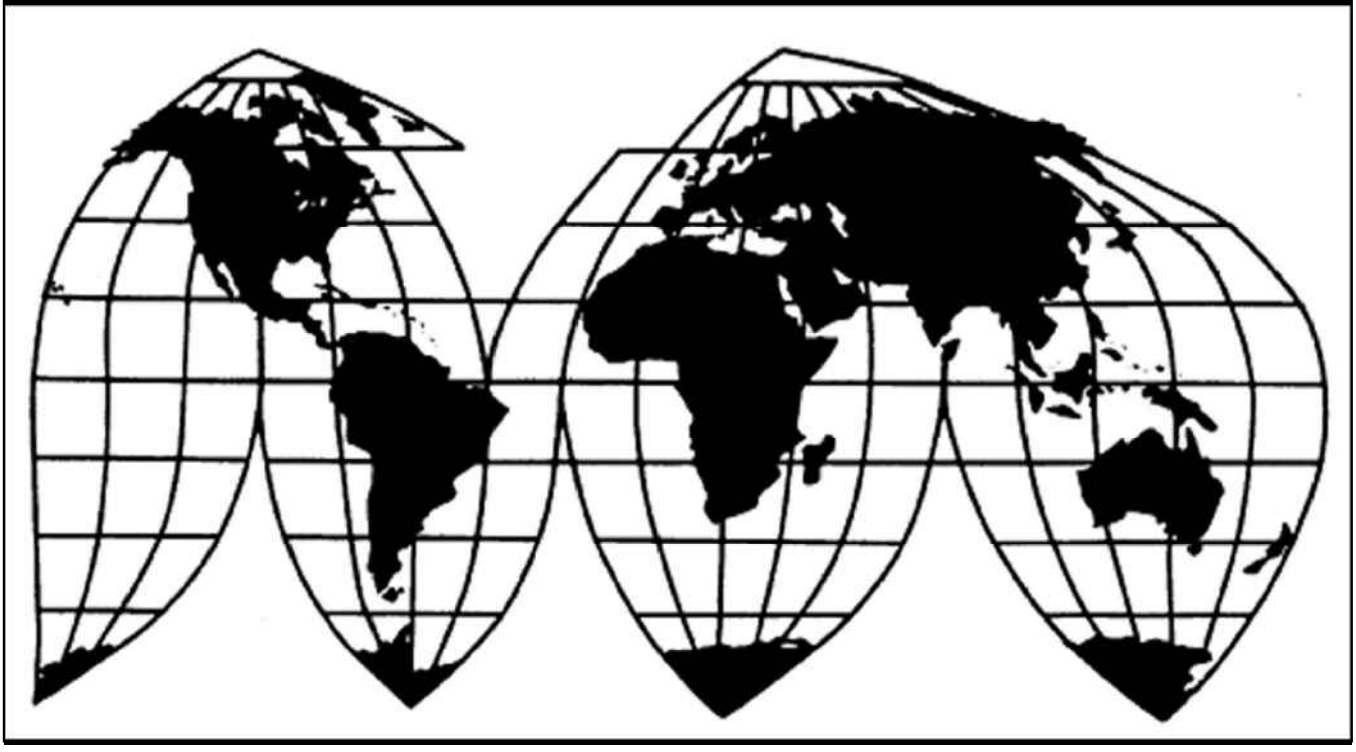
# Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey

Investigation Nos. 701-TA-560-561 and 731-TA-1317-1328 (Review)

**Publication 5399** **January 2023**

**U.S. International Trade Commission**



**Washington, DC 20436**

# U.S. International Trade Commission

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# U.S. International Trade Commission

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**CONTENTS**

**Page**

**CONTENTS**

**CONTENTS**

**Page**

**CONTENTS**

**Page**

**CONTENTS**

**Page**

**CONTENTS**

**Page**

**CONTENTS**

**Page**

**CONTENTS**



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**UNITED STATES INTERNATIONAL TRADE COMMISSION**

Investigation Nos. 701-TA-560-561 and 731-TA-1317-1328 (Review)

Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey

## DETERMINATION

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 orders on carbon and alloy steel cut-to-length plate from China and South Korea and the antidumping duty orders on carbon and alloy steel cut-to-length plate from Austria, Belgium, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. The Commission further determines that revocation of the antidumping duty order on carbon and alloy steel cut-to-length plate from Brazil would not be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.[2]

## BACKGROUND

The Commission instituted these reviews on December 1, 2021 (86 FR 68269) and determined on March 7, 2022 that it would conduct full reviews (87 FR 19121, April 1, 2022). Notice of the scheduling of the Commission's reviews and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the

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

[2] Commissioners Rhonda K. Schmidtlein and Randolph J. Stayin determine that revocation of the countervailing duty orders on carbon and alloy steel cut-to-length plate from China and South Korea and the antidumping duty orders on carbon and alloy steel cut-to-length plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

*Federal Register* on July 19, 2022 (87 FR 43057). The Commission conducted its hearing on November 15, 2022. All persons who requested the opportunity were permitted to participate.

## Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended ("the Tariff Act"), that revocation of the countervailing duty orders on carbon and alloy steel cut-to-length plate ("CTL plate") from China and South Korea and the antidumping duty orders on CTL plate from Austria, Belgium, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. The Commission further determines that revocation of the antidumping duty order on CTL plate from Brazil would not be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.[1]

## Background

*Original Investigations.* On April 8, 2016, ArcelorMittal USA LLC ("AMUSA"), Nucor Corporation ("Nucor"), and SSAB Enterprises, LLC ("SSAB"), U.S. producers of CTL plate filed petitions concerning imports of CTL plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Turkey, and Taiwan.[2] In January 2017, the Commission determined that an industry in the United States was materially injured by reason of imports of CTL plate from Brazil, South Africa, and Turkey that had been found by U.S. Department of Commerce ("Commerce") to be sold in the United States at less than fair value ("LTFV").[3] On

[1] Commissioners Rhonda K. Schmidtlein and Randolph J. Stayin determine that revocation of the countervailing duty orders on carbon and alloy steel cut-to-length plate from China and South Korea and the antidumping duty orders on carbon and alloy steel cut-to-length plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. Except where noted, they join sections I-III.D.2. and IV.A-C of these views. *See* Dissenting Views of Commissioners Rhonda K. Schmidtlein and Randolph J. Stayin.

[2] *Carbon and Alloy Steel Cut-to-Length Plate from Brazil, South, Africa, and Turkey,* Inv. Nos. 701-TA-560-561 and 731-TA-1317-1328 (Final), USITC Pub. 4664 (Jan. 2017) ("*Original Determinations,* USITC Pub. 4664") at 3.

[3] *Original Determinations,* USITC Pub. 4664 at 3. The Commission terminated the countervailing duty investigation concerning subject imports from Brazil based on a finding of negligible imports. *Certain Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey*, Inv. Nos. 701-TA-560-561 and 731-TA-1317-1328 (Preliminary), USITC Pub. 4615 (May 2016) ("*Preliminary Determinations*") at 3.

February 1, 2017, Commerce issued antidumping duty orders on imports of CTL Plate from Brazil, South Africa, and Turkey.[4]

In March 2017, the Commission determined that a domestic industry was injured by reason of subsidized and LTFV imports of CTL plate from China.[5] Commerce issued antidumping and countervailing duty orders on CTL plate imports from China on March 20, 2017.[6] Subsequently, the Commission determined in May 2017 that a domestic industry was injured by reason of LTFV imports of CTL plate from Austria, Belgium, France, Germany, Italy, Japan, South Korea, and Taiwan.[7] On May, 25, 2017, Commerce published the antidumping duty orders on imports of CTL plate from Austria, Belgium, France, Germany, Italy, Japan, South Korea, and Taiwan and the countervailing duty order on imports of CTL plate from South Korea.[8]

**Current Reviews:** The Commission instituted these first five-year reviews on December 1, 2021.[9] Three U.S. producers, Nucor, SSAB, and Cleveland-Cliffs Inc. ("Cleveland-Cliffs") (collectively "Domestic Producers"), responded to the notice of institution.[10] Ten respondent interested parties responded to the notice of institution. A joint response was filed on behalf of Austrian producers Böhler Edelstahl GmbH & Co KG, voestalpine Böhler Bleche GmbH & Co KG, voestalpine Grobblech GmbH, and voestalpine Steel & Service Center GmbH (collectively

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[4] *Certain Carbon and Alloy Steel Cut-to-Length Plate From Brazil, South Africa, and the Republic of Turkey; Antidumping Duty Orders*, 82 Fed. Reg. 8911, (Feb. 2, 2017).

