tr. at 56-57 (Brackemyre), 67-68 (Simpson). AMKR also provided support for this view. Hearing Tr. at 211-12 (Longbardo).

and materials would need to be in place before Ukraine would be able to export without constraint to the U.S. market, and by that time, home market demand for rebar should already be recovering.

Given the Ukrainian industry's loss of several large rebar-producing facilities as a result of the war with Russia, severe burdens adjusting to active hostilities (including electricity, water, and labor), no prospect of an imminent end to active hostilities, enemy occupation of—and serious damage to—port infrastructure, significantly reduced willingness of maritime traffic to traverse the dangerous waters of the Black Sea, and the resulting modest level of Ukrainian exports destined outside of Europe, I do not find that the Ukrainian industry would likely return to exporting significant volumes of rebar to the U.S. market if the order were revoked. Accordingly, I find that the likely volume of subject imports from Ukraine, in absolute terms and relative to U.S. consumption, would not be significant in the event of revocation.

2. Likely Price Effects

In considering the likely price effects of subject imports from Ukraine if the order were revoked, I acknowledge, as discussed above, that subject imports from Ukraine and the domestic like product generally are interchangeable and the general importance of price in purchasing decisions. In these reviews, there are no pricing data specific to rebar from Ukraine.

Given my finding that the volume of subject imports from Ukraine upon revocation is not likely to be significant, any likely volume of subject imports from Ukraine would be too small to have a significant effect on prices for the domestic like product. As discussed above, the Ukrainian industry's primary commercial focus is exporting to other EU countries, and the Ukrainian industry has no incentive to ship large volumes of aggressively priced subject product into the U.S. market, and in any case the Ukrainian industry has limited abilities to do so due to significant shipping constraints caused by the war.

Accordingly, I find that revocation of the antidumping duty order on rebar from Ukraine would not be likely to lead to significant underselling or significant price depression or suppression within a reasonably foreseeable time.

3. Likely Impact

In evaluating the likely impact of subject imports from Ukraine on the domestic industry, I reiterate my finding that the domestic industry is not in a vulnerable condition, as discussed in section IV.E.2 of the majority's views. Given that I do not find it likely that there would be a significant volume of subject imports from Ukraine or that any such imports likely would have

significant price effects, I find that revocation of the antidumping duty order on subject imports from Ukraine would not likely lead to a significant impact on the domestic industry.

4. Conclusion

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

IV. Conclusion

For the foregoing reasons, I determine that revocation of the antidumping duty order on rebar from Belarus, China, Indonesia, Moldova, and Poland would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. I also determine that revocation of the antidumping duty orders on stainless steel bar from Latvia and Ukraine 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.

Part I: Introduction

Background

On November 1, 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 steel concrete reinforcing bar ("rebar") from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine would likely lead to the continuation or recurrence of material injury to a domestic industry.[2] [3] On February 5, 2024, 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 75033, November 1, 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 duty orders. 88 FR 74977, November 1, 2023.

[4] 89 FR 13089, February 21, 2024.

[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 witnesses who appeared at the Commission's hearing.

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

Effective date	Action
December 17, 2018	Commerce's antidumping duty orders on rebar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine (83 FR 64530, December 17, 2018)
November 1, 2023	Commission's institution of five-year reviews (88 FR 75033, November 1, 2023)
November 1, 2023	Commerce's initiation of five-year reviews (88 FR 44077, November 1, 2023)
February 5, 2024	Commission's determinations to conduct full five-year reviews (89 FR 13089, February 21, 2024)
March 7, 2024	Commerce's final results of expedited five-year reviews of the antidumping duty orders (89 FR 16529, March 7, 2024)
April 9, 2024	Commission's scheduling of the reviews (89 FR 26188, April 15, 2024)
October 3, 2024	Commission's hearing
November 15, 2024	Commission's vote
December 10, 2024	Scheduled date for the Commission's determinations and views (administrative)

The original investigations

The original investigations resulted from petitions filed on June 28, 2000 with Commerce and the Commission by the Rebar Trade Action Coalition ("RTAC"), Washington, DC.[6] [7] On April 11, 2001, Commerce determined that imports of rebar from Indonesia, Poland,

[6] Certain Steel Concrete Reinforcing Bars From Indonesia, Poland, and Ukraine, Inv. Nos. 731-TA-875, 880, and 882 (Final), USITC Publication 3425, May 2001 ("Original publication"), p. I-1. The original petitions included Austria, Japan, Russia, and Venezuela. In its preliminary determinations, the Commission terminated its investigations with respect to these countries. 65 FR 51329, Aug. 23, 2000. In its preliminary investigations, the Commission found that imports of rebar from Austria, Russia, and Venezuela that are sold in the United States were negligible (Commissioner Lynn M. Bragg dissenting). The Commission also conducted a regional industry analysis as proposed by the petitioners. In so doing, the Commission found that subject imports from Japan were not sufficiently concentrated in the region and concluded that there was no reasonable indication that a regional industry in the United States was materially injured or threatened with material injury (Commissioner Lynn M. Bragg dissenting). Certain Steel Concrete Reinforcing Bars from Austria, Belarus, China, Indonesia, Japan, Korea, Latvia, Moldova, Poland, Russia, Ukraine, and Venezuela, Inv. Nos. 731-TA-872-883 (Preliminary), USITC Publication 3343, August 2000, p. 3. The Commission's investigations schedule became staggered when Commerce issued its final determinations with respect to Indonesia, Poland, and Ukraine on April 11, 2001, and its final determinations with respect to Latvia, Korea, Belarus, Moldova, and China on June 22, 2001. Certain Steel Concrete Reinforcing Bars From Belarus, China, Korea, Latvia, and Moldova, Inv. Nos. 731-TA- 873-874 and 877-879 (Final), USITC Publication 3440, July 2001 ("Original Belarus, China, Korea, Latvia, and Moldova publication"), pp. 3, I-2.

[7] The individual membership of RTAC was as follows: AmeriSteel (Tampa, Florida); Auburn Steel Co., (Auburn, New York); Birmingham Steel Corp. (Birmingham, Alabama); Border Steel, Inc. (El Paso, Texas); CMC Marion Steel Co. (Marion, Ohio); Nucor Corporation (Charlotte, North Carolina); and Riverview Steel (Glassport, Pennsylvania). Auburn Steel Co. was not a petitioner with respect to Indonesia and Japan.

and Ukraine were being sold at less than fair value ("LTFV").[8] On June 22, 2001, Commerce determined that imports of rebar from Belarus, China, Korea, Latvia, and Moldova were being sold at LTFV.[9] The Commission determined on May 25, 2001 that an industry in the United States was materially injured by reason of LTFV imports of rebar from Indonesia, Poland, and Ukraine.[10] The Commission determined on July 23, 2001 that an industry in the United States was materially injured by reason of LTFV imports of rebar from Belarus, Korea, Latvia, and Moldova, and that an industry in the United States was threatened with material injury by reason of LTFV imports of rebar from China.[11] On September 7, 2001, Commerce issued its antidumping duty orders with the final weighted-average dumping margin of 114.53 percent for Belarus, final weighted-average dumping margin of 133.00 percent for China, final weighted-average dumping margins ranging from 60.46 to 71.01 percent for Indonesia, final weighted-average dumping margins ranging from 22.89 to 102.28 percent for Korea, final weighted-average dumping margin of 17.21 percent for Latvia, final weighted-average dumping margin of 232.86 percent for Moldova, final weighted-average dumping margins ranging from 47.13 to 52.07 percent for Poland, and final weighted-average dumping margin of 41.69 percent for Ukraine.[12]

[8] 66 FR 18752, April 11, 2001.

[9] 66 FR 33522, 66 FR 33525, 66 FR 33526, 66 FR 33528, and 66 FR 33530, June 22, 2001.

[10] 66 FR 28541, May 23, 2001. Chairman Stephen Koplan, Vice Chairman Deanna Tanner Okun, and Commissioner Lynn M. Bragg determined that a regional industry in the United States is materially injured by reason of imports of rebar from Indonesia, Poland, and Ukraine. Commissioners Marcia E. Miller, Jennifer A. Hillman, and Dennis M. Devaney determined that an industry in the United States is materially injured by reason of imports of rebar from Indonesia, Poland, and Ukraine. The Commission also determined that critical circumstances did not exist with respect to subject imports from Poland and Ukraine.

[11] 66 FR 39333, July 30, 2001. Chairman Stephen Koplan, Vice Chairman Deanna Tanner Okun, and Commissioner Lynn M. Bragg determined that a regional industry in the United States is materially injured by reason of imports of rebar from Belarus, Korea, Latvia, and Moldova. Chairman Koplan and Vice Chairman Okun also determined that a regional industry in the United States is threatened with material injury by reason of imports from China of the subject merchandise. Commissioner Bragg determined that a regional industry in the United States is materially injured by reason of imports of rebar from China. Commissioners Marcia E. Miller, Jennifer A. Hillman, and Dennis M. Devaney determined that an industry in the United States is materially injured by reason of imports of rebar from Belarus, Korea, Latvia, and Moldova and that an industry in the United States is threatened with material injury by reason of imports from China of the subject merchandise. The Commission determined that critical circumstances do not exist with respect to subject imports from China and Korea.

[12] 66 FR 46777, September 7, 2001.

The first five-year reviews[13]

In July 2007, the Commission completed full five-year reviews of the subject orders and determined that revocation of the antidumping duty orders on rebar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time and that revocation of the antidumping duty order on rebar from Korea would not be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.[14] Following affirmative determinations in the first five-year reviews by Commerce and the Commission,[15] Commerce issued a continuation of the antidumping duty orders on imports of rebar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine, effective August 9, 2007.[16] Following the Commission's negative determination in the full five-year review, effective September 7, 2006, Commerce issued a revocation of the antidumping duty order on imports of rebar from Korea.[17]

The second five-year reviews

On October 5, 2012, the Commission completed full five-year reviews of the subject orders and determined that revocation of the antidumping orders on rebar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.[18] Following affirmative determinations in the second five-year reviews by Commerce and the Commission,[19] Commerce issued a continuation of the antidumping orders

[13] In the first reviews, the Commission found that appropriate circumstances did not exist to conduct a regional industry analysis, and therefore based its determinations on a national industry analysis. Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Korea, Latvia, Moldova, Poland, and Ukraine, Inv. Nos. 731-TA-873-875, 877-880 and 882 (Review), USITC Publication 3933, pp. 10-11, July 2007 ("First Review Publication"). Id., p. 10 fn. 33.

[14] First Review Publication, p. 3.

[15] 71 FR 70509, December 5, 2006; 72 FR 9732, March 5, 2007; 72 FR 16767, April 5, 2007, and 72 FR 42110, August 1, 2007.

[16] 72 FR 44830, August 9, 2007.

[17] 72 FR 44830, August 9, 2007.

[18] Concrete Reinforcing Bar from Belarus, China, Indonesia, Korea, Latvia, Moldova, Poland, and Ukraine, Inv. Nos. 731-TA-873-875, 877-880 and 882 (Second Review), USITC Publication 4409, p.1, July 2013 ("Second Review Publication")

[19] 77 FR 70140, November 23, 2012, and 78 FR 41079, July 9, 2013.

on imports of rebar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine, effective July 22, 2013.[20]

The third five-year reviews

On September 4, 2018, the Commission completed an expedited reviews of the subject orders and determined that revocation of the antidumping orders on rebar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.[21] Following affirmative determinations in the third five-year reviews by Commerce and the Commission,[22] Commerce issued a continuation of the antidumping orders on imports of rebar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine, effective December 17, 2018.[23]

Previous and related investigations

The Commission has conducted a number of previous import relief investigations on rebar or similar merchandise, as presented in table I-2.

[20] 78 FR 43858, July 22, 2013.

[21] Concrete Reinforcing Bar from Belarus, China, Indonesia, Korea, Latvia, Moldova, Poland, and Ukraine, Inv. Nos. 731-TA-873-875, 877-880 and 882 (Third Review), USITC Publication 4838, p.1, November 2018 ("Third Review Publication")

[22] 83 FR 50344, October 5, 2018, and 83 FR 63188, December 7, 2018.

[23] 83 FR 64530, December 17, 2018.

Table I-2
Rebar: Previous and related Commission proceedings and current status

Date	Number	Country	Determination	Current Status of Order
1963	AA1921-33	Canada	Affirmative	No outstanding antidumping duty order associated with this investigation
1969	AA1921-62	Australia	Affirmative	No outstanding antidumping duty order associated with this investigation
1973	AA1921-122	Mexico	Negative	---
1984	TA-201-51	Safeguard	Negative	Rejected by Presidential Proclamation 4508 of September 18
1996	731-TA-745	Turkey	Affirmative	Order revoked after second review, effective March 2008
2000	731-TA-872	Austria	Terminated	August 2000
2000	731-TA-876	Japan	Negative	---
2000	731-TA-877	South Korea	Affirmative	Order revoked after second review, effective September 2006
2000	731-TA-881	Russia	Terminated	August 2000
2000	731-TA-883	Venezuela	Terminated	August 2000
2001	TA-201-73	Safeguard	Affirmative	Terminated by Presidential Proclamation 7741 of December 4.
2012	731-TA-1227	Mexico	Affirmative	Order in place
2012	731-TA-1228	Turkey	Negative	---
2012	701-TA-502	Turkey	Affirmative	Order in place
2016	731-TA-1338	Japan	Affirmative	Order in place
2016	731-TA-1339	Taiwan	Affirmative	Order in place
2016	701-TA-564	Turkey	Affirmative	Order in place
2016	731-TA-1340	Turkey	Affirmative	Order in place

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.

Summary data

Table I-3 presents a summary of data from the original investigations, prior reviews, and the current full five-year reviews. Apparent U.S. consumption by quantity was lower in 2023 than in 2000, 2006, and 2012, but higher than in 2017. Apparent U.S. consumption by value was higher in 2023 than all prior terminal years. U.S. producers' market share by quantity and by value was higher in 2023 than all prior terminal years, with the exception of 2012 by quantity and value. Similarly, U.S. producers' capacity, production, and U.S. shipments were higher in 2023 than all prior terminal years, with the exception of 2012.

Table I-3
Rebar: Comparative data from the original investigation and subsequent reviews, by terminal years

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

Item	Measure	2000	2006	2012	2017	2023
Apparent consumption	Quantity	***	9,875,423	6,987,682	8,103,044	***
U.S. producers market share	Share of quantity	***	75.1	87.2	81.9	***
Belarus market share	Share of quantity	***	0.0	0.0	0.0	***
China market share	Share of quantity	***	0.0	0.0	0.0	***
Indonesia market share	Share of quantity	***	0.0	0.0	0.0	***
Latvia market share	Share of quantity	***	0.0	0.0	0.0	***
Moldova market share	Share of quantity	***	0.0	0.0	0.0	***
Poland market share	Share of quantity	***	0.0	0.0	0.0	***
Ukraine market share	Share of quantity	***	0.0	0.0	0.0	***
Subject market share	Share of quantity	***	0.0	0.0	0.0	***
Nonsubject market share	Share of quantity	***	24.9	12.8	18.1	***
Import market share	Share of quantity	***	24.9	12.8	18.1	***
Apparent consumption	Value	***	4,957,637	4,492,485	4,039,865	***
U.S. producers market share	Share of value	***	78.1	87.7	83.6	***
Belarus market share	Share of value	***	0.0	0.0	0.0	***
China market share	Share of value	***	0.0	0.0	0.0	***
Indonesia market share	Share of value	***	0.0	0.0	0.0	***
Latvia market share	Share of value	***	0.0	0.0	0.0	***
Moldova market share	Share of value	***	0.0	0.0	0.0	***
Poland market share	Share of value	***	0.0	0.0	0.0	***
Ukraine market share	Share of value	***	0.0	0.0	0.0	***
Subject market share	Share of value	***	0.0	0.0	0.0	***
Nonsubject market share	Share of value	***	21.9	12.3	16.3	***
Import market share	Share of value	***	21.9	12.3	16.4	***

Table continued.

Table I-3 Continued
Rebar: Comparative data from the original investigation and subsequent reviews, by terminal years

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

Item	Measure	2000	2006	2012	2017	2023
Belarus	Quantity	***	0	0	0	---
Belarus	Value	***	0	0		---
Belarus	Unit value	***	0	0	0	---
China	Quantity	163,124	3	0	1,198	1,037
China	Value	36,268	4	0	1,126	5,118
China	Unit value	$222	$1,303	0	940	$4,934
Indonesia	Quantity	---	0	0	0	---
Indonesia	Value	---	0	0	0	---
Indonesia	Unit value	---	0	0	0	---
Latvia	Quantity	207,705	0	0	0	---
Latvia	Value	41,965	0	0	0	---
Latvia	Unit value	$202	0	0	0	---
Moldova	Quantity	181,492	0	0	0	---
Moldova	Value	38,473	0	0	0	---
Moldova	Unit value	$212	0	0	0	---
Poland	Quantity	69,292	129	0	0	23
Poland	Value	13,959	50	0	0	36
Poland	Unit value	$201	$387	0	0	$1,586
Ukraine	Quantity	168,054	0	0	1,074	805
Ukraine	Value	33,783	0	0	563	5,064
Ukraine	Unit value	$201	0	0	524	$6,287
Subject sources	Quantity	***	133	0	0	1,865
Subject sources	Value	***	54	0	0	10,217
Subject sources	Unit value	$213	$411	0	0	$5,478
Nonsubject sources	Quantity	504,277	2,454,275	897,462	1,463,027	1,416,942
Nonsubject sources	Value	161,332	1,084,640	551,056	659,679	1,070,201
Nonsubject sources	Unit value	$320	$442	$614	$451	$755
All import sources	Quantity	***	2,454,407	897,462	1,465,298	1,418,807
All import sources	Value	***	1,084,694	551,056	661,368	1,080,418
All import sources	Unit value	$219	$442	$614	$451	$761

Table continued.

Table I-3 Continued
Rebar: Comparative data from the original investigation and subsequent reviews, by terminal years

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

Item	Measure	2000	2006	2012	2017	2023
Capacity	Quantity	8,392,708	8,615,640	9,663,799	***	***
Production	Quantity	6,444,053	7,704,871	6,564,137	***	***
Capacity utilization	Ratio	76.8	89.4	67.9	***	***
Producer U.S. shipments	Quantity	***	7,421,016	***	***	***
Producer U.S. shipments	Value	***	3,872,943	***	***	***
Producer U.S. shipments	Unit value	***	$522	***	***	***
Producer inventories	Quantity	***	597,345	508,550	***	***
Producer inventory ratio to total shipments	Ratio	***	7.8	7.8	***	***
Production workers (number)	Noted in label	***	4,056	3,944	***	***
Hours worked (in 1,000 hours)	Noted in label	***	8,650	8,024	***	***
Wages paid (1,000 dollars)	Value	***	284,103	301,350	***	***
Hourly wages (dollars per hour)	Value	***	$32.85	$37.56	***	***
Productivity (short tons per 1,000 hours)	Noted in label	***	890.8	818.1	***	***
Net sales	Quantity	***	7,742,037	6,501,637	***	***
Net sales	Value	1,750,282	4,006,813	4,214,958	***	***
Net sales	Unit value	270	$518	$648		***
Cost of goods sold	Value	$1,605,071	2,965,198	3,836,958	***	***
Gross profit or (loss)	Value	145,211	1,041,615	378,000	***	***
SG&A expense	Value	0	213,854	148,457	***	***
Operating income or (loss)	Value	44,562	827,761	229,544	***	***
Unit COGS	Unit value	248	$383	$590	***	***
Unit operating income	Unit value	$7	$107	$35	***	***
COGS/ Sales	Ratio	91.7	74.0	91.0	***	***
Operating income or (loss)/ Sales	Ratio	2.5	20.7	5.4	***	***

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.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Data for 2000 are from the last year of the original investigations; 2006 from the last year of the first review; 2012 the last year of the second review; 2017 the last year of the third review; and 2023 the last year of this review, the fourth review.

Table I-4 presents U.S. producers' U.S. shipments and U.S. imports from the current full five-year reviews. Figure I-1 presents U.S. producers' U.S. shipments and U.S. imports from the original investigations, prior reviews, and the current full five-year reviews.

Table I-4
Rebar: U.S. producers' U.S. shipments and U.S. imports, by period

Quantity in short tons

Source	Measure	2018	2019	2020	2021	2022	2023
U.S. producers	Quantity	***	***	***	***	***	***
Subject sources	Quantity	4,508	6,187	3,965	4,803	4,093	1,865
Nonsubject sources	Quantity	1,186,929	1,073,036	1,082,651	1,325,862	1,464,153	1,416,942
All import sources	Quantity	1,191,436	1,079,224	1,086,615	1,330,665	1,468,246	1,418,807
All sources	Quantity	***	***	***	***	***	***

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 7214.20.0000, 7222.11.0001, 7222.11.0057, 7222.11.0059, 7222.11.0082, 7222.11.0084, 7222.30.0001, 7222.30.0022, 7222.30.0024, 7222.30.0082, 7222.30.0084, 7228.20.1000, 7228.30.8010, and 7228.60.6000, accessed August 29, 2024. Imports are based on the imports for consumption data series.

Figure I-1
Rebar: U.S. producers' U.S. shipments and 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 7214.20.0000, 7222.11.0001, 7222.11.0057, 7222.11.0059, 7222.11.0082, 7222.11.0084, 7222.30.0001, 7222.30.0022, 7222.30.0024, 7222.30.0082, 7222.30.0084, 7228.20.1000, 7228.30.8010, and 7228.60.6000, accessed August 29, 2024. Imports are based on the imports for consumption data series.

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 proceeding that relates to the statutory criteria is presented throughout this report. A summary of trade and financial data for rebar 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 seven U.S. producers of rebar that are believed to have accounted for nearly all of domestic production of rebar in 2023. U.S. import data and related information are based on Commerce's official import statistics. Foreign industry data and related information are based on the questionnaire responses of three producers of rebar. One producer in Poland accounted for *** percent of total production and two producers in Ukraine accounted for *** percent of

total production submitted questionnaire responses.[24] The Commission did not receive foreign producer questionnaires from Belarus, China, Indonesia, Latvia, and Moldova. Responses by U.S. producers, importers, purchasers, and foreign producers of rebar 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.

Commerce's reviews[25]

Administrative reviews[26]

Commerce has completed one administrative review of the outstanding antidumping duty order on rebar from Belarus.[27] Since the completion of the last five-year reviews, Commerce has not conducted any administrative reviews of the outstanding antidumping duty orders on rebar from China, Indonesia, Latvia, Moldova, Poland, or Ukraine.[28]

Five-year reviews

Commerce has issued the final results of its expedited/full reviews with respect to all subject countries.[29] Table I-5 through I-11 present the antidumping margins calculated by Commerce in its original investigations and subsequent reviews.

[24] ***.

[25] Commerce has not conducted any changed circumstances review or scope rulings, since the completion of the last five-year review. In addition, Commerce has not issued any duty absorption findings, any company revocations, anti-circumvention findings since the imposition of the order.

[26] Commerce has not issued duty absorption findings with respect to product from the subject countries.

[27] 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.

[28] Commerce concluded that Belarus continues to be a non-market economy (NME) country for purpose of the antidumping duty law, because its economy does not primarily operate on market principles. 85 FR 67511, October 23, 2020

[29] 89 FR 16529, March 7, 2024.

Table I-5
Rebar: Commerce's original and first five-year countervailable subsidy/dumping margins for producers/exporters in Belarus

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*)
Country-wide	114.53	114.53	114.53	See note	See note

Source: 66 FR 46777, September 7, 2001, 71 FR 70509, December 5, 2006; 77 FR 70140, November 12, 2012; 83 FR 50344, October 5, 2018; 89 FR 16529, March 7, 2024.

Note: Commerce determines that revocation of the Order would be likely to lead to continuation or recurrence of dumping and that the magnitude of the margins of dumping likely to prevail would be at rates up to 114.53 percent.

Table I-6
Rebar: Commerce's original and first five-year countervailable subsidy/dumping margins for producers/exporters in China

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*)
Laiwu Steel Group	133.00	133.00	133.00	See note	See note
Country-wide	133.00	133.00	133.00	See note	See note

Source: 66 FR 46777, September 7, 2001, 71 FR 70509, December 5, 2006; 77 FR 70140, November 12, 2012; 83 FR 50344, October 5, 2018; 89 FR 16529, March 7, 2024.

Note: Commerce determines that revocation of the Order would be likely to lead to continuation or recurrence of dumping and that the magnitude of the margins of dumping likely to prevail would be at rates up to 133.00 percent.

Table I-7
Rebar: Commerce's original and first five-year countervailable subsidy/dumping margins for producers/exporters in Indonesia

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*)
Sakti	71.01	71.01	71.01	See note	See note
Bhirma	71.01	71.01	71.01	See note	See note
Krakatau	71.01	71.01	71.01	See note	See note
Perdana	71.01	71.01	71.01	See note	See note
Hanil	71.01	71.01	71.01	See note	See note
Pulogadung	71.01	71.01	71.01	See note	See note
Tunggal	71.01	71.01	71.01	See note	See note
Master Steel	71.01	71.01	71.01	See note	See note
All other	60.46	60.46	60.46	See note	See note
Country-wide	N/A	N/A	N/A	77.01	77.01

Source: 66 FR 46777, September 7, 2001, 71 FR 70509, December 5, 2006; 77 FR 70140, November 12, 2012; 83 FR 50344, October 5, 2018; 89 FR 16529, March 7, 2024.

Note: Commerce determines that revocation of the Order would be likely to lead to continuation or recurrence of dumping and that the magnitude of the margins of dumping likely to prevail would be at rates up to 77.01 percent.

Table I-8
Rebar: Commerce's original and first five-year countervailable subsidy/dumping margins for producers/exporters in Latvia

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*)
Liepajas Metalurgs	17.21	17.21	16.99	See note	See note
All others	17.21	17.21	16.99	See note	See note
Country-wide	N/A	N/A	N/A	16.99	16.99

Source: 66 FR 46777, September 7, 2001, 71 FR 68555, November 27, 2006; 77 FR 70140, November 12, 2012; 83 FR 50344, October 5, 2018; 89 FR 16529, March 7, 2024.

Note: Commerce determines that revocation of the Order would be likely to lead to continuation or recurrence of dumping and that the magnitude of the margins of dumping likely to prevail would be at rates up to 16.99 percent.

Table I-9
Rebar: Commerce's original and first five-year countervailable subsidy/dumping margins for producers/exporters in Moldova

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*)
Country-wide	232.86	232.86	232.86	232.86	232.86

Source: 66 FR 46777, September 7, 2001; 71 FR 70509, December 5, 2006; 77 FR 70140, November 12, 2012; 83 FR 50344, October 5, 2018, 89 FR 16529, March 7, 2024.

Note: Commerce determines that revocation of the Order would be likely to lead to continuation or recurrence of dumping and that the magnitude of the margins of dumping likely to prevail would be at rates up to 232.86 percent.

Table I-10
Rebar: Commerce's original and first five-year countervailable subsidy/dumping margins for producers/exporters in Poland

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*)
Stalexport	52.07	52.07	52.07	See note	52.07
Country-wide	47.13	47.13	47.13	52.07	52.07

Source: 66 FR 46777, September 7, 2001; 71 FR 70509, December 5, 2006; 77 FR 70140, November 12, 2012; 83 FR 50344, October 5, 2018; 89 FR 16529, March 7, 2024.

Note: Commerce determines that revocation of the Order would be likely to lead to continuation or recurrence of dumping and that the magnitude of the margins of dumping likely to prevail would be at rates up to 52.07 percent.

Table I-11
Rebar: Commerce's original and first five-year countervailable subsidy/dumping margins for producers/exporters in Ukraine

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*)
Mittal Steel Kryviy Rih	N/A	41.69	See note	See note	See note
Krivorozhstal	N/A	41.69	See note	See note	See note
Country-wide	41.69	41.69	41.69	41.69	41.69

Source: 66 FR 46777, September 7, 2001; 71 FR 68555, November 27, 2006; 77 FR 70140, November 12, 2012; 83 FR 50344, October 5, 2018; 89 FR 16529, March 7, 2024.

Note: Commerce determines that revocation of the Order would be likely to lead to continuation or recurrence of dumping and that the magnitude of the margins of dumping likely to prevail would be at rates up to 41.69 percent.

The subject merchandise

Commerce's scope

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

> *The product covered by the orders is all steel concrete reinforcing bars sold in straight lengths, currently classifiable in the Harmonized Tariff Schedule of the United States (HTSUS) under item numbers 7214.20.00, 7228.30.8050, 7222.11.0050, 7222.30.0000, 7228.60.6000, 7228.20.1000, or any other tariff item number. Specifically excluded are plain rounds (* i.e., *non-deformed or smooth bars) and rebar that has been further processed through bending or coating.*[30]

Tariff treatment

Rebar is currently provided for in Harmonized Tariff Schedule of the United States ("HTS") subheadings 7214.20.00, 7222.11.00, 7222.30.00, 7228.20.10, 7228.30.80, and 7228.60.60. Commerce's scope explicitly includes statistical reporting numbers 7214.20.0000, 7222.11.0050, 7222.30.0000, 7228.20.1000, 7228.30.8050, and 7228.60.6000. However, HTS statistical reporting numbers 7222.11.0050, 7222.30.0000, and 7228.30.8050 have changed. The changes to these HTS statistical reporting numbers are summarized in tables I-12, I-13, and I-14.

Table I-12
Rebar: Changes in HTS statistical reporting number 7222.11.0050, by year of change

2008	2009	2011	2013
7222.11.0050	7222.11.0055	7222.11.0001	7222.11.0001
	7222.11.0080	7222.11.0056	7222.11.0057
		7222.11.0081	7222.11.0059
			7222.11.0082
			7222.11.0084

Sources: USITC, HTS (2009) Supplement 1, January 2009, Change Record p. 2. USITC, HTS (2011) Basic Revision 1, Publication 4201, July 2011, Change Record p. 3. USITC, HTS (2013) Basic Edition, Publication 4368, January 2013, pp. 72-31.

