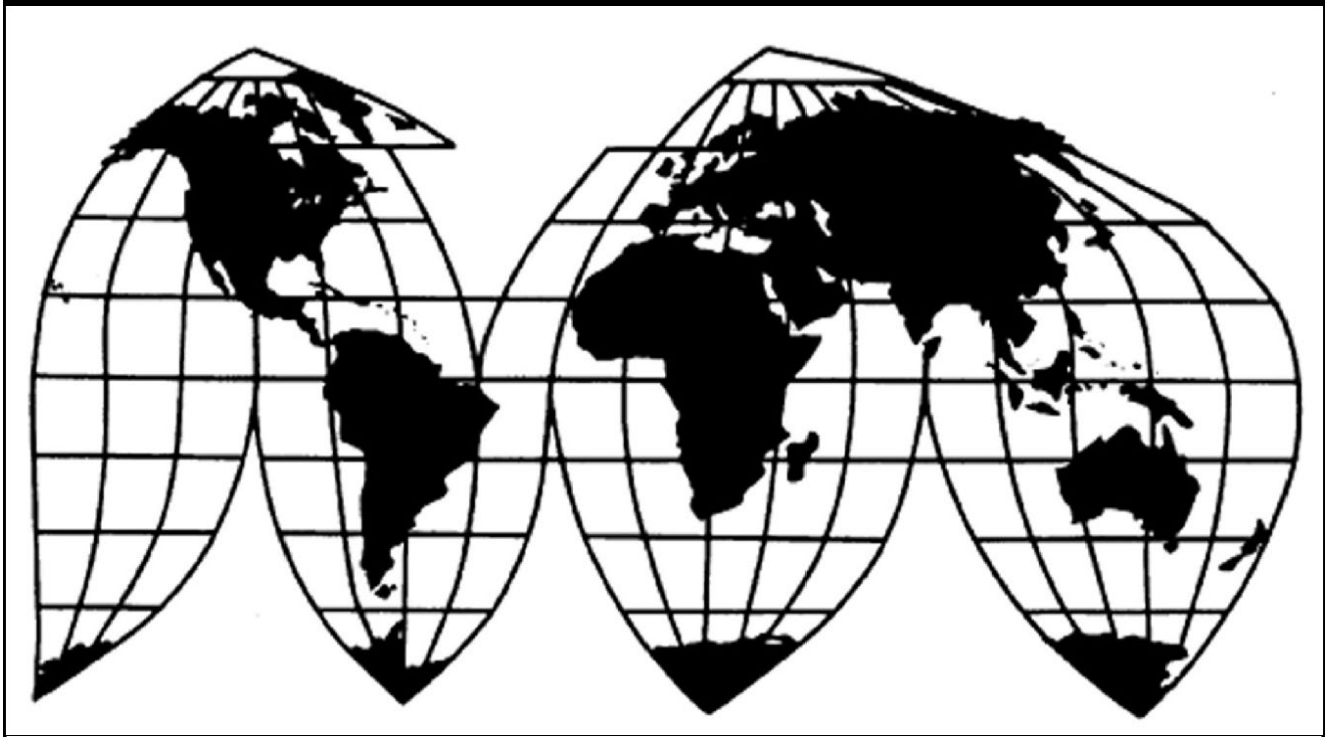
Circular Welded Carbon-Quality Steel Pipe from China

Investigation Nos. 701-TA-447 and 731-TA-1116 (Third Review)

Publication 5571 **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. 701-TA-447 and 731-TA-1116 (Third Review)

Circular Welded Carbon-Quality Steel Pipe from China

DETERMINATIONS

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

BACKGROUND

The Commission instituted these reviews on May 1, 2024 (89 FR 35244) and determined on August 5, 2024, that it would conduct expedited reviews (89 FR 77543, September 23, 2024).

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

Views of the Commission

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

I. Background

Original Investigations. On June 7, 2007, Allied Tube and Conduit, IPSCO Tubulars, Inc., Northwest Pipe Company, Sharon Tube Company, Western Tube & Conduit Corporation, and Wheatland Tube Company, domestic producers of CWP, and the United Steelworkers, a labor union whose members are engaged in the production of CWP, filed antidumping and countervailing duty petitions concerning imports of CWP from China.[1] In July 2008, the Commission determined that an industry in the United States was materially injured by reason of imports of CWP from China that the U.S. Department of Commerce ("Commerce") had determined were sold in the United States at less than fair value and subsidized by the government of China.[2] In July 2008, Commerce issued antidumping and countervailing duty orders covering CWP from China.[3]

First Reviews. In June 2013, the Commission instituted the first five-year reviews of the antidumping and countervailing duty orders on CWP from China.[4] In November 2013, after conducting expedited reviews, the Commission determined that revocation of the antidumping and countervailing duty orders would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.[5] Commerce

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[1] *Circular Welded Carbon-Quality Steel Pipe from China*, Inv. Nos. 701-TA-447 and 731-TA-1116 (Final), USITC Pub. 4019 (July 2008) ("*Original Determinations*") at 1.

[2] *Circular Welded Carbon-Quality Steel Pipe from China*, 73 Fed. Reg. 42,365 (July 22, 2008).

[3] *Circular Welded Carbon-Quality Steel Pipe from the People's Republic of China: Notice of Antidumping Duty Order*, 73 Fed. Reg. 42,547 (July 22, 2008); *Circular Welded Carbon-Quality Steel Pipe from the People's Republic of China: Notice of Amended Final Affirmative Countervailing Duty Determination and Notice of Countervailing Duty Order*, 73 Fed. Reg. 42,545 (July 22, 2008).

[4] *Circular Welded Carbon-Quality Steel Pipe from China: Institution of Five-Year Reviews*, 78 Fed. Reg. 33,108 (June 3, 2013).

[5] *Circular Welded Carbon-Quality Steel Pipe from China*, Inv. Nos. 701-TA-447 and 731-TA-1116 (Review), USITC Pub. 4435 (Nov. 2013) ("*First Review Determinations*"); *Circular Welded Carbon-Quality Steel Pipe from China*, 78 Fed. Reg. 70,069 (Nov. 22, 2013).

subsequently published notices of continuation of the orders on CWP from China in December 2013.[6]

Second Reviews. In November 2018, the Commission instituted the second five-year reviews of the antidumping and countervailing duty orders on CWP from China.[7] In June 2019, after conducting expedited reviews, the Commission determined that revocation of the antidumping and countervailing duty orders on CWP from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.[8] Commerce subsequently published notices of continuation of the orders on CWP from China in June 2019.[9]

Current Reviews. The Commission instituted these current five-year reviews on May 1, 2024.[10] The Commission received one response to the notice of institution filed jointly by Bull Moose Tube Company, Maruichi American Corporation, Nucor Tubular Products Inc., and Zekelman Industries,[11] domestic producers of CWP (collectively "Domestic Producers").[12] [13] The Commission received no respondent interested party responses to the notice of institution. On August 5, 2024, the Commission determined that the domestic interested party group response to the notice of institution was adequate, and the respondent interested party group response

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[6] *Circular Welded Carbon-Quality Steel Pipe from the People's Republic of China: Continuation of Antidumping Duty Order*, 78 Fed. Reg. 72,863 (Dec. 4, 2013); *Circular Welded Carbon-Quality Steel Pipe from the People's Republic of China: Continuation of Countervailing Duty Order*, 78 Fed. Reg. 72,863 (Dec. 4, 2013).

[7] *Circular Welded Carbon-Quality Steel Pipe from China: Institution of Five-Year Reviews*, 83 Fed. Reg. 54,936 (Nov. 1, 2018).

[8] *Circular Welded Carbon-Quality Steel Pipe from China*, Inv. Nos. 701-TA-447 and 731-TA-1116 (Review), USITC Pub. 4901 (June 2019) ("*Second Review Determinations*"); *Circular Welded Carbon-Quality Steel Pipe from China*, 84 Fed. Reg. 28,588 (June 19, 2019).

[9] *Circular Welded Carbon-Quality Steel Pipe from the People's Republic of China: Continuation of Antidumping and Countervailing Duty Orders*, 84 Fed. Reg. 30,086 (June 26, 2019).

[10] *Circular Welded Carbon-Quality Steel Pipe from China: Institution of Five-Year Reviews*, 89 Fed. Reg. 35,073 (May 1, 2024).

[11] Zekelman Industries is the parent company of domestic producers Atlas Tube and Wheatland Tube Company and provided data for these two companies collectively. Confidential Report, Memorandum INV-WW-084 (July 23, 2024) ("CR")/*Circular Welded Carbon-Quality Steel Pipe from China*, Inv. Nos. 701-TA-447 and 731-TA-1116 (Third Review), USITC Pub. 5571 (Dec. 2024) ("PR") at I-2 n.5.

[12] Domestic Producers Response to the Notice of Institution, EDIS Doc. 822731 (May 31, 2024) ("Response"); *see also* Domestic Producers Supplemental Response to the Notice of Institution, EDIS Doc. 823687 (June 13, 2024) ("Supplemental Response")

[13] Domestic Producers also filed adequacy comments. *See* Domestic Producers Comments on Adequacy, EDIS Doc. 825493 (July 9, 2024) ("Comments on Adequacy").

was inadequate.[14] In the absence of any other circumstances warranting full reviews, the Commission determined to conduct expedited reviews.[15] On November 20, 2024, Domestic Producers filed final comments pursuant to Commission rule 207.62(d).[16]

In these reviews, U.S. industry data are based on information submitted by the four Domestic Producers in their response to the notice of institution. Domestic Producers estimate that they accounted for *** percent of domestic production of CWP in 2023.[17] U.S. import data are based on Commerce's official import statistics.[18] Foreign industry data and related information are based on information submitted by Domestic Producers, information from the prior proceedings, and publicly available information gathered by Commission staff.[19]

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."[20] 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."[21] 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.[22]

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[14] Explanation of Commission Determination on Adequacy, EDIS Doc. 830242 (Aug. 5, 2024).

[15] *Circular Welded Carbon-Quality Steel Pipe from China: Scheduling of Expedited Five-Year Reviews*, 89 Fed. Reg. 77,543 (Sept. 23, 2024).

[16] Domestic Producers Final Comments, EDIS Doc. 837640 (Nov. 20, 2024) ("Final Comments").

[17] CR/PR at Table I-2.

[18] CR/PR at Table I-6. U.S. import data were compiled from HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090. Import data from Canada may include out-of-scope mechanical tubing and, thus, may be overstated. *See id.*

[19] CR/PR at I-24-27.

[20] 19 U.S.C. § 1677(4)(A).

[21] 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).

[22] *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-
(Continued…)

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

> Certain welded carbon quality steel pipes and tubes, of circular cross-section, and with an outside diameter of 0.372 inches (9.45 mm) or more, but not more than 16 inches (406.4 mm), whether or not stenciled, regardless of wall thickness, surface finish (e.g., black, galvanized, or painted), end finish (e.g., plain end, beveled end, grooved, threaded, or threaded and coupled), or industry specification (e.g., ASTM, proprietary, or other), generally known as standard pipe and structural pipe (they may also be referred to as circular, structural, or mechanical tubing).
>
> Specifically, the term "carbon quality" includes products in which (a) iron predominates, by weight, over each of the other contained elements; (b) the carbon content is 2 percent or less, by weight; and (c) none of the elements listed below exceeds the quantity, by weight, as indicated:
>
> (i) 1.80 percent of manganese;
> (ii) 2.25 percent of silicon;
> (iii) 1.00 percent of copper;
> (iv) 0.50 percent of aluminum;
> (v) 1.25 percent of chromium;
> (vi) 0.30 percent of cobalt;
> (vii) 0.40 percent of lead;
> (viii) 1.25 percent of nickel;
> (ix) 0.30 percent of tungsten;
> (x) 0.15 percent of molybdenum;
> (xi) 0.10 percent of niobium;
> (xii) 0.41 percent of titanium;
> (xiii) 0.15 percent of vanadium; or

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).

(xiv) 0.15 percent of zirconium.