[5] *Carbon and Alloy Steel Cut-to-Length Plate from China,* Inv. Nos. 701-TA-560-561 and 731-TA-1317-1328 (Final), USITC Pub. 4675 (Mar. 2017) ("*Original Determinations,* USITC Pub. 4675") at 3.

[6] *Certain Carbon and Alloy Steel Cut-to-Length Plate From the People's Republic of China; Countervailing Duty Order*, 82 Fed. Reg. 14346 (Mar. 20, 2017); *Certain Carbon and Alloy Steel Cut-to-Length Plate From the People's Republic of China; Antidumping Duty Order*, 82 Fed. Reg. 14349 (Mar. 20, 2017).

[7] *Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, France, Germany, Italy, Japan, Korea, and Taiwan*, Inv. Nos. 701-TA-560-561 and 731-TA-1317-1328 (Final), USITC Pub. 4691 (May 2017) ("*Original Determinations*, USITC Pub. 4691") at 3.

[8] *Certain Carbon and Alloy Steel Cut-to-Length Plate From Austria, Belgium, France, the Federal Republic of Germany, Italy, Japan, the Republic of South Korea, and Taiwan; Amended Final Affirmative Antidumping Determinations for France, the Federal Republic of Germany, the Republic of South Korea and Taiwan, and Antidumping Duty Orders*, 82 Fed. Reg. 24096, (May 25, 2017); *Certain Carbon and Alloy Steel Cut-to-Length Plate From the Republic of Korea: Countervailing Duty Order*, 82 Fed. Reg. 24103 (May 25, 2017).

[9] *Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey; Institution of Five-Year Reviews*, 86 Fed. Reg. 68269 (Dec. 1, 2021).

[10] Nucor and SSAB Response to the Notice of Institution, EDIS Doc. 759579 (Jan. 4, 2022); Cleveland-Cliffs Response to the Notice of Institution, EDIS Doc. 759567 (Jan. 4, 2022).

"Voestalpine").[11] One response was filed on behalf of Usinas Siderúrgicas de Minas Gerais S.A. ("USIMINAS"), a producer of CTL plate in Brazil,[12] and one on behalf of the Government of Brazil ("GBR").[13] A joint response was filed on behalf of Salzgitter AG, Ilsenburger Grobblech GmbH, Salzgitter Mannesmann Grobblech GmbH, and Salzgitter Flachstahl GmbH (collectively, "Salzgitter"), producers of CTL plate in Germany.[14] One response was filed on behalf of AG der Dillinger Hüttenwerke and Dillinger France S.A. (collectively "Dillinger"), producers of CTL plate in Germany and France, respectively.[15] A response was filed on behalf of NLMK Verona S.p.A. and NLMK North America Plate (collectively, "NLMK"), a producer of CTL plate in Italy and a U.S. importer of CTL plate, respectively.[16] One response was filed on behalf of JFE Steel Corporation ("JFE Steel"),[17] one on behalf of Nippon Steel Corporation ("Nippon Steel"),[18] and one on behalf of Tokyo Steel Manufacturing Co., Ltd. ("Tokyo Steel"), producers of CTL plate in Japan.[19] One response was filed on behalf of POSCO and POSCO America Corp. (collectively, "POSCO"), a producer of CTL plate in South Korea and a U.S. importer of CTL plate, respectively.[20] The Commission did not receive any response to its notice of institution from producers, exporters, or importers of CTL plate from Belgium, China, South Africa, Taiwan, or Turkey.