[30] 83 FR 63540, December 17, 2018.

Table I-13
Rebar: Changes in HTS statistical reporting number 7222.30.0000, by year of change

2008	2009	2011	2013
7222.30.0000	7222.30.0010	7222.30.0001	7222.30.0001
	7222.30.0080	7222.30.0011	7222.30.0012
		7222.30.0081	7222.30.0022
			7222.30.0024
			7222.30.0082
			7222.30.0084

Sources: USITC, HTS (2009) Supplement 1, January 2009, Change Record p. 2. USITC, HTS (2011) Basic Revision 1, Publication 4201, July 2011, Change Record p. 3. USITC, HTS (2013) Basic Edition, Publication 4368, January 2013, pp. 72-31.

Table I-14
Rebar: Changes in HTS statistical reporting number 7228.30.8050, by year of change

2008	2010	2012
7228.30.8050	7228.30.8010	7228.30.8010
	7228.30.8060	7228.30.8015
		7228.30.8041
		7228.30.8045
		7228.30.8070

Sources: USITC, HTS (2010) Basic Edition, Publication 4123, December 2009, Change Record, p. 9. USITC, HTS (2012) Basic Edition, Publication 4299, February 2012, Change Record, p. 56.

HTS statistical reporting numbers 7214.20.0000 and 7228.30.8010 cover only rebar within the scope of these reviews; HTS statistical reporting numbers 7222.30.0012, 7228.30.8015, 7228.30.8041, 7228.30.8045, and 7228.30.8070 were believed not to cover any in-scope products; and the other relevant HTS statistical reporting numbers cover both rebar within and products outside the scope of these reviews.

The general rate of duty is "free" for HTS subheadings 7214.20.00, 7222.11.00, 7222.30.00, 7228.20.10, 7228.30.80, and 7228.60.60."[31] Effective April 9, 2022, products from Belarus are subject to duty rates set forth in column 2 of the HTS.[32] The column 2 rates of duty are 20 percent ad valorem for HTS subheading 7214.20.00; 29 percent for HTS subheadings 7222.11.00 and 7222.30.00; and 28 percent for 7228.20.10, 7228.30.80, and 7228.60.60.[33] 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, rebar originating in Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine is subject to an additional 25 percent ad valorem duty under

[31] USITC, HTS (2024) Revision 8, Publication 5537, August 2024, pp. 72-20, 72-35, 72-36, 72-43, 72-44.
[32] 87 FR 38875, June 30, 2022.
[33] USITC, HTS (2024) Revision 8, Publication 5537, August 2024, pp. 72-20, 72-35, 72-36, 72-43, 72-44.

section 232 of the Trade Expansion Act of 1962, as amended. However, the section 232 duties on steel articles originating in Ukraine are suspended, effective June 1, 2022, to June 1, 2025.[34] [35]

Effective September 1, 2019, rebar originating in China was subject to an additional 15 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective February 14, 2020, the section 301 duty for rebar was reduced to 7.5 percent.[36]

The product

Description and applications[37]

The construction industry uses rebar extensively to enhance concrete's compressional and tensional strength. It also controls cracking during curing and temperature fluctuations. The surface of rebar is described as either "deformed" or "plain." Plain rebar is specifically excluded from the scope of the orders. Deformed rebar's surface protrusions (or deformations) inhibit longitudinal movement relative to the surrounding concrete which allows the rebar to resist tension, compression, temperature variation, and the shear stresses in reinforced concrete.

[34] See also HTS heading 9903.80.01 and U.S. notes 16(a) and 16(b) and related tariff provisions for this duty treatment. USITC, HTS (2024) Revision 8, Publication 5537, August 2024, pp. 99-III-5 – 99-III-7, 99-III-281.

[35] 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, 2025. 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 23421, May 21, 2019; 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; 89 FR 227, January 3, 2024; 89 FR 48233, June 5, 2024.

[36] 84 FR 45821, August 30, 2019; 85 FR 3741, January 22, 2020. See also HTS heading 9903.88.15 and U.S. notes 20(r) and 20(s) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2024) Revision 8, Publication 5537, August 2024, pp. 99-III-88 – 99-III-102, 99-III-313.

[37] Unless otherwise noted, this information is based on Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine, Investigation Nos. 731-TA-873-875, 878-880, and 882 (Third Review), USITC Publication 4838, November 2018 ("Third review publication"), pp. I-11 – I-13.

During construction, a deformed rebar is placed in a form and concrete from a mixer is poured over it. Once the concrete has set, movement is resisted, as the stresses are transferred from the concrete to the steel reinforcement by friction and adhesion along the deformed surface of the steel.

Rebar sold in the U.S. market is generally manufactured to conform to various ASTM International ("ASTM") standards,[38] which specify for each bar size, the nominal unit weight, nominal dimensions, and deformation requirements (dimensions and spacing), as well as the chemical composition, tensile strength, yield strength (grade), and elongation tolerances.[39] Rebar is most commonly rolled from nonalloy billet steel to the requirements of ASTM A615/A615M. Rebar can also be rerolled from the head (top) portion of scrapped nonalloy steel rails or rerolled from scrapped axles of railroad rolling stock and locomotives to the requirements of ASTM A996/A996M. For special applications (e.g., in seismic areas) that require a combination of strength, weldability, ductility, and bendability, ASTM A706/A706M (a high-strength low-alloy ("HSLA") steel) is specified. Certain forged rebars of nonalloy or HSLA steel are covered under ASTM A970/970M. There is also a standard for rebar made from stainless steel (ASTM A955/A955M) for special applications requiring corrosion resistance (e.g., for long-term resistance to road salts and de-icing chemicals on concrete bridges) or controlled magnetic permeability (e.g., for avoiding interference with hospital imaging equipment). To conform to ASTM specifications, rebar is identifiable by a distinctive set of raised marks legibly rolled onto the surface of one side of the bar that denote the producer's hallmark, mill designation, size, steel type, and minimum yield strength.

Generally, deformed rebar that meet these various ASTM specifications are interchangeable except for use in seismic areas.[40] The American Concrete Institute ("ACI") 318 Code provides guidelines for use of a deformed rebar in building construction. The American Association of State and Highway and Transportation Officials ("AASHTO") provide guidelines for use of deformed rebar in highway and bridge construction. However, the contents of the two specifications are similar and are applicable throughout the continental United States and in Puerto Rico.

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[38] ASTM International is not a product-testing or product-certification organization. Rather, manufacturers can choose voluntarily to indicate on the label or packaging that their products have been tested according to ASTM standards.

[39] The ASTM standards apply to both deformed and plain-round rebar, whether in straight lengths or coiled. There are separate and non-interchangeable standards for rebar with dimensions and designations in English units (e.g., ASTM A615) versus SI (metric) units (e.g., ASTM A615M).

[40] Rebar for use in seismic areas is of high-strength low-alloy steel that provides a combination of strength, weldability, ductility, and bendability, as specified by ASTM A706/A706M.

Rebar is available in sizes ranging from #3 through #18, as specified by ASTM standards. These size indicators are about eight times the respective nominal diameters in eighths of an inch (e.g., 3/8-inch bar is designated as size #3 and 1-inch rebar is designated as size #8),[41] although the relationship diverges somewhat for rebar larger than size #9.[42] Rebar is available from mills in various lengths, from less than 20 feet to more than 60 feet. Certain rebar sizes and lengths tend to predominate among end uses. A considerable portion of smaller sizes (i.e., #3–#5) is used in light construction applications (e.g., residences, swimming pools, patios, and walkways). By contrast, heavy construction applications (e.g., high-rise buildings, commercial facilities, industrial structures, bridges, roads, etc.) use all sizes and lengths. The larger sizes (#6 and above) and longer lengths (60 feet or more) are used almost exclusively in heavy construction applications.

Manufacturing processes[43]

Rebar mills typically specialize in producing rebar either from (1) billet steel, (2) rail steel, or (3) railroad axle steel, because each involves different starting materials and imposes somewhat different rolling requirements. The most common manufacturing process to produce deformed rebar from billet steel consists of three stages: (1) melting steel scrap, (2) casting billets, and (3) hot rolling the bar. In contrast, the manufacturing process for rebar produced from scrapped rail or axle steel, or from purchased billets, requires only the rolling stage.

In the United States, non-integrated "mini-mills" produce rebar by melting steel scrap in electric-arc furnaces. Once molten, the liquid steel is poured from the furnace into a refractory-lined ladle, where any necessary alloys are added to impart the required chemical and physical properties. Molten steel is cast into billets of the size and shape suitable for the rolling process. In the more common continuous (strand) casting process, molten steel is poured from the ladle into a tundish (reservoir dam), which controls the rate of flow into the molds at the top of the caster. A solid "skin" forms around the molten steel at the top openings of the mold, and as the columns of partially solidified steel descend through the caster, water sprays rapidly cool the cast steel (which helps minimize compositional segregation) to the point that the strands are completely solidified when emerging from the bottom of the caster. Lengths of continuous-cast

[41] Nominal diameters of deformed rebar are equivalent to those of plain round bars of the same unit weight (mass) per foot (meter).

[42] Rebar is also available in metric sizes, with nominal diameters from 10 millimeters (mm) to 57 mm, as specified by ASTM standards.

[43] Unless otherwise noted, this information is based on the Third review publication, pp. I-13 – I-15.

billets are flame-cut at intervals, and then may be either sent directly for further processing or be cooled on a cooling bed and subsequently stored for later use.

Prior to rolling, newly cast billets, scrapped rails, or scrapped axles are heated to rolling temperature in a reheat furnace. The steel is reduced in size as it passes through successive rolling stands of the rolling mill. Most modern rolling mills are in-line, and rebar of different sizes can be produced by changing the rolls. Deformations are rolled onto the surface of the rebar as it passes through the final finishing stand, which has patterns cut into the grooves of the rolls.[44] After the rolling process, the rebar is cut to length before being sent to a cooling bed to be air-cooled.

Rebar can be water-quenched and tempered, rather than air-cooled. Quenched-and-tempered rebar can meet the same physical property requirements of the ASTM A615/A615M specification without the addition of certain alloys to the steel billets that are rolled into rebar, and thus is slightly less expensive to produce. In this process,[45] hot-rolled rebar passes through a water-quenching stand (consisting of a series of water coolers), which rapidly cools the outer case of the rebar. The quench-and-temper treatment causes a dual metallurgical structure to form in the cross-section of the bar, which ultimately produces a rebar with a stronger outer case and a more ductile core. Thus, the quench-and-temper process can achieve high yield strength and improved ductility in the absence of the alloying elements that would otherwise be required to provide similar physical properties in air-cooled rebar.

Some U.S. rebar producers manufacture additional products using the same equipment, machinery, and production workers that are used to produce straight-length rebar, including coiled rebar, hot-rolled merchant bar, hot-rolled special-bar-quality ("SBQ") bar products, and wire rod.[46] Coiled rebar is produced by steel mills that possess laying heads (coilers) and coil

[44] When rolling plain rebar with uniformly smooth surfaces rather than with deformations, smooth-grooved rolls are substituted in the final finishing stand.

[45] The water-quench-and-tempering process can be referred to as the "Thermex" process. The mill equipment used to produce rebar through this process is also known as Thermex. The Thermex process was developed and branded by German engineering firm Hennigsdorfer Stahl Engineering ("HSE") GmbH in the 1970s.

[46] Merchant bar products are available with round, square, flat, angled, and channeled cross sections, and are used to manufacture a variety of products for the construction, industrial and commercial fabrication, and original equipment manufacturing ("OEM") sectors. SBQ bar products are produced from higher-quality carbon and alloy steels and to stricter requirements for their mechanical properties, metallurgical consistency, and dimensional tolerances than merchant bar products. SQB is used principally for producing OEM components for the automotive and heavy-equipment sectors. Wire rod (delivered in coil form) is used by manufacturers to provide a variety of products, such as chain-link fencing, nails, wire netting, and pre-stressed concrete strand.

boxes. Coiled rebar is used in the same applications as straight-length rebar but is often preferred by customers that have their own automatic straightening and cutting machines.

Domestic like product issues

In its original determinations, its full first and second five-year reviews, and its expedited third five-year reviews, the Commission defined the domestic like product as steel concrete reinforcing bar, coextensive with Commerce's scope. In its original determinations, three Commissioners based their material injury analysis on a national industry consisting of all producers of steel concrete reinforcing bar and three Commissioners found a regional industry consisting of all domestic production facilities producing the domestic like product in the region consisting of the 30 contiguous states from New England to Texas and from the Gulf of Mexico north on both sides of the Mississippi up to the Canadian border, plus the District of Columbia and Puerto Rico. In its full first five-year review determinations, the Commission found that appropriate circumstances did not exist to conduct a regional industry analysis and defined the domestic industry to consist of all domestic producers of steel concrete reinforcing bar. In its full second five-year review determinations and its expedited third five-year review determinations, the Commission defined the domestic industry to include all domestic producers of steel concrete reinforcing bar.[47]

In the original investigations, the Commission found that three firms qualified as related parties based on ownership interests, but the Commission did not exclude any of those firms from the domestic or regional industry.[48] In the first reviews, the Commission found that CMC and Border Steel Inc. (now ArcelorMittal Vinton) were related parties but did not find appropriate circumstances to exclude either firm.[49] In the second five-year reviews, CMC and ArcelorMittal Vinton were found to be related parties but the Commission did not find appropriate circumstances to exclude either firm.[50] In its notice of institution for the third reviews, the Commission solicited comments from interested parties regarding what they deemed to be the appropriate definitions of the domestic like product and domestic industry and inquired as to whether any related party issues existed. According to their response to the notice of institution, the domestic interested parties agreed with the Commission’s definition of

[47] 88 FR 75033, November 1, 2023.

[48] Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine, Investigation Nos. 731-TA-873-875, 878-880, and 882 (Second Review), USITC Publication 4409, July 2013 (“Second review publication”) , p. 6.

[49] Second Review Publication, p. 6.

[50] Second Review Publication, pp. 6-7.

the domestic like product as stated in the previous five-year reviews.[51] In the third five-year reviews, the domestic interested parties noted that CMC is related to CMC Poland z o.o. and provided foreign producer trade data on behalf of the firm.[52]

According to their response to the notice of institution, the domestic interested parties agreed with the Commission's definition of the domestic like product as stated in the previous five-year reviews.[53] According to its response to the notice of institution, the Ukrainian respondent interested party (ArcelorMittal) agreed with the Commission's definition of the domestic like product as stated in the previous five-year reviews.[54] No party requested that the Commission collect data concerning other possible domestic like products in their comments on the Commission's draft questionnaires. In its prehearing brief, counsel for RTAC agreed with the definition of the domestic like product set forth in the original investigations.[55] No other interested party provided further comment on the domestic like product.

U.S. market participants

U.S. producers

During the final phase of the original investigations, the Commission received U.S. producer questionnaires from 14 firms, which accounted for virtually all production of rebar in the United States during 2000.[56] During the first five-year reviews, the Commission received U.S. producer questionnaires from eight firms, which accounted for the vast majority of production of rebar in the United States during 2001-2007.[57] In the second five-year reviews, the Commission received U.S. producer questionnaires from seven producers, which were believed to account for virtually all U.S. production of rebar in 2012.[58] In the third five-year reviews, the domestic interested parties provided a list of eleven known and currently

[51] Third Review Publication, I-19.
[52] Third Review Publication, I-19.
[53] Domestic interested parties' response to the notice of institution, December 1, 2023, p. 49.
[54] Respondent interested party's response to the notice of institution, December 4, 2023, p. 7.
[55] Domesitc interested party's prehearing brief, p. 37.
[56] Original publication, p. III-1.
[57] First review publication, p. I-2.
[58] Second Review Publication, p. I-27.

operating U.S. producers of rebar. Six responding firms accounted for approximately *** percent of production of rebar in the United States during 2017.[59]

In the current fourth five-year reviews, the Commission issued U.S. producers' questionnaires to 11 firms. Seven firms *** provided the Commission with information on their rebar operations. These firms are believed to account for nearly all U.S. production of rebar in 2023. Table I-15 presents a list of current domestic producers of rebar and each firm's position on continuation of the orders, production locations, and share of reported production of rebar in 2023.

Table I-15
Rebar: U.S. producers, positions on orders, U.S. production locations, and shares of reported U.S. production, 2023

Share in percent

Firm	Position on continuation of orders	Production location(s)	Share of production
Byer	***	Byer Steel 200 West North Bend Road, Cincinnati, OH AB Steel 200 West North Bend Road, Cincinnati, OH Gastrich Rebar 200 West North Bend Road, Cincinnati, OH	***
Cascade	***	McMinnville, OR City of Industry, CA	***
CMC	***	Mesa, AZ Jacksonville, FL Cayce, SC Seguin, TX Durant, OK Knoxville, TN	***
Gerdau	***	Midlothian, TX Charlotte, NC Wilton, IA Jackson, TN	***
Nucor	***	Charlotte, NC	***
Optimus	***	Beaumont, TX	***
Steel Dynamics	***	Roanoke, VA Columbia City, IN Pittsboro, IN	***
All firms	Various	Various	100.0

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

[59] Investigation Nos. 731-TA-873-875, 878-880, and 882 (Third Review): Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine, Confidential Report, INV-QQ-096, August 23, 2018, as revised in INV-QQ-107, September 28, 2018 ("Third review confidential report"), pp. I-2-I-3, I-22.

As indicated in table I-16, one U.S. producer *** is related to foreign producer of the subject merchandise and none are related to U.S. importers of the subject merchandise. In addition, as discussed in greater detail in Part III, no U.S. producers directly import the subject merchandise or purchase the subject merchandise from U.S. importers.

Table I-16
Rebar: 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 investigations, the Commission received U.S. importer questionnaires from 23 firms, which accounted for approximately 44.1 to 57.9 percent of total U.S. imports of rebar during 1998-2000.[60] During the first five-year reviews, the Commission received U.S. importer questionnaires from 18 firms, which accounted for approximately 70 to 84 percent of total U.S. imports of rebar during 2001 to 2006.[61] In the second five-year reviews, the Commission received questionnaire responses from 15 firms. However, no firms reported importing rebar from subject countries and between 2007 and 2012, official import statistics indicated that China was the only subject source of U.S. imports of rebar.[62]

In its third five-year reviews, the Commission did not receive responses from any importer respondent interested parties, and in its response to the Commission's notice of institution, the domestic interested parties were not able to provide a list of potential U.S. importers of rebar.[63] Import data presented in the final phase and subsequent reviews are based on official Commerce statistics.

In the current proceedings, the Commission issued U.S. importers' questionnaires to 14 firms believed to be importers of rebar, as well as to all U.S. producers of rebar. No usable questionnaire responses were received from importers of rebar from subject sources, and three useable questionnaires were received from importers of rebar from nonsubject sources. Table I-17 lists all responding U.S. importers of rebar from subject sources and other sources, their locations, and their shares of U.S. imports in 2023.

[60] Second Review Publication, p. I-30.
[61] Second Review Publication, p. I-30.
[62] Second Review Publication, p. I-30.
[63] Third review publication, p. I-20.

Table I-17
Rebar: U.S. importers, their headquarters, and share of imports within each source, 2023

Share in percent

Firm	Headquarters	Subject sources	Nonsubject sources	All import sources
ArcelorMittal	Contrecoeur, QC	***	***	***
Steel Hub Americas	Danville, IL	***	***	***
Steel Hub PR	Danville, IL	***	***	***
All firms	Various	***	100.0	100.0

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

U.S. purchasers

The Commission received 17 usable questionnaire responses from firms that bought rebar during January 2018—June 2024.[64] *** responding purchasers are fabricators, *** are distributors, *** is an end-user, *** are fabricator-distributors, and *** are fabricator-end users. In general, responding U.S. purchasers were located across the contiguous United States. The responding purchasers represented firms in a variety of domestic industries, including construction, contracting, lumber yards, and rebar fabrication. Large purchasers of rebar include ***.

Apparent U.S. consumption and market shares

Quantity

Table I-18 and figure I-2 present data on apparent U.S. consumption and U.S. market shares by quantity for rebar. Apparent U.S. consumption based on quantity decreased by *** percent from 2021 to 2022 then decreased by *** percent from 2022 to 2023, decreasing overall by *** percent during 2021-23. Apparent U.S. consumption by quantity was *** percent lower in January-June 2024 than in January-June. U.S. producers' market share based on quantity decreased by *** percentage points during 2021-23 but was *** percentage points higher in January-June 2024 than in January-June 2023. Conversely, nonsubject import market share decreased by *** percentage points during 2021-23 but was *** percentage points higher in January-June 2024 than in January-June 2023. Imports from subject sources were less than 0.1 percent of apparent U.S. consumption in any one period.

[64] Of the 17 responding purchasers, *** purchased the domestic product, *** purchased imports of the subject merchandise from other sources and *** purchased imports of rebar from unknown sources.

Table I-18
Rebar: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in short tons; shares in percent

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. producers	Quantity	***	***	***	***	***
Belarus	Quantity	---	---	---	---	---
China	Quantity	482	668	1,037	527	253
Indonesia	Quantity	---	---	---	---	---
Latvia	Quantity	---	---	---	---	---
Moldova	Quantity	---	---	---	---	---
Poland	Quantity	28	1,122	23	23	60
Ukraine, adjusted	Quantity	4,292	2,303	805	765	***
Subject sources	Quantity	4,803	4,093	1,865	1,315	***
Nonsubject sources	Quantity	1,325,862	1,464,153	1,416,942	800,571	***
All import sources	Quantity	1,330,665	1,468,246	1,418,807	801,885	574,275
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
Belarus	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Indonesia	Share	***	***	***	***	***
Latvia	Share	***	***	***	***	***
Moldova	Share	***	***	***	***	***
Poland	Share	***	***	***	***	***
Ukraine, adjusted	Share	***	***	***	***	***
Subject 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 official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7214.20.0000, 7222.11.0001, 7222.11.0057, 7222.11.0059, 7222.11.0082, 7222.11.0084, 7222.30.0001, 7222.30.0022, 7222.30.0024, 7222.30.0082, 7222.30.0084, 7228.20.1000, 7228.30.8010, and 7228.60.6000, accessed August 28, 2024; imports from Ukraine were adjusted using proprietary, Census-edited Customs records to reclassify imports of rebar manufactured in Bulgaria from Ukrainian steel that were classified as country of origin Ukraine. 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 “---“.

Figure I-2
Rebar: Apparent U.S. consumption based on quantity, by source and period

* * * * * * *

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7214.20.0000, 7222.11.0001, 7222.11.0057, 7222.11.0059, 7222.11.0082, 7222.11.0084, 7222.30.0001, 7222.30.0022, 7222.30.0024, 7222.30.0082, 7222.30.0084, 7228.20.1000, 7228.30.8010, and 7228.60.6000, accessed August 28, 2024; imports from Ukraine were adjusted using proprietary, Census-edited Customs records to reclassify imports of rebar manufactured in Bulgaria from Ukrainian steel that were classified as country of origin Ukraine. Imports are based on the imports for consumption data series.

Value

Table I-19 and figure I-3 present data on apparent U.S. consumption and U.S. market shares by value for rebar. Apparent U.S. consumption based on value increased by *** percent from 2021 to 2022 then decreased by *** percent from 2022 to 2023, increasing overall by *** percent during 2021-23. Apparent U.S. consumption was *** percent lower in January-June 2024 than in January-June 2023. U.S. producers' market share based on value decreased by *** percentage points during 2021-23 but was *** percentage points lower in January-June 2024 than in January-June 2023. Conversely, nonsubject import market share increased by *** percentage points during 2021-23 but was *** percentage points lower in January-June 2024 than in January-June 2023. Imports from subject sources were less than 0.3 percent of apparent U.S. consumption in any one period.

Table I-19
Rebar: Apparent U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; shares in percent

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. producers	Value	***	***	***	***	***
Belarus	Value	---	---	---	---	---
China	Value	2,696	3,849	5,118	2,908	1,755
Indonesia	Value	---	---	---	---	---
Latvia	Value	---	---	---	---	---
Moldova	Value	---	---	---	---	---
Poland	Value	108	2,036	36	36	113
Ukraine, adjusted	Value	18,906	13,510	5,064	4,829	***
Subject sources	Value	21,710	19,394	10,217	7,773	***
Nonsubject sources	Value	1,012,905	1,396,998	1,070,201	615,420	***
All import sources	Value	1,034,615	1,416,392	1,080,418	623,192	437,161
All sources	Value	***	***	***	***	***
U.S. producers	Share of value	***	***	***	***	***
Belarus	Share of value	***	***	***	***	***
China	Share of value	***	***	***	***	***
Indonesia	Share of value	***	***	***	***	***
Latvia	Share of value	***	***	***	***	***
Moldova	Share of value	***	***	***	***	***
Poland	Share of value	***	***	***	***	***
Ukraine, adjusted	Share of value	***	***	***	***	***
Subject 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 official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7214.20.0000, 7222.11.0001, 7222.11.0057, 7222.11.0059, 7222.11.0082, 7222.11.0084, 7222.30.0001, 7222.30.0022, 7222.30.0024, 7222.30.0082, 7222.30.0084, 7228.20.1000, 7228.30.8010, and 7228.60.6000, accessed August 28, 2024; imports from Ukraine were adjusted using proprietary, Census-edited Customs records to reclassify imports of rebar manufactured in Bulgaria from Ukrainian steel that were classified as country of origin Ukraine. Imports are based on the imports for consumption data series. Import value data reflect landed-duty paid value.

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 I-3
Rebar: Apparent U.S. consumption based on value, by source and period

* * * * * * *

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7214.20.0000, 7222.11.0001, 7222.11.0057, 7222.11.0059, 7222.11.0082, 7222.11.0084, 7222.30.0001, 7222.30.0022, 7222.30.0024, 7222.30.0082, 7222.30.0084, 7228.20.1000, 7228.30.8010, and 7228.60.6000, accessed August 28, 2024; imports from Ukraine were adjusted using proprietary, Census-edited Customs records to reclassify imports of rebar manufactured in Bulgaria from Ukrainian steel that were classified as country of origin Ukraine. Imports are based on the imports for consumption data series. Import value data reflect landed-duty paid value.

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

U.S. market characteristics

The primary use of rebar is concrete reinforcement. As a result, the U.S. market is tied closely to construction activity in the United States. Major end-use projects requiring rebar include roads and bridges, commercial and industrial construction, residential construction, and public construction.[1]

In the U.S. market, available information indicates that rebar is sold to distributors and fabricators. Of the 17 purchasers providing purchasers' questionnaire responses to the Commission, *** purchased the domestic product, none purchased rebar from subject countries, *** purchased imports of rebar from other sources, and *** purchased rebar from unknown sources.

All seven U.S. producers, 1 of 3 importers, and *** of 17 purchasers indicated that the market was subject to distinctive conditions of competition. Specifically, U.S. producers reported that rebar demand is highly correlated with weather and non-residential construction activity. U.S. producers also report that high barriers for entry, a long timeline for return on investment, and the large market for rebar are distinctive conditions of competition. In addition, U.S. producers cited product fungibility, interchangeability, the presence of dumped and/or subsidized goods, and established distribution channels as distinctive conditions of competition. U.S. importer *** reported that rebar is often subject to restrictions in projects where there are clauses that request it to be domestically produced, and that many downstream fabricators are affiliated with U.S. mills. U.S. purchasers cited construction demand and the COVID-19 pandemic as distinctive conditions of competition.

Apparent U.S. consumption of rebar steadily decreased during January 2021 through December 2023. Overall, apparent U.S. consumption in 2023 was lower than in 2021.

Impact of section 301 tariffs and 232 tariffs

U.S. producers, importers, and purchasers were asked to report the impact of section 301 tariffs and 232 tariffs on overall demand, supply, prices, or raw material costs.

[1] Concrete Reinforcing Bar from Belarus, China, Indonesia, Korea, Latvia, Moldova, Poland, and Ukraine, Inv. Nos. 731-TA-873-875, 877-880 and 882 (Second Review), USITC Publication 4409, p.1, July 2013, p. II-1.

Three U.S. producers reported that the 301 tariffs had an impact, while four reported that they had not. One importer reported that the 301 tariffs had an impact, while two reported that they did not know. *** purchasers reported that section 301 tariffs had an impact, while *** reported that they had not, and *** reported that they did not know. Of the purchasers reporting an impact, purchasers reported that prices increased. U.S. producers and purchasers reported that there was not much Chinese rebar in the U.S. market before the 301 tariffs were imposed because of higher existing antidumping duty orders. One purchaser, ***, reported that it was difficult to isolate the impact of the 301 tariffs due to the COVID-19 pandemic.

Four U.S. producers, all three importers, and *** purchasers reported that the section 232 tariffs had an impact, while one U.S. producer and *** purchasers reported that they had not, and *** purchaser reported that it did not know.[2] Firms that reported that 232 tariffs had an impact reported that rebar prices increased due to the imposition the tariffs, with one purchaser reporting that it increased rebar prices by 25 percent immediately. Another purchaser reported that there was more consistency in pricing, and a slow reaction to market decreases. However, firms reported that through the country and product exclusions, rebar is being shipped to countries with exemptions and then finished, and that difficult economic conditions outside of the United States have encouraged foreign producers to ship through the tariffs.

Channels of distribution

U.S. producers sold mainly to fabricators, while nonsubject importers sold *** to distributors, as shown in table II-1.[3]

[2] As discussed in Part I, section 232 duties on steel articles originating in Ukraine are suspended until June 2025.

[3] ***.