Standard pipe is made primarily to American Society for Testing and Materials ("ASTM") specifications, but can be made to other specifications. Standard pipe is made primarily to ASTM specifications A-53, A-135, and A-795. Structural pipe is made primarily to ASTM specifications A-252 and A-500. Standard and structural pipe may also be produced to proprietary specifications rather than to industry specifications. This is often the case, for example, with fence tubing. Pipe multiple-stenciled to a standard and/or structural specification and to any other specification, such as the American Petroleum Institute ("API") API-5L specification, is also covered by the scope of the order when it meets the physical description set forth above and also has one or more of the following characteristics: is 32 feet in length or less; is less than 2.0 inches (50 mm) in outside diameter; has a galvanized and/or painted surface finish; or has a threaded and/or coupled end finish. (The term "painted" does not include coatings to inhibit rust in transit, such as varnish, but includes coatings such as polyester.)

The scope of the order does not include: (a) pipe suitable for use in boilers, superheaters, heat exchangers, condensers, refining furnaces and feedwater heaters, whether or not cold drawn; (b) mechanical tubing, whether or not cold-drawn; (c) finished electrical conduit; (d) finished scaffolding; (e) tube and pipe hollows for redrawing; (f) oil country tubular goods produced to API specifications; and (g) line pipe produced to only API specifications.

The pipe products that are the subject of the order are currently classifiable in HTSUS statistical reporting numbers 7306.30.10.00, 7306.30.50.25, 7306.30.50.32, 7306.30.50.40, 7306.30.50.55, 7306.30.50.85, 7306.30.50.90, 7306.50.10.00, 7306.50.50.50, 7306.50.50.70, 7306.19.10.10, 7306.19.10.50, 7306.19.51.10, and 7306.19.51.50. However, the product description, and not the Harmonized Tariff Schedule of the United States ("HTSUS")

classification, is dispositive of whether merchandise imported into the United States falls within the scope of the order.[23]

The scope definition has not changed substantively since the original investigations.[24]

CWP is used in low-pressure conveyance of water, steam, natural gas, air, and other liquids and gases in plumbing and heating systems, air conditioning units, automatic sprinkler systems, and other related uses. It is also used for structural or load-bearing purposes above ground by the construction industry, as well as for structural systems in ships, trailers, farm equipment, and other similar applications. It is produced in nominal wall thicknesses and sizes to ASTM specifications. CWP may also be used for light load-bearing and mechanical applications, such as for fence tubing; scaffolding components; and protection of electrical wiring, such as conduit shells. CWP may be galvanized (zinc-coated by dipping in molten zinc), lacquered (black finish), or painted (black) to provide corrosion resistance.[25]

In the original investigations, the Commission defined a single domestic like product consisting of CWP, coextensive with Commerce's scope.[26] In the first and second expedited reviews, the Commission found no new information that warranted revisiting the domestic like product definition from the original determinations. In addition, no party in either of the expedited reviews argued that the Commission should depart from that definition. The Commission, therefore, continued to define a single domestic like product consisting of all CWP, coextensive with the scope of the orders under review.[27]

In these reviews, Domestic Producers agree with the domestic like product definition from the prior proceedings.[28] The record contains no new information suggesting that the pertinent characteristics and uses of domestically produced CWP have changed since the

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[23] *Circular Welded Carbon-Quality Steel Pipe from the People's Republic of China: Final Results of the Expedited Second Sunset Review of the Antidumping Duty Order*, 89 Fed. Reg. 73,632 (Sept. 11, 2024); *Circular Welded Carbon-Quality Steel Pipe from the People's Republic of China: Final Results of the Expedited Third Sunset Review of the Countervailing Duty Order*, 89 Fed. Reg. 73,064 (Sept. 9, 2024).

[24] *See* Commerce Issues & Decision Memorandum for the Final Results of the Expedited Third Sunset Review of the Antidumping Duty Order on Circular Welded Carbon-Quality Steel Pipe from the People's Republic of China at 2-4, EDIS Doc. 837669 (Sept. 5, 2024) ("Commerce Antidumping I&D Memorandum"); Commerce Issues & Decision Memorandum for the Final Results of the Expedited Third Sunset Review of the Countervailing Duty Order on Circular Welded Carbon-Quality Steel Pipe from the People's Republic of China at 2-7, EDIS Doc. 837669 (Sept. 3, 2024).

[25] CR/PR at I-11-13.

[26] *Original Determinations*, USITC Pub. 4019 at 9.

[27] *First Review Determinations*, USITC Pub. 4435 at 6; *Second Review Determinations*, USITC Pub. 4901 at 7.

[28] Domestic Producers Response at 15-16.

original investigations and prior reviews.[29] Accordingly, we again define a single domestic like product consisting of CWP, 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."[30] In defining the domestic industry, the Commission's general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

In the original investigations, the Commission defined the domestic industry to include all domestic producers of CWP.[31] In the first and second expedited reviews, the Commission continued to define the domestic industry as all domestic producers of CWP.[32] There were no related parties or other domestic industry issues in any of the prior proceedings.[33]

Domestic Producers state that they agree with the domestic industry definition from the prior proceedings.[34] There are no related parties issues in these reviews.[35] Consistent with our definition of the domestic like product, and absent any argument to the contrary, we again define the domestic industry as all U.S. producers of CWP.

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[29] CR/PR at I-8-16.

[30] 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.

[31] *Original Determinations*, USITC Pub. 4019 at 9-10.

[32] *First Review Determinations*, USITC Pub. 4435 at 6; *Second Review Determinations*, USITC Pub. 4901 at 8.

[33] *Original Determinations*, USITC Pub. 4019 at 9-10; *First Review Determinations*, USITC Pub. 4435 at 6-7; *Second Review Determinations*, USITC Pub. 4901 at 8.

[34] Domestic Producers Response at 15-16.

[35] *See* Domestic Producers Response at 15-16; Domestic Producers Supplemental Response at 1-2.

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

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order "would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time."[36] The Uruguay Round Agreements Act Statement of Administrative Action (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."[37] Thus, the likelihood standard is prospective in nature.[38] 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.[39]

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[36] 19 U.S.C. § 1675a(a).

[37] SAA, H.R. Rep. 103-316, vol. I at 883-84 (1994). 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.

[38] 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.

[39] *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'").

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 time."[40] 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."[41]

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."[42] 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).[43] 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.[44]

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.[45] 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

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[40] 19 U.S.C. § 1675a(a)(5).

[41] 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*.

[42] 19 U.S.C. § 1675a(a)(1).

[43] 19 U.S.C. § 1675a(a)(1). Commerce has not issued any duty absorption findings with respect to CWP from China. *See* Commerce Antidumping I&D Memorandum at 4.

[44] 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

[45] 19 U.S.C. § 1675a(a)(2).

the United States; and (4) 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.[46]

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.[47]

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.[48] 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.[49]

No respondent interested party participated in these expedited reviews.[50] The record, therefore, contains limited new information with respect to the CWP industry in China. There

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[46] 19 U.S.C. § 1675a(a)(2)(A-D).

[47] *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.

[48] 19 U.S.C. § 1675a(a)(4).

[49] 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.

[50] CR/PR at I-2.

also is limited information regarding the CWP market in the United States during the current period of review. Accordingly, for our determinations, we rely as appropriate on information available from the original investigations and subsequent reviews and the limited new information on the record in these reviews.

B. Conditions of Competition and the Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry if an order were to be revoked, the statute directs the Commission to consider all relevant economic factors "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[51] The following conditions of competition inform our determinations.

1. Demand Conditions

Prior Proceedings. In the original investigations, the Commission found that demand for CWP was largely driven by downstream uses such as nonresidential construction. It observed that apparent U.S. consumption increased overall by 9.0 percent during the 2005-2007 period of investigation ("POI"), increasing from 2.36 million short tons in 2005 to 2.72 million short tons in 2006, before declining to 2.58 million short tons in 2007.[52]

In the expedited first reviews, the Commission found that demand for CWP was still largely driven by nonresidential construction, which declined sharply in 2009 and then remained below the levels attained in 2007. Consistent with this, apparent U.S. consumption for CWP was significantly lower in 2012, at *** short tons, than in 2007, at 2.58 million short tons.[53]

In the expedited second reviews, the Commission found that the drivers of demand for CWP were unchanged from the prior proceedings. It further found that apparent U.S. consumption in 2017, at 2.66 million short tons, was higher than in 2007 and 2012.[54]

Current Reviews. In the current reviews, the information available indicates that factors influencing demand remain unchanged from the prior proceedings.[55] Domestic Producers

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[51] 19 U.S.C. § 1675a(a)(4).

[52] *Original Determinations*, USITC Pub. 4019 at 11.

[53] *First Review Determinations*, USITC Pub. 4435 at 10; First Review Confidential Report, Memorandum INV-LL-078, EDIS Doc. 823989 at Table I-9 (Oct. 18, 2023).

[54] *Second Review Determinations*, USITC Pub. 4901 at 11.

[55] Domestic Producers Supplemental Response at 4 (stating that they are unaware of any significant changes in demand conditions or the business cycle for the domestic like product in the U.S. market).

reported that demand for CWP declined over the period of review due to slowing economic growth and a downturn in construction activity.[56] Available data indicate that apparent U.S. consumption in 2023 was *** short tons, which is lower than apparent U.S. consumption in 2007 and 2017, but higher than apparent U.S. consumption in 2012.[57]

2. Supply Conditions

Prior Proceedings. In the original investigations, the Commission found that the domestic industry's capacity declined by 13.7 percent over the POI, due largely to the closure of several domestic production facilities.[58] The domestic industry's market share declined by 3.2 percentage points over the POI, declining from 58.4 percent in 2005 to 49.3 percent in 2006, before increasing to 55.2 percent in 2007. Nonsubject import market share also declined by 9.6 percentage points over the POI, declining from 25.4 percent in 2005 to 24.3 percent in 2006 and 15.8 percent in 2007. Meanwhile, subject import market share increased by 12.9 percentage points over the POI, increasing from 16.2 percent in 2005 to 26.4 percent in 2006 and 29.0 percent in 2007.[59]

In the expedited first reviews, the Commission observed that the domestic industry experienced additional consolidation and mill closures since the original investigations, but that it accounted for a larger share of apparent U.S. consumption than it did at the end of the original POI.[60] Specifically, the domestic industry's market share increased to *** percent in 2012 as subject imports withdrew from the market. Subject import market share fell to *** percent of the market in 2012 and nonsubject import market share rose to *** percent.[61]

In the expedited second reviews, the Commission found that the domestic industry continued to experience consolidation and facility closures.[62] Nevertheless, the domestic industry remained the largest source of supply in the U.S. market, accounting for 58.4 percent of apparent U.S. consumption in 2017. Subject import market share was 2.0 percent in 2017 and nonsubject import market share was 39.6 percent.[63]

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[56] Domestic Producers Supplemental Response at 4.
[57] CR/PR at Table I-7.
[58] *Original Determinations*, USITC Pub. 4019 at 11-12.
[59] *Original Determinations*, USITC Pub. 4019 at 12.
[60] *First Review Determinations*, USITC Pub. 4435 at 11.
[61] First Review Confidential Report, Memorandum INV-LL-078, EDIS Doc. 823989 at Table I-10.
[62] *Second Review Determinations*, USITC Pub. 4901 at 12.
[63] *Second Review Determinations*, USITC Pub. 4901 at 12.