On March 7, 2022, the Commission found that the domestic interested party group response to its notice of institution was adequate and the respondent interested party group response from Austria, Brazil, France, Germany, Italy, Japan, and South Korea were also adequate.[21] Therefore, it determined to conduct full reviews with respect to the orders concerning Austria, Brazil, France, Germany, Italy, Japan, and South Korea.[22] The Commission further found that the respondent interested party group responses with respect to Belgium, China, South Africa, Thailand, and Turkey were inadequate.[23] Nevertheless, the Commission determined to conduct full reviews regarding the orders on CTL plate from Belgium, China,

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[11] Voestalpine Response to the Notice of Institution, EDIS Doc. 759571 (Jan. 4, 2022).
[12] USIMINAS Response to the Notice of Institution, EDIS Doc. 759568 (Jan. 4, 2022).
[13] GBR Response to the Notice of Institution, EDIS Doc. 759565 (Jan. 4, 2022).
[14] Salzgitter Response to the Notice of Institution, EDIS Doc. 759597 (Jan. 4, 2022).
[15] Dillinger Response to the Notice of Institution, EDIS Doc. 759611 (Jan 4. 2022).
[16] NLMK Response to the Notice of Institution, EDIS Doc. 759569 (Jan. 4, 2022).
[17] JFE Steel Response to the Notice of Institution, EDIS Doc. 760829 (Jan. 19, 2022).
[18] Nippon Steel Response to the Notice of Institution, EDIS Doc. 759555 (Jan. 4, 2022).
[19] Tokyo Steel Response to the Notice of Institution, EDIS Doc. 759560 (Jan. 4, 2022).
[20] POSCO Response to the Notice of Institution, EDIS Doc. 759569 (Jan. 4, 2022).
[21] *Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey; Notice of Commission Determination To Conduct Full Five-Year Reviews*, 87 Fed. Reg. 19121 (Apr. 1, 2022) ("*Full Review Determination*").
[22] *Full Review Determination*, 87 Fed. Reg. 19121, 19122.
[23] *Full Review Determination*, 87 Fed. Reg. 19121, 19122.

South Africa, Thailand, and Turkey to promote administrative efficiency in light of its decision to conduct full reviews with respect to orders on CTL plate from Austria, Brazil, France, Germany, Italy, Japan, and South Korea.[24]

The Commission received joint prehearing and posthearing briefs and final comments filed on behalf of two domestic producers of CTL plate: Nucor and SSAB (collectively, "Nucor/SSAB"). Domestic producer Cleveland-Cliffs Inc. individually filed prehearing and posthearing briefs as well as final comments.[25]

The following respondents or groups of respondents filed prehearing and posthearing briefs and final comments, except where noted:

- USIMINAS, a producer of CTL plate in Brazil;
- Four producers of CTL plate in Japan, Daido Steel, Co., Ltd. ("Daido"), JFE Steel, Kobe Steel, Ltd. ("Kobe Steel"), and Nippon Steel (collectively, "Japanese Respondents");
- POSCO, a foreign producer/exporter and U.S. importer of subject merchandise;
- NLMK, a foreign producer/exporter of CTL plate in Italy and a U.S. importer of subject merchandise;[26]
- Salzgitter, producers of CTL plate in Germany; and
- Dillinger, producers of CTL plate in Germany and France.

The GBR and government of South Korea ("GSK") also filed prehearing and posthearing briefs. Jiangsu Tiangong Tools New Materials Co., Ltd., a producer and exporter of subject merchandise in China, filed a posthearing brief. The Commission did not receive briefs from any producers, exporters, or importers of CTL plate from Austria, Belgium, South Africa, Taiwan, and Turkey.

Representatives from Nucor/SSAB, Cleveland-Cliffs, USINIMAS, Japanese Respondents, POSCO, NLMK, Salzgitter, and Dillinger, as well as a representative from the government of South Korea appeared at the Commission's hearing accompanied by counsel.

In these reviews, U.S. industry data are based on questionnaire responses from six U.S. producers that are believed to account for a majority of U.S. production of CTL plate during 2020.[27] U.S. import data are based on official Commerce import statistics and the responses of

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[24] *Full Review Determination*, 87 Fed. Reg. 19121, 19122.