Table II-1
Rebar: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent

Source	Channel	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
United States	Distributors	***	***	***	***	***
United States	Fabricators	***	***	***	***	***
United States	End users	***	***	***	***	***
Nonsubject	Distributors	***	***	***	***	***
Nonsubject	Fabricators	***	***	***	***	***
Nonsubject	End users	***	***	***	***	***
All imports	Distributors	***	***	***	***	***
All imports	Fabricators	***	***	***	***	***
All imports	End users	***	***	***	***	***

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

Geographic distribution

U.S. producers reported selling rebar to all regions in the contiguous United States. (table II-2); *** percent of U.S. producers' sales were within 100 miles of their production facility, *** percent were between 101 and 1,000 miles, and *** percent were over 1,000 miles.[4]

Table II-2
Rebar: Count of U.S. producers' and U.S. importers' geographic markets

Region	U.S. producers
Northeast	***
Midwest	***
Southeast	***
Central Southwest	***
Mountain	***
Pacific Coast	***
Other	***
All regions (except Other)	***
Reporting firms	***

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

Note: Other U.S. markets include AK, HI, PR, and VI.

[4] ***.

Supply and demand considerations

U.S. supply

Table II-3 provides a summary of the supply factors regarding rebar from U.S. producers and Poland and Ukraine, the two subject countries for which data were received.

Table II-3
Rebar: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in short tons; shares and ratio in percent

Factor	Measure	United States	Poland	Ukraine	Reporting subject foreign producers
Capacity 2021	Quantity	***	***	***	***
Capacity 2023	Quantity	***	***	***	***
Capacity utilization 2021	Ratio	***	***	***	***
Capacity utilization 2023	Ratio	***	***	***	***
Inventories to total shipments 2021	Ratio	***	***	***	***
Inventories to total shipments 2023	Ratio	***	***	***	***
Home market shipments 2023	Share	***	***	***	***
Non-U.S. export market shipments 2023	Share	***	***	***	***
Ability to shift production	Count	***	***	***	***

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

Note: Responding U.S. producers accounted for nearly all U.S. production of rebar in 2023. Responding foreign producer/exporter firms accounted for no U.S. imports of rebar from subject sources during 2023. 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.”

Note: Ukraine producer ***, after the hearing, revised its practical rebar capacity for 2022 and 2023 to reflect unscheduled downtimes. In addition, as the revised 2023 practical capacity was lower than production, staff further revised practical capacity to match production. This revised the firm’s 2023 capacity from *** short tons to *** short tons. For more information on this revision, please see Part IV.

Domestic production

Based on available information, U.S. producers of rebar have the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced rebar to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity and ability to shift production to or from alternate products. Factors mitigating responsiveness of supply include limited ability to shift to alternate markets and a limited market for the alternate products domestic producers can produce on the same equipment used to produce rebar because rebar is a much bigger market. This limits the capacity U.S. producers are willing to allocate to alternate products.

Subject imports from Belarus

The producer of rebar from Belarus did not respond to the foreign producers' questionnaire. On December 16, 2019, the government of the Republic of Belarus requested that the U.S. Department of Commerce conduct a changed circumstances review of Belarus' status as a non-market economy within the context of the antidumping orders on steel concrete reinforcing bars, but the Department of Commerce concluded that Belarus remained a non-market economy.[5] On August 9, 2023, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) designated the Joint Stock Company Byelorussian Steel Works Management Company of Holding Byelorussian Metallurgical Company as blocked property.[6] Based on limited available information, the producer of rebar from Belarus has the ability to respond to changes in demand with small changes in the quantity of shipments of rebar to the U.S. market. There were *** imports of rebar from Belarus between January 2018 and June 2024.

Subject imports from China

No producers from China responded to the foreign producers' questionnaire. Based on limited available information, producers of rebar from China have the ability to respond to changes in demand with moderate changes in the quantity of shipments of rebar to the U.S.

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[5] U.S. Department of Commerce International Trade Administration. "Steel Concrete Reinforcing Bars From Belarus and Carbon and Alloy Steel Wire Rod From Belarus: Final Results of Antidumping Duty Changed Circumstances Reviews". https://www.federalregister.gov/documents/2020/10/23/2020-23513/steel-concrete-reinforcing-bars-from-belarus-and-carbon-and-alloy-steel-wire-rod-from-belarus-final

[6] U.S. Department of the Treasury's Office of Foreign Assets Control. "U.S. Expands Sanctions on the Belarusian Regime, Marking the Three-Year Anniversary of the Fraudulent August 2020 Presidential Election". Retrieved October 31, 2024. https://home.treasury.gov/news/press-releases/jy1682.

market. China was the second-largest subject source of U.S. imports between January 2018 and June 2024.

Subject imports from Indonesia

No producers from Indonesia responded to the foreign producers' questionnaire. Based on limited available information, producers of rebar from Indonesia have the ability to respond to changes in demand with small to moderate changes in the quantity of shipments of rebar to the U.S. market. There were *** imports from Indonesia between January 2018 and June 2024.

Subject imports from Latvia

The producer of rebar from Latvia did not provide a response to the foreign producers' questionnaire, and it is understood that this producer is insolvent.[7] Based on limited available information, the producer of rebar from Latvia has the ability to respond to changes in demand with small changes in the quantity of shipments of rebar to the U.S. market. There were *** imports of rebar from Latvia between January 2018 and June 2024.

Subject imports from Moldova

No producers from Moldova responded to the foreign producers' questionnaire. Based on limited available information, producers of rebar from Moldova have the ability to respond to changes in demand with small changes in the quantity of shipments of rebar to the U.S. market. There were *** imports of rebar from Moldova between January 2018 and June 2024.

Subject imports from Poland

Based on limited available information, producers of rebar from Poland have the ability to respond to changes in demand with moderate changes in the quantity of shipments of rebar to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity and ability to shift production to or from alternate products and markets. Major export markets include Czechia, Germany, and Slovakia, and Baltic countries and Scandinavia. Another product that the responding foreign producer reportedly can produce on the same equipment as rebar is merchant bar. The factor affecting the foreign producer's ability to shift production include market demand.

[7] For additional information, please refer to Part IV.

Subject imports from Ukraine

Based on limited available information, producers of rebar from Ukraine have the ability to respond to changes in demand with small to moderate changes in the quantity of shipments of rebar to the U.S. market. This estimate may depend on the geopolitical situation surrounding Ukraine's continuing war with Russia. The main mitigating factors to this degree of responsiveness of supply are factors relating to the war in Ukraine, including: shutdowns caused by limited and inconsistent electricity supply, inability to obtain billet, damage to infrastructure, and labor constraints. Further factors mitigating responsiveness of supply include limited availability of capacity, and a limited ability to increase overall capacity. Other products that responding foreign producers reportedly can produce on the same equipment as rebar are light section mills being switched to the production of angles, strip, rounds, and squares.

Imports from nonsubject sources

The largest sources of nonsubject imports during January 2018 through June 2024 were Turkey, Mexico, and Algeria. Nonsubject imports accounted for 99.9 percent of imports by quantity in 2023.

Supply constraints

Five of 7 U.S. producers, all 3 importers, and *** of 17 purchasers reported that they had not experienced supply constraints since January 1, 2018.

Responding firms reported a "catastrophic" outage at Cascade Steel Rolling Mills, and that other mills could not completely fill the void and put customers on allocation.[8] Purchasers *** and *** reported being placed on allocation around 2021 through 2022. Others reported supply chain constraints included allocation during peak construction season and COVID-19 pandemic related shutdowns, during which historic customers were given priority on the order file and non-rebar products were prioritized. U.S. producer *** reported that in 2021, there was a temporary spike in demand for non-rebar products, so ***.

New suppliers

*** of 17 responding purchasers indicated that new suppliers entered the U.S. market since January 1, 2018, and *** of 17 expect additional entrants. Purchasers reported new rebar mills in the next 2 to 3 years and additional capacity from existing mills in the next few years, and that foreign mills are purchasing or building mills in the United States, adding additional domestic supply to the U.S. market.

U.S. demand

Based on available information, the overall demand for rebar is likely to experience small changes in response to changes in price. The main contributing factors are the limited range of substitute products and the small cost share of rebar in most of its end-use products.

[8] On May 22, 2021, the melt shop at Cascade Steel Rolling Mills was damaged by fire; production restarted in ***. BusinessWire, "Schnitzer Announces Restart of Production at its Cascade Steel Rolling Mills and Agreement to Acquire Leading U.S. Metal Recycler in the Southeast", August 17, 2021, https://www.businesswire.com/news/home/20210817005270/en/Schnitzer-Announces-Restart-of-Production-at-its-Cascade-Steel-Rolling-Mills-and-Agreement-to-Acquire-Leading-US-Metal-Recycler-in-the-Southeast and *** questionnaire response.

Construction activity

U.S. demand for rebar depends on demand for construction activity. As shown in table II-4 and figure II-1, although nonresidential construction spending temporarily moderated, coinciding with the start of the COVID-19 pandemic, nonresidential construction spending in the United States increased steadily by 58.1 percent between 2019 and 2024. In 2023 alone, nonresidential construction spending grew by 12.9 percent. However, growth slowed, with spending growing by 1.1 percent between January and August 2024, compared to 8.7 percent for the same period in 2023.

According to the Portland Cement Association, U.S. rebar consumption increased by *** percent between 2019 and 2023, the last year for which data were available, and is forecast to *** in 2024 before increasing by *** percent in 2025 and *** percent in 2026, respectively.[9] In addition, according to the Architectural Billings Index, billings *** for the entire period between July 2023 and July 2024.[10]

Table II-4
Rebar: Total nonresidential construction spending in the United States, seasonally adjusted rate, monthly

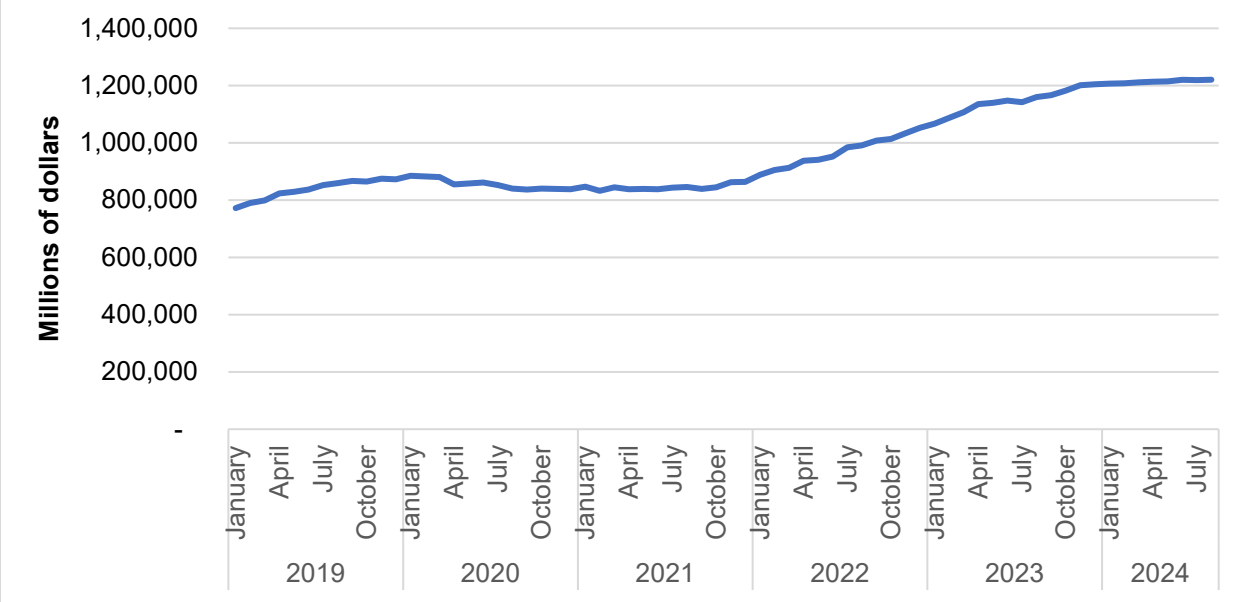
Millions of dollars

Month	2019	2020	2021	2022	2023	2024
January	772,158	885,019	846,852	888,350	1,066,812	1,206,831
February	789,840	882,766	832,851	905,108	1,087,027	1,208,252
March	798,707	880,565	845,138	912,632	1,107,380	1,211,846
April	823,531	854,418	838,350	937,724	1,134,962	1,213,820
May	829,005	858,652	839,269	940,399	1,139,236	1,215,061
June	836,608	861,045	837,947	952,471	1,147,474	1,220,340
July	852,634	852,699	844,164	984,914	1,142,315	1,219,640
August	859,558	840,392	845,895	990,846	1,159,850	1,220,507
September	867,483	837,269	838,799	1,007,570	1,166,763	NA
October	865,361	840,178	844,869	1,013,855	1,182,437	NA
November	874,887	838,775	862,926	1,033,422	1,200,999	NA
December	873,122	838,144	863,262	1,052,240	1,204,109	NA

Source: U.S. Census Bureau, Total Construction Spending: Nonresidential Construction in the United States ***, retrieved from FRED, Federal Reserve Bank of St. Louis; https://fred.stlouisfed.org/series/TLNRESCONS, October 15, 2024.

[9] Domestic interested parties' prehearing brief, Exhibit 87.
[10] ***. Domestic interested parties' posthearing brief, Exhibit 88.

Figure II-1
Rebar: Total nonresidential construction spending in the United States, seasonally adjusted rate, monthly



Source: U.S. Census Bureau, Total Construction Spending: Nonresidential Construction in the United States ***, retrieved from FRED, Federal Reserve Bank of St. Louis; https://fred.stlouisfed.org/series/TLNRESCONS, October 15, 2024.

End uses and cost share

All responding U.S. producers, importers, and purchasers reported no changes in end uses. Rebar accounts for a small share of the cost of the end-use products in which it is used.

Business cycles

All 7 U.S. producers, all 3 importers, and *** of 17 purchasers indicated that the market was subject to business cycles. Specifically, firms cited: seasonal weather demand (with one purchaser, ***, reporting March-November), and U.S. producer *** reporting April-September in the Western United States); construction demand (specifically non-residential construction demand); overall economic conditions; and the performance of the U.S. economy, for which purchaser *** reported softening of U.S. demand this year. With respect to weather-based seasonality, U.S. producer *** reported that in the northern part of the United States, demand tends to be higher in the spring and summer. U.S. producer *** added that weather plays less of a role in the South and Southwestern region, where construction happens year-round.

Demand trends

Most firms reported that U.S. demand for rebar had either fluctuated up or that U.S. demand had fluctuated down since January 1, 2018 (table II-5). Most purchasers expect U.S. demand to fluctuate up over the next two years, while U.S. producer and importer responses were mixed; responses were also mixed with respect to foreign demand (table II-6).

Table II-5
Rebar: Count of firms' responses regarding overall domestic and foreign demand since January 1, 2018, by firm type

Market	Firm type	Steadily increased	Fluctuated up	No change	Fluctuated down	Steadily decreased
U.S. demand	U.S. producers	0	0	0	2	0
U.S. demand	Importers	***	***	***	***	***
U.S. demand	Purchasers	***	***	***	***	***
U.S. demand	Foreign producers	***	***	***	***	***
Foreign demand	U.S. producers	0	0	0	1	0
Foreign demand	Importers	***	***	***	***	***
Foreign demand	Purchasers	***	***	***	***	***
Demand in subject country	Foreign producers	***	***	***	***	***
Demand in other export markets	Foreign producers	***	***	***	***	***
Demand for end use products	Purchasers	***	***	***	***	***

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

Table II-6
Rebar: Count of firms' responses regarding anticipated overall domestic and foreign demand, by firm type

Market	Firm type	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease
U.S. demand	U.S. producers	1	0	0	1	0
U.S. demand	Importers	***	***	***	***	***
U.S. demand	Purchasers	***	***	***	***	***
U.S. demand	Foreign producers	***	***	***	***	***
Foreign demand	U.S. producers	0	0	0	1	0
Foreign demand	Importers	***	***	***	***	***
Foreign demand	Purchasers	***	***	***	***	***
Demand in subject country	Foreign producers	***	***	***	***	***
Demand in other export markets	Foreign producers	***	***	***	***	***

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

War in Ukraine

U.S. producers, importers, and purchasers were asked if the market for rebar experienced any changes or issues related to the war in Ukraine since February 2022, and whether they anticipated any changes or issues relating to the war in the foreseeable future. Three of 7 U.S. producers, all 3 importers, *** of 17 purchasers, and *** foreign producers reported that it had an impact. All 6 responding U.S. producers, all 3 U.S. importers, *** of 17 purchasers, and *** foreign producers reported that they did not anticipate changes or issues in the foreseeable future.

Table II-7
Rebar: Narrative on impact of war in Ukraine since February 2022

Firm	Firm type	Narrative on impact of war in Ukraine since February 2022
***	U.S. Producer	***
***	U.S. Producer	***
***	U.S. Producer	***
***	U.S. Producer	***
***	U.S. Producer	***
***	U.S. Producer	***
***	Importer	***
***	Importer	***
***	Importer	***
***	Purchaser	***
***	Purchaser	***
***	Purchaser	***

Table continued.

Table II-7 Continued
Rebar: Narrative on impact of war in Ukraine since February 2022

Firm	Firm type	Narrative on impact of war in Ukraine since February 2022
***	Purchaser	***
***	Purchaser	***
***	Purchaser	***
***	Purchaser	***
***	Purchaser	***.
***	Purchaser	***
***	Foreign Producer	***
***	Foreign Producer	***
***	Foreign Producer	***

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

Table II-8
Rebar: Narrative on anticipated impact from continued war in Ukraine

Firm	Firm type	Narrative on anticipated impact of war in Ukraine
***	U.S. Producer	***
***	U.S. Producer	***
***	U.S. Producer	***
***	U.S. Producer	***
***	U.S. Producer	***
***	U.S. Producer	***
***	U.S. Producer	***
***	Purchaser	***
***	Purchaser	***
***	Purchaser	***
***	Purchaser	***
***	Purchaser	***
***	Purchaser	***.
***	Foreign Producer	***

Table continued.

Table II-8 Continued
Rebar: Narrative on anticipated impact from continued war in Ukraine

Firm	Firm type	Narrative on anticipated impact of war in Ukraine
***	Foreign Producer	***

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

Substitute products

Substitutes for rebar are limited. Most U.S. producers and purchasers reported that there were no substitutes and did not anticipate any future changes in substitutes. Nucor stated that the major substitute product would be fiberglass rebar, it is lighter and easy to carry, but its end-use applications are limited to marine and coastal applications or MRI rooms. Southwestern Suppliers added that fiberglass rebar is at least twice as expensive as steel rebar.[11] Two of three importers reported a change in substitutes; they cited coiled and/or spooled rebar being used. Purchasers reporting a change in substitutes cited fiberglass and polymer products, wire mesh, Martensic Microcomposite Formable Steel (MMFX, a proprietary product *** produces under license), and stainless steel rebar. Purchaser *** reported that the overall market penetration for alternate products such as fiberglass reinforcement products is one percent or less.

Substitutability issues

This section assesses the degree to which U.S.-produced rebar and imports of rebar from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of rebar from domestic and imported sources based on those factors. Based on available data, staff believes that there is a high degree of substitutability between domestically produced rebar and rebar imported from subject sources.[12] Factors contributing to this level of substitutability include rebar across sources always meeting minimum quality specifications and rebar being produced to ASTM standards,

[11] Hearing transcript, p. 78 (Johnson and Webb).

[12] The degree of substitution between domestic and imported rebar depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced rebar to the rebar imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as 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.).

creating similarities between domestically produced rebar and imported rebar, and no significant factors other than price.

Factors affecting purchasing decisions[13]

Purchaser decisions based on source

As shown in table II-9, responses were mixed amongst purchasers for purchasing decisions based on the producer, but a plurality make purchasing decisions based on the country of origin. Most purchasers' customers sometimes or never make purchasing decisions based on the producer or country of origin. Of the *** purchasers that reported that they always make decisions based on the country of origin, *** cited security of supply, two cited Buy America, *** reported customer requirements, and *** cited previous poor experiences.

Table II-9
Rebar: Count of purchasers' responses regarding frequency of purchasing decisions based on producer and country of origin

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	***	***	***	***
Customer	Producer	***	***	***	***
Purchaser	Country	***	***	***	***
Customer	Country	***	***	***	***

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

Importance of purchasing domestic product

*** of 15 responding purchasers reported that most or all of their purchases did not require purchasing U.S.-produced product. *** reported that domestic product was required by law (for 3 to 50 percent of their purchases), *** reported it was required by their customers (for 10 to 100 percent of their purchases), and *** reported other preferences for domestic product.

Most important purchase factors

The most often cited top three factors firms consider in their purchasing decisions for rebar were price/cost (*** firms), availability/supply (*** firms), and quality (*** firms), as shown in table II-10. Price/cost was the most frequently cited first-most important factor (cited

[13] Fifteen purchasers indicated they had marketing/pricing knowledge of domestic product, 4 of product from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine, and 9 of nonsubject product.

by *** firms), followed by availability/supply and quality (*** each); availability/supply was the most frequently reported second-most important factor (*** firms); and availability/supply was the most frequently reported third-most important factor (*** firms).

Table II-10
Rebar: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Factor	First	Second	Third	Total
Price or cost	***	***	***	***
Quality	***	***	***	***
Availability or supply	***	***	***	***
All other factors	***	***	***	NA

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

Importance of specified purchase factors

Purchasers were asked to rate the importance of 19 factors in their purchasing decisions (table II-11). The factors rated as very important by more than half of responding purchasers were price and quality meets industry standards (*** firms each), ability to meet specified grades/specifications and availability (*** purchasers), reliability of supply ***, product consistency ***, and delivery time ***.

Table II-11
Rebar: Count of purchasers' responses regarding importance of purchase factors, by factor

Factor	Very important	Somewhat important	Not important
Ability to meet specified grades/specifications	***	***	***
Availability	***	***	***
Delivery terms	***	***	***
Delivery time	***	***	***
Discounts offered	***	***	***
Extension of credit	***	***	***
Fabrication services	***	***	***
Minimum quantity requirements	***	***	***
Packaging	***	***	***
Payment terms	***	***	***
Physical product characteristics	***	***	***
Price	***	***	***
Product consistency	***	***	***
Product range	***	***	***
Quality meets industry standards	***	***	***
Quality exceeds industry standards	***	***	***
Reliability of supply	***	***	***
Technical support/service	***	***	***
U.S. transportation costs	***	***	***

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

Lead times

Rebar is primarily produced-to-order. U.S. producers reported that *** percent of their commercial shipments were produced-to-order, with lead times averaging *** days. The remaining *** percent of their commercial shipments came from inventories, with lead times averaging *** days.[14]

Supplier certification

*** of 17 responding purchasers require their suppliers to become certified or qualified to sell rebar to their firm; however, 6 purchasers reported requiring compliance with ASTM standards; two purchasers reported that this is accomplished through a mill test report. Purchasers reported that the time to qualify a new supplier ranged from 30 to 90 days. No purchasers reported that either domestic or foreign suppliers had failed in an attempt to qualify rebar or had lost approved status since 2018.

Minimum quality specifications

As can be seen from table II-12, *** purchasers reported that domestically produced product always met minimum quality specifications, while *** responding purchasers reported that rebar produced in Belarus, China, Latvia, Moldova, Poland, and Ukraine always met minimum quality specifications, and *** reported that rebar from Indonesia always met minimum quality specifications. *** purchasers each reported that they did not know for all subject countries.

[14] While *** were available for subject imports, U.S. importers reported that *** percent of their nonsubject commercial shipments were produced to order, with lead times averaging *** days.

Table II-12
Rebar: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source

Source of purchases	Always	Usually	Sometimes	Rarely or never	Don't Know
United States	***	***	***	***	***
Belarus	***	***	***	***	***
China	***	***	***	***	***
Indonesia	***	***	***	***	***
Latvia	***	***	***	***	***
Moldova	***	***	***	***	***
Poland	***	***	***	***	***
Ukraine	***	***	***	***	***
All other sources	***	***	***	***	***

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

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

Fourteen of 15 responding purchasers reported factors that determined quality; 8 purchasers reported meeting ASTM mill certification standards, while two cited general industry standards. Specifically, purchaser *** cited consistent bundle counts per size, consistent lengths, and rust as quality factors, while *** reported bar quality, deformation quality, rust, straightness of bars, and surface quality, and purchaser *** reported steel with correct ribs and rib depth, number of bars per bundle, and paperwork as factors that determined quality.

Changes in purchasing patterns

*** purchasers reported that they had added suppliers since January 1, 2018, while *** reported that they had not. Specifically, firms added purchases from Optimus Steel, Tosyali (Algeria), and Hybar. Firms reported additional supply from Algeria and Egypt, and from Brazil, Italy, Portugal, and Spain. ***.

Purchasers were also asked about changes in their purchasing patterns from different countries since January 1, 2018 (table II-13).*** purchasers reported increasing purchases of U.S.-produced product; purchasers reporting increasing domestic purchases because of the backlog trends, business conditions/growth/trends, COVID-19 pandemic, marketing strategy, section 232 tariffs, and import competition.

Table II-13
Rebar: Count of purchasers' responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries

Source of purchases	Steadily increase	Fluctuated up	No change	Fluctuated down	Steadily decreased	Did not purchase
United States	***	***	***	***	***	***
Belarus	***	***	***	***	***	***
China	***	***	***	***	***	***
Indonesia	***	***	***	***	***	***
Latvia	***	***	***	***	***	***
Moldova	***	***	***	***	***	***
Poland	***	***	***	***	***	***
Ukraine	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
Sources unknown	***	***	***	***	***	***

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

Purchase factor comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a number of questions comparing rebar produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on 16 factors (table II-14) for which they were asked to rate the importance.

Most purchasers reported that U.S. and nonsubject rebar were comparable across country sources on all purchase factors except for price, for which the domestic comparison was reported to be inferior.

Table II-14
Rebar: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Ability to meet specified grades/specifications	U.S. v. Belarus	***	***	***
Availability	U.S. v. Belarus	***	***	***
Delivery terms	U.S. v. Belarus	***	***	***
Delivery time	U.S. v. Belarus	***	***	***
Discounts offered	U.S. v. Belarus	***	***	***
Extension of credit	U.S. v. Belarus	***	***	***
Fabrication services	U.S. v. Belarus	***	***	***
Minimum quantity requirements	U.S. v. Belarus	***	***	***
Packaging	U.S. v. Belarus	***	***	***
Payment terms	U.S. v. Belarus	***	***	***
Price	U.S. v. Belarus	***	***	***
Product consistency	U.S. v. Belarus	***	***	***
Product range	U.S. v. Belarus	***	***	***
Quality meets industry standards	U.S. v. Belarus	***	***	***
Quality exceeds industry standards	U.S. v. Belarus	***	***	***
Reliability of supply	U.S. v. Belarus	***	***	***
Technical support/service	U.S. v. Belarus	***	***	***
U.S. transportation costs	U.S. v. Belarus	***	***	***

Table continued.

Table II-14 Continued
Rebar: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Ability to meet specified grades/specifications	U.S. v. China	***	***	***
Availability	U.S. v. China	***	***	***
Delivery terms	U.S. v. China	***	***	***
Delivery time	U.S. v. China	***	***	***
Discounts offered	U.S. v. China	***	***	***
Extension of credit	U.S. v. China	***	***	***
Fabrication services	U.S. v. China	***	***	***
Minimum quantity requirements	U.S. v. China	***	***	***
Packaging	U.S. v. China	***	***	***
Payment terms	U.S. v. China	***	***	***
Price	U.S. v. China	***	***	***
Product consistency	U.S. v. China	***	***	***
Product range	U.S. v. China	***	***	***
Quality meets industry standards	U.S. v. China	***	***	***
Quality exceeds industry standards	U.S. v. China	***	***	***
Reliability of supply	U.S. v. China	***	***	***
Technical support/service	U.S. v. China	***	***	***
U.S. transportation costs	U.S. v. China	***	***	***

Table continued.

Table II-14 Continued
Rebar: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Ability to meet specified grades/specifications	U.S v. Indonesia	***	***	***
Availability	U.S. v. Indonesia	***	***	***
Delivery terms	U.S. v. Indonesia	***	***	***
Delivery time	U.S. v. Indonesia	***	***	***
Discounts offered	U.S. v. Indonesia	***	***	***
Extension of credit	U.S. v. Indonesia	***	***	***
Fabrication services	U.S. v. Indonesia	***	***	***
Minimum quantity requirements	U.S. v. Indonesia	***	***	***
Packaging	U.S. v. Indonesia	***	***	***
Payment terms	U.S. v. Indonesia	***	***	***
Price	U.S. v. Indonesia	***	***	***
Product consistency	U.S. v. Indonesia	***	***	***
Product range	U.S. v. Indonesia	***	***	***
Quality meets industry standards	U.S. v. Indonesia	***	***	***
Quality exceeds industry standards	U.S. v. Indonesia	***	***	***
Reliability of supply	U.S. v. Indonesia	***	***	***
Technical support/service	U.S. v. Indonesia	***	***	***
U.S. transportation costs	U.S. v. Indonesia	***	***	***

Table continued.