Current Reviews. The domestic industry remained the largest supplier of CWP to the U.S. market, followed by nonsubject imports and subject imports.[64] The domestic industry accounted for *** percent of apparent U.S. consumption in 2023, which is lower than the industry's share of apparent U.S. consumption in 2012 (*** percent) and 2017 (58.4 percent), but higher than its share of apparent U.S. consumption in 2007 (55.2 percent), the last year of the original POI.[65] The information available indicates that several domestic producers have made or intend to make capital investments to expand or improve their CWP production facilities during the period of review.[66]

Subject imports accounted for *** percent of apparent U.S. consumption in 2023, which is lower than their share of apparent U.S. consumption in 2017 and 2007, the last year of the original POI, but higher than in 2012.[67] Nonsubject imports remained the second largest source of supply of CWP to the U.S. market in 2023, accounting for *** percent of apparent U.S. consumption that year.[68] The largest sources of nonsubject imports were Canada, the United Arab Emirates, Thailand, and Vietnam.[69]

3. Substitutability and Other Conditions

Prior Proceedings. In the original investigations, the Commission found a moderately high degree of substitutability between the domestic like product and subject imports.[70] It further found that the vast majority of purchasers indicated that price was a very important factor in purchasing decisions, among other important factors.[71]

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

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

[66] CR/PR at Table I-4. Zekelman Industries announced in April 2024 that it will invest up to $120 million to expand manufacturing capabilities, including for CWP at Atlas Tube's facility in Blytheville, Arkansas. Nucor Tubular Products announced in March 2021 that it plans to invest $164 million in its construction of a tube mill in Gallatin County, Kentucky. Bull Moose announced in January 2021 that it completed major capital investments in two tubular facilities in Elkhart, Indiana and Trenton, Georgia. Wheatland Tube Co. announced in May 2021 that it plans to build a $30 million fully automated warehouse at its facility in Warren, Ohio. *See id.*

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

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

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

[70] *Original Determinations*, USITC Pub. 4019 at 12.

[71] *Original Determinations*, USITC Pub. 4019 at 12.

In the expedited first and second reviews, the Commission again found there was a moderately high degree of substitutability between the domestic like product and subject imports, and that price continued to be an important factor in purchasing decisions.[72]

Current Reviews. There is no new information on the record of these reviews indicating that the degree of substitutability between the domestic like product and subject imports, or the importance of price in purchasing decisions, has changed since the prior proceedings.[73] Accordingly, we again find a moderately high degree of substitutability between the domestic like product and subject imports, and that price is an important factor in purchasing decisions in the U.S. market.

Effective March 23, 2018, CWP from China became subject to a 25 percent Section 232 *ad valorem* duty.[74] In addition, effective September 1, 2019, CWP from China became subject to an additional 15 percent *ad valorem* duty under Section 301 of the Trade Act of 1974. Effective February 14, 2020, this additional Section 301 duty was reduced to 7.5 percent *ad valorem*.[75]

C. Likely Volume of Subject Imports

1. Prior Proceedings

In the original investigations, the Commission found that the volume of subject imports, and the increase in that volume, were significant in absolute terms and relative to consumption and production in the United States.[76] The record showed that over the POI, subject imports increased from 382,122 short tons in 2005 to 715,728 short tons in 2006 and 748,181 short tons in 2007. Subject import market share grew from 16.2 percent of apparent U.S. consumption in 2005 to 26.4 percent in 2006 and 29.0 percent in 2007, and the ratio of subject imports to U.S. production increased by 23.7 percentage points, from 27.6 percent in 2005 to 51.3 percent in 2007.[77]

In the expedited first reviews, the Commission found that the likely volume of subject imports would be significant, both in absolute terms and relative to consumption in the United

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[72] *First Review Determinations*, USITC Pub. 4435 at 11; *Second Review Determinations*, USITC Pub. 4901 at 13.

[73] CR/PR at I-8-16.

[74] CR/PR at I-10.

[75] CR/PR at I-10.

[76] *Original Determinations*, USITC Pub. 4019 at 13-14.

[77] *Original Determinations*, USITC Pub. 4019 at 13-14.

States, if the orders were revoked.[78] It found that the orders had a disciplining effect on the volume of subject imports, which was significantly lower at 3,778 short tons in 2012 compared with 748,181 short tons in 2007.[79] The Commission further found the subject industry in China nevertheless had the ability and incentive to increase exports of subject CWP to the United States upon revocation. Specifically, the available information indicated that the subject industry in China had significant production capacity and substantial unused capacity. In addition, the record indicated that the subject industry's production increased and that it remained export oriented.[80] The Commission also found that CWP from China was subject to antidumping duty orders in Australia, Canada, and the European Union, providing further incentive for subject producers to direct significant volumes of CWP to the U.S. market upon revocation.[81]

In the expedited second reviews, the Commission again found that the volume of subject imports would likely be significant, both in absolute terms and relative to U.S. consumption, upon revocation of the orders.[82] It found that even under the disciplining effect of the orders, subject imports maintained a continuous presence in the U.S. market, totaling 5,044 short tons in 2013; 6,368 short tons in 2014; 24,012 short tons in 2015; 86,732 short tons in 2016; and 53,382 short tons in 2017.[83] It further found that several factors supported the conclusion that subject producers in China had the ability and incentive to increase exports to the United States to significant levels within a reasonably foreseeable time if the orders were revoked.[84] Available data indicated that China was the largest producer of welded tube, a product category that included CWP in addition to out-of-scope merchandise, and that it was the largest exporter of circular welded pipe, also a product category that included CWP in addition to out-of-scope merchandise. Moreover, the available data indicated that in 2017, the United States was the third largest market for Chinese exports of welded pipe.[85] The record further indicated that CWP from China continued to be subject to antidumping and/or countervailing duty orders in other export markets, including Australia, Canada, the European

[78] *First Review Determinations*, USITC Pub. 4435 at 12-13.
[79] *First Review Determinations*, USITC Pub. 4435 at 12.
[80] *First Review Determinations*, USITC Pub. 4435 at 12.
[81] *First Review Determinations*, USITC Pub. 4435 at 12-13.
[82] *Second Review Determinations*, USITC Pub. 4901 at 14-15.
[83] *Second Review Determinations*, USITC Pub. 4901 at 14.
[84] *Second Review Determinations*, USITC Pub. 4901 at 14-15.
[85] *Second Review Determinations*, USITC Pub. 4901 at 14-15.

Union, and Mexico, which would increase the attractiveness of the United States as an export destination if the orders were revoked.[86]

2. Current Reviews

The available information in these reviews indicates that subject imports maintained a small presence in the U.S. market under the disciplining effect of the orders. Subject imports fluctuated over the period of review, decreasing from 19,380 short tons in 2018 to 10,619 short tons in 2019 and 7,317 short tons in 2020, before increasing to 13,182 short tons in 2021, 13,349 short tons in 2022, and 17,712 short tons in 2023. In 2023, the volume of subject imports, at 17,712 short tons, remained below the level of subject imports in the original POI.[87] Subject imports accounted for *** percent of apparent U.S. consumption in 2023, compared with 2.0 percent in 2017, *** percent in 2012, and 29.0 percent in 2007.[88]

Due to the expedited nature of these reviews, the record contains limited information on the CWP industry in China. The information available, however, indicates that subject producers have the ability and incentive to significantly increase their exports of subject merchandise to the U.S. market if the orders were revoked. Specifically, the information available indicates that the CWP industry in China remains large. Domestic Producers have identified 51 possible producers of CWP in China.[89]

Furthermore, available GTA data indicate that the subject industry continued to produce and export substantial volumes of welded pipe, a product category that includes CWP and out-of-scope merchandise, with Chinese exports of welded pipe increasing from 1.2 million short tons in 2018 to 1.5 million short tons in 2023.[90] These data also indicate that China was the world's largest exporter of such merchandise in during the period of review, with the exception of 2019 when it was the world's second largest exporter of such merchandise.[91]

Available information also indicates that the U.S. market remains attractive to subject producers. As discussed above, even under the disciplining effect of the orders, subject imports maintained a continuous presence in the U.S. market during the period of review, reflecting the subject producers' continued interest in serving the U.S. market.[92] With established customer and distribution networks in the United States, the subject industry would have the ability and

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[86] *Second Review Determinations*, USITC Pub. 4901 at 14-15.
[87] CR/PR at Table I-7.
[88] CR/PR at Table I-7.
[89] Domestic Producers Response at Exhibit 1.
[90] CR/PR at Table I-8.
[91] CR/PR at Table I-9.
[92] CR/PR at Table I-4.

incentive to use its substantial capacity to increase exports of CWP to the United States upon revocation of the orders. According to information submitted by Domestic Producers, the slowing growth of China's economy has contributed to declining demand for welded steel pipe in China, which would further incentivize Chinese producers to increase exports of subject CWP to the United States upon revocation of the orders.[93] Furthermore, the information available indicates that barriers to entry in third-country markets continue to exist, including antidumping duty orders on CWP from China in Canada, the United Kingdom, and Mexico, providing subject producers with additional incentive to increase exports of CWP to the U.S. market if the orders were revoked.[94]

Given the foregoing, including the significant and increasing volume and market share of subject imports in the original investigations, the size and export orientation of the subject industry, the attractiveness of the U.S. market to subject producers, and the existence of third country trade remedy orders on CWP from China, we find that the volume of subject imports would likely be significant, both in absolute terms and relative to U.S. consumption, if the orders were revoked.[95]

D. Likely Price Effects

1. Prior Proceedings

In the original investigations, the Commission found that CWP from China significantly undersold the domestic like product and suppressed domestic prices to a significant degree.[96] The record showed that subject imports undersold the domestic like product in all 96 quarterly pricing comparisons, by margins ranging from 4.3 to 56.0 percent. Prices for six of the eight

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[93] Domestic Producers Response at 11, Exhibits 2-7.

[94] CR/PR at I-26.

[95] We recognize that CWP from China became subject to a 25 percent *ad valorem* duty under section 232 effective 2018 and a 15.0 percent *ad valorem* duty under section 301 effective 2019, reduced to 7.5 percent *ad valorem* effective 2020. CR/PR at I-10. Domestic Producers did not report that these duties would prevent subject imports from increasing to significant levels after revocation, however, and the duties did not prevent subject imports from increasing irregularly from 10,619 short tons in 2019 to 17,712 short tons in 2023. *See* Domestic Producers' Response; CR/PR at Table I-6. Given this, as well as the large size and exports of the subject industry and the attractiveness of the U.S. market, we find that the duties under sections 232 and 301 would not prevent subject imports from increasing to significant levels if the orders were revoked.

We also note that the record in these expedited reviews does not contain information concerning inventories of the subject merchandise or the potential for product shifting by subject producers.

[96] *Original Determination*, USITC Pub. 4019 at 14-15.

domestically produced pricing products declined over the POI. The record further showed that the domestic industry did not initially reduce its prices to compete with subject imports, but that when it did so in 2007, it was unable to regain market share or cover its increased costs due to the increased volume of subject imports underselling the domestic like product.[97] The Commission therefore concluded that subject imports had significant price effects during the POI.[98]

In the expedited first reviews, the Commission observed that domestic prices, which peaked in late 2008, generally trended downward during the review period.[99] Given the substitutable nature of CWP, the importance of price in purchasing decisions, and the occurrence of underselling in every price comparison observed during the original investigations, the Commission found it likely that subject imports would undersell the domestic like product at high margins if the orders were revoked, causing domestic producers to cut prices or forego price increases to avoid losing sales.[100] Accordingly, the Commission found that subject imports would likely engage in significant underselling of the domestic like product and have significant depressing or suppressing effects on the price of the domestic like product if the orders were revoked.[101]

In the expedited second reviews, the Commission observed that the limited record did not contain pricing data.[102] It found, however, that in light of the likely significant increase in subject imports from China upon revocation of the orders and the importance of price in purchasing decisions, that subject producers would likely resume the aggressive pricing behavior observed in the original investigations, which, in turn, would likely cause domestic producers to cut prices or forego price increases to avoid losing sales.[103] The Commission therefore found that subject imports would likely engage in significant underselling of the domestic like product to gain market share and would likely have significant depressing or suppressing effects on the domestic prices if the orders were revoked.[104]

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[97] *Original Determination*, USITC Pub. 4019 at 14-15.
[98] *Original Determination*, USITC Pub. 4019 at 15.
[99] *First Review Determinations*, USITC Pub. 4435 at 14.
[100] *First Review Determinations*, USITC Pub. 4435 at 14.
[101] *First Review Determinations*, USITC Pub. 4435 at 14.
[102] *Second Review Determinations*, USITC Pub. 4901 at 16.
[103] *Second Review Determinations*, USITC Pub. 4901 at 16.
[104] *Second Review Determinations*, USITC Pub. 4901 at 16.

2. Current Reviews

As previously discussed in Section III.B.3., we have found that there is a moderately high degree of substitutability between the domestic like product and subject imports, and that price continues to be an important factor in purchasing decisions.