[25] Nucor, SSAB, and Cleveland-Cliffs are collectively referred to as the "Domestic Producers."

[26] NMLK did not submit final comments.

[27] Confidential Report, Memorandum INV-UU-123 (Dec. 14, 2022) as modified by Memorandum INV-UU-125 (Dec. 20, 2022) ("CR") and *Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey*, Inv. Nos. 701-TA-560-561 and 731-TA-1317-1328 (Review) USITC Pub. 5399 (Jan. 2023) ("PR") at I-19 and III-1.

48 U.S. importers of CTL plate that are believed to have accounted for 92.7 percent of subject imports and 65.1 percent of all imports of CTL plate in 2021.[28] Foreign industry data are based on the questionnaire responses of 26 foreign producers/exporters and publicly available information.[29]

## ■ 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."[30] The Tariff Act defines "domestic like

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[28] CR/PR at I-63, IV-1. Where appropriate, official Commerce statistics for CTL plate have been adjusted using data collected separately in questionnaire responses. CR/PR at IV-2.

[29] Data and related information concerning the CTL plate industry in Austria are based on industry research data, public export data, and the questionnaire responses of four firms, which accounted for *** CTL plate production in Austria in 2021. CR/PR at I-19, IV-40. Data and related information concerning the CTL plate industry in Belgium are based on industry research data, public export data, and the questionnaire responses of three firms, which reportedly accounted for *** percent of CTL plate production in Belgium in 2021. CR/PR at I-19, IV-55. Data and related information concerning the CTL plate industry in Brazil are based on industry research data, public export data, and the questionnaire response of one firm, which reportedly accounted for *** percent of CTL plate production in Brazil in 2021. CR/PR at I-19, IV-69. Data and related information concerning the CTL plate industry in China are based on industry research data, public export data, and the questionnaire response of one firm, believed to account for *** of total CTL plate production in China in 2021. CR/PR at I-19, IV-84. Data and related information concerning the CTL plate industry in France are based on industry research data, public export data, and the questionnaire response of three firms, which accounted for *** of CTL plate production in France in 2021. CR/PR at I-19, IV-100. Data and related information concerning the CTL plate industry in Germany are based on industry research data, public export data, and the questionnaire response of four firms, which reportedly accounted for *** of total CTL plate production in Germany in 2021. CR/PR at I-19, IV-115. Data and related information concerning the CTL plate industry in Italy are based on industry research data, public export data, and the questionnaire responses of two firms, which are believed to account for *** of CTL plate production in Italy in 2021. CR/PR at I-19, IV-130. Data and related information concerning the CTL plate industry in Japan are based on industry research data, public export data, and the questionnaire responses of five firms, which are believed to account for *** percent of production in Japan in 2021. CR/PR at I-19, IV-145. Data and related information concerning the CTL plate industry in South Africa are based on industry research data and public export data. CR/PR at IV-161. Data and related information concerning the CTL plate industry in South Korea are based on industry research data, public export data, and the questionnaire responses of three firms, one of which is estimated to accounted for *** production of subject CTL plate in South Korea in 2021. CR/PR at IV-168. Data and related information concerning the CTL plate industry in Taiwan are based on industry research data and public export data. CR/PR at IV-184. Data and related information concerning the CTL plate industry in Turkey are based on industry research data and public export data. CR/PR at IV-190.

[30] 19 U.S.C. § 1677(4)(A).

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."[31] 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.[32]

Commerce has defined the imported merchandise within the scope of the orders under review as follows:[33]

> The products covered by these orders are certain carbon and alloy steel hot-rolled or forged flat plate products not in coils, whether or not painted, varnished, or coated with plastics or other non-metallic substances (cut-to-length plate). Subject merchandise includes plate that is produced by being cut-to-length from coils or from other discrete length plate and plate that is rolled or forged into a discrete length. The products covered include (1) Universal mill plates (i.e., flat-rolled

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[31] 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).