Table II-14 Continued
Rebar: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Ability to meet specified grades/specifications	U.S. v. Latvia	***	***	***
Availability	U.S. v. Latvia	***	***	***
Delivery terms	U.S. v. Latvia	***	***	***
Delivery time	U.S. v. Latvia	***	***	***
Discounts offered	U.S. v. Latvia	***	***	***
Extension of credit	U.S. v. Latvia	***	***	***
Fabrication services	U.S. v. Latvia	***	***	***
Minimum quantity requirements	U.S. v. Latvia	***	***	***
Packaging	U.S. v. Latvia	***	***	***
Payment terms	U.S. v. Latvia	***	***	***
Price	U.S. v. Latvia	***	***	***
Product consistency	U.S. v. Latvia	***	***	***
Product range	U.S. v. Latvia	***	***	***
Quality meets industry standards	U.S. v. Latvia	***	***	***
Quality exceeds industry standards	U.S. v. Latvia	***	***	***
Reliability of supply	U.S. v. Latvia	***	***	***
Technical support/service	U.S. v. Latvia	***	***	***
U.S. transportation costs	U.S. v. Latvia	***	***	***

Table continued.

Table II-14 Continued
Rebar: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Ability to meet specified grades/specifications	U.S. v. Moldova	***	***	***
Availability	U.S. v. Moldova	***	***	***
Delivery terms	U.S. v. Moldova	***	***	***
Delivery time	U.S. v. Moldova	***	***	***
Discounts offered	U.S. v. Moldova	***	***	***
Extension of credit	U.S. v. Moldova	***	***	***
Fabrication services	U.S. v. Moldova	***	***	***
Minimum quantity requirements	U.S. v. Moldova	***	***	***
Packaging	U.S. v. Moldova	***	***	***
Payment terms	U.S. v. Moldova	***	***	***
Price	U.S. v. Moldova	***	***	***
Product consistency	U.S. v. Moldova	***	***	***
Product range	U.S. v. Moldova	***	***	***
Quality meets industry standards	U.S. v. Moldova	***	***	***
Quality exceeds industry standards	U.S. v. Moldova	***	***	***
Reliability of supply	U.S. v. Moldova	***	***	***
Technical support/service	U.S. v. Moldova	***	***	***
U.S. transportation costs	U.S. v. Moldova	***	***	***

Table continued.

Table II-14 Continued
Rebar: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Ability to meet specified grades/specifications	U.S. v. Poland	***	***	***
Availability	U.S. v. Poland	***	***	***
Delivery terms	U.S. v. Poland	***	***	***
Delivery time	U.S. v. Poland	***	***	***
Discounts offered	U.S. v. Poland	***	***	***
Extension of credit	U.S. v. Poland	***	***	***
Fabrication services	U.S. v. Poland	***	***	***
Minimum quantity requirements	U.S. v. Poland	***	***	***
Packaging	U.S. v. Poland	***	***	***
Payment terms	U.S. v. Poland	***	***	***
Price	U.S. v. Poland	***	***	***
Product consistency	U.S. v. Poland	***	***	***
Product range	U.S. v. Poland	***	***	***
Quality meets industry standards	U.S. v. Poland	***	***	***
Quality exceeds industry standards	U.S. v. Poland	***	***	***
Reliability of supply	U.S. v. Poland	***	***	***
Technical support/service	U.S. v. Poland	***	***	***
U.S. transportation costs	U.S. v. Poland	***	***	***

Table continued.

Table II-14 Continued
Rebar: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Ability to meet specified grades/specifications	U.S. v. Ukraine	***	***	***
Availability	U.S. v. Ukraine	***	***	***
Delivery terms	U.S. v. Ukraine	***	***	***
Delivery time	U.S. v. Ukraine	***	***	***
Discounts offered	U.S. v. Ukraine	***	***	***
Extension of credit	U.S. v. Ukraine	***	***	***
Fabrication services	U.S. v. Ukraine	***	***	***
Minimum quantity requirements	U.S. v. Ukraine	***	***	***
Packaging	U.S. v. Ukraine	***	***	***
Payment terms	U.S. v. Ukraine	***	***	***
Price	U.S. v. Ukraine	***	***	***
Product consistency	U.S. v. Ukraine	***	***	***
Product range	U.S. v. Ukraine	***	***	***
Quality meets industry standards	U.S. v. Ukraine	***	***	***
Quality exceeds industry standards	U.S. v. Ukraine	***	***	***
Reliability of supply	U.S. v. Ukraine	***	***	***
Technical support/service	U.S. v. Ukraine	***	***	***
U.S. transportation costs	U.S. v. Ukraine	***	***	***

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

Note: With respect to cost/price factors, a rating of superior means that price/transportation cost for the first source in the country pair 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 rebar

In order to determine whether U.S.-produced rebar can generally be used in the same applications as imports from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine, 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-15 to II-16, all U.S. producers and most purchasers reported that they could always be used interchangeably.[15]

[15] The sole responding importer, ***, reported that rebar can always be used interchangeably across sources.

Table II-15
Rebar: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. Belarus	***	***	***	***
United States vs. China	***	***	***	***
United States vs. Indonesia	***	***	***	***
United States vs. Latvia	***	***	***	***
United States vs. Moldova	***	***	***	***
United States vs. Poland	***	***	***	***
United States vs. Ukraine	***	***	***	***
Belarus vs. China	***	***	***	***
Belarus vs. Indonesia	***	***	***	***
Belarus vs. Latvia	***	***	***	***
Belarus vs. Moldova	***	***	***	***
Belarus vs. Poland	***	***	***	***
Belarus vs. Ukraine	***	***	***	***
China vs. Indonesia	***	***	***	***
China vs. Latvia	***	***	***	***
China vs. Moldova	***	***	***	***
China vs. Poland	***	***	***	***
China vs. Ukraine	***	***	***	***
Indonesia vs. Latvia	***	***	***	***
Indonesia vs. Moldova	***	***	***	***
Indonesia vs. Poland	***	***	***	***
Indonesia vs. Ukraine	***	***	***	***
Latvia vs. Moldova	***	***	***	***
Latvia vs. Poland	***	***	***	***
Latvia vs. Ukraine	***	***	***	***
Moldova vs. Poland	***	***	***	***
Moldova vs. Ukraine	***	***	***	***
Poland vs. Ukraine	***	***	***	***
United States vs. Other	***	***	***	***
Belarus vs. Other	***	***	***	***
China vs. Other	***	***	***	***
Indonesia vs. Other	***	***	***	***
Latvia vs. Other	***	***	***	***
Moldova vs. Other	***	***	***	***
Poland vs. Other	***	***	***	***
Ukraine vs. Other	***	***	***	***

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

Table II-16
Rebar: Count of purchasers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. Belarus	***	***	***	***
United States vs. China	***	***	***	***
United States vs. Indonesia	***	***	***	***
United States vs. Latvia	***	***	***	***
United States vs. Moldova	***	***	***	***
United States vs. Poland	***	***	***	***
United States vs. Ukraine	***	***	***	***
Belarus vs. China	***	***	***	***
Belarus vs. Indonesia	***	***	***	***
Belarus vs. Latvia	***	***	***	***
Belarus vs. Moldova	***	***	***	***
Belarus vs. Poland	***	***	***	***
Belarus vs. Ukraine	***	***	***	***
China vs. Indonesia	***	***	***	***
China vs. Latvia	***	***	***	***
China vs. Moldova	***	***	***	***
China vs. Poland	***	***	***	***
China vs. Ukraine	***	***	***	***
Indonesia vs. Latvia	***	***	***	***
Indonesia vs. Moldova	***	***	***	***
Indonesia vs. Poland	***	***	***	***
Indonesia vs. Ukraine	***	***	***	***
Latvia vs. Moldova	***	***	***	***
Latvia vs. Poland	***	***	***	***
Latvia vs. Ukraine	***	***	***	***
Moldova vs. Poland	***	***	***	***
Moldova vs. Ukraine	***	***	***	***
Poland vs. Ukraine	***	***	***	***
United States vs. Other	***	***	***	***
Belarus vs. Other	***	***	***	***
China vs. Other	***	***	***	***
Indonesia vs. Other	***	***	***	***
Latvia vs. Other	***	***	***	***
Moldova vs. Other	***	***	***	***
Poland vs. Other	***	***	***	***
Ukraine vs. Other	***	***	***	***

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 rebar from the United States, subject, or nonsubject countries. As seen in tables II-17 to II-18, all U.S. producers reported that differences other than price were never significant, while most purchasers reported that they were sometimes or never significant.[16]

[16] Only one importer, ***, reported the significance of differences other than price between source, and reported that they were sometimes important.

Table II-17
Rebar: 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

Country pair	Always	Frequently	Sometimes	Never
United States vs. Belarus	***	***	***	***
United States vs. China	***	***	***	***
United States vs. Indonesia	***	***	***	***
United States vs. Latvia	***	***	***	***
United States vs. Moldova	***	***	***	***
United States vs. Poland	***	***	***	***
United States vs. Ukraine	***	***	***	***
Belarus vs. China	***	***	***	***
Belarus vs. Indonesia	***	***	***	***
Belarus vs. Latvia	***	***	***	***
Belarus vs. Moldova	***	***	***	***
Belarus vs. Poland	***	***	***	***
Belarus vs. Ukraine	***	***	***	***
China vs. Indonesia	***	***	***	***
China vs. Latvia	***	***	***	***
China vs. Moldova	***	***	***	***
China vs. Poland	***	***	***	***
China vs. Ukraine	***	***	***	***
Indonesia vs. Latvia	***	***	***	***
Indonesia vs. Moldova	***	***	***	***
Indonesia vs. Poland	***	***	***	***
Indonesia vs. Ukraine	***	***	***	***
Latvia vs. Moldova	***	***	***	***
Latvia vs. Poland	***	***	***	***
Latvia vs. Ukraine	***	***	***	***
Moldova vs. Poland	***	***	***	***
Moldova vs. Ukraine	***	***	***	***
Poland vs. Ukraine	***	***	***	***
United States vs. Other	***	***	***	***
Belarus vs. Other	***	***	***	***
China vs. Other	***	***	***	***
Indonesia vs. Other	***	***	***	***
Latvia vs. Other	***	***	***	***
Moldova vs. Other	***	***	***	***
Poland vs. Other	***	***	***	***
Ukraine vs. Other	***	***	***	***

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

Table II-18
Rebar: Count of purchasers reporting the significance of differences between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. Belarus	***	***	***	***
United States vs. China	***	***	***	***
United States vs. Indonesia	***	***	***	***
United States vs. Latvia	***	***	***	***
United States vs. Moldova	***	***	***	***
United States vs. Poland	***	***	***	***
United States vs. Ukraine	***	***	***	***
Belarus vs. China	***	***	***	***
Belarus vs. Indonesia	***	***	***	***
Belarus vs. Latvia	***	***	***	***
Belarus vs. Moldova	***	***	***	***
Belarus vs. Poland	***	***	***	***
Belarus vs. Ukraine	***	***	***	***
China vs. Indonesia	***	***	***	***
China vs. Latvia	***	***	***	***
China vs. Moldova	***	***	***	***
China vs. Poland	***	***	***	***
China vs. Ukraine	***	***	***	***
Indonesia vs. Latvia	***	***	***	***
Indonesia vs. Moldova	***	***	***	***
Indonesia vs. Poland	***	***	***	***
Indonesia vs. Ukraine	***	***	***	***
Latvia vs. Moldova	***	***	***	***
Latvia vs. Poland	***	***	***	***
Latvia vs. Ukraine	***	***	***	***
Moldova vs. Poland	***	***	***	***
Moldova vs. Ukraine	***	***	***	***
Poland vs. Ukraine	***	***	***	***
United States vs. Other	***	***	***	***
Belarus vs. Other	***	***	***	***
China vs. Other	***	***	***	***
Indonesia vs. Other	***	***	***	***
Latvia vs. Other	***	***	***	***
Moldova vs. Other	***	***	***	***
Poland vs. Other	***	***	***	***
Ukraine vs. Other	***	***	***	***

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

Elasticity estimates

This section discusses elasticity estimates; parties did not provide comments on these elasticity estimates.

U.S. supply elasticity

The domestic supply elasticity for rebar measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of rebar. 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 rebar. 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 6 to 10 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for rebar measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of rebar. 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 rebar in the production of any downstream products. Based on the available information, the aggregate demand for rebar is likely to be inelastic; a range of -0.25 to -0.75 is suggested.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.[17] 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 rebar and imported rebar is likely to be in the range of 5 to 8. Factors contributing to this level of substitutability include rebar across sources always meeting minimum quality specifications and rebar being produced to ASTM standards, creating similarities between domestically produced rebar and imported rebar, and no significant factors other than price.

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

Part III: Condition of the U.S. industry

Overview

The information in this section of the report was compiled from responses to the Commission's questionnaires. Seven firms, which accounted for nearly all of U.S. production of rebar during 2023, supplied information on their operations in these reviews and other proceedings on rebar.

Table III-1 presents events in the U.S. industry since January 1, 2018.

Table III-1
Rebar: Developments in the U.S. industry since 2018

Item	Firm	Event
Acquisition	Optimus	January 2018: Optimus entered into a definitive agreement to purchase Gerdau Ameristeel Corp's. ("Gerdau's") Beaumont, Texas wire rod mill and two downstream operations (Beaumont Wire Products and Carrollton Wire Products). The mill has a melt-shop capacity of approximately 700,000 short tons and can produce both wire rod and coiled rebar.
Construction	CMC	April 2018: CMC held a dedication for a new rebar micro mill in Durant, Oklahoma.
Acquisition	CMC	November 2018: CMC completed its acquisition of 33 rebar fabrication facilities from Gerdau.
Plant idling	Gerdau	March 2020: Gerdau announced that it would idle its melt shop and rolling mill in St. Paul, Minnesota. The rolling mill produced rebar, merchant bar, special bars, and round bars.
Plant opening	Nucor	December 2020: Nucor began production at a new rebar micro mill in Frostproof, Florida with an annual production capacity of 350,000 short tons.
Construction	Nucor	April 2022: Nucor announced that it would build a new rebar micro mill in Lexington, North Carolina. The mill was expected to take two years to build with an annual production capacity of 430,000 short tons and employ approximately 200 full-time workers.
Expansion	Nucor	August 2022: Nucor announced that it would add a new melt shop with the capacity to produce 600,000 short tons annually at its bar mill in Kingman, Arizona. The new production would supply existing rebar and wire rod production operations at the Kingman plant.
Construction	Nucor	October 2023: Nucor announced that it was exploring potential sites in the Pacific Northwest to build a new rebar micro mill with an annual production capacity of 650,000 short tons.

Sources: Gerdau, Notice to the market, January 31, 2018, https://mz-filemanager.s3.amazonaws.com/21e1d193-5cab-456d-8bb8-f00a49a43c1c/avisos-comunicados-e-fatos-

relevantescentral-de-downloads/04e6de1b2a4786cbd8eb6b628a00f9d567bd1f1554411e405ebd8e1b5d64ea84/sale_of_operation_in_us.pdf. CMC, Commercial Metals Company celebrates the dedication of new micro mill in Durant, Oklahoma, April 27, 2018, https://ir.cmc.com/profiles/investor/ResLibraryView.asp?ResLibraryID=87530&BzID=653&G=597. CMC, Commercial Metals Company completes acquisition of certain U.S. rebar assets from Gerdau, November 5, 2018, https://ir.cmc.com/profiles/investor/ResLibraryView.asp?ResLibraryID=89088&BzID=653&G=597. Argus Media, Gerdau to idle EAF, rolling mill in Minnesota, March 10, 2022, https://www.argusmedia.com/en/news/2085552-gerdau-to-idle-eaf-rolling-mill-in-minnesota. Nucor, Form 10-K for the Fiscal year ended December 31, 2020, February 26, 2021, p. 6, https://nucor.gcs-web.com/static-files/f0d64d98-2da9-4b92-b263-3956fd72d84a. Nucor, Nucor to build rebar micro mill in the South Atlantic Region, December 6, 2021, https://investors.nucor.com/news/news-details/2021/Nucor-to-Build-Rebar-Micro-Mill-in-the-South-Atlantic-Region-12-06-2021/default.aspx. Nucor, Nucor to build new rebar micro mill in North Carolina, April 7, 2022, https://investors.nucor.com/news/news-details/2022/Nucor-to-Build-New-Rebar-Micro-Mill-in-North-Carolina-04-07-2022/default.aspx. Nucor, Nucor to add melt shop at its Arizona bar mill, August 3, 2022, https://investors.nucor.com/news/news-details/2022/Nucor-to-Add-Melt-Shop-at-its-Arizona-Bar-Mill-08-03-2022/default.aspx. Nucor, Nucor exploring potential sites in the Pacific Northwest to build new rebar micro mill, October 20, 2023, https://nucor.com/news-release/nucor-exploring-potential-sites-in-the-pacific-northwest-to-build-new-rebar-micro-mill-122547#:~:text=CHARLOTTE%2C%20N.C.%20%2C%20Oct.,by%20Nucor's%20Board%20of%20Directors.

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 rebar since 2018. All seven producers indicated in their questionnaires that they had experienced such changes. Table III-2 presents the changes identified by these producers.

Anticipated changes in operations

The Commission asked domestic producers to report anticipated changes in the character of their operations relating to the production of rebar. Their responses appear in table III-2.

Table III-2
Rebar: Reported changes in operations since January 1, 2018

Type of change	Firm name and narrative on changes in operations
Plant openings	***
Plant openings	***
Plant closings	***
Plant closings	***
Prolonged shutdowns	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Acquisitions	***
Acquisitions	***

Type of change	Firm name and narrative on changes in operations
Other	***
Other	***
Anticipated changes in operations	***
Anticipated changes in operations	***
Anticipated changes in operations	***
Anticipated changes in operations	***
Anticipated changes in operations	***
Anticipated changes in operations	***

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

U.S. production, capacity, and capacity utilization

Table III-3 presents U.S. producers' installed and practical capacity and production on the same equipment. Installed overall capacity increased year to year, ending *** percent higher in 2023 than in 2021, and was *** percent higher in January-June 2024 than in January-June 2023. Similarly, practical overall capacity increased year to year, ending *** percent higher in 2023 than in 2021, and was *** percent higher in January-June 2024 than in January-June 2023.

Table III-4
Rebar: U.S. producers' installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical rebar	Capacity	***	***	***	***	***
Practical rebar	Production	***	***	***	***	***
Practical rebar	Utilization	***	***	***	***	***

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

Constraints on capacity

All seven responding U.S. producers reported constraints in the manufacturing process. Table III-4 presents U.S. producers' reported narratives regarding practical capacity constraints.

Table III-4
Rebar: U.S. producers' reported capacity constraints since January 1, 2018

Type of change	Firm name and narrative on constraints to practical overall capacity
Existing labor force	***
Other constraints	***
Other constraints	***
Other constraints	***

Type of change	Firm name and narrative on constraints to practical overall capacity
Other constraints	***
Other constraints	***
Other constraints	***

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

Table III-5 and figure III-1 present U.S. producers' production, capacity, and capacity utilization. U.S. producers' capacity to produce rebar increased year to year, ending *** percent higher in 2023 than in 2021, and was *** percent higher in January-June 2024 than in January-June 2023. While U.S. production decreased year to year, ending *** percent lower in 2023 than in 2021, and was *** percent lower in January-June 2024 than in January-June 2023. Two firms (***) accounted for the vast majority of production (between ***) between 2021 and June 2024. On a company specific basis, three firms (***) had lower production in 2023 than in 2021, while four were higher. Production for four firms (***) was lower in January-June 2024 than in January-June 2023. U.S. producers' capacity utilization decreased from *** percent in 2021 to *** percent in 2022 and decreased to *** percent in 2023. Capacity utilization was markedly lower in January-June 2024 at *** percent than in January-June 2023 at *** percent. Four of seven firms (***) had lower capacity utilization in 2023 than in 2021, while was lower for three firms (***) in January-June 2024 than in January-June 2023.

Table III-5
Rebar: U.S. producers' output, by firm and period

Practical capacity

Capacity in short tons

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-5 Continued
Rebar: U.S. producers' output, by firm and period

Production

Production in short tons

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-5 Continued
Rebar: U.S. producers' output, by firm and period

Capacity utilization

Capacity utilization in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
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
Rebar: U.S. producers' output, by firm and period

Share of production

Share in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	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 "---".

Figure III-1
Rebar: U.S. producers' output, by period

* * * * * * *

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

Alternative products

As shown in table III-6 presents U.S. producers' overall production on the same equipment as in-scope production. Rebar accounted for *** percent of U.S. producers' overall production during 2023, with merchant bar accounting for *** percent, coiled rebar accounting for ***, and other products account for *** percent of overall production during 2023.

Table III-6
Rebar: U.S. producers' overall production on the same equipment as in-scope production, by period

Quantity in short tons; share in percent

Product type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Rebar	Quantity	***	***	***	***	***
Coiled rebar	Quantity	***	***	***	***	***
Merchant bar	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
Out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Rebar	Share	***	***	***	***	***
Coiled rebar	Share	***	***	***	***	***
Merchant bar	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
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 "---".

U.S. producers' U.S. shipments and exports

Table III-7 presents U.S. producers' U.S. shipments, export shipments, and total shipments. U.S. shipments accounted for the majority of U.S. producers' total shipments from 2021 to 2023.[1] The quantity of their U.S. shipments fluctuated but decreased overall by *** percent during 2021-23, and was *** percent lower in January-June 2024 than in January-June 2023. The decrease reflects ***, which accounted for *** percent of U.S. shipments, during 2021-2023. The value of U.S. producers' U.S. shipments fluctuated year to year, increasing overall by *** percent during 2021-2023, but were *** percent lower in January-June 2024 than in January-June 2023.

The average unit value of U.S. producers' U.S. shipments fluctuated year to year, increasing overall by *** percent during 2021-2023, but were *** percent lower in January-June 2024 than in January-June 2023.

By quantity, export shipments accounted for a minority share of U.S. producers' total shipments in each year from 2021 to 2023.[2] The quantity of their export shipments fluctuated, but increased by *** percent during 2021-23 and was *** percent higher in January-June 2024 than in January-June 2023. The value of U.S. producers' export shipments increased yearly from 2021 to 2023, ending *** percent higher. In contrast, export shipments were *** percent lower in January-June 2024 than in January-June 2023. The unit value of their export shipments fluctuated year to year, ending *** percent lower in 2023 than in 2021, and was *** percent lower in January-June 2024 than in January-June 2023.

[1] Three firms (***) reported internal consumption, including firm's own retail sales, accounting for less than 1.0 percent of U.S. producers' U.S. shipments in any single year during 2021-23. While three firms (***) reported transfers to related firms, accounting for 32.4 to 36.4 percent of U.S. producers' U.S. shipments during 2021-23.

[2] Five of the seven firms (except ***) reported exports during 2021-23, with ***.

Table III-7
Rebar: U.S. producers' total 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	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
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.

Table III-8
Rebar: U.S. producers' U.S. shipments, by type and period

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

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Commercial U.S. shipments	Quantity	***	***	***	***	***
Internal consumption	Quantity	***	***	***	***	***
Transfers to related firms	Quantity	***	***	***	***	***
U.S. shipments	Quantity	***	***	***	***	***
Commercial U.S. shipments	Value	***	***	***	***	***
Internal consumption	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Commercial U.S. shipments	Unit value	***	***	***	***	***
Internal consumption	Unit value	***	***	***	***	***
Transfers to related firms	Unit value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Commercial U.S. shipments	Share of quantity	***	***	***	***	***
Internal consumption	Share of quantity	***	***	***	***	***
Transfers to related firms	Share of quantity	***	***	***	***	***
U.S. shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
Commercial U.S. shipments	Share of value	***	***	***	***	***
Internal consumption	Share of value	***	***	***	***	***
Transfers to related firms	Share of value	***	***	***	***	***
U.S. shipments	Share of value	100.0	100.0	100.0	100.0	100.0

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

U.S. producers' inventories

Table III-9 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments**.** U.S. producers' end-of-period inventories fluctuated but increased by *** percent during 2021-23, and was *** percent higher in January-June 2024 than in January-June 2023. The ratios of U.S. producers' end-of-period inventories to their U.S. production, U.S. shipments, and total shipments each fluctuated year to year from 2021 to 2023, ending *** percentage points, *** percentage points, and *** percentage points higher, respectively. The ratios of U.S. producers' end-of-period inventories to their U.S. production, U.S. shipments, and total shipments were higher in January-June 2024 than in January-June 2023.

Table III-9
Rebar: 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	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
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 imports of rebar during 2021-23 and both interim periods.

U.S. producers' purchases of imports from subject sources

No responding U.S. producer reported purchases of rebar from subject sources during 2021-23 and both interim periods.

U.S. employment, wages, and productivity

Table III-10 shows U.S. producers' employment-related data. Production and related workers increased by *** percent during 2021-23 and were *** percent higher in January-June 2024 than in January-June 2023. Hours worked increased by *** percent during 2021-23 and were *** percent higher in January-June 2024 than in January-June 2023. Wages paid increased by *** percent between 2021 and 2023 and was *** percent higher in January-June 2024 than in January-June 2023. Productivity decreased by *** percent during 2021-23 and was *** percent lower in January-June 2024 than in January-June 2023. Unit labor costs increased by *** percent between 2021 and 2023 and were *** percent higher in January-March 2024 than in January-March 2023.

Table III-10
Rebar: U.S. producers' employment related information, by period

Item	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
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

Background[3]

Seven U.S. producers provided usable financial results on their rebar operations. All U.S. producers reported financial data on a calendar year basis.[4] One firm, ***, reported its financial data on the basis of International Financial Reporting Standards ("IFRS") and all other responding U.S. producers provided their financial data on the basis of GAAP.

Two U.S. producers (***) accounted for *** percent of rebar sales by quantity and value from 2021 to June 2024. One U.S. producer (***) entered the U.S. rebar industry in 2023. Figure III-2 presents each responding firm's share of the total reported net sales quantity in 2023.

[3] 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").

[4] ***. U.S. producer questionnaire responses, section III-2A.2.

Figure III-2
Rebar: U.S. producers' share of net sales quantity in 2023, by firm

* * * * * * *

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

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

Operations on Rebar

Table III-11 presents aggregated data on U.S. producers' operations in relation to rebar, while table III-12 presents corresponding changes in AUVs. Table III-13 presents selected company-specific financial data.

Table III-11
Rebar: U.S. producers' results of operations, by item and period

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

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Commercial sales	Quantity	***	***	***	***	***
Internal consumption	Quantity	***	***	***	***	***
Transfers to related firms	Quantity	***	***	***	***	***
Total net sales	Quantity	***	***	***	***	***
Commercial sales	Value	***	***	***	***	***
Internal consumption	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
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	***	***	***	***	***
Interest expense	Value	***	***	***	***	***
All other expenses	Value	***	***	***	***	***
All other income	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
Rebar: 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	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
COGS: Raw materials	Share	***	***	***	***	***
COGS: Direct labor	Share	***	***	***	***	***
COGS: Other factory	Share	***	***	***	***	***
COGS: Total	Share	100.0	100.0	100.0	100.0	100.0
Commercial sales	Unit value	***	***	***	***	***
Internal consumption	Unit value	***	***	***	***	***
Transfers to related firms	Unit value	***	***	***	***	***
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	***	***	***	***	***
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
Rebar: Changes in AUVs between comparison periods

Changes in percent

Item	2021-23	2021-22	2022-23	Jan-Jun 2023-24
Commercial sales	▲***	▲***	▼***	▼***
Internal consumption	▲***	▲***	▲***	▼***
Transfers to related firms	▲***	▲***	▼***	▼***
Total net sales	▲***	▲***	▼***	▼***
COGS: Raw materials	▼***	▲***	▼***	▼***
COGS: Direct labor	▲***	▲***	▲***	▲***
COGS: Other factory	▲***	▲***	▲***	▲***
COGS: Total	▲***	▲***	▼***	▲***

Table continued.

Table III-12 Continued
Rebar: Changes in AUVs between comparison periods

Changes in dollars per short ton

Item	2021-23	2021-22	2022-23	Jan-Jun 2023-24
Commercial sales	▲***	▲***	▼***	▼***
Internal consumption	▲***	▲***	▲***	▼***
Transfers to related firms	▲***	▲***	▼***	▼***
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
Rebar: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in short tons

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales value

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss)

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss)

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss)

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS to net sales ratio

Ratios in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss) to net sales ratio

Ratios in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses to net sales ratio

Ratios in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss) to net sales ratio

Ratios in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss) to net sales ratio

Ratios in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net sales value

Unit values in dollars per short ton

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit raw material

Unit values in dollars per short ton

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit direct labor

Unit values in dollars per short ton

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit other factory costs

Unit values in dollars per short ton

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit COGS

Unit values in dollars per short ton

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: 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	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit SG&A expenses

Unit values in dollars per short ton

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: 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	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-13 Continued
Rebar: 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	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

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 "---".

Net sales

Total net sales are composed primarily of commercial sales and transfers to related firms, with relatively small amounts of internal consumption.[5] [6] [7] As shown in table III-13, total net sales quantity irregularly decreased from 2021 to 2023 and was lower in January-June 2024 ("interim 2024") compared to January-June 2023 ("interim 2023"). Total net sales value irregularly increased from 2021 to 2023 and was lower in interim 2024 compared to interim 2023. On a company specific basis, *** reported an overall decrease in net sales quantity from 2021 to 2023 and *** reported a lower net sales quantity in interim 2024 compared to interim 2023. *** reported an overall decrease in net sales value from 2021 to 2023, and *** reported a lower net sales value in interim 2024 compared to interim 2023.

The net sales AUV irregularly increased from $*** per short ton in 2021 to $*** per short ton in 2022 and $*** per short ton in 2023. It was lower in interim 2024 compared to interim 2023. On a company specific basis, U.S. producers' (***) net sales AUVs irregularly increased from 2021 to 2023 and *** reported a lower net sales AUVs in interim 2024 compared to interim 2023.