Due to the expedited nature of these reviews, the record does not contain any new product-specific pricing information. Based on the available information, including universal underselling of the domestic like product by subject imports in the original investigations, the moderately high degree of substitutability of subject imports and the domestic like product, and the importance of price in purchasing decisions, we find that the significant increase in subject import volume that is likely after revocation of the orders would likely be accompanied by significant subject import underselling, as a means for subject imports to gain market share. Absent the discipline of the orders, the significant volumes of low-priced subject imports would likely take sales and market share from the domestic industry and/or force the industry to cut prices or forego any price increases necessary to cover increasing costs. Consequently, we find that if the orders were revoked, subject imports would likely have significant price effects.

E. Likely Impact

1. Prior Proceedings

In the original investigations, the Commission found a general decline in domestic industry profitability due largely to the significant price effects of subject imports. It observed that the domestic industry initially competed with subject imports in 2006 by sacrificing volume rather than lowering prices. From 2007 through the end of the POI, the domestic industry began to lower prices and therefore was unable to sustain operating margins, which declined from 2006 levels. Domestic capacity also fell steadily throughout the POI, due to mill closures. The Commission found that domestic production, capacity utilization, shipments, and market share decreased and increased irregularly, mirroring the domestic industry's shifting response to the presence of subject imports; while domestic sales volume rose by 5.1 percent over the POI, the value of domestic sales rose by only 2.9 percent. The Commission found that subject imports' absolute and relative volumes were significant, that they gained market share at the expense of the domestic industry, that they undersold the domestic like product, and that they suppressed prices, causing the domestic industry's financial performance to fall to its lowest

level in 2007. The Commission consequently concluded that subject imports had a significant impact on the condition of the domestic industry during the POI.[105]

In the expedited first reviews, the Commission found that although the domestic industry's capacity in 2012 was higher than that reported in 2007, its reported production, U.S. shipments, capacity utilization, operating income, and operating income margin were all lower.[106] It found that the limited record was insufficient for it to make a finding on whether the domestic industry was in a vulnerable condition.[107] It did find, however, that given the likely significant increase in the volume of subject imports and their likely adverse price effects if the orders were revoked, the domestic industry would likely experience declines in production, shipments, sales, market share, revenues, profitability, employment, and capital and research and development expenditures.[108] The Commission also considered the role of nonsubject imports, whose volume and market share had increased since issuance of the orders. Given that the domestic industry was able to increase its market share notwithstanding the increase in nonsubject imports during the period of review, the Commission found that the presence of nonsubject imports would not preclude subject imports from taking substantial market share from the domestic industry if the orders were revoked.[109] The Commission concluded that revocation of the orders would likely have a significant impact on the domestic industry within a reasonably foreseeable time.[110]

In the expedited second reviews, the Commission found that the domestic industry's trade and financial indicators had generally improved since the expedited first reviews, but that the limited evidence was insufficient to make a finding on whether the domestic industry was vulnerable to the continuation or recurrence of material injury should the orders be revoked.[111] The Commission further found that the increased subject import competition that would likely occur after revocation of the order would likely have a significant impact on the domestic industry.[112] The Commission also considered the role of factors other than subject imports. While recognizing that nonsubject imports had increased their market share since the original investigations, the Commission found that the increase in subject imports would likely take

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[105] *Original Determinations*, USITC Pub. 4019 at 16-19.
[106] *First Review Determinations*, USITC Pub. 4435 at 15.
[107] *First Review Determinations*, USITC Pub. 4435 at 15.
[108] *First Review Determinations*, USITC Pub. 4435 at 15-16.
[109] *First Review Determinations*, USITC Pub. 4435 at 16.
[110] *First Review Determinations*, USITC Pub. 4435 at 16.
[111] *Second Review Determinations*, USITC Pub. 4901 at 17-18.
[112] *Second Review Determinations*, USITC Pub. 4901 at 18.

market share from the domestic industry, as well as nonsubject imports, because the industry supplied a majority of the U.S. market and would complete head-to-head with subject imports.[113]

2. Current Reviews

The record contains limited information concerning the domestic industry's performance since the last five-year reviews.

The information available indicates that in 2023, the domestic industry's production capacity, production, capacity utilization, and quantity of U.S. shipments were generally lower than in the prior proceedings, while its financial performance was relatively stronger. In 2023, the domestic industry's production capacity was *** short tons, its production was *** short tons, and its capacity utilization rate was *** percent.[114] Its U.S. shipments totaled *** short tons, valued at $***, with an average unit value ("AUV") of $*** per short ton.[115] In 2023, the domestic industry had net sales revenues of $***, a cost of goods sold ("COGS") of $***, a gross profit of $***, and an operating income of $***.[116] Its ratio of operating income to net sales was *** percent.[117] The limited information available in these expedited reviews is insufficient for us to make a finding as to whether the domestic industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of the orders.

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[113] *Second Review Determinations*, USITC Pub. 4901 at 18.

[114] CR/PR at Table I-5. Reported capacity in 2023 at *** short tons was lower than in 2007 at 2.2 million short tons, 2012 at *** short tons, and 2017 at 2.6 million short tons. Reported production in 2023 at *** short tons was lower than in 2007 at 1.5 million short tons and 2017 at 1.7 million short tons, but higher than in 2012 at *** short tons. Reported capacity utilization in 2023 at *** percent was also lower than in 2007 at 65.7 percent and 2017 at 63.7 percent, but higher than in 2012 at *** percent. *See id.*

[115] CR/PR at Table I-5. The quantity of U.S. shipments in 2023 at *** short tons was lower than in 2007 at 1.4 million short tons and 2017 at 1.6 million short tons, but higher than in 2012 at *** short tons. The total value U.S. shipments in 2023 at $*** was higher than in 2007 at $1.4 billion, 2012 at $***, and 2017 at $1.4 billion. The AUV of U.S. shipment in 2023 at $*** per short ton was higher than in 2007 at $949 per short ton, 2012 at $*** per short ton, and 2017 at $1,081 per short ton. *See id*.

[116] CR/PR at Table I-5. The domestic industry net sales revenues in 2023 at $*** was higher than in 2007 at $1.4 billion, 2012 at $***, and 2017 at $1.4 billion. Its COGS in 2023 at $*** was lower than in 2007 at $1.2 billion, 2012 at $***, and 2017 at $1.2 billion. Its gross profit in 2023 at $*** was higher than in 2007 at $148.5 million, 2012 at $***, and 2017 at $269.8 million. Its operating income in 2023 at $*** was higher than in 2007 at $61.5 million, 2012 at $***, and 2017 at $170.3 million. *See id.*

[117] CR/PR at Table I-5. The domestic industry's ratio of operating income to net sales in 2023 at *** percent was higher than in 2007 at 4.5 percent, 2012 at *** percent, and 2017 at 11.8 percent. *See id.*

Based on the information available in these reviews, we find that revocation of the orders would likely lead to a significant volume of subject imports that would likely significantly undersell the domestic like product. Given the moderately high degree of substitutability between domestically produced CWP and subject imports and the importance of price to purchasers, significant volumes of low-priced subject imports would likely capture market share from the domestic industry and/or force domestic producers to lower their prices or forego price increases to retain their sales, thereby depressing or suppressing prices for the domestic like product to a significant degree. The likely significant volume of low-priced subject imports and their adverse price effects would likely have a significant adverse impact on the production, shipments, sales, market share, and revenues of the domestic industry, which, in turn, would have a direct adverse impact on the industry's profitability and employment, as well as its ability to raise capital and make and maintain necessary capital investments. We therefore conclude that, if the orders were revoked, subject imports from China would be likely to have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

We have also considered the role of factors other than subject imports, including nonsubject imports, so as not to attribute likely injury from other factors to subject imports. Although nonsubject imports have increased their presence in the U.S. market since the original investigation, accounting for *** percent of apparent U.S. consumption in 2023,[118] the record provides no indication that the presence of nonsubject imports would prevent subject imports from entering the U.S. market in significant quantities in the event of revocation of the orders. Given the domestic industry's *** percent share of apparent U.S. consumption in 2023, as well as the moderately high degree of substitutability between subject imports and the domestic like product, the importance of price in purchasing decisions, and the likelihood of significant underselling by subject imports after revocation, we find it likely that any increase in subject imports would come at least in part at the expense of the domestic industry. Consequently, we find that any future effects of nonsubject imports would be distinct from the likely effects attributable to subject imports and that nonsubject imports would not prevent subject imports from having a significant adverse impact on the domestic industry.

We recognize that apparent U.S. consumption of CWP was *** percent lower in 2023 than in 2017.[119] As discussed in section III.B.1 above, Domestic Producers reported that demand for CWP declined over the period of review due to slowing economic growth and a

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

[119] CR/PR at Table I-7. Apparent U.S. consumption in 2023 was lower than apparent U.S. consumption in 2007 and 2017, but higher than apparent U.S. consumption in 2012.

downturn in construction activity.[120] If demand were to continue to weaken, given the moderately high degree of substitutability between subject imports and the domestic like product and the importance of price to purchasers, the significant volume of low-priced subject imports that is likely after revocation would exacerbate any effects of declining demand on the domestic industry, by further reducing the industry's sales and placing additional downward pressure on domestic prices. Moreover, any decline in demand for CWP would be unlikely to explain any loss in market share. Given these considerations, we find that the likely effects attributable to subject imports are distinguishable from any likely effects of demand if the orders were revoked.

IV. Conclusion

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

[120] Domestic Producers Supplemental Response at 4.

Information obtained in these reviews

Background

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

Table I-1
Circular welded pipe: Information relating to the background and schedule of this proceeding

Effective date	Action
May 1, 2024	Notice of initiation by Commerce (89 FR 35073, May 1, 2024)
May 1, 2024	Notice of institution by Commission (89 FR 35244, May 1, 2024)
August 5, 2024	Commission's vote on adequacy
September 9, 2024	Commerce's results of its expedited review of the countervailing duty order (89 FR 73064)
September 11, 2024	Commerce's results of its expedited review of the antidumping duty order (89 FR 73632)
December 12, 2024	Commission's determinations and views

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

[2] 89 FR 35244, May 1, 2024. In accordance with section 751(c) of the Act, the U.S. Department of Commerce ("Commerce") published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. 89 FR 35073, May 1, 2024. Pertinent Federal Register notices are referenced in app. A and may be found at the Commission's website (www.usitc.gov).

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

[4] Interested parties were also requested to provide a list of three to five leading purchasers in the U.S. market for the domestic like product and the subject merchandise. A response was received from domestic interested parties, and it provided contact information for the following four firms as top purchasers of CWP: ***. Purchaser questionnaires were sent to these four firms, but no firms submitted a response to the Commission's request for information.

Responses to the Commission's notice of institution

Individual responses

The Commission received one submission in response to its notice of institution in the subject reviews filed on behalf of Bull Moose Tube Company, Maruichi American Corporation, Nucor Tubular Products Inc., and Zekelman Industries,[5] domestic producers of circular welded pipe (collectively referred to herein as "domestic interested parties").

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

Table I-2
Circular welded pipe: Summary of responses to the Commission's notice of institution

Interested party type	Number	Coverage
U.S. producer	4	***%

Note: The U.S. producer coverage figure presented is the domestic interested parties' estimate of their collective share of total U.S. production of circular welded pipe during 2023. The domestic interested parties noted in their response, "***. Domestic interested parties' response to the notice of institution, May 31, 2024, p. 15.

[5] Zekelman Industries is the parent company of domestic producers Atlas Tube and Wheatland Tube Company. In the domestic interested parties' response to the notice of institution, data was initially presented separately for Atlas Tube and Wheatland Tube Company but was revised in the domestic interested parties' supplemental response to the notice of institution to present Zekelman Industries' collective data as the sum of the data for Atlas Tube and Wheatland Tube Company. Domestic interested parties' response to the notice of institution, May 31, 2024, exh. 1 and domestic interested parties' supplemental response to the notice of institution, June 13, 2024, exh. 1.