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

[33] *Certain Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, the People's Republic of China, France, the Federal Republic of Germany, Italy, Japan, the Republic of Korea, South Africa, Taiwan, and the Republic of Turkey: Final Results of the Expedited Sunset Reviews of the Antidumping Duty Orders*, 87 Fed. Reg. 17066 (Mar. 25, 2022) and accompanying Issues and Decision Memorandum. The CTL items described in the scope of the antidumping and countervailing duty orders on CTL plate from the sources subject to these reviews is essentially the same for all sources, except for certain sources for which certain CTL plate items were already covered by an existing order at the time of the filing of the petitions (*e.g.*, hot-rolled steel flat products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom (81 FR 67962, October 3, 2016); certain hot-rolled carbon steel flat products from China (66 FR 59561, November 29, 2001); and CTL plate from China (68 FR 60081, Oct. 21, 2003, as amended by 76 FR 50996 (August 17, 2011)). In addition, at the time of the filing of the petitions, there were existing 1999 antidumping and countervailing duty orders on certain cut-to-length carbon-quality steel plate products from Korea. The scope of the orders in these reviews cover only the subject cut-to-length plate not within the physical description of cut-to-length carbon quality steel plate in the earlier orders. In addition, the scope of the antidumping duty order on CTL plate from South Korea that is the subject of these reviews covers CTL plate produced and/or exported by those companies that were excluded or revoked from the 1999 Korea antidumping duty order as of April 8, 2016 (i.e., Pohang Iron and Steel Company, also known as POSCO). CR/PR at I-37 n.32.

products rolled on four faces or in a closed box pass, of a width exceeding 150 mm but not exceeding 1250 mm, and of a thickness of not less than 4 mm, which are not in coils and without patterns in relief), and (2) hot-rolled or forged flat steel products of a thickness of 4.75 mm or more and of a width which exceeds 150 mm and measures at least twice the thickness, and which are not in coils, whether or not with patterns in relief. The covered products described above may be rectangular, square, circular or other shapes and include products of either rectangular or non-rectangular cross-section where such non-rectangular cross-section is achieved subsequent to the rolling process, i.e., products which have been ''worked after rolling'', (e.g., products which have been beveled or rounded at the edges).

For purposes of the width and thickness requirements referenced above, the following rules apply:

(1) Except where otherwise stated where the nominal and actual thickness or width measurements vary, a product from a given subject country is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set forth above, and

(2) where the width and thickness vary for a specific product (e.g., the thickness of certain products with non-rectangular cross section, the width of certain products with non-rectangular shape, etc.), the measurement at its greatest width or thickness applies.

Steel products included in the scope of this order are products in which:

(1) Iron predominates, by weight, over each of the other contained elements; and (2) the carbon content is 2 percent or less by weight.

Subject merchandise includes cut-to-length plate that has been further processed in the subject country or a third country, including but not limited to pickling, oiling, levelling, annealing, tempering, temper rolling, skin passing, painting, varnishing, trimming, cutting, punching, beveling, and/or slitting, or any other processing that would not otherwise remove the merchandise from the scope of the order if performed in the country of manufacture of the cut-to-length plate.

All products that meet the written physical description, are within the scope of this order unless specifically excluded or covered by the scope of an existing order. The following products are outside of, and/ or specifically excluded from, the scope of this order:

(1) Products clad, plated, or coated with metal, whether or not painted, varnished or coated with plastic or other non-metallic substances;

(2) military grade armor plate certified to one of the following specifications or to a specification that references and incorporates one of the following specifications:

• MIL–A–12560,

• MIL–DTL–12560H,

• MIL–DTL–12560J,

• MIL–DTL–12560K,

• MIL–DTL–32332,

• MIL–A–46100D,

• MIL–DTL–46100–E,

• MIL–46177C,

• MIL–S–16216K Grade HY80,

• MIL–S–16216K Grade HY100,

• MIL–S–24645A HSLA–80;