Cost of goods sold and gross profit or loss

Raw materials, direct labor and other factory costs accounted for ***, ***, and *** percent of COGS, respectively, in 2023. Raw material costs decreased overall from 2021 to 2023 by *** percent and were lower in interim 2024 compared to interim 2023. On a per short ton basis, raw material costs irregularly decreased from $*** in 2021 to $*** in 2023 and were lower in interim 2024 compared to interim 2023. The two largest U.S. producers (***) and one small U.S. producer (***) reported an overall decrease in raw

[5] ***. U.S. producer questionnaire responses, questions II-2a and II-2b

[6] Internal consumption, reported by ***, accounted for *** percent of total net sales quantity in 2023. Transfers to related firms, reported by ***, accounted for *** of total net sales quantity in 2023.

[7] ***. ***, August 28, 2024.

material costs on a per short ton basis from 2021 to 2023.[8] As a ratio to net sales, raw material costs decreased irregularly from *** percent in 2021 to *** percent in 2022 and increased to *** percent in 2023. Raw material costs as a share of net sales were higher in interim 2024 compared to interim 2023. Table III-14 presents raw materials, by type.[9] Secondary steel, scrap, accounted for the largest share of raw material costs.

Table III-14
Rebar: U.S. producers' raw material costs in 2023

Value in 1,000 dollars; unit values in dollars per short ton; share of value in percent

Item	Value	Share of value
Primary steel, billets	***	***
Secondary steel, scrap	***	***
Steel, both primary and secondary	***	***
Other material inputs	***	***
All raw materials	***	100.0

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

Direct labor costs represent the smallest component of COGS and increased overall by *** percent from 2021 to 2023. Direct labor costs were higher by *** percent in interim 2024 compared to interim 2023. On a per short ton basis, direct labor costs increased from $*** in 2021 to $*** in 2023 and were higher in interim 2024 compared to interim 2023. On a company specific basis, *** reported an overall

[8] The remaining U.S. producers (***) reported irregular increases in the cost of raw materials per unit from 2021 to 2023. Overall, U.S. producers cited a slowdown in demand as a factor of lower (and fluctuating) raw material prices after historic highs set during the COVID-19 pandemic. ***. U.S. producer questionnaire responses, section III-9b.

[9] *** U.S. producer questionnaire responses, questions III-6, III-7a, III-7b; email to USITC staff from ***, September 4, 2024; and email to USITC staff from ***, August 20, 2024.

increase in direct labor AUVs and *** reported a higher direct labor AUV in interim 2024 compared to interim 2023. As a ratio to net sales, direct labor costs irregularly increased overall by *** percentage points from 2021 to 2023 and were higher in interim 2024 compared to interim 2023.

Other factory costs represent the second largest component of COGS and increased overall by *** percent from 2021 to 2023. Other factory costs were lower in interim 2024 compared to interim 2023. On a per short ton basis, other factory costs increased from $*** in 2021 to $*** in 2023 and were higher in interim 2024 compared to interim 2023. On a company specific basis, *** companies *** reported an overall increase in other factory cost AUVs from 2021 to 2023 and *** reported higher other factory costs AUVs in interim 2024 compared to interim 2023.[10] As a ratio to net sales, other factory costs increased from *** percent in 2021 to *** percent in 2023 and were higher in interim 2024 compared to interim 2023.

Total COGS irregularly increased by *** percent from 2021 to 2023 and was lower in interim 2024 compared to interim 2023. On a per short ton basis, total COGS irregularly increased from $*** in 2021 to $*** in 2023 and was higher in interim 2024 compared to interim 2023. On a company specific basis, *** reported an overall increase in total COGS AUVs from 2021 to 2023, *** reported higher total COGS AUVs in interim 2024 compared to interim 2023. As a ratio to net sales, total COGS decreased irregularly from *** percent in 2021 to *** percent in 2023 and was higher in interim 2024 compared to interim 2023.

Gross profit irregularly increased from $*** in 2021 to $*** in 2023 and was lower in interim 2024 compared to interim 2023. The gross profit margin increased irregularly from *** percent in 2021 to *** percent in 2023 and was lower in interim 2024 compared to interim 2023. *** reported an overall increase in gross profit from 2021 to 2023.[11]

[10] U.S. producers attributed increases in other factory costs to ***. U.S. producer questionnaire responses, question III-9b.

[11] ***. U.S. producer questionnaire responses, question III-9b.

SG&A expenses and operating income or loss

SG&A expenses irregularly decreased from 2021 to 2023 and were higher in interim 2024 compared to interim 2023. On a company specific basis, *** reported an overall increase in SG&A expenses from 2021 to 2023. As a ratio to net sales, SG&A expenses decreased overall from *** percent in 2021 to *** percent in 2023 and were higher in interim 2024 compared to interim 2023.

Table III-11 shows that operating income irregularly increased by *** percent from 2021 to 2023 and was lower in interim 2024 compared to interim 2023. The operating income margin increased from *** percent in 2021 to *** percent in 2022, then to *** percent in 2023 and was lower in interim 2024 compared to interim 2023.[12] On a company specific basis, U.S. producers maintained a positive operating income from 2021 to 2022, with ***. Three U.S. producers (***) reported operating losses in interim 2024.

All other expenses and net income or loss

Classified below the operating income level are interest expenses, other expenses, and other income. Table III-11 shows interest expenses declining (resulting in interest income), all other income irregularly increasing, and all other expenses increasing from 2021 to 2023. As a result of the large interest income as well as all other income, U.S. producers' all other expenses/income, net, declined from 2021 to 2023 and were lower in interim 2024 than in interim 2023.[13]

Net income had a similar pattern as operating income: the U.S. rebar industry reported irregularly increasing net income from 2021 to 2023. Net income was lower in interim 2024

[12] ***. Petitioner's posthearing brief, exh. 1, p.36

[13] The high interest income for the U.S. industry is the result of one U.S. producer's (***) corporate allocations. ***. Email to USITC staff from ***, August 22, 2024.

compared to interim 2023. The absolute difference between operating and net profits is the result of the aforementioned net effects of all other expenses/income.

Variance analysis

A variance analysis for the operations of U.S. producers of rebar is presented in table III-15.[14] The information for this variance analysis is derived from table III-11. As shown in the analysis, the increase in operating income from 2021 to 2023 was due to a greater favorable price variance compared to smaller unfavorable cost and volume variances (indicating that prices increased more than costs and expenses). The lower operating income in interim 2024 compared to interim 2023 was due to unfavorable price, cost, and volume variances (indicating a decline in prices while costs and expenses increased).

[14] 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.

Table III-15
Rebar: Variance analysis on the operations of U.S. producers between comparison periods

Value in 1,000 dollars

Item	2021-23	2021-22	2022-23	Jan-Jun 2023-24
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 research and development expenses

Table III-16 presents capital expenditures, by firm, and table III-18 presents R&D expenses, by firm.[15] Tables III-17 and III-19 present the firms' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively.

Table III-16
Rebar: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

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

Table III-17
Rebar: U.S. producers' narrative descriptions of their capital expenditures, by firm

Firm	Narrative on capital expenditures
Byer	***
Cascade	***
CMC	***
Gerdau	***
Nucor	***
Optimus	***
Steel Dynamics	***

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

[15] ***. ***, September 11, 2024.

Table III-18
Rebar: U.S. producers' R&D expenses, by firm and period

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Byer	***	***	***	***	***
Cascade	***	***	***	***	***
CMC	***	***	***	***	***
Gerdau	***	***	***	***	***
Nucor	***	***	***	***	***
Optimus	***	***	***	***	***
Steel Dynamics	***	***	***	***	***
All firms	***	***	***	***	***

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

Table III-19
Rebar: U.S. producers' narrative descriptions of their R&D expenses, by firm

Firm	Narrative on R&D expenses
Byer	***
Cascade	***
CMC	***
Gerdau	***
Nucor	***
Optimus	***
Steel Dynamics	***

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

Assets and return on assets

Table III-20 presents data on the U.S. producers' total net assets, while table III-21 presents their operating ROA.[16] [17] Table III-22 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. Assets increased overall from 2021 to 2023. The industry's ROA decreased irregularly from *** percent in 2021 to *** percent in 2023.

Table III-20
Rebar: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2021	2022	2023
Byer	***	***	***
Cascade	***	***	***
CMC	***	***	***
Gerdau	***	***	***
Nucor	***	***	***
Optimus	***	***	***
Steel Dynamics	***	***	***
All firms	***	***	***

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

[16] 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.

[17] ***. ***, September 11, 2024.

Table III-21
Rebar: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2021	2022	2023
Byer	***	***	***
Cascade	***	***	***
CMC	***	***	***
Gerdau	***	***	***
Nucor	***	***	***
Optimus	***	***	***
Steel Dynamics	***	***	***
All firms	***	***	***

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.

Table III-22
Rebar: U.S. producers' narrative descriptions of their total net assets, by firm

Firm	Narrative on assets
Byer	***
Cascade	***
CMC	***
Gerdau	***
Nucor	***
Optimus	***
Steel Dynamics	***

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 14 potential importers of rebar between 2018 to 2023. Three firms provided data and information in response to the questionnaires, while three firms indicated that they had not imported product during the period for which data were collected. Based on official Commerce statistics for imports of rebar, importers' questionnaire data accounted for *** percent of total U.S. imports during 2023. Staff believe U.S. imports of rebar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine was less than 0.5 percent of total imports in any single period during the period for which data were collected.

In light of the data coverage by the Commission's questionnaires, import data in this report are based on official Commerce statistics for rebar.[1]

Imports from subject and nonsubject countries

Table IV-1 and figure IV-1 present information on U.S. imports of rebar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine and all other sources over the period examined. U.S. imports from subject countries by a share of total imports decreased from 0.4 percent in 2021 to 0.3 percent in 2022 and decreased to 0.2 percent in 2023.[2] U.S. imports from subject countries by a share of total imports was higher in January-June 2024 at *** percent than in January-June 2023 at 0.2 percent. The quantity of total U.S. imports from subject sources of rebar decreased year to year, ending 61.2 percent lower in 2023 than in 2021, and was *** percent higher in January-June 2024 than in January-June 2023.

The quantity of total U.S. imports of rebar increased by 10.3 percent from 2021 to 2022, but decreased by 3.4 percent from 2022 to 2023, resulting in an overall increase of 6.6 percent from 2021 to 2023. U.S. imports were 28.4 percent lower in January-June 2024 than in January-

[1] HTS statistical reporting numbers 7214.20.0000 and 7228.30.8010 cover only rebar within the scope of these reviews; HTS statistical reporting numbers 7222.30.0012, 7228.30.8015, 7228.30.8041, 7228.30.8045, and 7228.30.8070 were believed not to cover any in-scope products; and the other relevant HTS statistical reporting numbers cover both rebar within and products outside of the scope of these reviews.

[2] U.S. imports of rebar from Ukraine are believed to be manufactured by ***. The firm did not provide a foreign producers' questionnaire response or respond to staff inquires.

June 2023. In 2023, the largest sources for U.S. imports of rebar were Algeria, Canada, and Egypt.

Table IV-1
Rebar: U.S. imports by source and period

Quantity in short tons; value in 1,000 dollars

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Belarus	Quantity	---	---	---	---	---
China	Quantity	482	668	1,037	527	253
Indonesia	Quantity	---	---	---	---	---
Latvia	Quantity	---	---	---	---	---
Moldova	Quantity	---	---	---	---	---
Poland	Quantity	28	1,122	23	23	60
Ukraine, adjusted	Quantity	4,292	2,303	805	765	***
Subject sources	Quantity	4,803	4,093	1,865	1,315	***
Nonsubject sources	Quantity	1,325,862	1,464,153	1,416,942	800,571	***
All import sources	Quantity	1,330,665	1,468,246	1,418,807	801,885	574,275
Belarus	Value	---	---	---	---	---
China	Value	2,696	3,849	5,118	2,908	1,755
Indonesia	Value	---	---	---	---	---
Latvia	Value	---	---	---	---	---
Moldova	Value	---	---	---	---	---
Poland	Value	108	2,036	36	36	113
Ukraine, adjusted	Value	18,906	13,510	5,064	4,829	***
Subject sources	Value	21,710	19,394	10,217	7,773	***
Nonsubject sources	Value	1,012,905	1,396,998	1,070,201	615,420	***
All import sources	Value	1,034,615	1,416,392	1,080,418	623,192	437,161

Table continued.

Table IV-1 Continued
Rebar: U.S. imports by source and period

Unit value in dollars per short tons; shares in percent

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Belarus	Unit value	---	---	---	---	---
China	Unit value	5,593	5,761	4,934	5,515	6,951
Indonesia	Unit value	---	---	---	---	---
Latvia	Unit value	---	---	---	---	---
Moldova	Unit value	---	---	---	---	---
Poland	Unit value	3,811	1,814	1,586	1,586	1,871
Ukraine, adjusted	Unit value	4,405	5,867	6,287	6,314	***
Subject sources	Unit value	4,520	4,739	5,478	5,912	***
Nonsubject sources	Unit value	764	954	755	769	***
All import sources	Unit value	778	965	761	777	761
Belarus	Share of quantity	---	---	---	---	---
China	Share of quantity	0.0	0.0	0.1	0.1	0.0
Indonesia	Share of quantity	---	---	---	---	---
Latvia	Share of quantity	---	---	---	---	---
Moldova	Share of quantity	---	---	---	---	---
Poland	Share of quantity	0.0	0.1	0.0	0.0	0.0
Ukraine, adjusted	Share of quantity	0.3	0.2	0.1	0.1	***
Subject sources	Share of quantity	0.4	0.3	0.1	0.2	***
Nonsubject sources	Share of quantity	99.6	99.7	99.9	99.8	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0

Table continued.

Table IV-1 Continued
Rebar: U.S. imports by source and period

Shares and ratios in percent; ratios represent the ratio to U.S. production

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Belarus	Share of value	---	---	---	---	---
China	Share of value	0.3	0.3	0.5	0.5	0.4
Indonesia	Share of value	---	---	---	---	---
Latvia	Share of value	---	---	---	---	---
Moldova	Share of value	---	---	---	---	---
Poland	Share of value	0.0	0.1	0.0	0.0	0.0
Ukraine, adjusted	Share of value	1.8	1.0	0.5	0.8	***
Subject sources	Share of value	2.1	1.4	0.9	1.2	***
Nonsubject sources	Share of value	97.9	98.6	99.1	98.8	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
Belarus	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Indonesia	Ratio	***	***	***	***	***
Latvia	Ratio	***	***	***	***	***
Moldova	Ratio	***	***	***	***	***
Poland	Ratio	***	***	***	***	***
Ukraine, adjusted	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7214.20.0000, 7222.11.0001, 7222.11.0057, 7222.11.0059, 7222.11.0082, 7222.11.0084, 7222.30.0001, 7222.30.0022, 7222.30.0024, 7222.30.0082, 7222.30.0084, 7228.20.1000, 7228.30.8010, and 7228.60.6000, accessed August 28, 2024; imports from Ukraine were adjusted using proprietary, Census-edited Customs records to reclassify imports of rebar manufactured in Bulgaria from Ukrainian steel that were classified as country of origin Ukraine. Imports are based on the imports for consumption data series. Import value data reflect landed-duty paid value.

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-1
Rebar: U.S. imports quantities and average unit values, by source and period

* * * * * * *

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7214.20.0000, 7222.11.0001, 7222.11.0057, 7222.11.0059, 7222.11.0082, 7222.11.0084, 7222.30.0001, 7222.30.0022, 7222.30.0024, 7222.30.0082, 7222.30.0084, 7228.20.1000, 7228.30.8010, and 7228.60.6000, accessed August 28, 2024; imports from Ukraine were adjusted using proprietary, Census-edited Customs records to reclassify imports of rebar manufactured in Bulgaria from Ukrainian steel that were classified as country of origin Ukraine. Imports are based on the imports for consumption data series. Import value data reflect landed-duty paid value.

Cumulation considerations (if applicable)

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

Table IV-2 presents data on U.S. producers' U.S. shipments and reporting foreign producers' total shipments of rebar by size.[3] In 2023, all other sizes comprised *** percent, number 5 comprised *** percent, number 4 comprised *** percent, number 6 comprised *** percent, and number 3 comprised *** percent of U.S. producers' U.S. shipments, by quantity. During the same year, all other sizes comprised *** percent, number 3 comprised *** percent, and number 5 comprised *** percent of foreign producer's total shipments, by quantity.

Table IV-2
Rebar: U.S. producers' U.S. shipments and reporting foreign producer's total shipments, by size, 2023

Quantity in short tons

Source	No. 3	No. 4	No. 5	No. 6	All other	All sizes
U.S. producers	***	***	***	***	***	***
Poland	***	***	***	***	***	***
Ukraine	***	***	***	***	***	***
Responding subject producers	***	***	***	***	***	***

Table continued.

Table IV-2 Continued
Rebar: U.S. producers' U.S. shipments and reporting foreign producer's total shipments, by size, 2023

Share of quantity across in percent

Source	No. 3	No. 4	No. 5	No. 6	All other	All sizes
U.S. producers	***	***	***	***	***	***
Poland	***	***	***	***	***	***
Ukraine	***	***	***	***	***	***
Responding subject 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. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

[3] No responses were received of imports from subject sources.

Figure IV-2
Rebar: U.S. producers' U.S. shipments and reporting foreign producer's total shipments, by size, 2023

* * * * * * *

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

Geographical markets

Table IV-3 presents data on U.S. imports of rebar by source and by border of entry in 2023, based on official statistics. There were no U.S. imports from Belarus, Indonesia, Latvia, or Moldova during 2023. Imports from China and Ukraine in 2023 entered through all U.S. ports of entry, while imports from Poland entered through the Northern border of entry. During 2023, the largest share of imports of rebar entered via the Southern border of entry.

Table IV-3
Rebar: U.S. imports by source and border of entry, 2023

Quantity in short tons

Source	East	North	South	West	All borders
Belarus	---	---	---	---	---
China	352	135	430	121	1,037
Indonesia	---	---	---	---	---
Latvia	---	---	---	---	---
Moldova	---	---	---	---	---
Poland	---	23	---	---	23
Ukraine	243	308	145	109	805
Subject sources	595	465	575	230	1,865
Nonsubject sources	421,613	40,986	922,726	31,618	1,416,942
All import sources	422,208	41,451	923,301	31,848	1,418,807

Table continued.

Table IV-3 Continued
Rebar: U.S. imports by source and border of entry, 2023

Share of quantity across in percent

Source	East	North	South	West	All borders
Belarus	---	---	---	---	---
China	33.9	13.0	41.5	11.7	100.0
Indonesia	---	---	---	---	---
Latvia	---	---	---	---	---
Moldova	---	---	---	---	---
Poland	---	100.0	---	---	100.0
Ukraine	30.1	38.2	18.0	13.6	100.0
Subject sources	31.9	24.9	30.8	12.3	100.0
Nonsubject sources	29.8	2.9	65.1	2.2	100.0
All import sources	29.8	2.9	65.1	2.2	100.0

Table continued.

Table IV-3 Continued
Rebar: U.S. imports by source and border of entry, 2023

Share of quantity down in percent

Source	East	North	South	West	All borders
Belarus	---	---	---	---	---
China	0.1	0.3	0.0	0.4	0.1
Indonesia	---	---	---	---	---
Latvia	---	---	---	---	---
Moldova	---	---	---	---	---
Poland	---	0.1	---	---	0.0
Ukraine	0.1	0.7	0.0	0.3	0.1
Subject sources	0.1	1.1	0.1	0.7	0.1
Nonsubject sources	99.9	98.9	99.9	99.3	99.9
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7214.20.0000, 7222.11.0001, 7222.11.0057, 7222.11.0059, 7222.11.0082, 7222.11.0084, 7222.30.0001, 7222.30.0022, 7222.30.0024, 7222.30.0082, 7222.30.0084, 7228.20.1000, 7228.30.8010, and 7228.60.6000, accessed August 28, 2024. 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 "---".

Presence in the market

Table IV-4 presents monthly data for U.S. imports of rebar from subject and nonsubject sources between January 2018 and June 2024. Imports from Belarus, Indonesia, Latvia, and Moldova were reported in zero months during this period. Imports from China were reported in 77 of 78 months, imports from Ukraine were reported in 72 of 78 months, and imports from Poland were 8 of 78 months.

Table IV-4
Rebar: Quantity of U.S. imports, by source and month

Quantity in short tons

Year	Month	Belarus	China	Indonesia	Latvia	Moldova
2018	January	---	58	---	---	---
2018	February	---	24	---	---	---
2018	March	---	97	---	---	---
2018	April	---	15	---	---	---
2018	May	---	71	---	---	---
2018	June	---	186	---	---	---
2018	July	---	38	---	---	---
2018	August	---	44	---	---	---
2018	September	---	55	---	---	---
2018	October	---	9	---	---	---
2018	November	---	6	---	---	---
2018	December	---	28	---	---	---
2019	January	---	85	---	---	---
2019	February	---	24	---	---	---
2019	March	---	44	---	---	---
2019	April	---	13	---	---	---
2019	May	---	38	---	---	---
2019	June	---	57	---	---	---
2019	July	---	58	---	---	---
2019	August	---	80	---	---	---
2019	September	---	3	---	---	---
2019	October	---	10	---	---	---
2019	November	---	4	---	---	---
2019	December	---	14	---	---	---

Table continued.

Table IV-4 Continued
Rebar: Quantity of U.S. imports, by source and month

Quantity in short tons

Year	Month	Poland	Ukraine, adjusted	Subject sources	Nonsubject sources	All import sources
2018	January	---	225	283	98,662	98,944
2018	February	---	354	378	44,717	45,094
2018	March	---	544	641	128,359	129,000
2018	April	---	211	227	190,785	191,012
2018	May	---	500	571	168,237	168,808
2018	June	8	450	644	49,458	50,102
2018	July	---	442	479	137,917	138,396
2018	August	---	94	138	158,796	158,934
2018	September	---	288	342	70,676	71,018
2018	October	---	361	369	52,591	52,961
2018	November	---	229	235	49,901	50,136
2018	December	---	174	201	36,830	37,031
2019	January	---	263	348	128,555	128,903
2019	February	---	563	587	107,523	108,111
2019	March	---	580	624	89,637	90,261
2019	April	---	574	587	95,929	96,516
2019	May	---	285	323	135,743	136,066
2019	June	---	692	749	91,017	91,765
2019	July	---	408	466	89,075	89,540
2019	August	---	534	615	90,647	91,261
2019	September	---	672	675	76,319	76,994
2019	October	7	322	339	60,920	61,258
2019	November	---	569	573	62,501	63,074
2019	December	3	284	302	45,171	45,473

Table continued.

Table IV-4 Continued
Rebar: Quantity of U.S. imports, by source and month

Quantity in short tons

Year	Month	Belarus	China	Indonesia	Latvia	Moldova
2020	January	---	58	---	---	---
2020	February	---	47	---	---	---
2020	March	---	---	---	---	---
2020	April	---	3	---	---	---
2020	May	---	18	---	---	---
2020	June	---	22	---	---	---
2020	July	---	95	---	---	---
2020	August	---	20	---	---	---
2020	September	---	53	---	---	---
2020	October	---	92	---	---	---
2020	November	---	3	---	---	---
2020	December	---	40	---	---	---
2021	January	---	30	---	---	---
2021	February	---	94	---	---	---
2021	March	---	13	---	---	---
2021	April	---	108	---	---	---
2021	May	---	1	---	---	---
2021	June	---	63	---	---	---
2021	July	---	66	---	---	---
2021	August	---	0	---	---	---
2021	September	---	38	---	---	---
2021	October	---	26	---	---	---
2021	November	---	40	---	---	---
2021	December	---	2	---	---	---

Table continued.

Table IV-4 Continued
Rebar: Quantity of U.S. imports, by source and month

Quantity in short tons

Year	Month	Poland	Ukraine, adjusted	Subject sources	Nonsubject sources	All import sources
2020	January	---	349	407	107,479	107,885
2020	February	---	220	267	95,138	95,405
2020	March	---	408	408	81,400	81,808
2020	April	6	352	361	122,614	122,975
2020	May	---	318	336	109,792	110,127
2020	June	---	397	420	80,138	80,558
2020	July	7	369	471	126,929	127,400
2020	August	---	259	279	97,687	97,966
2020	September	---	169	223	52,851	53,074
2020	October	---	308	400	83,697	84,097
2020	November	---	222	225	95,676	95,901
2020	December	---	129	170	29,250	29,419
2021	January	---	399	429	107,598	108,027
2021	February	---	177	271	86,430	86,701
2021	March	---	215	228	142,053	142,281
2021	April	---	203	310	116,382	116,692
2021	May	---	431	432	93,797	94,229
2021	June	9	425	498	105,978	106,476
2021	July	19	451	536	86,963	87,499
2021	August	---	439	439	92,889	93,328
2021	September	---	419	456	153,707	154,163
2021	October	---	223	249	139,743	139,992
2021	November	---	269	309	133,856	134,165
2021	December	---	642	644	66,467	67,111

Table continued.

Table IV-4 Continued
Rebar: Quantity of U.S. imports, by source and month

Quantity in short tons

Year	Month	Belarus	China	Indonesia	Latvia	Moldova
2022	January	---	14	---	---	---
2022	February	---	23	---	---	---
2022	March	---	42	---	---	---
2022	April	---	46	---	---	---
2022	May	---	27	---	---	---
2022	June	---	88	---	---	---
2022	July	---	57	---	---	---
2022	August	---	43	---	---	---
2022	September	---	44	---	---	---
2022	October	---	78	---	---	---
2022	November	---	87	---	---	---
2022	December	---	118	---	---	---
2023	January	---	62	---	---	---
2023	February	---	38	---	---	---
2023	March	---	80	---	---	---
2023	April	---	43	---	---	---
2023	May	---	78	---	---	---
2023	June	---	226	---	---	---
2023	July	---	195	---	---	---
2023	August	---	81	---	---	---
2023	September	---	96	---	---	---
2023	October	---	49	---	---	---
2023	November	---	33	---	---	---
2023	December	---	55	---	---	---
2024	January	---	33	---	---	---
2024	February	---	74	---	---	---
2024	March	---	27	---	---	---
2024	April	---	19	---	---	---
2024	May	---	54	---	---	---
2024	June	---	45	---	---	---

Table continued.

Table IV-4 Continued
Rebar: Quantity of U.S. imports, by source and month

Quantity in short tons

Year	Month	Poland	Ukraine, adjusted	Subject sources	Nonsubject sources	All import sources
2022	January	---	330	344	78,163	78,507
2022	February	---	387	410	152,554	152,964
2022	March	---	379	421	155,225	155,646
2022	April	---	178	224	109,387	109,611
2022	May	569	36	631	224,419	225,050
2022	June	---	22	109	111,019	111,128
2022	July	---	---	57	155,708	155,766
2022	August	---	---	43	114,994	115,038
2022	September	---	210	253	106,402	106,656
2022	October	553	361	993	107,462	108,455
2022	November	---	157	245	64,497	64,742
2022	December	---	243	361	84,321	84,682
2023	January	---	105	167	102,654	102,821
2023	February	---	18	57	139,257	139,314
2023	March	---	55	135	86,203	86,338
2023	April	---	74	117	182,777	182,894
2023	May	23	383	484	75,669	76,153
2023	June	---	129	355	214,010	214,365
2023	July	---	18	213	153,604	153,817
2023	August	---	---	81	171,592	171,673
2023	September	---	---	96	61,326	61,423
2023	October	---	---	49	105,041	105,090
2023	November	---	---	33	73,153	73,186
2023	December	---	22	78	51,655	51,733
2024	January	---	***	***	***	45,908
2024	February	---	***	***	***	111,616
2024	March	0	***	***	***	100,201
2024	April	60	***	***	***	131,365
2024	May	---	***	***	***	126,329
2024	June	---	***	***	***	58,858

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7214.20.0000, 7222.11.0001, 7222.11.0057, 7222.11.0059, 7222.11.0082, 7222.11.0084, 7222.30.0001, 7222.30.0022, 7222.30.0024, 7222.30.0082, 7222.30.0084, 7228.20.1000, 7228.30.8010, and 7228.60.6000, accessed August 28, 2024; imports from Ukraine were adjusted using proprietary, Census-edited Customs records to reclassify imports of rebar manufactured in Bulgaria from Ukrainian steel that were classified as country of origin Ukraine. Imports are based on the imports for consumption data series.

U.S. inventories of imported merchandise

Table IV-5 presents data for inventories of U.S. imports of rebar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine and all other sources held in the United States. There were no inventories from Belarus, China, Indonesia, Latvia, Moldova, Poland, or Ukraine during the period for which data were collected.

Table IV-5
Rebar: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in short tons; ratio in percent

Measure	Source	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Inventories quantity	Subject	***	***	***	***	***
Ratio to imports	Subject	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject	***	***	***	***	***
Ratio to total shipments of imports	Subject	***	***	***	***	***
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, 2024

The Commission requested importers to indicate whether they had imported or arranged for the importation of rebar from Belarus, China, Indonesia, Latvia, Moldova, Poland, or Ukraine for delivery after June 30. 2024; such imports are presented in table IV-6. There were no arranged imports of subject merchandise for delivery after June 30, 2024. ***.

Table IV-6
rebar: U.S. importers' arranged imports, by source and period

Quantity in short tons

Source	Jul-Sep 2024	Oct-Dec 2024	Jan-Mar 2025	Apr-Jun 2025	Total
Subject sources	***	***	***	***	***
Nonsubect sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

The industry in Belarus

Overview

Since the original investigations, Byelorussian Steel Works ("BMZ") has been the only producer of rebar in Belarus. BMZ accounted for 100 percent of production and exports to the United States during the original investigations and subsequent five-year reviews.[4] Neither BMZ nor an entity representing their interests responded to the notice of institution in these reviews.

There were no known major developments in the rebar industry in Belarus since the continuation of the orders identified by interested parties in the proceeding and no relevant information from outside sources was found.