Party comments on adequacy

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

The original investigations

The original investigations resulted from a petitions filed on June 7, 2007 with Commerce and the Commission by six U.S. producers[7] and the United Steelworkers (Pittsburgh, Pennsylvania).[8] On June 5, 2008, Commerce determined that imports of circular welded pipe from China were being sold at less than fair value ("LTFV") and subsidized by the Government of China.[9] The Commission determined on July 15, 2008, that the domestic industry was materially injured by reason of LTFV and subsidized imports of circular welded pipe from China.[10] On July 22, 2008, Commerce issued its antidumping and countervailing duty orders with final weighted-average dumping margins which had ranged from 69.20 to 85.55 percent and net subsidy rates ranging from 29.62 to 616.83 percent.[11]

[6] Domestic interested parties' comments on adequacy, July 9, 2024, pp. 2 and 5.

[7] The six U.S. producers were Allied Tube & Conduit (Harvey, Illinois); IPSCO Tubulars, Inc., (Camanche, Iowa); Northwest Pipe Co. (Portland, Oregon); Sharon Tube Co. (Sharon, Pennsylvania); Western Tube & Conduit Corp. (Long Beach, California); and Wheatland Tube Co. (Collingswood, New Jersey).

[8] Circular Welded Carbon-Quality Steel Pipe from China, Investigation nos. 701-TA-447 and 731-TA-1116 (Final), USITC Publication 4019, July 2008 ("Original publication"), p. I-1.

[9] 73 FR 31966 and 31970, June 5, 2008.

[10] 73 FR 42365, July 21, 2008. The Commission also found that critical circumstances did not exist with respect to imports of the subject merchandise from China that were subject to the affirmative critical circumstances determination by Commerce.

[11] 73 FR 42545 and 42547, July 22, 2008. Effective August 21, 2012, pursuant to proceedings under section 129 of the Uruguay Round Trade Agreements Act, Commerce revised its net countervailable subsidy rates, which ranged from 29.83 percent to 620.08 percent. 77 FR 52683, August 30, 2012.

The first five-year reviews

On September 6, 2013, the Commission determined that it would conduct expedited reviews of the antidumping and countervailing duty orders on circular welded pipe from China.[12] On October 2, 2013, Commerce determined that revocation of the countervailing duty order on circular welded pipe from China would be likely to lead to continuation or recurrence of subsidization.[13] On October 3, 2013, Commerce determined that revocation of the antidumping duty order on circular welded pipe from China would be likely to lead to continuation or recurrence of dumping.[14] On November 18, 2013, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.[15] Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective December 4, 2013, Commerce issued a continuation of the antidumping and countervailing duty orders on imports of circular welded pipe from China.[16]

The second five-year reviews

On March 11, 2019, the Commission determined that it would conduct expedited reviews of the antidumping and countervailing duty orders on circular welded pipe from China.[17] On March 25, 2019, Commerce determined that revocation of the countervailing duty order on circular welded pipe from China would be likely to lead to continuation or recurrence of subsidization.[18] On April 16, 2019, Commerce determined that revocation of the antidumping duty order on circular welded pipe from China would be likely to lead to continuation or recurrence of dumping.[19] On June 14, 2019, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.[20] Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective June 26, 2019, Commerce issued a continuation of the antidumping and countervailing duty orders on imports of circular welded pipe from China.[21]

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[12] 78 FR 59371, September 26, 2013.
[13] 78 FR 60849, October 2, 2013.
[14] 78 FR 61335, October 3, 2013.
[15] 78 FR 70069, November 22, 2013.
[16] 78 FR 72863, December 4, 2013.
[17] 84 FR 17889, April 26, 2019.
[18] 84 FR 11050, March 25, 2019.
[19] 84 FR 15584, April 16, 2019.
[20] 84 FR 28588, June 19, 2019.
[21] 84 FR 30086, June 26, 2019.

Previous and related investigations

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

Table I-3
Circular welded pipe: Previous and related Commission proceedings and current status

Date	Number	Country	Original determination	Current status
1982	701-TA-165	Brazil	Terminated	Not applicable
1982	701-TA-166	France	Terminated	Not applicable
1982	701-TA-167	Italy	Negative (Preliminary)	Not applicable
1982	701-TA-168	Korea	Affirmative	Order revoked by Commerce, October 1985
1982	701-TA-169	West Germany	Terminated	Not applicable
1983	731-TA-132	Taiwan	Affirmative	Order continued, January 2024
1984	701-TA-220	Spain	Terminated	Not applicable
1984	731-TA-183	Brazil	Terminated	Not applicable
1984	731-TA-197	Brazil	Terminated	Not applicable
1984	731-TA-198	Spain	Terminated	Not applicable
1984	TA-201-51	Safeguard	Affirmative	Terminated by Presidential Memorandum, September 1984
1985	701-TA-242	Venezuela	Terminated	Not applicable
1985	701-TA-251	India	ITA Negative	Not applicable
1985	701-TA-252	Taiwan	ITA Negative	Not applicable
1985	701-TA-253	Turkey	Affirmative	Order continued, January 2024
1985	731-TA-211	Taiwan	Negative	Not applicable
1985	731-TA-212	Venezuela	Terminated	Not applicable
1985	731-TA-252	Thailand	Affirmative	Order continued, January 2024
1985	731-TA-253	Venezuela	Terminated	Not applicable
1985	731-TA-271	India	Affirmative	Order continued, January 2024
1985	731-TA-273	Turkey	Affirmative	Order continued, January 2024
1985	731-TA-274	Yugoslavia	Terminated	Not applicable
1986	731-TA-292	China	Negative	Not applicable
1986	731-TA-293	Philippines	Negative	Not applicable
1986	731-TA-294	Singapore	Negative	Not applicable
1991	701-TA-311	Brazil	ITA Negative	Not applicable
1991	731-TA-532	Brazil	Affirmative	Order revoked, January 2024 (ITC negative)
1991	731-TA-533	Korea	Affirmative	Order continued, January 2024
1991	731-TA-534	Mexico	Affirmative	Order continued, January 2024
1991	731-TA-535	Romania	Negative	Not applicable
1991	731-TA-536	Taiwan	Affirmative	Order continued, January 2024

Table continued.

Table I-3 Continued
Circular welded pipe: Previous and related Commission proceedings and current status

Date	Inv. no.	Country	Original determination	Current status of order
1991	731-TA-537	Venezuela	Affirmative	Order revoked, August 2000 (ITC negative)
1995	731-TA-732	Romania	Negative	Not applicable
1995	731-TA-733	South Africa	Negative	Not applicable
2001	731-TA-943	China	Negative	Not applicable
2001	731-TA-944	Indonesia	Negative (Preliminary)	Not applicable
2001	731-TA-945	Malaysia	Negative (Preliminary)	Not applicable
2001	731-TA-946	Romania	Negative (Preliminary)	Not applicable
2001	731-TA-947	South Africa	Negative (Preliminary)	Not applicable
2001	TA-201-73	Safeguard	Affirmative	Terminated by Presidential Proclamation, December 2003
2005	TA-421-6	Safeguard	Affirmative	Terminated by Presidential Proclamation, December 2005
2007	701-TA-447	China	Affirmative	Current review
2011	701-TA-482	India	Negative	Not applicable
2011	701-TA-483	Oman	Negative	Not applicable
2011	701-TA-484	United Arab Emirates	Negative	Not applicable
2011	701-TA-485	Vietnam	ITA Negative	Not applicable
2011	731-TA-1191	India	Negative	Not applicable
2011	731-TA-1192	Oman	Negative	Not applicable
2011	731-TA-1193	United Arab Emirates	Negative	Not applicable
2011	731-TA-1194	Vietnam	Negative	Not applicable
2015	701-TA-549	Pakistan	Negative	Not applicable
2015	731-TA-1299	Oman	Affirmative	Order continued, December 2022
2015	731-TA-1300	Pakistan	Affirmative	Order continued, December 2022
2015	731-TA-1301	Philippines	Terminated	Not applicable
2015	731-TA-1302	United Arab Emirates	Affirmative	Order continued, December 2022
2015	731-TA-1303	Vietnam	Negative	Not applicable

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

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

Commerce's five-year reviews

Commerce announced that it would conduct expedited reviews with respect to the orders on imports of circular welded pipe from China with the intent of issuing the final results of these reviews based on the facts available not later than August 29, 2024.[22] Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at https://access.trade.gov/public/FRNoticesListLayout.aspx and subsequently on the Commission's Electronic Document Information System ("EDIS"). Issues and Decision Memoranda contain complete and up-to-date information regarding the background and history of the order, including scope rulings, duty absorption, changed circumstances reviews, and anticircumvention, as well as any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping and/or countervailing duty orders on imports of circular welded pipe from China are noted in the sections titled "The original investigations" and "U.S. imports," if applicable.

[22] Letter from Eric Greynolds, Office Director, Office IV, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, June 21, 2024.

The product

Commerce's scope

Commerce has defined the scope as follows:

The scope of these orders covers certain welded carbon quality steel pipes and tubes, of circular cross-section, and with an outside diameter of 0.372 inches (9.45 mm) or more, but not more than 16 inches (406.4 mm), whether or not stenciled, regardless of wall thickness, surface finish (e.g., black, galvanized, or painted), end finish (e.g., plain end, beveled end, grooved, threaded, or threaded and coupled), or industry specification (e.g., ASTM, proprietary, or other), generally known as standard pipe and structural pipe (they may also be referred to as circular, structural, or mechanical tubing).

Specifically, the term ''carbon quality'' includes products in which (a) iron predominates, by weight, over each of the other contained elements; (b) the carbon content is 2 percent or less, by weight; and (c) none of the elements listed below exceeds the quantity, by weight, as indicated:

(i) 1.80 percent of manganese;
(ii) 2.25 percent of silicon;
(iii) 1.00 percent of copper;
(iv) 0.50 percent of aluminum;
(v) 1.25 percent of chromium;
(vi) 0.30 percent of cobalt;
(vii) 0.40 percent of lead;
(viii) 1.25 percent of nickel;
(ix) 0.30 percent of tungsten;
(x) 0.15 percent of molybdenum;
(xi) 0.10 percent of niobium;
(xii) 0.41 percent of titanium;
(xiii) 0.15 percent of vanadium; or
(xiv) 0.15 percent of zirconium.

Standard pipe is made primarily to American Society for Testing and Materials (ASTM) specifications, but can be made to other specifications.

Standard pipe is made primarily to ASTM specifications A–53, A–135, and A–795. Structural pipe is made primarily to ASTM specifications A–252 and A–500. Standard and structural pipe may also be produced to proprietary specifications rather than to industry specifications. This is often the case, for example, with fence tubing. Pipe multiple-stenciled to a standard and/or structural specification and to any other specification, such as the American Petroleum Institute (API) API–5L specification, is also covered by the scope of these orders when it meets the physical description set forth above and also has one or more of the following characteristics: Is 32 feet in length or less; is less than 2.0 inches (50 mm) in outside diameter; has a galvanized and/or painted surface finish; or has a threaded and/or coupled end finish. (The term ''painted'' does not include coatings to inhibit rust in transit, such as varnish, but includes coatings such as polyester.)

The scope of these orders does not include: (a) Pipe suitable for use in boilers, superheaters, heat exchangers, condensers, refining furnaces and feedwater heaters, whether or not cold drawn; (b) mechanical tubing, whether or not cold-drawn; (c) finished electrical conduit; (d) finished scaffolding; (e) tube and pipe hollows for redrawing; (f) oil country tubular goods produced to API specifications; and (g) line pipe produced to only API specifications.[23]

[23] 84 FR 30086, June 26, 2019.

U.S. tariff treatment

Circular welded pipe is currently imported under Harmonized Tariff Schedule of the United States ("HTS") statistical reporting numbers 7306.30.1000, 7306.30.5026, 7306.30.5027, 7306.30.5031, 7306.30.5033, 7306.30.5041, 7306.30.5043, 7306.30.5056, 7306.30.5057, 7306.30.5085, and 7306.30.5090. The general rate of duty is "free" for HTS subheading 7306.30.10 and 7306.30.50.[24] 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, circular welded pipe originating in China are subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended.[25] Effective September 1, 2019, circular welded pipe originating in China were 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 circular welded pipe was reduced to 7.5 percent.[26]

[24] The merchandise subject to this review may also be provided for in the following HTS subheadings: 7306.50.10, 7306.50.50, 7306.19.10 and 7306.19.51. USITC, HTS (2024) Revision 3, Publication 5519, June 2024, pp 73-16, 73-19.

[25] 83 FR 11625, March 15, 2018. See also HTS heading 9903.80.01 and U.S. notes 16(a) and 16(b). USITC, HTS (2024) Revision 1, USITC Publication 5491, January 2024, pp. 99-III-6–99-III-7, 99-III-272.

[26] 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 3, Publication 5519, June 2024, pp. 99-III-87 – 99-III-101, 99-III-331.

Description and uses[27]

Steel pipes and tubes are produced in various grades of carbon, alloy, or stainless steel. Tubular products frequently are distinguished by the following six end uses as defined by the American Iron and Steel Institute ("AISI").

- **Standard pipe** is ordinarily used for low-pressure conveyance of air, steam, gas, water, oil, or other fluids for mechanical applications. It is used primarily in machinery, buildings, sprinkler systems, irrigation systems and water wells rather than in pipelines or utility distribution systems. It may carry fluids at elevated temperatures, which are not subject to external heat applications. It is usually produced in standard diameters and wall thicknesses to ASTM specifications.
- **Line pipe** is used for transportation of gas, oil, or water in a pipeline or utility distribution system. It is produced to API-5L and American Water Works Association ("AWWA") specifications.
- **Structural pipe and tubing** is welded or seamless pipe and tubing generally used for structural or load-bearing purposes above ground by the construction industry, as well as for structural members in ships, trailers, farm equipment, and other similar uses. It is produced in nominal wall thicknesses and sizes to ASTM specifications in round, square, rectangular, or other cross-sectional shapes.
- **Mechanical tubing** is welded or seamless tubing produced in a large number of shapes of varied chemical composition in sizes 3/16 inch to 10¾ inches O.D. inclusive for carbon and alloy material generally used for industrial high-stress applications, including conveyor rollers, and agricultural equipment. It is not normally produced to meet any specification other than that required to meet the end use. It is produced to meet exact O.D. and decimal wall thickness.[28]
- **Pressure tubing** is used to convey fluids at elevated temperatures or pressures, or both, and is suitable to be subjected to heat applications. It is produced to exact O.D. and decimal wall thickness in sizes ½ inch to 6 inches O.D. inclusive, usually to specifications such as ASTM.

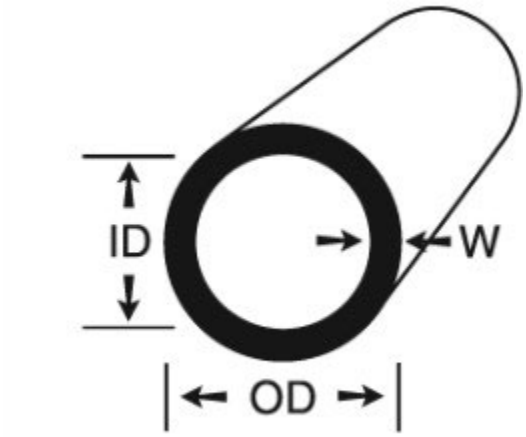
[27] Unless otherwise noted, this information is based on Circular Welded Carbon-Quality Steel Pipe from China, Investigation Nos. 701-TA-447 and 731-TA-1116 (Second Review), USITC Publication 4901, June 2019 ("Second review publication"), pp. I-14-I-16.

[28] American Piping Products, "Mechanical Tubing," Retrieved July 5, 2024 at https://amerpipe.com/products/mechanical-tubing/

- **Oil country tubular goods** ("OCTG") are pipe produced to API specifications and used in wells in oil and gas industries. Specifically,
    - *Casing* is the structural retainer for the walls of oil or gas wells and covers sizes 4½ to 20 inches O.D. inclusive.
    - *Tubing* is used within casing oil wells to convey oil to ground level and ordinarily includes sizes 1.050 to 4.500 inches O.D. inclusive.
    - *Drill pipe* is used to transmit power to a rotary drilling tool below ground level and covers sizes 2¼ to 6¾ inches O.D. inclusive.

Standard pipe of non-alloy steel with an outside diameter of 0.372 (9.45 mm) inches or more, but not more than 16 inches (406.4 mm), is the primary product within the scope of these investigations (*see* figure I-1). As noted earlier, standard pipe is intended for the low-pressure conveyance of water, steam, natural gas, air, and other liquids and gases in plumbing and heating systems, air conditioning units, automatic sprinkler systems, and other related uses. Standard pipe may carry liquids at elevated temperatures but may not be subject to the application of external heat. It is made primarily to ASTM A-53, A-135, and A-795 specifications, but can also be made to other specifications, such as British Standard 1387. Since these standards often specify required engineering characteristics that overlap, a pipe can also be dual stenciled, signifying compliance with two different specifications.

Figure I-1
Circular welded pipe: Cross section of welded pipe showing inside diameter "ID", outside diameter "OD", and wall thickness "W"



Source: Onlinemetals.com, https://www.onlinemetals.com/merchant.cfm?id=1254&step=2, retrieved June 26, 2024.

In addition, circular welded pipe is used for structural applications in general construction. As noted earlier, structural pipe is generally used for structural or load-bearing purposes above ground by the construction industry, as well as for structural members in ships, trailers, farm equipment, and other similar uses. It is produced in nominal wall thicknesses and sizes to ASTM specifications. These products also are manufactured primarily to standard ASTM specifications (such as A-500 or A-252) as well as American Society of Mechanical Engineers ("ASME") specifications.

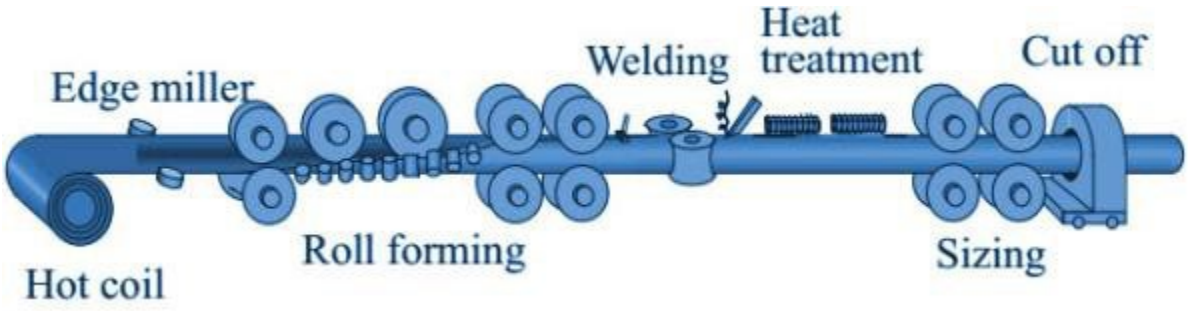
Other uses of circular welded pipe include light load-bearing and mechanical applications, such as for fence tubing; scaffolding components; and protection of electrical wiring, such as conduit shells. Fence tubing is commonly produced to ASTM specification F-1083, which covers hot-dipped galvanized welded steel pipe used for fence structures.

Standard pipe used in light load-bearing, mechanical, and structural applications may be galvanized (zinc-coated by dipping in molten zinc), lacquered (black finish), or painted (black) to provide corrosion resistance, which is important for storage in humid conditions or for ocean transport. End finishes include plain end, which may be either cut, or beveled suitable for welding, or include threaded ends, or threaded or coupled, as well as other special end finishes. Pipe with threaded ends is usually provided "threaded and coupled," meaning that a coupling is attached to one end of each length of pipe.

Manufacturing process[29]

Circular welded pipes subject to these reviews are manufactured by either the electric resistance-welding ("ERW") process or the continuous-welding ("CW") process. The ERW process is a cold-forming process. The raw material input is steel sheet which has been slit into strips of appropriate width that will equal the diameter of the pipe to be welded. The strips, or "skelp," are formed into a tubular shape by passing it through a series of rollers, which provide the initial shaping into round form, as well as guidance into the welding section (see figure I-2). ERW is limited by the coil width and is accordingly suitable for thinner walled and smaller diameter pipes.[57]

Figure I-2
Circular welded pipe: Operations to make ERW tubes from steel strip



Source: The Process Piping, https://www.theprocesspiping.com/introduction-to-welded-pipe-manufacturing, retrieved June 26, 2024.

After the strips have been formed to a tubular shape, the edges are heated by electrical resistance and welded by a combination of heat and pressure. The welding pressure causes some of the metal to be squeezed from the joint, forming a bead of metal on both the inside and outside of the tube. While still in the continuous processing line, the tube is then subjected to post-weld heat treatment, as required. This may involve heat treatment of the welded seam only, or treatment of the entire pipe. After heat treatment, sizing rolls shape the tube to the accurate diameter. The product is cooled and then cut at the end of the tube mill by a flying shear or saw, which is synchronized with the tube's movement.

In the CW process, the entire strip is heated to approximately 2,450 degrees Fahrenheit in a gas-fired, continuous furnace. As the strip leaves the furnace, a blower is normally furnished to provide a blast of hot air to raise the temperature of the edges to approximately 2,600 degrees Fahrenheit for welding. The strip is formed into tubular shape by a series of

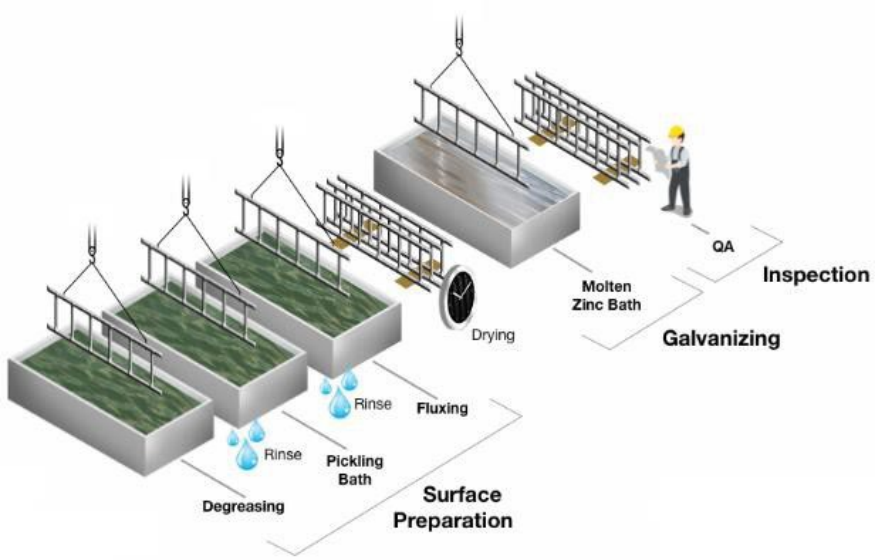
[29] Unless otherwise noted, this information is based on Second review publication, pp. I-17 - I-19.

rollers, and the edges are butted together under pressure to form the weld. While still hot, a "mother" tube may be processed through a stretch reduction mill, which heats and stretches the tube to produce pipe of various smaller diameters and thinner wall thicknesses. The continuous tube is then cut into predetermined lengths by a flying saw or shear. The CW method can be used to produce pipe up to 4.5 inches in O.D.

Use of a stretch mill can be advantageous because it allows the company to produce a single diameter and wall thickness of mother tubes on its ERW or CW mill—allowing these operations to run more efficiently—while still producing other pipe sizes on the stretch reduction mill.

Finishing operations on standard pipe and tube may include hydrostatic testing, oiling, and galvanizing. The process of galvanizing involves the application of a zinc coating to steel pipe for protection from atmospheric corrosion. In a hot-dip process of galvanizing, cut lengths of steel pipe are dipped in a bath of molten zinc maintained at a temperature of 820 to 860 degrees Fahrenheit (*see* figure I-3). The combination of the temperature of both the zinc and the steel, as well as the immersion time within the zinc bath, determine the thickness of the coating. The zinc coating may be applied to the outside only, or both the inside and outside of the steel pipe, depending on end-use application and industry specification. In a continuous galvanizing process, the zinc coating may be applied to the outside of the pipe before the steel pipe is cut to length by passing it through a bath of molten zinc. End finishing may include square cutting, beveling, threading, or grooving. Threaded pipe may be furnished "threaded or coupled," in which case both ends of each length of pipe are threaded and a threaded coupling is applied to one end.