In the current proceeding, the Commission issued a foreign producer questionnaire to three firms in Belarus for which valid contact information was identified and received responses from none of these firms.

Exports

Table IV-7 presents export data for rebar from Belarus (by export destination in descending order of quantity for 2023). Kazakhstan, Lebanon and the Azerbaijan were the leading export destinations in 2023, accounting for 55.2 percent, 36.8 percent and 7.9 percent, respectively, of total exports from Belarus. The overall quantity of exports of rebar from Belarus decreased year to year, ending 93.5 percent lower in 2023.

[4] Third Review Publication, I-26, and Domestic interested parties' response to the notice of institution, December 1, 2023, p. 27.

Table IV-7
Rebar: Exports from Belarus, by destination market and period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2021	2022	2023
United States	Quantity	---	---	---
Kazakhstan	Quantity	---	50,901	21,676
Lebanon	Quantity	296	19,330	14,435
Azerbaijan	Quantity	---	77	3,096
Armenia	Quantity	---	---	54
Russia	Quantity	302,537	---	---
Lithuania	Quantity	118,844	38,158	---
Poland	Quantity	92,704	34,820	---
All other destination markets	Quantity	91,775	36,772	---
Non-U.S. destination markets	Quantity	606,156	180,058	39,261
All destination markets	Quantity	606,156	180,058	39,261
United States	Value	---	---	---
Kazakhstan	Value	---	25,421	10,324
Lebanon	Value	145	10,361	9,638
Azerbaijan	Value	---	36	1,612
Armenia	Value	---	---	26
Russia	Value	187,485	---	---
Lithuania	Value	67,153	26,061	---
Poland	Value	60,547	23,182	---
All other destination markets	Value	50,970	26,741	---
Non-U.S. destination markets	Value	366,300	111,803	21,600
All destination markets	Value	366,300	111,803	21,600

Table continued.

Table IV-7 Continued
Rebar: Exports from Belarus, by destination market and period

Unit value in dollars per short ton; shares in percent

Destination market	Measure	2021	2022	2023
United States	Unit value	---	---	---
Kazakhstan	Unit value	---	499	476
Lebanon	Unit value	491	536	668
Azerbaijan	Unit value	---	470	521
Armenia	Unit value	---	---	490
Russia	Unit value	620	---	---
Lithuania	Unit value	565	683	---
Poland	Unit value	653	666	---
All other destination markets	Unit value	555	727	---
Non-U.S. destination markets	Unit value	604	621	550
All destination markets	Unit value	604	621	550
United States	Share of quantity	---	---	---
Kazakhstan	Share of quantity	---	28.3	55.2
Lebanon	Share of quantity	0.0	10.7	36.8
Azerbaijan	Share of quantity	---	0.0	7.9
Armenia	Share of quantity	---	---	0.1
Russia	Share of quantity	49.9	---	---
Lithuania	Share of quantity	19.6	21.2	---
Poland	Share of quantity	15.3	19.3	---
All other destination markets	Share of quantity	15.1	20.4	---
Non-U.S. destination markets	Share of quantity	100.0	100.0	100.0
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official imports statistics of imports from Belarus (constructed export statistics for Belarus) under HS subheadings 7214.20, 7222.11, and 7222.30 as reported by various national statistical reporting authorities in the Global Trade Atlas Suite database, accessed October 8, 2024.

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 for these three HS subheadings relate primarily to rebar but may be overstated slightly due to the inclusion of relatively small volumes of out-of-scope merchandise, additionally these data may be understated because they do not include some small volumes of rebar coming in under other HS subheadings which are primarily non-rebar subheadings. Russia, the primary market destination for Belarus' exports in 2021, stopped reporting all merchandise trade data to GTAS in 2022. The data constructed for Belarus' exports in this table are therefore understated significantly beginning in 2022. United States is shown at the top followed by the top destination markets in descending order of 2023 data, plus some additional destination markets with notable volumes prior to 2023.

The industry in China

Overview

During the original investigations, the petition listed 17 firms believed to be producing rebar in China. Only Laiwu Steel Group, Ltd. ("Laiwu") provided data in response to Commission questionnaires. It accounted for approximately *** percent of production of rebar in China during 2000, and approximately *** percent of rebar exports from China to the United States during 2000.[5] In the first reviews, domestic interested parties identified 20 potential producers of rebar in China in their response to the Commission's notice of institution, none of whom replied to the Commission's foreign producers' questionnaire during those reviews. In the second five-year reviews, the Commission sent questionnaires to 30 firms in China identified as possible producers of rebar according to domestic interested parties' responses to the notice of institution. None of these firms provided data on their rebar operations. No Chinese firms nor an entity representing Chinese producers' interests responded to the notice of institution in the third five-year reviews or in these reviews.[6]

In the current proceeding, the Commission issued a foreign producer questionnaire to sixteen firms in China for which valid contact information was identified and received responses from none of these firms.

There were no known major developments in the Chinese rebar industry since the continuation of the orders identified by interested parties in the proceeding and no relevant information from outside sources was found.

[5] Investigation Nos. 731-TA-873-875,877-880, and 882 (Final): Certain Steel Concrete Reinforcing Bars from Belarus, China, Indonesia, Korea, Latvia, Moldova, Poland, and Ukraine, Confidential Report, INV-Y-087, May 1, 2001, as supplemented in INV-Y-097, May 11, 2001 ("Original confidential report"), p. VII-4. Another firm, Yunnan Kungang Group Import & Export Co., Ltd. supplied very limited information on its rebar operations. It estimated that it alone accounts for about *** percent of China's production of rebar in 2000. Ibid, fn. 3.

[6] Third Review Publication, p. I-29, and Domestic interested parties' response to the notice of institution, December 1, 2023, p. 28.

Exports

Table IV-8 presents export data for rebar from China (by export destination in descending order of quantity for 2023). Hong Kong, Mongolia, and Myanmar were the leading export destinations in 2023, accounting for 25.2 percent, 10. 8 percent and 10.2 percent, respectively, of total exports from China. The overall quantity of exports of rebar from China increased year to year, ending 311.7 percent higher in 2023.

Table IV-8
Rebar: Exports from China, by destination market and period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2021	2022	2023
United States	Quantity	764	1,659	1,927
Hong Kong	Quantity	4,030	28,348	466,232
Mongolia	Quantity	96,181	137,749	199,769
Myanmar	Quantity	68,968	102,584	188,884
Macau	Quantity	2,475	49,267	149,359
Laos	Quantity	22,399	37,993	104,416
South Korea	Quantity	107,680	66,156	83,696
Netherlands	Quantity	103	14,483	71,898
Guinea	Quantity	7,873	45,159	68,128
All other destination markets	Quantity	138,276	268,047	513,046
Non-U.S. destination markets	Quantity	447,985	749,786	1,845,428
All destination markets	Quantity	448,749	751,445	1,847,355
United States	Value	5,063	6,859	7,499
Hong Kong	Value	3,736	19,467	241,745
Mongolia	Value	49,505	84,790	95,657
Myanmar	Value	43,849	56,978	98,525
Macau	Value	1,647	36,734	89,462
Laos	Value	15,738	27,399	62,623
South Korea	Value	89,109	53,397	59,210
Netherlands	Value	232	8,347	38,737
Guinea	Value	5,812	31,557	40,717
All other destination markets	Value	186,488	380,950	460,506
Non-U.S. destination markets	Value	396,116	699,619	1,187,181
All destination markets	Value	401,179	706,477	1,194,680

Table continued.

Table IV-8 Continued
Rebar: Exports from China, by destination market and period

Unit value in dollars per short ton; shares in percent

Destination market	Measure	2021	2022	2023
United States	Unit value	6,627	4,134	3,892
Hong Kong	Unit value	927	687	519
Mongolia	Unit value	515	616	479
Myanmar	Unit value	636	555	522
Macau	Unit value	666	746	599
Laos	Unit value	703	721	600
South Korea	Unit value	828	807	707
Netherlands	Unit value	2,255	576	539
Guinea	Unit value	738	699	598
All other destination markets	Unit value	1,349	1,421	898
Non-U.S. destination markets	Unit value	884	933	643
All destination markets	Unit value	894	940	647
United States	Share of quantity	0.2	0.2	0.1
Hong Kong	Share of quantity	0.9	3.8	25.2
Mongolia	Share of quantity	21.4	18.3	10.8
Myanmar	Share of quantity	15.4	13.7	10.2
Macau	Share of quantity	0.6	6.6	8.1
Laos	Share of quantity	5.0	5.1	5.7
South Korea	Share of quantity	24.0	8.8	4.5
Netherlands	Share of quantity	0.0	1.9	3.9
Guinea	Share of quantity	1.8	6.0	3.7
All other destination markets	Share of quantity	30.8	35.7	27.8
Non-U.S. destination markets	Share of quantity	99.8	99.8	99.9
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7214.20, 7222.11, and 7222.30 as reported by China Customs in the Global Trade Atlas Suite database, accessed October 8, 2024.

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 for these three HS subheadings relate primarily to rebar but may be overstated slightly due to the inclusion of relatively small volumes of out-of-scope merchandise, additionally these data may be understated because they do not include some small volumes of rebar coming in under other HS subheadings which are primarily non-rebar subheadings. The United States is shown at the top followed by the top destination markets in descending order of 2023 data.

The industry in Indonesia

Overview

In the original investigations, the Commission identified 13 firms that produced rebar in Indonesia, but only one, PT The Master Steel Mfg. Co., provided a response to the Commission's questionnaire. The Commission also received information from the Indonesian Ministry of Industry and Trade ("MOIT").[7] In the first reviews, domestic interested parties identified six potential producers of rebar in Indonesia in their response to the Commission's notice of institution, none of which replied to the Commission's foreign producers' questionnaire. In the second reviews, domestic interested parties identified ten possible producers of rebar in Indonesia in their response to the Commission's notice of institution, none of which replied to the Commission's foreign producers' questionnaire.[8] In the third five-year reviews, the Commission received a response from the Government of Indonesia but did not receive any industry data.[9]

In the current proceeding, the Commission issued a foreign producer questionnaire to four firms in Indonesia for which valid contact information was identified and received responses from none of these firms.

Table IV-9 presents events in Indonesia's industry since January 1, 2018.

Table IV-9
Rebar: Developments in the Indonesian industry since January 1, 2018

Item	Firm	Event
Plant opening	PT Dexin	March 2020: PT Dexin Steel Indonesia ("PT Dexin") began blast furnace production of crude steel in March 2020, began production at a second blast furnace in February 2021, and planned to open a third blast furnace. PT Dexin Steel Indonesia also produces steel products such as slab, billet, rebar, and wire rod.

Source: Choo, Clement, Zhuo, Joy, and Chin, Samuel, Dexin Steel Indonesia fires up second blast furnace at Morowali, February 5, 2021, https://www.spglobal.com/commodityinsights/es/market-insights/latest-news/metals/020521-dexin-steel-indonesia-fires-up-second-blast-furnace-at-morowali.

[7] Original Publication 1, pp. VII-3-VII-4.
[8] Second Review Publication, p. IV-18.
[9] Third Review Publication, p. I-32.

Exports

Table IV-10 presents export data for rebar from Indonesia (by export destination in descending order of quantity for 2023). Australia, Papua New Guinea, and East Timor were the leading export destinations in 2023, accounting for 90.3 percent, 3.4 percent and 2.3 percent, respectively, of total exports from Indonesia. The overall quantity of exports of rebar from Indonesia increased year to year, ending 89.4 percent higher in 2023.

Table IV-10
Rebar: Exports from Indonesia, by destination market and period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2021	2022	2023
United States	Quantity	---	---	---
Australia	Quantity	47,977	60,413	96,831
Papua New Guinea	Quantity	1,990	1,269	3,607
East Timor	Quantity	839	1,206	2,435
Vanuatu	Quantity	732	822	1,341
Samoa	Quantity	820	760	1,337
American Samoa	Quantity	365	395	668
Tonga	Quantity	274	90	605
Solomon Islands	Quantity	305	277	331
All other destination markets	Quantity	3,354	1,488	137
Non-U.S. destination markets	Quantity	56,656	66,720	107,292
All destination markets	Quantity	56,656	66,720	107,292
United States	Value	---	---	---
Australia	Value	31,997	41,870	55,662
Papua New Guinea	Value	1,390	828	2,014
East Timor	Value	175	330	1,182
Vanuatu	Value	471	572	770
Samoa	Value	571	485	759
American Samoa	Value	250	258	382
Tonga	Value	186	51	341
Solomon Islands	Value	212	218	190
All other destination markets	Value	2,070	1,804	112
Non-U.S. destination markets	Value	37,323	46,416	61,412
All destination markets	Value	37,323	46,416	61,412

Table continued.

Table IV-10 Continued
Rebar: Exports from Indonesia, by destination market and period

Unit value in dollars per short ton; shares in percent

Destination market	Measure	2021	2022	2023
United States	Unit value	---	---	---
Australia	Unit value	667	693	575
Papua New Guinea	Unit value	698	652	558
East Timor	Unit value	209	273	485
Vanuatu	Unit value	643	696	574
Samoa	Unit value	697	638	568
American Samoa	Unit value	685	654	571
Tonga	Unit value	680	569	564
Solomon Islands	Unit value	696	789	573
All other destination markets	Unit value	617	1,212	814
Non-U.S. destination markets	Unit value	659	696	572
All destination markets	Unit value	659	696	572
United States	Share of quantity	---	---	---
Australia	Share of quantity	84.7	90.5	90.2
Papua New Guinea	Share of quantity	3.5	1.9	3.4
East Timor	Share of quantity	1.5	1.8	2.3
Vanuatu	Share of quantity	1.3	1.2	1.2
Samoa	Share of quantity	1.4	1.1	1.2
American Samoa	Share of quantity	0.6	0.6	0.6
Tonga	Share of quantity	0.5	0.1	0.6
Solomon Islands	Share of quantity	0.5	0.4	0.3
All other destination markets	Share of quantity	5.9	2.2	0.1
Non-U.S. destination markets	Share of quantity	100.0	100.0	100.0
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7214.20, 7222.11, 7222.30 as reported by Statistics Indonesia in the Global Trade Atlas Suite database, accessed October 8, 2024.

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 for these three HS subheadings relate primarily to rebar but may be overstated slightly due to the inclusion of relatively small volumes of out-of-scope merchandise, additionally these data may be understated because they do not include some small volumes of rebar coming in under other HS subheadings which are primarily non-rebar subheadings. The United States is shown at the top followed by the top destination markets in descending order of 2023 data.

The industry in Latvia

Overview

Since the original investigations, Liepajas Metalurgs ("LM") has been the only producer of rebar in Latvia.[10] LM accounted for 100 percent of production and exports to the United States during the original investigations and subsequent five-year reviews.[11] Following the closing of LM's 2012 balance sheet, the company experienced declining production volumes and diminished cash flow, which it attributed to a crisis in the EC metallurgical industry.[12] As a result of this general environment, combined with a shortage of orders for rebar, the company halted production in April 2013.[13] In November 2013, LM became insolvent after it failed to repay a state-guaranteed loan back to an Italian bank. It was first sold to the Ukrainian company KVV Group in late 2014 and reopened in March 2015 as KVV Lepajas Metalurgs. However, it quickly became insolvent in September 2016. In March 2018, the Austrian company Smart Stahl Gmbh ("Smart Stahl") won the auction to acquire the rolling mill section of KVV Liepajas Metalurgs. Smart Stahl wanted to relaunch production and rehire some of the former employees. It is unclear whether Smart Stahl still has the rolling mill section of the plant because in April 2018, British Steel also showed interest in the purchase of the company. British Steel requested that the insolvency administrator cancel all previous and future auctions so that it could purchase the plant in its entirety.[14] Latvia does not have a significant domestic rebar market.[15] Neither LM nor an entity representing their interests responded to the notice of institution in the third five-year reviews.

In the current proceeding, the Commission issued a foreign producer questionnaire to one firm in Latvia for which valid contact information was identified and received no response from that firm.

Table IV-11 presents events in Latvia's industry since January 1, 2018.

[10] Third Review Publication, p. I-35.
[11] Id.
[12] Id.
[13] Id.
[14] Baltic Times, "British Steel company wishes to acquire KVV Liepajas Metalurgs," April 19, 2018. https://www.baltictimes.com/british_steel_company_wishes_to_acquire_kvv_liepajas_metalurgs/.
[15] Third Review Publication, p. I-35.

Table IV-11
Rebar: Developments in Latvia's industry since January 1, 2018

Item	Firm	Event
Plant purchased	Liepajas Metalurgs	April 2021: ASLANLI Metalürji ve Metal Ürünleri Sanayi ve Ticaret A.Ş. of Turkey purchased the Liepajas Metalurgs steelworks with a plan to invest in the plant and restart production. Production at Liepajas Metalurgs ceased in 2013.
Plant dismantling	Liepajas Metalurgs	August 2023: ASLANLI Metalürji ve Metal Ürünleri Sanayi ve Ticaret A.Ş. was unable to reach an agreement with Liepaja City Council and the administration of Liepaja Special Economic Zone (SEZ) on restarting production at Liepajas Metalurgs. Therefore, the company announced it would dismantle the steel melting furnace and relocated it to Turkey. Information was not available about when and if the dismantling and transfer of the furnace took place, but in September 2024 it was reported that construction on the new Liepaja Industrial Park began on the site where Liepajas Metalurgs had been located.

Sources: LSM+, Liepaja steelworks site faces new ownership wrangle, May 1, 2021, https://eng.lsm.lv/article/economy/business/liepaja-steelworks-site-faces-new-ownership-wrangle.a402830/. The Baltic Times, Turkish investors lose hope to revive metallurgyin Liepaja - Latvian Television, August 29, 2023. https://www.baltictimes.com/turkish_investors_lose_hope_to_revive_metallurgy_in_liepaja_-_latvian_television/. Liepaja Special Economic Zone, Construction of theinfrastructure of the LiepajaIndustrial Park begins, September 23, 2024, https://liepaja-sez.lv/en/news/construction-of-the-infrastructure-of-the-liepaja-industrial-park-begins.

Exports

Table IV-12 presents export data for rebar from Latvia (by export destination in descending order of quantity for 2023). Estonia, Lithuania and Poland were the leading export destinations in 2023, accounting for 42.2 percent, 20.5 percent and 19.2 percent, respectively, of total exports from Latvia. The overall quantity of exports of rebar from Latvia increased year to year, ending 15.6 percent higher in 2023.

Table IV-12
Rebar: Exports from Latvia, by destination market and period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2021	2022	2023
United States	Quantity	---	---	---
Estonia	Quantity	1,142	797	9,255
Lithuania	Quantity	10,308	1,904	4,545
Poland	Quantity	3,052	635	4,216
Finland	Quantity	2,343	4,830	2,428
Sweden	Quantity	4,294	5,644	3,379
Norway	Quantity	559	493	320
Denmark	Quantity	111	754	310
Netherlands	Quantity	5	172	250
All other destination markets	Quantity	534	275	---
Non-U.S. destination markets	Quantity	22,348	15,504	24,703
All destination markets	Quantity	22,348	15,504	24,703
United States	Value	---	---	---
Estonia	Value	870	815	4,927
Lithuania	Value	6,428	1,695	2,763
Poland	Value	2,612	671	2,781
Finland	Value	2,369	4,096	1,552
Sweden	Value	2,755	5,299	2,205
Norway	Value	543	601	345
Denmark	Value	153	490	316
Netherlands	Value	6	224	317
All other destination markets	Value	366	216	0
Non-U.S. destination markets	Value	16,101	14,106	15,206
All destination markets	Value	16,101	14,106	15,206

Table continued.

Table IV-12 Continued
Rebar: Exports from Latvia, by destination market and period

Unit value in dollars per short ton; shares in percent

Destination market	Measure	2021	2022	2023
United States	Unit value	---	---	---
Estonia	Unit value	762	1,023	532
Lithuania	Unit value	624	890	608
Poland	Unit value	856	1,056	660
Finland	Unit value	1,011	848	639
Sweden	Unit value	642	939	653
Norway	Unit value	972	1,218	1,079
Denmark	Unit value	1,378	650	1,020
Netherlands	Unit value	1,106	1,300	1,268
All other destination markets	Unit value	685	787	---
Non-U.S. destination markets	Unit value	720	910	616
All destination markets	Unit value	720	910	616
United States	Share of quantity	---	---	---
Estonia	Share of quantity	5.1	5.1	37.5
Lithuania	Share of quantity	46.1	12.3	18.4
Poland	Share of quantity	13.7	4.1	17.1
Finland	Share of quantity	10.5	31.2	9.8
Sweden	Share of quantity	19.2	36.4	13.7
Norway	Share of quantity	2.5	3.2	1.3
Denmark	Share of quantity	0.5	4.9	1.3
Netherlands	Share of quantity	0.0	1.1	1.0
All other destination markets	Share of quantity	2.4	1.8	---
Non-U.S. destination markets	Share of quantity	100.0	100.0	100.0
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official imports statistics of imports from Latvia (constructed export statistics for Latvia) under HS subheadings 7214.20, 7222.11, 7222.30 as reported by various national statistical reporting authorities in the Global Trade Atlas Suite database, accessed October 8, 2024.

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 for these three HS subheadings relate primarily to rebar but may be overstated slightly due to the inclusion of relatively small volumes of out-of-scope merchandise, additionally these data may be understated because they do not include some small volumes of rebar coming in under other HS subheadings which are primarily non-rebar subheadings. The United States is shown at the top followed by the top destination markets in descending order of 2023 data.

The industry in Moldova

Overview

Since the original investigations, JSCC Moldova Steel Works ("MSW") has been the only producer of rebar in Moldova. MSW accounted for 100 percent of production and exports during the original investigations and subsequent five-year reviews.[16] Neither MSW nor an entity representing their interests responded to the notice of institution in the third five-year reviews or in these reviews. The domestic interested parties noted that Moldova, much like Latvia, does not have a meaningful home market and depends on exports for revenue generation.[17]

In the current proceeding, the Commission issued a foreign producer questionnaire to one firm in Moldova for which valid contact information was identified and received no response from that firm.

There were no known major developments in the Moldovan rebar industry since the continuation of the orders identified by interested parties in the proceeding and no relevant information from outside sources was found.

Exports

Table IV-13 presents export data for rebar from Moldova (by export destination in descending order of quantity for 2023). Ukraine and Romania were the leading export destinations in 2023, accounting for 98.8 percent and 0.4 percent, respectively, of total exports from Moldova. The overall quantity of exports of rebar from Moldova decreased, ending 8.6 percent lower in 2023 than in 2021.

[16] Third review publication, p. I-37.

[17] Third review publication, p. I-37, and Domestic interested parties' response to the notice of institution, December 1, 2023, pp. 31-32.

Table IV-13
Rebar: Exports from Moldova, by destination market and period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2021	2022	2023
United States	Quantity	---	---	---
Ukraine	Quantity	27,015	39,667	27,518
Romania	Quantity	---	125	100
Egypt	Quantity	---	---	80
Bulgaria	Quantity	---	---	57
Turkey	Quantity	184	617	41
Russia	Quantity	4	2,844	---
All other destination markets	Quantity	3,264	174	53
Non-U.S. destination markets	Quantity	30,467	43,427	27,849
All destination markets	Quantity	30,467	43,427	27,849
United States	Value	---	---	---
Ukraine	Value	17,561	28,858	17,028
Romania	Value	1	117	65
Egypt	Value	---	---	50
Bulgaria	Value	---	---	37
Turkey	Value	181	603	33
Russia	Value	21	2,272	---
All other destination markets	Value	2,020	245	131
Non-U.S. destination markets	Value	19,784	32,095	17,344
All destination markets	Value	19,784	32,095	17,344

Table continued.

Table IV-13 Continued
Rebar: Exports from Moldova, by destination market and period

Unit value in dollars per short ton; shares in percent

Destination market	Measure	2021	2022	2023
United States	Unit value	---	---	---
Ukraine	Unit value	650	728	619
Romania	Unit value	---	933	652
Egypt	Unit value	---	---	619
Bulgaria	Unit value	---	---	657
Turkey	Unit value	986	978	805
Russia	Unit value	5,164	799	---
All other destination markets	Unit value	619	1,407	2,472
Non-U.S. destination markets	Unit value	649	739	623
All destination markets	Unit value	649	739	623
United States	Share of quantity	---	---	---
Ukraine	Share of quantity	88.7	91.3	98.8
Romania	Share of quantity	---	0.3	0.4
Egypt	Share of quantity	---	---	0.3
Bulgaria	Share of quantity	---	---	0.2
Turkey	Share of quantity	0.6	1.4	0.1
Russia	Share of quantity	0.0	6.5	---
All other destination markets	Share of quantity	10.7	0.4	0.2
Non-U.S. destination markets	Share of quantity	100.0	100.0	100.0
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official imports statistics of imports from Moldova (constructed export statistics for Moldova) under HS subheadings 7214.20, 7222.11, and 7222.30 as reported by various national statistical reporting authorities in the Global Trade Atlas Suite database, accessed October 8, 2024.

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 for these three HS subheadings relate primarily to rebar but may be overstated slightly due to the inclusion of relatively small volumes of out-of-scope merchandise, additionally these data may be understated because they do not include some small volumes of rebar coming in under other HS subheadings which are primarily non-rebar subheadings. Russia did not report any data for 2023, but it is not likely that it stopped trade. The United States is shown at the top followed by the top destination markets in descending order of 2023 data.

The industry in Poland

Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from two firms in Poland, Huta Ostrowiec S.A. and Huta Zawiercie S.A.[18] In the first reviews, domestic interested parties identified four potential producers of rebar in Poland in their response to the Commission's notice of institution, but only CMC Zawiercie ("CMCZ"), which accounted for an estimated *** percent of production of rebar in Poland during 2005 and ***, replied to the Commission's foreign producers' questionnaire.[19] In the second five-year reviews, domestic interested parties identified six potential producers of rebar in Poland and the Commission received responses from two Polish producers, ArcelorMittal Warszawa and CMC Poland sp. z o.o. ("CMC Poland"),[20] accounting for an estimated *** percent of total rebar production in 2012, and ***.[21]

In their response to the notice of institution for the third five-year reviews, U.S. producer CMC included data regarding their related firm CMC Poland, which accounted for approximately *** percent of production of rebar in Poland during 2017, and *** from Poland to the United States during 2017. According to publicly available data, Poland reported producing 1.8 million short tons of rebar in 2016.[22]

In the current proceeding, the Commission issued a foreign producer questionnaire to three firms in Poland for which valid contact information was identified and received responses from one firm: CMC Poland. This firm *** export to the United States. According to estimates requested of the responding producer in Poland, this firm accounted for *** of production of rebar in Poland during 2023. Table IV-14 presents information on the rebar operations of the responding producer and exporters in Poland.

[18] Original publication, VII-7.

[19] Investigation Nos. 731-TA-873-875,877-880, and 882 (Review): Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Korea, Latvia, Moldova, Poland, and Ukraine, Confidential Report, INV- -EE-061, June 12,2007, ("First review confidential report"), pp. IV-58-IV-59.

[20] CMC Poland is affiliated with U.S. producer, CMC.

[21] Investigation Nos. 731-TA-873-875, 878-880, and 882 (Second Review): Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine, Confidential Report, INV-LL-035, May 24, 2013, as revised in INV-LL-038, June 3, 2013 ("Second review confidential report"), pp. IV-46-IV-49. AMW is affiliated with U.S. producer ArcelorMittal and CMC Poland is affiliated with U.S. producer, CMC.

[22] Third review confidential report, pp. I-51-I-52.

Table IV-14
Rebar: Summary data for producer in Poland, 2023

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)
CMC Poland	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Table IV-15 presents events in Poland's industry since January 1, 2018.

Table IV-15
Rebar: Developments in Poland's industry since January 1, 2018

Item	Firm	Event
Plant opening	Sarralle Group	December 2023: Sarralle Group announced that it would startup a combined mill for rebar and merchant bar with an annual production capacity of 400,000 metric tons (440,924 short tons) for a customer in Poland. Sarralle did not name the customer.

Source: Sarralle Group, New rebar and merchant bar mill start up in Poland, October 31, 2023, https://www.sarralle.com/en/news/view/new-rebar-and-merchant-bar-mill-start-up-in-poland.

Changes in operations

The producers in Poland were asked to report any change in the character of their operations or organization relating to the production of rebar since 2018. CMC indicated in their questionnaires that they had experienced such changes. Table IV-16 presents the changes identified by these producers.

Table IV-16
Rebar: Reported changes in operations in Poland, since January 1, 2018, by firm

Item	Firm name and narrative on changes in operations
Prolonged shutdowns	***

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

Operations on rebar

Table IV-17 presents data on Polish producers installed capacity, practical capacity, and production on the same equipment. Polish practical capacity increased by *** percent and while overall production decreased by *** percent from 2021 to 2023.

Table IV-17
Rebar: Polish producer's overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical rebar	Capacity	***	***	***	***	***
Practical rebar	Production	***	***	***	***	***
Practical rebar	Utilization	***	***	***	***	***

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

Table IV-18 presents Polish producers' reported narratives regarding practical capacity constraints.

Table IV-18
Rebar: Polish producer's reported capacity constraints since January 1, 2018

Item	Firm name and narrative on constraints to practical overall capacity
Other constraints	***

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

Table IV-19 presents data on the industry in Poland. From 2021 to 2023, production decreased by *** percent. Capacity utilization, *** percent in 2021, decreased to *** percent in 2023. The share of home shipments in Poland was *** percent in 2021 and increased to *** percent in 2023 and the share of internal consumption was *** percent in 2021 and decreased to *** percent in 2023. The primary destinations for Polish exports were Czech Republic and Lithuania, and Germany with shares of quantities of 21.9 percent, 1.7 percent, and 34.1 percent in 2021 and 32.8 percent, 17.8 percent, and 17.8 percent in 2023, respectively. The inventory to production ratio in Poland decreased from *** percent in 2021 to *** percent in 2023.

Table IV-19
Rebar: Data on industry in Poland, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
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-19 Continued
Rebar: Data on industry in Poland, by period

Unit value in dollars per short tons; ratio and share in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
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-19
Rebar: Producer's exports from Poland, by destination market and period

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

Destination market	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
United States	Quantity	***	***	***	***	***
Canada or Mexico	Quantity	***	***	***	***	***
European Union	Quantity	***	***	***	***	***
Asia	Quantity	***	***	***	***	***
All other destination markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
Canada or Mexico	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	***	***	***	***	***
Canada or Mexico	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	***	***	***	***	***

Table Continued.

Table IV-19 Continued
Rebar: Producer's exports from Poland, by destination market and period

Ratio and share in percent

Destination market	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
United States	Share of quantity	***	***	***	***	***
Canada or Mexico	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	***	***	***	***	***
Canada or Mexico	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-20, The Polish responding firm produced other products on the same equipment and machinery used to produce rebar. Rebar accounted for approximately *** percent of the Polish producers' overall production during 2023 and merchant bar account for *** percent of overall production during 2023.

Table IV-20
Rebar: Producer's in Poland overall production on the same equipment as in-scope production, period

Quantity in short tons; share and ratio in percent

Product type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Rebar	Quantity	***	***	***	***	***
Coiled rebar	Quantity	***	***	***	***	***
Merchant bar	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
Out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Rebar	Share	***	***	***	***	***
Coiled rebar	Share	***	***	***	***	***
Merchant bar	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
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 rebar from Poland are the Czech Republic, Lithuania, and Germany which accounted for 32.8 percent, 17.8 percent, and 17.8 percent, of total rebar exports from Poland by quantity, respectively (table IV-21).

Table IV-21
Rebar: Exports from Poland, by destination market and period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2021	2022	2023
United States	Quantity	77	7	16
Czech Republic	Quantity	51,496	82,186	82,777
Lithuania	Quantity	4,072	21,300	44,987
Germany	Quantity	80,407	139,222	44,858
Slovakia	Quantity	30,829	46,255	29,647
Latvia	Quantity	3,131	13,885	11,164
Denmark	Quantity	26,473	14,161	7,872
Romania	Quantity	4,884	8,549	4,903
Hungary	Quantity	7,877	13,071	4,713
All other destination markets	Quantity	26,274	33,193	21,150
Non-U.S. destination markets	Quantity	235,443	371,822	252,071
All destination markets	Quantity	235,520	371,829	252,087
United States	Value	241	40	152
Czech Republic	Value	38,931	72,606	54,517
Lithuania	Value	3,825	17,655	29,274
Germany	Value	60,615	135,560	35,556
Slovakia	Value	22,890	40,311	20,052
Latvia	Value	2,185	12,041	7,642
Denmark	Value	20,722	13,341	5,744
Romania	Value	3,372	7,928	3,387
Hungary	Value	6,936	14,294	5,091
All other destination markets	Value	34,463	43,386	27,431
Non-U.S. destination markets	Value	193,939	357,122	188,692
All destination markets	Value	194,180	357,162	188,844

Table continued.

Table IV-21 Continued
Rebar: Exports from Poland, by destination market and period

Unit value in dollars per short ton; shares in percent

Destination market	Measure	2021	2022	2023
United States	Unit value	3,125	5,715	9,477
Czech Republic	Unit value	756	883	659
Lithuania	Unit value	939	829	651
Germany	Unit value	754	974	793
Slovakia	Unit value	742	871	676
Latvia	Unit value	698	867	685
Denmark	Unit value	783	942	730
Romania	Unit value	690	927	691
Hungary	Unit value	881	1,094	1,080
All other destination markets	Unit value	1,312	1,307	1,297
Non-U.S. destination markets	Unit value	824	960	749
All destination markets	Unit value	824	961	749
United States	Share of quantity	0.0	0.0	0.0
Czech Republic	Share of quantity	21.9	22.1	32.8
Lithuania	Share of quantity	1.7	5.7	17.8
Germany	Share of quantity	34.1	37.4	17.8
Slovakia	Share of quantity	13.1	12.4	11.8
Latvia	Share of quantity	1.3	3.7	4.4
Denmark	Share of quantity	11.2	3.8	3.1
Romania	Share of quantity	2.1	2.3	1.9
Hungary	Share of quantity	3.3	3.5	1.9
All other destination markets	Share of quantity	11.2	8.9	8.4
Non-U.S. destination markets	Share of quantity	100.0	100.0	100.0
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7214.20, 7222.11, and 7222.30 as reported by Eurostat in the Global Trade Atlas Suite database, accessed October 8, 2024.

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 for these three HS subheadings relate primarily to rebar but may be overstated slightly due to the inclusion of relatively small volumes of out-of-scope merchandise, additionally these data may be understated because they do not include some small volumes of rebar coming in under other HS subheadings which are primarily non-rebar subheadings. The United States is shown at the top followed by the top destination markets in descending order of 2023 data.

The industry in Ukraine

Overview

The major producer in Ukraine is ArcelorMittal Kryviy Rih ("Arcelor Mittal"), the formerly state-owned entity previously named Krivoi Rog Mining & Metallurgical Integrated Works ("Krivorozhstal"). The original petition and the response to the notice of institution of the first reviews named five producers of rebar in Ukraine. In the second reviews, domestic

interested parties identified four potential producers of rebar in Ukraine.[23] During the third five-year reviews, the Government of Ukraine responded to the Commission's notice of institution.[24]

During the final phase of the original investigations, the Commission received a foreign producer/exporter questionnaire from one firm, Krivoi Rog Mining & Metallurgical Integrated Works ("Krivorozhstal"), which reported that it accounts for ***.[25]

During the first five-year reviews, the Commission received a foreign producer/exporter questionnaire from one firm, the major producer in Ukraine Mittal Steel Kryviy Rih ("Mittal"), the formerly state owned entity previously named Krivorozhstal, which accounted for approximately *** percent of production of rebar in Ukraine, and ***.[26]

During the second five-year reviews, the Commission received a foreign producer/exporter questionnaire from the major producer in Ukraine, ArcelorMittal Kryviy Rih ("AMK"), which accounted for approximately *** percent of production of rebar in Ukraine during 2012, and ***.[27]

During the third five-year reviews, the Commission received a response to the notice of institution from the Government of Ukraine ("GOU"), which submitted available data on behalf of the Ukrainian industry. Citing the conflict with Russia in Eastern Ukraine resulting in production facilities residing outside the control of the GOU, partial data was provided regarding production of long products from 2013 to 2017 and capacity from 2013 to 2016. GOU was unable to provide data pertaining solely to rebar. According to publicly available data, Ukraine reported producing 3.3 million short tons of rebar in 2016.[28]

In the current proceeding, the Commission issued a foreign producer questionnaire to four firms in Ukraine for which valid contact information was identified and received responses from two firms: PJSC ArcelorMittal, and PJSC Kamet-Steel.[29] These firms *** export to the United States. According to estimates requested of the responding producer in Ukraine, ***

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[23] In addition to Arcelor Mittal, the identified potential producers were Dneprovsky Iron & Steel Works, Kramatorsk Iron Works, and Yenakievo Iron & Steel. Domestic interested parties' response to the notice of institution, December 1, 2023, p. 30, Exhibit 1.

[24] Third Review Publication, p. I-41.

[25] Original confidential report, p. VII-20. Krivorozhstal supplied information on its operations in the preliminary phase of these investigations but firm did not respond to the Commission's request for information in the final phase. The original petition named five producers of rebar in Ukraine.

[26] First review confidential report, p. IV-67-IV-69. In its prehearing brief, Mittal claimed that its share of Ukraine production is actually over *** percent.

[27] Second review confidential report, p. IV-54-IV-56. ArcelorMittal Kryviy Rih shares the same parent company as U.S. producer ArcelorMittal.

[28] Third review publication, p. I-41.

[29] ***. ***'s foreign producer questionnaire response, section I-6.

accounted for *** percent of production of rebar in Ukraine during 2023 ***. Table IV-22 presents information on the rebar operations of the responding producer and exporters in Ukraine.

Table IV-22
Rebar: Summary data for producers in Ukraine, 2023

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)
PJSC ArcelorMittal	***	***	***	***	***	***
PJSC Kamet-Steel	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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 "---".

Table IV-23 presents events in Ukraine's industry since January 1, 2018. On February 24, 2022, the Russian army invaded Ukraine, creating serious challenges for Ukrainian steel and steel product producers, including logistical and supply chain disruptions and increased prices and supply disruptions for energy and raw materials.[30] After the start of the war in 2022, energy supply to steel and steel product producers was significantly disrupted.[31] And in 2024, members of the Ukrainian steel industry reported having to pay high costs for imported electricity because of high delivery costs and some companies were exploring the construction of its own electricity generation capabilities.[32] On May 2, 2022, Ukraine formally closed four of its Black Sea and Azov Sea ports at Mariupol, Berdiansk, Skadovsk, and Kherson after the

[30] Metinvest, Update on operations of Kamet Steel and Metinvest's iron ore assets, June 29, 2022, https://metinvestholding.com/en/media/news/gzk-u-krivomu-roz-ta-kametstalj-chastkovo-pripinyayutj-robotu-z-1-lipnya-cherez-logstichn-ta-ekonomchn-chinniki.

[31] Kolisnichenko, Vadim, Ukrainian steelmakers reduced electricity consumption by 52% y/y in 2022, March 2, 2023, https://gmk.center/en/news/ukrainian-steelmakers-reduced-electricity-consumption-by-52-y-y-in-2022/#:~:text=The%20total%20consumption%20of%20electricity,by%2052%25%20compared%20to%202021.

[32] Yermolenko, Halina, Current prices for imported electricity are a problem for Ukrainian steel industry – CEO of Metinvest, September 12, 2024, https://gmk.center/en/news/current-prices-for-imported-electricity-are-a-problem-for-ukrainian-steel-industry-ceo-of-metinvest/.

Russian army had either captured or blockaded the ports.[33] Ukraine's ports have largely remained blocked, requiring Ukrainian steel producers to find alternative shipping routes with higher shipping costs.[34] In August 2023, the first ship sailed through the Black Sea corridor, a shipping route intended to allow cargo ships to leave Ukrainian ports and bypass the Russian blockade.[35] As of September 2024, the Ukrainian government said that the corridor had allowed 2,577 ships carrying 46 million tons of grains and foodstuffs and 23 million tons of other goods including mining and metals exports to sail from Ukrainian ports.[36] However, the quantity of rebar shipped through the Black Sea corridor was not known and risks to ships using corridor remained. The Black Sea corridor was established without approval from Russia and Russian attacks on ships utilizing the corridor have been reported. One effect of those attacks was that insurance costs for ships using the Black Sea corridor have reportedly risen sharply.[37]

[33] Polityuk, Pavel, Ukraine formally closes seaports captured by Russia, May 2, 2022, https://www.reuters.com/world/europe/ukraine-formally-closes-seaports-captured-by-russia-2022-05-02/.

[34] Polityuk, Pavel, Five more cargo ships head for Ukraine's Black Sea ports, deputy prime minister says, October 1, 2023, https://www.reuters.com/world/europe/three-cargo-vessels-left-ukrainian-black-sea-ports-after-loading-marinetraffic-2023-10-01/. Hunder, Max, and Polityuk, Pavel, Ukraine's once-mighty steel sector choked by export blockade, October 26, 2023, https://www.reuters.com/markets/commodities/ukraines-once-mighty-steel-sector-choked-by-export-blockade-2023-10-26/.

[35] Khalilova, Dinara, Ukraine announces 'temporary corridor' for civilian ships in Black Sea, August 10, 2023, https://kyivindependent.com/ukraine-announces-temporary-corridor-for-civilian-ships-in-black-sea/. Fornusek, Martin, Minister: First vessel sails through temporary Black Sea corridor, August 16, 2023, https://kyivindependent.com/minister-first-civilian-vessel-sails-through-temporary-black-sea-corridor/.

[36] The Maritime Executive, Ukraine vows to expand Black Sea shipments on first anniversary of corridor, September 19, 2024, https://maritime-executive.com/article/ukraine-vows-to-expand-black-sea-shipments-on-first-anniversary-of-corridor.

[37] Marsi, Federica, Why is Russia bombing ships carrying Ukrainian grain?, October 10, 2024, https://www.aljazeera.com/news/2024/10/10/why-is-russia-bombing-ships-carrying-ukrainian-grain. Quinn, Áine and Alex Longley, Russian attacks spark surge in war insurance for Ukraine grains, October 10, 2024.

Table IV-23
Rebar: Developments in Ukraine's industry since January 1, 2018

Item	Firm	Event
Acquisition	Metinvest	July 2021: Metinvest acquired PJSC Dneprovsky Iron & Steel Integrated Works (DMK) in Kamianske, Ukraine, for UAH 9.17 billion (approximately US$340 million). The acquisition allowed Metinvest to replace production of wire rod and other products that used to be produced at an asset located in eastern Ukraine which was taken over by separatists in 2014 After being purchased by Metinvest, DMK was renamed Kamet Steel.
Production shutdown	ArcelorMittal Kryvyi Rih	March 2022: ArcelorMittal Kryvyi Rih idled steel production following the Russian invasion of Ukraine.
Production interruption	Kamet Steel (subsidiary of Metinvest)	March 2022: Kamet Steel continued to operate but was producing at about 60 percent of 2021 production levels.
Production interruption	Kamet Steel (subsidiary of Metinvest)	June 2022: Kamet Steel reduced operations to use only one blast furnace.
Production restart	ArcelorMittal Kryvyi Rih	July 2022: ArcelorMittal Kryvyi Rih restarted rebar production at one unit of its plant.
Production interruption	ArcelorMittal Kryvyi Rih	November 2022: ArcelorMittal Kryvyi Rih halted all production because it lacked electricity following Russian missile strikes on Ukraine's energy infrastructure. In February 2023, it was reported that overall, the plant was producing at 25 percent capacity utilization. However, the status of rebar production was not known.
Production interruption	Kamet Steel (subsidiary of Metinvest)	November 2022: Kamet Steel suffered an emergency stoppage due to a lack of power supply because of infrastructure damage during the war in Ukraine. Some production was restarted in late December.
Production expansion	AB Metal Group	June 2023: AB Metal Group announced that it would expand production by installing new lines for the production of rebar and rebar mesh. No date was given for when the new lines would begin production.

Source: Metinvest, Metinvest Wins Auction to Acquire DMK's Production Complex, July 26, 2021, https://metinvestholding.com/en/media/news/metinvest-stal-pobeditelem-torgov-po-prodazhe-proizvodstvennogo-kompleksa-dneprovskogo-metkombinata. ArcelorMittal, Annual Report 2022, undated, p. 11, 26, https://corporate.arcelormittal.com/media/obsd1lud/annual-report-2022.pdf. Metinvest, Update on operations from Metinvest in Ukraine, March 22, 2022, https://metinvestholding.com/en/media/news/update-on-operations-from-metinvest-in-ukraine. Metinvest, Update on operations of Kamet Steel and Metinvest's iron ore assets, June 29, 2022, https://metinvestholding.com/en/media/news/gzk-u-krivomu-roz-ta-kametstalj-chastkovo-pripinyayutj-robotu-z-1-lipnya-cherez-logstichn-ta-ekonomchn-chinniki. Sheludchenko, Igor, ArcelorMittal launched a small section rebar mill, July 15, 2022, https://gmk.center/en/news/arcelormittal-launched-a-small-section-rebar-mill/. Hunder, Max, ArcelorMittal plant in Ukraine aims to resume production as soon as possible, November 25, 2022, https://www.reuters.com/markets/commodities/arcelormittal-plant-ukraine-aims-resume-production-soon-possible-2022-11-25/. Steel Orbis, Ukraine's AMRK to reach 50% of utilization with stable energy supply, February 8, 2023, https://www.steelorbis.com/steel-news/latest-news/ukraines-amkr-to-reach-50-of-utilization-with-stable-energy-supply-1278073.htm. Metinvest, Update on Ukrainian operations, November 28, 2022, https://metinvestholding.com/en/media/news/update-on-ukrainian-

operations. Metinvest, Kamet Steel resumes production after blackout, December 28, 2022, https://metinvestholding.com/en/media/news/kametstalj-vdnovila-viplavku-stal-pslya-blekautu. Yermolenko, Halina, AB Metal Group is expanding its own production, June 28, 2023, https://gmk.center/en/news/ab-metal-group-is-expanding-its-own-production/#:~:text=In%20the%20current%20year%2C%20the,of%20cold%2Ddeformed%20rebar%20bars.

Changes in operations

Producers in Ukraine were asked to report any change in the character of their operations or organization relating to the production of rebar since 2018. The Ukrainian producers indicated in their questionnaires that they had experienced such changes. Table IV-24 presents the changes identified by these producers.

Table IV-24
Rebar: Reported changes in operations in Ukraine, since January 1, 2018, by firm

Item	Firm name and narrative on changes in operations
Prolonged shutdowns	***
Production curtailments	***
Weather related or force majeure events	***
Other	***
Other	***

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

Operations on rebar

Table IV-25 presents data on both responding Ukrainian producers' installed capacity, practical capacity, and production on the same equipment. Ukrainian capacity to produce rebar decreased by *** percent and overall production decreased by *** percent from 2021 to 2023.[38] [39]

[38] PJSC ArcelorMittal in its foreign producers' questionnaire response reported practical rebar capacity of *** short tons in 2021, *** short tons in 2022, *** short tons in 2023, and *** in January to June 2023 and 2024. After the hearing PJSC ArcelorMittal revised their 2022-24 practical capacity data to reflect unscheduled downtimes as follows: *** short tons in 2022, *** short tons in 2023, and *** short tons in January to June 2023 and 2024. As PJSC ArcelorMittal's revised practical capacity in 2023 was lower than production, Staff further revised the 2023 practical capacity to match production (*** short tons). PJSC ArcelorMittal reported that unscheduled downtimes included ***. Respondent PJSC ArcelorMittal's posthearing brief, Attachment, pp. 1-2.

[39] PJSC Kamet Steel reported that its practical rebar capacity takes into account "***." PJSC Kamet-Steel's foreign producers' questionnaire, section II-3c.

Table IV-25
Rebar: Ukraine producer's overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical rebar	Capacity	***	***	***	***	***
Practical rebar	Production	***	***	***	***	***
Practical rebar	Utilization	***	***	***	***	***

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

Table IV-26 presents Ukrainian producers reported narratives regarding practical capacity constraints.

Table IV-26
Rebar: Producer's in Ukraine reported capacity constraints since January 1, 2018

Item	Firm name and narrative on constraints to practical overall capacity
Production bottlenecks	***
Production bottlenecks	***
Existing labor force	***
Supply of material inputs	***
Fuel or energy	***
Fuel or energy	***
Logistics/transportation	***

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

Table IV-27 presents data on the industry in Ukraine. From 2021 to 2023, production in Ukraine decreased by *** percent. Capacity utilization, *** percent in 2021, increased to *** percent in 2023. The share of home shipments in Ukraine was *** percent in 2021 and increased to *** percent in 2023 and the share of internal consumption was *** percent in 2021 and increased to *** percent in 2023. The primary destinations for Ukrainian exports were Iraq and Moldova, with shares of quantities of 30.7 percent and 3.7 percent in 2021 and 25.1 percent and 21.1 percent in 2023, respectively. The inventory to production ratio in Ukraine increased from *** percent in 2021 to *** percent in 2023.

Table IV-27
Rebar: Data on industry in Ukraine, by period

Quantity in short ton; value in 1,000 dollars

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
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-27 Continued
Rebar: Data on industry in Ukraine, by period

Unit value in dollars per short tons; ratio and share in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
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-28
Rebar: Producer's exports from Ukraine, 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	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
United States	Quantity	***	***	***	***	***
Canada or Mexico	Quantity	***	***	***	***	***
European Union	Quantity	***	***	***	***	***
Asia	Quantity	***	***	***	***	***
All other destination markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
Canada or Mexico	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	***	***	***	***	***
Canada or Mexico	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	***	***	***	***	***
Canada or Mexico	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

Table Continued.

Table IV-28 Continued.
Rebar: Producer's exports from Ukraine, by destination market and period

Ratio and share in percent

Destination market	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
United States	Ratio	***	***	***	***	***
Canada or Mexico	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-29, the responding Ukrainian firm *** produced other products on the same equipment and machinery used to produce rebar. Rebar accounted for approximately *** percent of the Ukrainian producer's overall production during 2023, other products account for *** percent and merchant bar account for *** percent of overall production during 2023.

Table IV-29
Rebar: Producer's in Ukraine's overall production on the same equipment as in-scope production, period

Quantity in short tons; share and ratio in percent

Product type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Rebar	Quantity	***	***	***	***	***
Coiled rebar	Quantity	***	***	***	***	***
Merchant bar	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
Out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Rebar	Share	***	***	***	***	***
Coiled rebar	Share	***	***	***	***	***
Merchant bar	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
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 rebar from Ukraine are Iraq and Moldova which accounted for 25.1 percent and 21.1 percent, of total rebar exports from Ukraine by quantity, respectively (table IV-30). During 2023, Ukraine did not export rebar to the United States.

Table IV-30
Rebar: Exports from Ukraine, by destination market and period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2021	2022	2023
United States	Quantity	---	---	---
Iraq	Quantity	216,858	---	33,003
Moldova	Quantity	25,952	39,317	27,673
Poland	Quantity	772	36,130	23,954
Romania	Quantity	19,972	3,279	20,033
Lithuania	Quantity	40,018	30,774	17,627
Czech Republic	Quantity	---	1,800	4,588
Senegal	Quantity	64,831	17,819	2,011
Slovakia	Quantity	---	1,611	1,635
All other destination markets	Quantity	337,515	26,034	811
Non-U.S. destination markets	Quantity	705,918	156,764	131,335
All destination markets	Quantity	705,918	156,764	131,335
United States	Value	---	---	---
Iraq	Value	132,678	---	16,053
Moldova	Value	16,937	27,823	16,570
Poland	Value	629	26,038	12,897
Romania	Value	12,959	2,369	9,640
Lithuania	Value	27,656	21,468	9,836
Czech Republic	Value	---	1,348	2,478
Senegal	Value	37,663	11,232	959
Slovakia	Value	---	1,617	1,006
All other destination markets	Value	205,574	16,478	852
Non-U.S. destination markets	Value	434,096	108,375	70,292
All destination markets	Value	434,096	108,375	70,292

Table continued.

Table IV-30 Continued
Rebar: Exports from Ukraine, by destination market and period

Unit value in dollars per short ton; shares in percent

Destination market	Measure	2021	2022	2023
United States	Unit value	---	---	---
Iraq	Unit value	612	---	486
Moldova	Unit value	653	708	599
Poland	Unit value	815	721	538
Romania	Unit value	649	723	481
Lithuania	Unit value	691	698	558
Czech Republic	Unit value	---	749	540
Senegal	Unit value	581	630	477
Slovakia	Unit value	---	1,004	615
All other destination markets	Unit value	609	633	1,051
Non-U.S. destination markets	Unit value	615	691	535
All destination markets	Unit value	615	691	535
United States	Share of quantity	---	---	---
Iraq	Share of quantity	30.7	---	25.1
Moldova	Share of quantity	3.7	25.1	21.1
Poland	Share of quantity	0.1	23.0	18.2
Romania	Share of quantity	2.8	2.1	15.3
Lithuania	Share of quantity	5.7	19.6	13.4
Czech Republic	Share of quantity	---	1.1	3.5
Senegal	Share of quantity	9.2	11.4	1.5
Slovakia	Share of quantity	---	1.0	1.2
All other destination markets	Share of quantity	47.8	16.6	0.6
Non-U.S. destination markets	Share of quantity	100.0	100.0	100.0
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7214.20, 7222.11, and 7222.30 as reported by State Customs Committee of the Ukraine in the Global Trade Atlas Suite database, accessed October 8, 2024.

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 for these three HS subheadings relate primarily to rebar but may be overstated slightly due to the inclusion of relatively small volumes of out-of-scope merchandise, additionally these data may be understated because they do not include some small volumes of rebar coming in under other HS subheadings which are primarily non-rebar subheadings. The United States is shown at the top followed by the top destination markets in descending order of 2023 data.

Subject countries combined

Table IV-31 presents information on the rebar operations of the responding producer and exporters in subject countries.

Table IV-31
Rebar: Summary data for producer in subject countries, by firm 2023

Subject foreign industry	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 reporting foreign industries' total shipments exported to the United States (percent)
Ukraine	***	***	***	***	***	***
Poland	***	***	***	***	***	***
All reporting subject foreign industries	***	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 “---“.

Table IV-32 presents summary data on rebar operations of the reporting subject producers in the subject countries.

Table IV-32
Rebar: Data on the industry in subject countries, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
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-32 Continued
Rebar: Data on the industry in subject countries, by period

Unit value in dollars per short tons; ratio and share in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
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.

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 “---“.

Table IV-33
Rebar: Producer's exports from subject countries, by destination market and period

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

Destination market	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
United States	Quantity	***	***	***	***	***
Canada or Mexico	Quantity	***	***	***	***	***
European Union	Quantity	***	***	***	***	***
Asia	Quantity	***	***	***	***	***
All other destination markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
Canada or Mexico	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	***	***	***	***	***
Canada or Mexico	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	***	***	***	***	***
Canada or Mexico	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

Table continued.

Table IV-33 Continued
Rebar: Producer's exports from subject countries, by destination market and period

Ratio in percent

Destination market	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
United States	Ratio	***	***	***	***	***
Canada or Mexico	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 "---".

Third-country trade actions

Third-country antidumping and countervailing duty orders are provided in table IV-34 and safeguard orders are provided in table IV-35. In addition, the European Union ("EU") and the United States have imposed additional actions on Belarus. In March 2022, due to Belarus' involvement in the war in Ukraine, the EU prohibited imports of iron or steel products (including rebar) originating in or exported from Belarus.[40] In August 2023, the United States extended sanctions on Joint Stock Company Byelorussian Steel Works and other Belarusian entities because of "the Belarusian regime's continued civil society repression, complicity in the Russian Federation's unjustified war in Ukraine, and enrichment of repressive Belarusian regime leader Alyaksandr Lukashenka".[41]

[40] European Commission ("EC"), Commission implementing regulation (EU) 2022/355 of 2 March 2022 amending Regulation (EC) No 765/2006 concerning restrictive measures in view of the situation in Belarus, March 2, 2022, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022R0355&from=EN.

[41] U.S. Department of the Treasury, U.S. expands sanctions on the Belarusian regime, marking the three-year anniversary of the fraudulent August 2020 presidential election, August 9, 2023, https://home.treasury.gov/news/press-releases/jy1682.

Table IV-34
Rebar: Third-country antidumping and countervailing duty orders on subject countries

Subject country and order	Reporting country	Product and HS codes	Initiation date	Last extension date	Duty
Belarus (antidumping)	Canada	Certain concrete reinforcing bar (7213.10 and 7214.20)	May 3, 2017	February 2, 2023	Individual margin: 37.5 percent All other rate: 108.5 percent
Belarus (antidumping)	European Union	Certain concrete reinforcement bars and rods (7214.20, 7214.30, 7214.91, and 7214.99)	June 17, 2017	May 31, 2023	10.6 percent
Belarus (antidumping)	Ukraine	Bars made of carbon and other alloy steels	July 13, 2023	Not applicable	
China (antidumping)	Australia	Steel reinforcing bar (7213.10, 7214.20, 7227.90, 7228.30, and 7228.60)	April 13, 2016	April 12, 2021	Individual margin: 11.7–16.4 percent All other rate: 30.0 percent
China (antidumping and countervailing duty)	Canada	Certain concrete reinforcing bar (7213.10, 7215.90, and 7227.90)	September 1, 2015	October 14, 2020	Antidumping: Individual margin: 54.0 percent All other rate: 108.5 percent Countervailing duty: Individual margin: 13 RMB/MT All other rate: 469 RMB/MT
China (antidumping)	Dominican Republic	Steel rods and bars for concrete reinforcement (7213.10, 7213.20, 7214.10, 7214.20, 7214.30, 7214.91, and 7214.99)	January 20, 2017	January 31, 2022	43.0 percent
China (antidumping)	Pakistan	Deformed concrete reinforcing steel bars (7214.20, 7214.30, 7214.99, 7215.10, 7215.50, 7215.90, 7228.10, 7228.20, 7228.30,	October 23, 2017	Not applicable	19.15 percent

Subject country and order	Reporting country	Product and HS codes	Initiation date	Last extension date	Duty
		7228.40, 7228.50, and 7228.60)			
China (antidumping)	United Kingdom	High fatigue performance steel concrete reinforcement bars	January 1, 2021	Not applicable	Individual margin: 18.4–22.5 percent All other rate: 22.5 percent
Indonesia (antidumping)	Australia	Steel reinforcing bar (7213.10, 7214.20, 7227.90, 7228.30, and 7228.60)	March 7, 2018	February 21, 2023	0.0–9.3 percent
Indonesia (antidumping)	Canada	Concrete reinforcing bar (7213.10, 7214.20, 7215.90, and 7227.90)	June 4, 2021	Not applicable	3.3 percent

Source: WTO, Trade remedies data portal, accessed December 27, 2023, at https://trade-remedies.wto.org/en. Links to individual subject country data are located at: Belarus: https://trade-remedies.wto.org/en/antidumping/investigations/measures/can-rb2-2016-inby-1; https://trade-remedies.wto.org/en/antidumping/investigations/measures/eec-ad633-by-1. China: https://trade-remedies.wto.org/en/antidumping/investigations/measures/aus-adc-300-ad-1-1; https://trade-remedies.wto.org/en/antidumping/investigations/measures/can-rb2-2016-inhk-1; https://trade-remedies.wto.org/en/countervailing/investigations/investigation/can-cv138cn; https://trade-remedies.wto.org/en/antidumping/investigations/measures/dom-cdc-rdad2015-010-1; https://trade-remedies.wto.org/en/antidumping/investigations/measures/pak-482016ntcrebarschi-1; https://trade-remedies.wto.org/en/antidumping/investigations/measures/gbr-2020-09-cn. Indonesia: https://trade-remedies.wto.org/en/antidumping/investigations/measures/aus-adc-418-ad-2-1; https://trade-remedies.wto.org/en/antidumping/investigations/measures/can-rb3-2020-inid-1.