Figure I-3
Circular welded pipe: The galvanizing process



Source: Saferack.com, https://www.saferack.com/what-is-galvanizing/, retrieved June 26, 2024.

The industry in the United States

U.S. producers

During the final phase of the original investigations, the Commission received U.S. producer questionnaires from 21 firms, which accounted for more than 90 percent of production of circular welded pipe in the United States during 2007.[30]

During the first five-year reviews, domestic interested parties provided a list of 14 known and currently operating U.S. producers of circular welded pipe. The eight responding firms accounted for approximately *** percent of production of circular welded pipe in the United States during 2012.[31]

During the second five-year reviews, domestic interested parties provided a list of ten known and currently operating U.S. producers of circular welded pipe.[32] The nine responding firms accounted for approximately 80 percent of production of circular welded pipe in the United States during 2017.[33]

In response to the Commission's notice of institution in these current reviews, domestic interested parties provided a list of seven known and currently operating U.S. producers of circular welded pipe. The four firms providing U.S. industry data in response to the Commission's notice of institution estimated that they accounted for approximately *** percent of production of circular welded pipe in the United States during 2023.[34]

[30] Original publication, pp. I-3 and III-1.

[31] Investigation Nos. 701-TA-447 and 731-TA-1116 (Review): Circular Welded Carbon-Quality Steel Pipe from China, Confidential Report, INV-LL-078, October 18, 2013 as revised in INV-LL-080, October 21, 2013; INV-LL-086, November 4, 2013; and INV-LL-090; November 6, 2013 ("First review confidential report"), pp. I-24-25.

[32] Circular Welded Carbon-Quality Steel Pipe from China, Investigation nos. 701-TA-447 and 731-TA-1116 (Second Review), USITC Publication 4901, June 2019 ("Second review publication"), p. I-19.

[33] Second review publication, p. I-2.

[34] The domestic interested parties noted in their response, "***. Domestic interested parties' response to the notice of institution, May 31, 2024, p. 15. Domestic interested parties' supplemental response to the notice of institution, June 13, 2024, exh. 1.

Recent developments

Table I-4 presents events in the U.S. industry since the Commission's last five-year reviews.[35]

Table I-4
Circular welded pipe: Developments in the U.S. industry since 2017

Item	Firm	Event
Investment	Zekelman	Zekelman Industries announced in April of 2024 that it will invest up to $120 million to expand the manufacturing capabilities, including circular welded pipe, of Atlas Tube in Blytheville, Arkansas. The project is expected to bring the total number of employees to 300.
New Facility	Nucor Tubular Products	Nucor Tubular Products announced in March of 2021 that it plans to build a $164 million tube mill in Gallatin County, Kentucky. This facility will produce 250,000 tons of steel tubing annually, including hollow structural section tubing, mechanical steel tubing and galvanized solar torque tubing.
Capital Investment	Bull Moose	Bull Moose announced in January 2021 that it completed major capital investments into two tubular facilities in Elkhart, Indiana and Trenton, Georgia. The multi-million dollar investments in new high-performance equipment were for optimizing both facilities operational capabilities, including upgrades to automation control systems, and sizing section of the mills.
Capital Investment	Wheatland	Wheatland Tube Co. (a subsidiary of Zekelman) announced in May 2021 plans to build a $30 million fully automated warehouse at its Wheatland Tube facility in Warren, Ohio. The 83,000-square foot warehouse is scheduled to begin operating in December 2022. The new warehouse will convey pipe from the production lines of the manufacturing facility into the warehouse storage system and "will significantly increase safety and shipping capacity."

Source: TBP, "Zekelman Industries to invest $120 million in its NEA Atlas Tube operations" April 18, 2024. https://talkbusiness.net/2024/04/zekelman-industries-to-invest-120-million-in-its-nea-atlas-tube-operations/; ABC News, "Nucor plans to build a $164 million tube mill in Gallatin County," March 25, 2021, https://www.wtvq.com/nucor-plans-to-build-a-164-million-tube-mill-in-gallatin-county/.; Circular Welded Pipe and Tube from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey, Investigation Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536 (Fifth Review), USITC Publication 5481, December 2023 pp. III-2-III-4.

[35] For recent developments, if any, in tariff treatment, please see "U.S. tariff treatment" section.

U.S. producers' trade and financial data

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year reviews.[36] Table I-5 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigations and subsequent five-year reviews.

Table I-5
Circular welded pipe: Trade and financial data submitted by U.S. producers, by period

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

Item	Measure	2007	2012	2017	2023
Capacity	Quantity	2,219,300	***	2,648,695	***
Production	Quantity	1,457,128	***	1,687,522	***
Capacity utilization	Ratio	65.7	***	63.7	***
U.S. shipments	Quantity	1,422,667	***	1,554,138	***
U.S. shipments	Value	1,350,791	***	1,437,596	***
U.S. shipments	Unit value	949	***	1,081	***
Net sales	Value	1,373,678	***	1,443,892	***
COGS	Value	1,225,209	***	1,174,097	***
COGS to net sales	Ratio	89.2	***	81.3	***
Gross profit or (loss)	Value	148,469	***	269,795	***
SG&A expenses	Value	86,933	***	99,533	***
Operating income or (loss)	Value	61,536	***	170,262	***
Operating income or (loss) to net sales	Ratio	4.5	***	11.8	***

Source: For the years 2007-17, data are compiled using data submitted in the Commission's original investigations and subsequent five-year reviews. For the year 2023, data are compiled using data submitted by domestic interested parties. Domestic interested parties' supplemental response to the notice of institution, June 13, 2024, exh. 1.

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

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

Definitions of the domestic like product and domestic industry

The domestic like product is defined as the domestically produced product or products which are like, or in the absence of like, most similar in characteristics and uses with, the subject merchandise. The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like product constitutes a major proportion of the total domestic production of the product. Under the related parties provision, the Commission may exclude a U.S. producer from the domestic industry for purposes of its injury determination if "appropriate circumstances" exist.[37]

In its original determinations, and its expedited first and second five-year reviews, the Commission defined the domestic like product as circular welded carbon-quality steel pipe, coextensive with Commerce's scope. In its original determinations, and its expedited first and second five-year reviews, the Commission defined the domestic industry as all domestic producers of circular-welded carbon-quality steel pipe.[38]

[37] Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).
[38] 89 FR 35244, May 1, 2024

U.S. importers

During the final phase of the original investigations, the Commission received U.S. importer questionnaires from 32 firms, which accounted for approximately 82.6 percent of total U.S. imports of circular welded pipe from China during 2007.[39] Import data presented in the original investigations are based on adjusted official Commerce statistics.

Although the Commission did not receive responses from any respondent interested parties in its first five-year reviews, the domestic interested parties provided a list of three firms that were believed to import circular welded pipe from China in addition to the original 32 importers identified in the original investigations.[40] Import data presented in the first reviews are based on adjusted official Commerce statistics.

Although the Commission did not receive responses from any respondent interested parties in its second five-year reviews and the domestic interested parties did not know the identities of the remaining U.S. importers, the domestic interested parties suggested that the number of U.S. importers has fallen greatly since the original investigations along with import volumes.[41] Import data presented in the second reviews are based on official Commerce statistics.

Although the Commission did not receive responses from any respondent interested parties in these current reviews, in its response to the Commission's notice of institution, the domestic interested parties provided a list of 52 potential U.S. importers of circular welded pipe.[42]

[39] Original publication, p. IV-1.
[40] First review publication, p. I-25.
[41] Second review publication, p. I-24
[42] Domestic interested parties' response to the notice of institution, May 31, 2024, exh 1.

U.S. imports

Table I-6 presents the quantity, value, and unit value of U.S. imports from China as well as the other top sources of U.S. imports entered under the specified HTS statistical reporting numbers (shown in descending order of 2023 imports by quantity).

Table I-6
Circular welded pipe: U.S. imports, by source and period

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

U.S. imports from	Measure	2018	2019	2020	2021	2022	2023
China	Quantity	19,380	10,619	7,317	13,182	13,349	17,712
Canada	Quantity	192,595	162,582	155,730	177,864	194,918	187,976
United Arab Emirates	Quantity	84,969	87,388	105,105	113,982	123,983	113,111
Thailand	Quantity	107,038	9,608	52,302	10,066	37,375	98,475
Vietnam	Quantity	74,495	65,877	49,392	47,912	66,549	77,134
All other sources	Quantity	363,580	317,106	218,500	260,073	375,490	280,322
Nonsubject sources	Quantity	822,677	642,560	581,029	609,897	798,315	757,018
All import sources	Quantity	842,057	653,179	588,346	623,079	811,663	774,730
China	Value	27,807	18,443	15,569	31,027	35,372	34,202
Canada	Value	250,467	188,023	154,101	312,986	349,184	267,145
United Arab Emirates	Value	81,828	84,312	87,150	132,809	204,198	134,309
Thailand	Value	92,562	12,133	42,388	8,778	57,181	111,044
Vietnam	Value	66,814	62,349	43,196	61,313	103,884	92,462
All other sources	Value	383,599	335,488	207,550	350,720	605,950	381,415
Nonsubject sources	Value	875,269	682,307	534,386	866,605	1,320,398	986,375
All import sources	Value	903,076	700,749	549,955	897,632	1,355,770	1,020,577
China	Unit value	1,435	1,737	2,128	2,354	2,650	1,931
Canada	Unit value	1,300	1,156	990	1,760	1,791	1,421
United Arab Emirates	Unit value	963	965	829	1,165	1,647	1,187
Thailand	Unit value	865	1,263	810	872	1,530	1,128
Vietnam	Unit value	897	946	875	1,280	1,561	1,199
All other sources	Unit value	1,055	1,058	950	1,349	1,614	1,361
Nonsubject sources	Unit value	1,064	1,062	920	1,421	1,654	1,303
All import sources	Unit value	1,072	1,073	935	1,441	1,670	1,317

Source: Compiled from official Commerce statistics for HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed June 14, 2024.

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

Note: Import data from Canada are overstated as they contain out-of-scope mechanical tubing.

Apparent U.S. consumption and market shares

Table I-7 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

Table I-7
Circular welded pipe: Apparent U.S. consumption and market shares, by source and period

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

Source	Measure	2007	2012	2017	2023
U.S. producers	Quantity	1,422,667	***	1,554,138	***
China	Quantity	748,181	3,778	53,382	17,712
Nonsubject sources	Quantity	406,280	580,442	1,055,219	757,018
All import sources	Quantity	1,154,462	584,220	1,108,601	774,730
Apparent U.S. consumption	Quantity	2,577,129	***	2,662,739	***
U.S. producers	Value	1,350,791	***	1,437,596	***
China	Value	470,787	5,805	62,798	34,202
Nonsubject sources	Value	363,801	588,044	893,744	986,375
All import sources	Value	834,588	593,849	956,542	1,020,577
Apparent U.S. consumption	Value	2,185,379	***	2,394,138	***
U.S. producers	Share of quantity	55.2	***	58.4	***
China	Share of quantity	29.0	***	2.0	***
Nonsubject sources	Share of quantity	15.8	***	39.6	***
All import sources	Share of quantity	44.8	***	41.6	***
U.S. producers	Share of value	61.8	***	58.0	***
China	Share of value	21.5	***	2.6	***
Nonsubject sources	Share of value	16.6	***	37.3	***
All import sources	Share of value	38.2	***	40.0	***

Source: For the years 2007-17, U.S. producers' shipment data are compiled using data submitted in the Commission's original investigations and subsequent five-year reviews. For the years 2007 and 2012, U.S. import data are based on adjusted official Commerce import statistics, and for the year 2017, U.S. import data are based on official Commerce import statistics. For the year 2023, U.S. producers' U.S. shipments are compiled from the domestic interested parties' response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed June 14, 2024.