Table IV-35 presents information on third-country safeguard orders on rebar.

Table IV-35
Rebar: Third-country safeguard orders on subject countries

Market	Products	Initiation date	Safeguard measures	Notes
European Union	Certain steel products including rebar. The safeguard measures on rebar do not apply to Belarus, China, or Indonesia.	January 31, 2019	Tariff rate quota ("TRQ"). Imports that exceed the TRQ limits are subject to an additional duty of 25 percent.	Effective July 1, 2024, the safeguard measures were extended until June 30, 2026.
United Kingdom	Certain steel products including rebar.	January 1, 2021	Tariff rate quota ("TRQ"). Imports that exceed the TRQ limits are subject to an additional duty of 25 percent.	Effective July 1, 2024, the safeguard measures were extended until June 30, 2026. Ukraine was exempt from the measures during that period.

Source: EC, Commission implementing regulation (EU) 2019/159 of 31 January 2019 imposing definitive safeguard measures with regard to imports of certain steel products, February 1, 2019, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0159&from=EN. EC, Commission implementing regulation (EU) 2021/1029 of June 24, 2021 amending Commission Implementing Regulation (EU) 2019/159 to prolong the safeguard measure on imports of certain steel products, June 25, 2021, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R1029. EC, EU prolongs steel safeguard measure until June 2026, June 25, 2024, https://policy.trade.ec.europa.eu/news/eu-prolongs-steel-safeguard-measure-until-june-2026-2024-06-25_en. GOV.UK, Taxation notice 2020/06: safeguard measures on certain steel products – application of tariff rate quotas, June 30, 2023, https://www.gov.uk/government/publications/trade-remedies-notices-tariff-rate-quotas-on-steel-goods/taxation-notice-202006-safeguard-measures-on-certain-steel-products-application-of-tariff-rate-quotas. GOV.UK, TRA opens review of steel safeguard measure, September 5, 2023, https://www.gov.uk/government/news/tra-opens-review-of-steel-safeguard-measure#:~:text=The%20TRA%20has%20initiated%20an,two%20further%20years%20to%202026%20. GOV.UK, Trade remedies notice 2024/06: safeguard measure-tariff rate quota on steel goods, July 11, 2024, https://www.gov.uk/government/publications/trade-remedies-notices-tariff-rate-quotas-on-steel-goods/trade-remedies-notice-202406-safeguard-measure-tariff-rate-quota-on-steel-goods.

Global market

Table IV-36 presents global export data (by source in descending order of quantity for 2023). Turkey and China were the largest exporters in 2023 and accounted for 21.7 percent and 10.6 percent of total global exports by quantity, respectively.

Table IV-36
Rebar: Global exports, by exporting country and period

Quantity in short tons

Exporting country	Measure	2021	2022	2023
United States	Quantity	220,596	201,672	239,829
Belarus	Quantity	606,156	180,058	39,260
China	Quantity	448,749	751,445	1,847,355
Indonesia	Quantity	56,656	66,720	107,292
Latvia	Quantity	22,348	15,504	24,703
Moldova	Quantity	30,467	43,427	27,849
Poland	Quantity	235,520	371,829	252,087
Ukraine	Quantity	705,918	156,764	131,335
Subject exporters	Quantity	2,105,814	1,585,747	2,429,881
Turkey	Quantity	7,870,045	6,021,949	3,787,084
Italy	Quantity	1,493,375	1,139,060	1,191,850
Oman	Quantity	745,960	680,008	937,620
Portugal	Quantity	830,428	761,943	826,697
Germany	Quantity	799,544	674,017	757,846
Spain	Quantity	673,732	642,175	617,619
United Arab Emirates	Quantity	881,789	909,293	598,479
Egypt	Quantity	12,748	2,822	545,524
Iran	Quantity	2,234,220	---	---
Russia	Quantity	1,290,502	---	---
Vietnam	Quantity	964,660	1,131,051	---
All other exporters	Quantity	9,871,907	7,166,707	5,480,737
Nonsubject exporters	Quantity	27,668,910	19,129,025	14,743,456
All reporting exporters	Quantity	29,995,320	20,916,444	17,413,166

Table continued.

Table IV-34 Continued
Rebar: Global exports, by exporting country and period

Value in 1,000 dollars

Exporting country	Measure	2021	2022	2023
United States	Value	255,918	309,834	359,370
Belarus	Value	366,300	111,803	21,600
China	Value	401,179	706,477	1,194,680
Indonesia	Value	37,323	46,416	61,412
Latvia	Value	16,101	14,106	15,206
Moldova	Value	19,784	32,095	17,344
Poland	Value	194,180	357,162	188,844
Ukraine	Value	434,096	108,375	70,292
Subject exporters	Value	1,468,962	1,376,434	1,569,378
Turkey	Value	4,550,965	3,996,412	2,128,082
Italy	Value	1,215,808	1,224,812	938,467
Oman	Value	456,102	531,599	608,594
Portugal	Value	514,556	562,470	481,664
Germany	Value	867,555	918,791	862,881
Spain	Value	575,201	686,367	537,068
United Arab Emirates	Value	532,917	620,111	394,297
Egypt	Value	8,732	2,092	308,251
Iran	Value	1,284,428	---	---
Russia	Value	754,266	---	---
Vietnam	Value	666,622	891,063	---
All other exporters	Value	7,005,387	6,328,236	4,582,479
Nonsubject exporters	Value	18,432,540	15,761,953	10,841,783
All reporting exporters	Value	20,157,420	17,448,221	12,770,531

Table continued.

Table IV-34 Continued
Rebar: Global exports, by exporting country and period

Unit values in dollars per short ton

Exporting country	Measure	2021	2022	2023
United States	Unit value	1,160	1,536	1,498
Belarus	Unit value	604	621	550
China	Unit value	894	940	647
Indonesia	Unit value	659	696	572
Latvia	Unit value	720	910	616
Moldova	Unit value	649	739	623
Poland	Unit value	824	961	749
Ukraine	Unit value	615	691	535
Subject exporters	Unit value	698	868	646
Turkey	Unit value	578	664	562
Italy	Unit value	814	1,075	787
Oman	Unit value	611	782	649
Portugal	Unit value	620	738	583
Germany	Unit value	1,085	1,363	1,139
Spain	Unit value	854	1,069	870
United Arab Emirates	Unit value	604	682	659
Egypt	Unit value	685	741	565
Iran	Unit value	575	---	---
Russia	Unit value	584	---	---
Vietnam	Unit value	691	788	---
All other exporters	Unit value	710	883	836
Nonsubject exporters	Unit value	666	824	735
All reporting exporters	Unit value	672	834	733

Table continued.

Table IV-34 Continued
Rebar: Global exports, by exporting country and period

Shares in percent

Exporting country	Measure	2021	2022	2023
United States	Share of quantity	0.7	1.0	1.4
Belarus	Share of quantity	2.0	0.9	0.2
China	Share of quantity	1.5	3.6	10.6
Indonesia	Share of quantity	0.2	0.3	0.6
Latvia	Share of quantity	0.1	0.1	0.1
Moldova	Share of quantity	0.1	0.2	0.2
Poland	Share of quantity	0.8	1.8	1.4
Ukraine	Share of quantity	2.4	0.7	0.8
Subject exporters	Share of quantity	7.0	7.6	14.0
Turkey	Share of quantity	26.2	28.8	21.7
Italy	Share of quantity	5.0	5.4	6.8
Oman	Share of quantity	2.5	3.3	5.4
Portugal	Share of quantity	2.8	3.6	4.7
Germany	Share of quantity	2.7	3.2	4.4
Spain	Share of quantity	2.2	3.1	3.5
United Arab Emirates	Share of quantity	2.9	4.3	3.4
Egypt	Share of quantity	0.0	0.0	3.1
Iran	Share of quantity	7.4	---	---
Russia	Share of quantity	4.3	---	---
Vietnam	Share of quantity	3.2	5.4	---
All other exporters	Share of quantity	32.9	34.3	31.5
Nonsubject exporters	Share of quantity	92.2	91.5	84.7
All reporting exporters	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7214.20, 7222.11, and 7222.30 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed October 8, 2024 and official imports statistics of imports from Belarus, Latvia, and Moldova (constructed export statistics for Belarus, Latvia, and Moldova) under HS subheadings 7214.20, 7222.11, and 7222.30 as reported by various national statistical reporting authorities in the Global Trade Atlas Suite database, accessed October 8, 2024.

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 for these three HS subheadings relate primarily to rebar but may be overstated slightly due to the inclusion of relatively small volumes of out-of-scope merchandise, additionally these data may be understated because they do not include some small volumes of rebar exported under other HS subheadings which are primarily non-rebar subheadings. HS subheadings 7222.11 and 7222.30 cover products made of stainless steel and therefore, countries with exports under these HS subheadings may have relatively high export values and unit values. Russia stopped reporting all merchandise trade data to GTAS in 2022. Iran stopped reporting in 2022 and Vietnam has not yet responded for 2023. The United States is shown at the top followed by the top destination markets in descending order of 2023 data followed by several additional exporting countries with large, reported exports in prior years.

Part V: Pricing data

Factors affecting prices

Raw material costs

Rebar is generally produced from steel scrap, which accounts for the greatest share of raw material costs to domestic producers. Raw material costs accounted for approximately *** percent of the total cost of goods sold for rebar production in 2023, and scrap costs accounted for *** percent of U.S. producers' raw material costs in 2023. Most U.S. producers and all importers reported including scrap prices in the cost when setting prices for rebar. Responding U.S. producers reported that trends in the prices of raw materials since January 1, 2018 had either fluctuated up or fluctuated down and anticipated they would continue to do so. As shown in tables V-1 and V-2 and figure V-1, the Black Sea steel billet index decreased overall by *** percent during January 2018 through July 2024 but fluctuated, reaching a peak during March 2022 that was *** percent higher than its start in January 2018, while Tangshan billet prices reached a peak in May 2021 before fluctuating downwards, to end at *** percent lower than in January 2018.

According to respondent PJSC ArcelorMittal's data, its daily electricity consumption ***.[1]

[1] Respondent's posthearing brief, Exhibit 1.

Table V-1
Rebar: Steel billet index export, Commonwealth of Independent States, monthly average, dollars per short ton

Index in dollars per short ton

Month	2018	2019	2020	2021	2022	2023	2024
January	***	***	***	***	***	***	***
February	***	***	***	***	***	***	***
March	***	***	***	***	***	***	***
April	***	***	***	***	***	***	***
May	***	***	***	***	***	***	***
June	***	***	***	***	***	***	***
July	***	***	***	***	***	***	***
August	***	***	***	***	***	***	***
September	***	***	***	***	***	***	***
October	***	***	***	***	***	***	***
November	***	***	***	***	***	***	***
December	***	***	***	***	***	***	***

Source: ***.

Table V-2
Rebar: Steel billet, Northern China, monthly average, dollars per short ton

Prices in dollars per short ton

Month	2018	2019	2020	2021	2022	2023	2024
January	***	***	***	***	***	***	***
February	***	***	***	***	***	***	***
March	***	***	***	***	***	***	***
April	***	***	***	***	***	***	***
May	***	***	***	***	***	***	***
June	***	***	***	***	***	***	***
July	***	***	***	***	***	***	***
August	***	***	***	***	***	***	***
September	***	***	***	***	***	***	***
October	***	***	***	***	***	***	***
November	***	***	***	***	***	***	***
December	***	***	***	***	***	***	***

Source: ***.

Figure V-1
Rebar: Steel billet, monthly average, January 2018 through July 2024

* * * * * * *

Source: ***.

Transportation costs to the U.S. market

Transportation costs for rebar shipped from subject countries to the United States averaged 3.4 percent for China during 2023.[2] These estimates were derived from official import data and represent the transportation and other charges on imports.[3] Respondent PJSC ArcelorMittal states that *** U.S. producers and *** importers reported that they typically arrange transportation to their customers. U.S. producers reported that their U.S. inland transportation costs ranged from 4.3 to 10.0 percent.

[2] Transportation costs were not available for any of the subject countries.

[3] The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2023 and then dividing by the customs value based on the HTS statistical reporting numbers 7214.20.0000, 7222.11.0001, 7222.11.0057, 7222.11.0059, 7222.11.0082, 7222.11.0084, 7222.30.0001, 7222.30.0022, 7222.30.0024, 7222.30.0082, 7222.30.0084, 7228.20.1000, 7228.30.8010, and 7228.60.6000.

Pricing practices

Pricing methods

Almost all U.S. producers and all importers reported setting prices using transaction-by-transaction negotiations (table V-3).

Table V-3
Rebar: Count of U.S. producers' and importers' reported price setting methods

Method	U.S. producers	U.S. importers
Transaction-by-transaction	6	3
Contract	0	0
Set price list	1	0
Other	1	0
Responding firms	7	3

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.

U.S. producers and importers reported selling *** percent of their rebar under short-term contracts, *** percent in the spot market, and *** percent under long-term contracts.

*** purchasers reported that they purchase product daily, *** purchase weekly, *** purchase monthly, and *** purchases quarterly. *** of 16 responding purchasers contact one to three suppliers before making a purchase, while *** responding purchasers contact one to five suppliers, and *** contact two to three suppliers.

Domestic interested parties reported that publications such as CRU, Platts/SBB, and MEPs regularly publish pricing, and that market participants often subscribe to and consult these publications to determine the market price levels for use in price negotiations.[4] According to CRU's market summary data, U.S. prices for rebar are forecast to decline by *** percent between 2024 and 2025.[5]

Sales terms and discounts

Four of seven U.S. producers typically quote prices on an f.o.b. basis. Three producers offered quantity discounts and three offered other discounts. *** reported offering rebates to large customers, *** reported a discount for paying within a specified number of days from the invoice date, and *** reported setting prices through market trends

[4] Domestic interested parties' posthearing brief, Answers to Commissioners' question, p. 2.
[5] Domestic interested parties' prehearing brief, Exhibit 78. Nominal prices, FOB U.S. Midwest Mill.

and two reported no discount policy. Domestic interested parties stated that rebar arrives at U.S. ports in bulk and that those imports are then offered to U.S. purchasers, after which purchasers may contact U.S. rebar producers and ask them to beat the price, and U.S. producers can lower the price or lose the sale.[6]

Price leadership

*** of 17 purchasers did not name a price leader, *** reported that Nucor was a price leader, *** reported that CMC was a leader, and *** reported that Adelphia was a price leader. Purchasers indicating the presence of price leaders indicated that Nucor was a price leader because it was the first to post price increases, which others then followed; that CMC was a price leader because it was the first to announce price changes and that it was the dominant market supplier with multiple plants to manage freight costs; and that Adelphia was a price leader because it had the lowest price.

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 rebar products shipped to unrelated U.S. customers during January 2021 through June 2024.

Product 1.-- Straight ASTM A615, No. 3, grade 60 rebar.

Product 2.-- Straight ASTM A615, No. 4, grade 60 rebar.

Product 3.-- Straight ASTM A615, No. 5, grade 60 rebar.

Product 4.-- Straight ASTM A615, No. 6, grade 60 rebar.

Seven U.S. producers and no importers provided usable pricing data for sales of the requested products, although not all producers reported pricing for all products for all

[6] Domestic interested parties' posthearing brief, Answers to Commissioners' question, p. 1.

quarters.[7] Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. commercial shipments of rebar in 2023.[8]

Price data for products 1 through 4 are presented in table V-4 and figure V-2.

Table V-4
Rebar: U.S. producers' price and quantity data, by product, January 2021 through June 2024

Quantity in short tons; prices in dollars per short ton

Quarter	Product 1: Price	Product 1: Quantity	Product 2: Price	Product 2: Quantity	Product 3: Price	Product 3: Quantity	Product 4: Price	Product 4: Quantity
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***	***	***

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

Note: No quarters were available for comparison between the U.S. and subject product.

[7] 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.

[8] Pricing coverage is based on commercial U.S. shipments reported in questionnaires.

Figure V-2
Rebar: U.S. producers' price and quantity data, by product, January 2021 through June 2024

Price

* * * * * * *

Volume

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Product 1: Straight ASTM A615, No. 3, grade 60 rebar; Product 2: Straight ASTM A615, No. 4, grade 60 rebar; Product 3: Straight ASTM A615, No. 5, grade 60 rebar; Product 4: Straight ASTM A615, No. 6, grade 60 rebar.

Price trends

In general, prices increased during January 2021 through June 2024. Table V-5 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from *** to *** percent during January 2021 through June 2024. Price comparisons between domestic and imported product were not available for any quarter.[9]

[9] In the original investigations, subject imports from Belarus were priced lower than domestic product in 29 of 32 comparisons, with underselling margins ranging from 3.5 to 18.3 percent; subject imports from China were priced lower than domestic product in all 20 comparisons, with underselling margins ranging from 20.5 to 32.2 percent; subject imports from Indonesia were priced lower than domestic product in all 24 comparisons, with underselling margins ranging from 18.1 to 30.9 percent; subject imports from Latvia were priced lower than domestic product in all 46 comparisons, with underselling margins ranging from 16.5 to 32.4 percent; subject imports from Moldova were priced lower than domestic product in all 36 comparisons, with underselling margins ranging from 15.2 to 29.2 percent; subject imports from Poland were priced lower than domestic product in 46 of 48 comparisons, with underselling margins ranging from 17.0 to 28.4 percent; and subject imports from Ukraine were priced lower than domestic product in 23 of 24 comparisons, with underselling margins ranging from 16.2 to 29.0 percent. Original Publication, Appendix G. In the first reviews, subject imports from Latvia were priced lower than domestic product in 17 of 48 instances, with underselling margins ranging from 0.3 to 22.8 percent. First Review Publication, p. V-31.

Table V-5
Rebar: Summary of price data, by product and source, January 2021 through June 2024

Quantity in short tons, price in dollars per short ton

Product	Source	Number of quarters	Quantity of shipments	Low price	High price	First quarter price	Last quarter price	Percent change in price over period
Product 1	United States	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 4	United States	***	***	***	***	***	***	***

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

Note: Percent change column is percentage change from the first quarter in 2021 to the second quarter in 2024.

Table V-6
Rebar: Indexed U.S. producer prices, January 2021 through June 2024

Index in percent

Period	Product 1	Product 2	Product 3	Product 4
2021 Q1	***	***	***	***
2021 Q2	***	***	***	***
2021 Q3	***	***	***	***
2021 Q4	***	***	***	***
2022 Q1	***	***	***	***
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***
2022 Q3	***	***	***	***
2023 Q4	***	***	***	***
2024 Q1	***	***	***	***
2024 Q2	***	***	***	***

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 V-3
Rebar: Indexed U.S. producer prices, January 2021 through June 2024

* * * * * * *

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

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 44977, November 1, 2023	Initiation of Five-Year (Sunset) Reviews	https://www.govinfo.gov/content/pkg/FR-2023-11-01/pdf/2023-24101.pdf
88 FR 75033, November 1, 2023	Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine; Institution of Five-Year Reviews	https://www.govinfo.gov/content/pkg/FR-2023-11-01/pdf/2023-24017.pdf
89 FR 13089, February 21, 2024	Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine; Notice of Commission Determination To Conduct Full Five-Year Reviews	https://www.govinfo.gov/content/pkg/FR-2024-02-21/pdf/2024-03482.pdf
89 FR 16529, March 7, 2024	Steel Concrete Reinforcing Bars From Belarus, the People's Republic of China, Indonesia, Latvia, Moldova, Poland, and Ukraine: Final Results of the Expedited Fourth Sunset Review of the Antidumping Duty Orders	https://www.govinfo.gov/content/pkg/FR-2024-03-07/pdf/2024-04822.pdf
89 FR 26188, April 15, 2024	Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine; Scheduling of Full Five-Year Reviews	https://www.govinfo.gov/content/pkg/FR-2024-04-15/pdf/2024-07917.pdf

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed below appeared as witnesses at the United States International Trade Commission's hearing:

Subject:	Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine
Inv. Nos.:	731-TA-873-875, 878-880, and 882 (Fourth Review)
Date and Time:	October 3, 2024 - 9:30 a.m.

Sessions were held in connection with these reviews in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, DC.

FOREIGN GOVERNMENT APPEARANCE:

Ministry of Economy of Ukraine
Kyiv, UA

Olena Zasypkina, Deputy Director, Department of Foreign Economic Activity and Trade Defense

Yuliia Proskurova, Deputy Head of the Protection on Foreign Markets and Dispute Settlement Unit, Division for Protection of Rights and Interests of Ukraine in Trade and Economic Spheres, Department of Foreign Economic Activity and Trade Defense

Taras Sauliak, First Secretary on Economic Issues, Embassy of Ukraine in the United States of America

OPENING REMARKS:

In Support of Continuation (**Alan H. Price**, Wiley Rein, LLP)
In Opposition to Continuation (**Edmund W. Sim**, Appleton Luff PTE Ltd.)

In Support of the Continuation of the Antidumping Duty Orders:

Wiley Rein LLP
Washington, DC
on behalf of

Rebar Trade Action Coalition ("RTAC")
Nucor Corporation ("Nucor")
Gerdau Ameristeel US Inc. ("Gerdau")
Commercial Metals Company ("CMC")
Optimus Steel, LLC ("Optimus")
Steel Dynamics Inc. ("SDI")
Byer Steel

Randy Spicer, Executive Vice President of Bar and Engineered Bar, Nucor

Erik Johnson, Commercial Director, Nucor

Steve Simpson, Senior Vice President of North American Steel Group, CMC

Edward Goettl, Vice President of Market Development, Optimus

Shayne Byer, Chief Executive Officer and Owner, Byer Steel

Robert Webb, President, Southwestern Suppliers, Inc.

Jordan Burkholder, Sales and Marketing Manager, SDI

Bethany Hennings, Rebar Sales Manager, Gerdau

Roy Houseman, Legislative Director, United Steelworkers

Alan H. Price)
John R. Shane)
) – OF COUNSEL
Maureen E. Thorson)
Theodore P. Brackemyre)

In Opposition to the Continuation of the Antidumping Duty Orders:

Appleton Luff PTE Ltd.
Washington, DC
on behalf of

ArcelorMittal Kryvyi Rih ("AMKR")

Mauro Longobardo, Chief Executive Officer, AMKR

Edmund W. Sim)
) – OF COUNSEL
Kelly A. Slater)

REBUTTAL/CLOSING REMARKS:

In Support of Continuation (**John R. Shane**, Wiley Rein, LLP)
In Opposition to Continuation (**Edmund W. Sim**, Appleton Luff PTE Ltd.)

APPENDIX C

SUMMARY DATA

Table C-1
Rebar: 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: Calendar year 2021	2022	2023	Jan-Jun 2023	2024	Period changes: Calendar year 2021-23	2021-22	2022-23	Jan-Jun 2023-24
U.S. consumption quantity:									
Amount	***	***	***	***	***	▼***	▼***	▼***	▼***
Producers' share (fn1)	***	***	***	***	***	▼***	▼***	▲***	▲***
Importers' share (fn1):									
Belarus	***	***	***	***	***	***	***	***	***
China	***	***	***	***	***	▲***	▲***	▲***	▼***
Indonesia	***	***	***	***	***	***	***	***	***
Latvia	***	***	***	***	***	***	***	***	***
Moldova	***	***	***	***	***	***	***	***	***
Poland	***	***	***	***	***	▼***	▲***	▼***	▲***
Ukraine, adjusted	***	***	***	***	***	▼***	▼***	▼***	▲***
Subject sources	***	***	***	***	***	▼***	▼***	▼***	▲***
Nonsubject sources	***	***	***	***	***	▲***	▲***	▼***	▼***
All import sources	***	***	***	***	***	▲***	▲***	▼***	▼***
U.S. consumption value:									
Amount	***	***	***	***	***	▲***	▲***	▼***	▼***
Producers' share (fn1)	***	***	***	***	***	▲***	▼***	▲***	▲***
Importers' share (fn1):									
Belarus	***	***	***	***	***	***	***	***	***
China	***	***	***	***	***	▲***	▲***	▲***	▼***
Indonesia	***	***	***	***	***	***	***	***	***
Latvia	***	***	***	***	***	***	***	***	***
Moldova	***	***	***	***	***	***	***	***	***
Poland	***	***	***	***	***	▼***	▲***	▼***	▲***
Ukraine, adjusted	***	***	***	***	***	▼***	▼***	▼***	▲***
Subject sources	***	***	***	***	***	▼***	▼***	▼***	▲***
Nonsubject sources	***	***	***	***	***	▲***	▲***	▼***	▼***
All import sources	***	***	***	***	***	▼***	▲***	▼***	▼***
U.S. imports from:									
Belarus:									
Quantity	---	---	---	---	---	---	---	---	---
Value	---	---	---	---	---	---	---	---	---
Unit value	---	---	---	---	---	---	---	---	---
Ending inventory quantity	***	***	***	***	***	***	***	***	***
China:									
Quantity	482	668	1,037	527	253	▲115.2	▲38.6	▲55.3	▼(52.1)
Value	2,696	3,849	5,118	2,908	1,755	▲89.9	▲42.8	▲33.0	▼(39.7)
Unit value	$5,593	$5,761	$4,934	$5,515	$6,951	▼(11.8)	▲3.0	▼(14.3)	▲26.0
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Indonesia:									
Quantity	---	---	---	---	---	---	---	---	---
Value	---	---	---	---	---	---	---	---	---
Unit value	---	---	---	---	---	---	---	---	---
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Latvia:									
Quantity	---	---	---	---	---	---	---	---	---
Value	---	---	---	---	---	---	---	---	---
Unit value	---	---	---	---	---	---	---	---	---
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Moldova:									
Quantity	---	---	---	---	---	---	---	---	---
Value	---	---	---	---	---	---	---	---	---
Unit value	---	---	---	---	---	---	---	---	---
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Poland:									
Quantity	28	1,122	23	23	60	▼(20.1)	▲3,869.6	▼(98.0)	▲166.3
Value	108	2,036	36	36	113	▼(66.8)	▲1,789.7	▼(98.2)	▲214.2
Unit value	$3,811	$1,814	$1,586	$1,586	$1,871	▼(58.4)	▼(52.4)	▼(12.6)	▲18.0
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Ukraine, adjusted:									
Quantity	4,292	2,303	805	765	***	▼(81.2)	▼(46.4)	▼(65.0)	▲***
Value	18,906	13,510	5,064	4,829	***	▼(73.2)	▼(28.5)	▼(62.5)	▲***
Unit value	$4,405	$5,867	$6,287	$6,314	***	▲42.7	▲33.2	▲7.2	▼***
Ending inventory quantity	***	***	***	***	***	***	***	***	***

Table continued.

Table C-1 Continued
Rebar: 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: Calendar year 2021	2022	2023	Jan-Jun 2023	2024	Period changes: Calendar year 2021-23	2021-22	2022-23	Jan-Jun 2023-24
Subject sources:									
Quantity	4,803	4,093	1,865	1,315	***	▼(61.2)	▼(14.8)	▼(54.4)	▲***
Value	21,710	19,394	10,217	7,773	***	▼(52.9)	▼(10.7)	▼(47.3)	▲***
Unit value	$4,520	$4,739	$5,478	$5,912	***	▲21.2	▲4.8	▲15.6	▼***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Nonsubject sources:									
Quantity	1,325,862	1,464,153	1,416,942	800,571	***	▲6.9	▲10.4	▼(3.2)	▼***
Value	1,012,905	1,396,998	1,070,201	615,420	***	▲5.7	▲37.9	▼(23.4)	▼***
Unit value	$764	$954	$755	$769	***	▼(1.1)	▲24.9	▼(20.8)	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
All import sources:									
Quantity	1,330,665	1,468,246	1,418,807	801,885	574,275	▲6.6	▲10.3	▼(3.4)	▼(28.4)
Value	1,034,615	1,416,392	1,080,418	623,192	437,161	▲4.4	▲36.9	▼(23.7)	▼(29.9)
Unit value	$778	$965	$761	$777	$761	▼(2.1)	▲24.1	▼(21.1)	▼(2.0)
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	***	***	***	***	***	▲***	▲***	▲***	▲***
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 and from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7214.20.0000, 7222.11.0001, 7222.11.0057, 7222.11.0059, 7222.11.0082, 7222.11.0084, 7222.30.0001, 7222.30.0022, 7222.30.0024, 7222.30.0082, 7222.30.0084, 7228.20.1000, 7228.30.8010, and 7228.60.6000, accessed August 28, 2024; imports from Ukraine were adjusted using proprietary, Census-edited Customs records to reclassify imports of rebar manufactured in Bulgaria from Ukranian steel that were classified as country of origin Ukraine. Imports are based on the imports for consumption data series. Import value data reflect landed-duty paid value.

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.

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. 508 compliant tables for these data are contained in Parts I, III, and IV of this report.

APPENDIX D

COMMENTS ON EFFECTS OF ORDERS AND LIKELY EFFECTS OF REVOCATION

Table D-1
Rebar: 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	***
Effect of order	U.S. producers	***

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	***
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	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Purchasers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Likely impact of revocation	Purchasers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Effect of order	Foreign producers	***

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