Note: Import data from Canada for 2017 and 2023 are overstated as they contain out-of-scope mechanical tubing.

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

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

The industry in China

Producers in China

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from 15 firms, which accounted for an estimated 51.5 percent of production in China in 2007 and an estimated 65.1 percent of circular welded pipe exports from China to the United States during 2007.[43]

Although the Commission did not receive responses from any respondent interested parties in its first five-year reviews, the domestic interested parties provided a list of 52 possible producers of circular welded pipe in China in that proceeding.[44]

Although the Commission did not receive responses from any respondent interested parties in its second five-year reviews, the domestic interested parties provided a list of 22 possible producers and/or exporters of circular welded pipe in China in that proceeding.[45]

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of 51 possible producers and/or exporters of circular welded pipe in China.[46]

[43] Original publication, p. VII-1.
[44] First review publication, p. I-33.
[45] Second review publication, p. I-28.
[46] Domestic interested parties' response to the notice of institution, May 31, 2024, exh. 1.

Recent developments

There were no major developments in the Chinese industry since the continuation of the orders identified by interested parties and no relevant information from outside sources was found.

Exports

Table I-8 presents export data for certain welded pipe, a category that includes circular welded pipe and out-of-scope products, from China (by export destination in descending order of quantity for 2023). During 2023, the Philippines was the largest export market for certain welded pipe from China, accounting for 14.7 percent of exports, followed by Singapore and Indonesia, accounting for 5.2 percent and 4.5 percent of exports, respectively.

Table I-8
Certain welded pipe: Quantity of exports from China, by destination and period

Quantity in short tons

Destination market	2018	2019	2020	2021	2022	2023
Philippines	251,347	169,122	212,195	235,400	231,800	218,616
Singapore	31,637	37,549	32,779	56,116	73,185	77,503
Indonesia	33,602	49,494	43,458	46,730	59,919	67,825
Hong Kong	44,459	34,641	33,305	46,454	54,882	54,845
Myanmar	52,963	89,683	76,865	35,811	59,576	53,623
Saudi Arabia	3,633	4,092	4,880	16,357	30,352	49,975
United Kingdom	51,435	38,201	22,614	26,929	30,455	46,779
Australia	25,957	26,163	30,576	33,182	29,331	45,736
United Arab Emirates	20,992	22,166	22,968	18,088	24,371	42,763
Mongolia	23,009	29,772	27,458	21,190	38,734	41,973
All other markets	640,465	636,389	598,861	648,232	642,416	792,000
All markets	1,179,499	1,137,272	1,105,959	1,184,489	1,275,021	1,491,638

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7306.30, accessed June 26, 2024. These data may be overstated as HS subheading 7306.30 may contain products outside the scope of this review.

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

Third-country trade actions

Canada, the United Kingdom, and Mexico have antidumping measures in effect on certain circular welded pipe products from China. Canadian antidumping measures on imports of certain carbon steel welded pipe (including circular welded pipe) from China came into effect in July 2008, with continuation orders issued on August 19, 2013 and March 28, 2019. Imports under HS subheading 7306.30 are subject to a 179 percent duty rate in Canada.[47] The United Kingdom's antidumping measures on certain imports of welded tubes and pipes (including circular welded pipe) from China came into effect in 2021. Imports under HS subheading 7306.30 are subject to a 90.6 percent duty rate in the United Kingdom.[48] Mexican antidumping measures on certain imports of welded tubes and pipes (including circular welded pipe) from China came into effect in 2023. Imports under HS subheading 7306.30 are subject to a 25 percent duty rate in Mexico.[49]

[47] "Carbon steel welded pipe: Measures in force," Government of Canada. Retrieved June 27, 2024 at https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/cswp1-eng.html.

[48] "Trade remedies notice 2021/09: anti-dumping duty on welded tubes and pipe from Belarus and China," Government of the United Kingdom. Retrieved June 27, 2024 at https://www.gov.uk/government/publications/trade-remedies-notice-anti-dumping-duty-on-certain-welded-tubes-and-pipes-of-iron-or-non-alloy-steel-originating-in-belarus-the-peoples-republic-of/trade-remedies-notice-202309-anti-dumping-duty-on-welded-tubes-and-pipes-from-belarus-and-china.

[49] "Mexico extends CVD for welded steel pipe from China until 2028," SteelOrbis. Retrieved June 27, 2024 at https://www.steelorbis.com/steel-news/latest-news/mexico-extends-cvd-for-welded-steel-pipe-from-china-until-2028-1338326.htm.

The global market

Table I-9 presents global export data for certain welded pipe, a category that includes circular welded pipe and out-of-scope products, by source in descending order of quantity for 2023. China, Italy, and Turkey were the leading exporters in 2023, accounting for 24 percent, 16 percent, and 9 percent, respectively.

Table I-9
Certain welded pipe: Quantity of global exports by country and period

Quantity in short tons

Exporting country	2018	2019	2020	2021	2022	2023
China	1,179,499	1,137,272	1,105,959	1,184,489	1,275,021	1,491,638
Italy	1,168,062	1,168,073	1,015,213	1,043,010	1,052,500	986,656
Turkey	690,485	618,489	623,295	764,266	793,943	560,473
India	285,110	360,364	222,674	366,523	315,874	333,488
Spain	249,660	261,993	251,972	280,248	274,616	277,802
Germany	365,253	344,281	280,423	306,750	274,783	273,106
South Korea	393,132	333,705	300,963	279,274	287,936	268,162
United States	299,741	224,348	213,855	248,565	235,048	225,242
Canada	230,851	184,190	169,265	192,421	212,092	203,417
Thailand	132,494	35,322	121,629	194,495	163,044	183,418
All other markets	2,333,841	2,272,857	1,963,994	2,447,173	1,918,776	1,453,546
All markets	7,328,128	6,940,894	6,269,242	7,307,214	6,803,633	6,256,948

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7306.30, accessed June 26, 2024. These data may be overstated as HS subheading 7306.30 may contain products outside the scope of this review.

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

APPENDIX A

FEDERAL REGISTER NOTICES

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

Citation	Title	Link
89 FR 35073, May 1, 2024	Initiation of Five-Year (Sunset) Reviews	https://www.govinfo.gov/content/pkg/FR-2024-05-01/pdf/2024-09424.pdf
89 FR 35244, May 1, 2024	Circular Welded Carbon-Quality Steel Pipe from China; Institution of a Five-Year Review	https://www.govinfo.gov/content/pkg/FR-2024-05-01/pdf/2024-09366.pdf

APPENDIX B

COMPANY-SPECIFIC DATA

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APPENDIX C

SUMMARY DATA COMPILED IN PREVIOUS PROCEEDINGS

Table C-1
Circular welded pipe: Summary data concerning the U.S. market, 2005-07

(Quantity=short tons, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per short ton; period changes=percent, except where noted)

	Reported data			Period changes		
Item	2005	2006	2007	2005-07	2005-06	2006-07
U.S. consumption quantity:						
Amount	2,364,274	2,715,043	2,577,129	9.0	14.8	-5.1
Producers' share (1)	58.4	49.3	55.2	-3.2	-9.1	5.9
Importers' share (1):						
China	16.2	26.4	29.0	12.9	10.2	2.7
All other sources	25.4	24.3	15.8	-9.6	-1.1	-8.6
Total imports	41.6	50.7	44.8	3.2	9.1	-5.9
U.S. consumption value:						
Amount	2,098,972	2,237,056	2,185,379	4.1	6.6	-2.3
Producers' share (1)	64.9	58.8	61.8	-3.1	-6.2	3.0
Importers' share (1):						
China	11.7	18.6	21.5	9.9	6.9	3.0
All other sources	23.4	22.7	16.6	-6.7	-0.7	-6.0
Total imports	35.1	41.2	38.2	3.1	6.2	-3.0
U.S. imports from:						
China:						
Quantity	382,122	715,728	748,181	95.8	87.3	4.5
Value	245,357	415,197	470,787	91.9	69.2	13.4
Unit value	$642	$580	$629	-2.0	-9.7	8.5
Ending inventory quantity	9,328	42,220	29,798	219.5	352.6	-29.4
All other sources:						
Quantity	600,574	660,381	406,280	-32.4	10.0	-38.5
Value	490,728	507,222	363,801	-25.9	3.4	-28.3
Unit value	$817	$768	$895	9.6	-6.0	16.6
Ending inventory quantity	28,190	46,494	48,319	71.4	64.9	3.9
All sources:						
Quantity	982,696	1,376,109	1,154,462	17.5	40.0	-16.1
Value	736,086	922,419	834,588	13.4	25.3	-9.5
Unit value	$749	$670	$723	-3.5	-10.5	7.8
Ending inventory quantity	37,518	88,714	78,117	108.2	136.5	-11.9
U.S. producers':						
Average capacity quantity	2,571,019	2,405,229	2,219,300	-13.7	-6.4	-7.7
Production quantity	1,385,959	1,383,110	1,457,128	5.1	-0.2	5.4
Capacity utilization (1)	53.9	57.5	65.7	11.8	3.6	8.2
U.S. shipments:						
Quantity	1,381,578	1,338,934	1,422,667	3.0	-3.1	6.3
Value	1,362,886	1,314,637	1,350,791	-0.9	-3.5	2.8
Unit value	$986	$982	$949	-3.8	-0.5	-3.3
Export shipments:						
Quantity	37,605	30,514	48,668	29.4	-18.9	59.5
Value	37,375	28,082	44,193	18.2	-24.9	57.4
Unit value	$994	$920	$908	-8.6	-7.4	-1.3
Ending inventory quantity	197,527	192,877	166,336	-15.8	-2.4	-13.8
Inventories/total shipments (1)	13.9	14.1	11.3	-2.6	0.2	-2.8
Production workers	2,528	2,451	2,450	-3.1	-3.0	-0.0
Hours worked (1,000s)	4,773	4,733	4,630	-3.0	-0.8	-2.2
Wages paid ($1,000s)	103,195	100,393	104,073	0.9	-2.7	3.7
Hourly wages	$21.62	$21.21	$22.48	4.0	-1.9	6.0
Productivity (tons/1,000 hours)	290.4	292.2	314.7	8.4	0.6	7.7
Unit labor costs	$74.46	$72.58	$71.42	-4.1	-2.5	-1.6
Net sales:						
Quantity	1,400,129	1,364,791	1,471,543	5.1	-2.5	7.8
Value	1,335,159	1,302,373	1,373,678	2.9	-2.5	5.5
Unit value	$954	$954	$933	-2.1	0.1	-2.2
Cost of goods sold (COGS)	1,143,517	1,083,988	1,225,209	7.1	-5.2	13.0
Gross profit or (loss)	191,642	218,385	148,469	-22.5	14.0	-32.0
SG&A expenses	51,097	66,745	86,933	70.1	30.6	30.2
Operating income or (loss)	140,545	151,640	61,536	-56.2	7.9	-59.4
Capital expenditures	42,724	37,666	23,962	-43.9	-11.8	-36.4
Unit COGS	$817	$794	$833	1.9	-2.8	4.8
Unit SG&A expenses	$36	$49	$59	61.9	34.0	20.8
Unit operating income or (loss)	$100	$111	$42	-58.3	10.7	-62.4
COGS/sales (1)	85.6	83.2	89.2	3.5	-2.4	6.0
Operating income or (loss)/ sales (1)	10.5	11.6	4.5	-6.0	1.1	-7.2

(1) "Reported data" are in percent and "period changes" are in percentage points.

Note.--Financial data are reported on a calendar year basis, except for those of *** which are based on the fiscal year ending March 31, 2006-08.

Because of rounding, figures may not add to the totals shown. Unit values and shares are calculated from the unrounded figures.

Source: Compiled from data submitted in response to Commission questionnaires and from official Commerce statistics.

APPENDIX D

PURCHASER QUESTIONNAIRE RESPONSES

As part of their response to the notice of institution, interested parties were asked to provide a list of three to five leading purchasers in the U.S. market for the domestic like product. A response was received from domestic interested parties, and it provided contact information for the following four firms as top purchasers of CWP: ***. Purchaser questionnaires were sent to these four firms but no firms submitted a response to the Commission's request for information.