• MIL–S–24645A HSLA–100,

• T9074–BD–GIB–010/0300 Grade HY80,

• T9074–BD–GIB–010/0300 Grade HY100,

• T9074–BD–GIB–010/0300 Grade HSLA80,

• T9074–BD–GIB–010/0300 Grade HSLA100, and

• T9074–BD–GIB–010/0300 Mod. Grade HSLA115,

except that any cut-to-length plate certified to one of the above specifications, or to a military grade armor specification that references and incorporates one of the above specifications, will not be excluded from the scope if it is also dual- or multiple-certified to any other non-armor specification that otherwise would fall within the scope of this order;

(3) stainless steel plate, containing 10.5 percent or more of chromium by weight and not more than 1.2 percent of carbon by weight;

(4) CTL plate meeting the requirements of ASTM A–829, Grade E 4340 that are over 305mm in actual thickness;

(5) Alloy forged and rolled CTL plate greater than or equal to 152.4 mm in actual thickness meeting each of the following requirements:

(a) Electric furnace melted, ladle refined & vacuum degassed and having a chemical composition (expressed in weight percentages):

• Carbon 0.23–0.28,

• Silicon 0.05–0.20,

• Manganese 1.20–1.60,

• Nickel not greater than 1.0,

• Sulfur not greater than 0.007,

• Phosphorus not greater than 0.020,

• Chromium 1.0–2.5,

• Molybdenum 0.35–0.80,

• Boron 0.002–0.004,

• Oxygen not greater than 20 ppm,

• Hydrogen not greater than 2 ppm, and

• Nitrogen not greater than 60 ppm;

(b) With a Brinell hardness measured in all parts of the product including mid thickness falling within one of the following ranges:

(i) 270–300 HBW,

(ii) 290–320 HBW, or

(iii) 320–350HBW;

(c) Having cleanliness in accordance with ASTM E45 method A (Thin and Heavy): A not exceeding 1.5, B not exceeding 1.0, C not exceeding 0.5, D not exceeding 1.5; and

(d) Conforming to ASTM A578–S9 ultrasonic testing requirements with acceptance criteria 2 mm flat bottom hole;

(6) Alloy forged and rolled steel CTL plate over 407 mm in actual thickness and meeting the following requirements:

(a) Made from Electric Arc Furnace melted, Ladle refined & vacuum degassed, alloy steel with the following chemical composition (expressed in weight percentages):

• Carbon 0.23–0.28,

• Silicon 0.05–0.15,

• Manganese 1.20–1.50,

• Nickel not greater than 0.4,

• Sulfur not greater than 0.010,

• Phosphorus not greater than 0.020,

• Chromium 1.20–1.50,

• Molybdenum 0.35–0.55,

• Boron 0.002–0.004,

• Oxygen not greater than 20 ppm,

• Hydrogen not greater than 2 ppm, and

• Nitrogen not greater than 60 ppm;

(b) Having cleanliness in accordance with ASTM E45 method A (Thin and Heavy): A not exceeding 1.5, B not exceeding 1.5, C not exceeding 1.0, D not exceeding 1.5;

(c) Having the following mechanical properties:

(i) With a Brinell hardness not more than 237 HBW measured in all parts of the product including mid thickness; and having a Yield Strength of 75ksi min and UTS 95ksi or more, Elongation of 18% or more and Reduction of area 35% or more; having charpy V at -75 degrees F in the longitudinal direction equal or greater than 15 ft. lbs (single value) and equal or greater than 20 ft. lbs (average of 3 specimens) and conforming to the requirements of NACE MR01–75; or

(ii) With a Brinell hardness not less than 240 HBW measured in all parts of the product including mid thickness; and having a Yield Strength of 90 ksi min and UTS 110 ksi or more, Elongation of 15% or more and Reduction of area 30% or more; having charpy V at -40 degrees F in the longitudinal direction equal or greater than 21 ft. lbs (single value) and equal or greater than 31 ft. lbs (average of 3 specimens);

(d) Conforming to ASTM A578–S9 ultrasonic testing requirements with acceptance criteria 3.2 mm flat bottom hole; and

(e) Conforming to magnetic particle inspection in accordance with AMS 2301;

(7) Alloy forged and rolled steel CTL plate over 407 mm in actual thickness and meeting the following requirements:

(a) Made from Electric Arc Furnace melted, ladle refined & vacuum degassed, alloy steel with the following chemical composition (expressed in weight percentages):

• Carbon 0.25–0.30,

- Silicon not greater than 0.25,
- Manganese not greater than 0.50,
- Nickel 3.0–3.5,
- Sulfur not greater than 0.010,
- Phosphorus not greater than 0.020,
- Chromium 1.0–1.5,
- Molybdenum 0.6–0.9,
- Vanadium 0.08 to 0.12
- Boron 0.002–0.004,
- Oxygen not greater than 20 ppm,
- Hydrogen not greater than 2 ppm, and
- Nitrogen not greater than 60 ppm.

(b) Having cleanliness in accordance with ASTM E45 method A (Thin and Heavy): A not exceeding 1.0(t) and 0.5(h), B not exceeding 1.5(t) and 1.0(h), C not exceeding 1.0(t) and 0.5(h), and D not exceeding 1.5(t) and 1.0(h);

(c) Having the following mechanical properties: A Brinell hardness not less than 350 HBW measured in all parts of the product including mid thickness; and having a Yield Strength of 145ksi or more and UTS 160ksi or more, Elongation of 15% or more and Reduction of area 35% or more; having charpy V at -40 degrees F in the transverse direction equal or greater than 20 ft. lbs (single value) and equal or greater than 25 ft. lbs (average of 3 specimens);

(d) Conforming to ASTM A578–S9 ultrasonic testing requirements with acceptance criteria 3.2 mm flat bottom hole; and

(e) Conforming to magnetic particle inspection in accordance with AMS 2301.

> The products subject to the order are currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) under subheadings: 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000.
>
> The products subject to the order may also enter under the following HTSUS subheadings: 7208.40.6060, 7208.53.0000, 7208.90.0000, 7210.70.3000, 7210.90.9000, 7211.19.1500, 7211.19.2000, 7211.19.4500, 7211.19.6000, 7211.19.7590, 7211.90.0000, 7212.40.1000, 7212.40.5000, 7212.50.0000, 7214.10.0000, 7214.30.0010, 7214.30.0080, 7214.91.0015, 7214.91.0016, 7214.91.0020, 7214.91.0060, 7214.91.0090, 7225.11.0000, 7225.19.0000, 7225.40.5110, 7225.40.5130, 7225.40.5160, 7225.40.7000, 7225.99.0010, 7225.99.0090, 7226.11.1000, 7226.11.9060, 7226.19.1000, 7226.19.9000, 7226.91.0500, 7226.91.1530, 7226.91.1560, 7226.91.2530, 7226.91.2560, 7226.91.7000, 7226.91.8000, and 7226.99.0180.
>
> The HTSUS subheadings above are provided for convenience and customs purposes only. The written description of the scope of the order is dispositive.

CTL plate is a flat-rolled or press-forged carbon or alloy steel product that is generally 4.75 millimeters or more in thickness.[34] CTL plate is available in a wide variety of widths, thicknesses, and shapes that are incorporated or further processed into other products. The term "cut-to-length" refers to a flat plate product with a defined length.[35] Most CTL plate is hot-rolled on a reversing plate mill, although it also may be rolled in Steckel mills and in continuous hot strip mills.[36] Most CTL plate is used in load-bearing and structural applications, such as agricultural and construction equipment, bridges, electricity transmission towers and light poles, buildings (especially nonresidential), and heavy transportation equipment, including railroad cars and ships.[37] CTL plate is also used in the production of tanks, sills, floors, offshore drilling rigs, pipes, petrochemical plant and machinery, various other fabricated pieces, utility applications, such as wind towers, and pressure vessels.[38]

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[34] CR/PR at I-50.
[35] CR/PR at I-50.
[36] CR/PR at I-50.
[37] CR/PR at I-50.
[38] CR/PR at I-50.

### A. Analysis

In the original investigations, the Commission defined a single domestic like product, consisting of all CTL plate, coextensive with Commerce's scope.[39]

In these reviews, Cleveland-Cliffs argues that the Commission should again define a single domestic like product coextensive with Commerce's scope, as it did in the original investigations.[40] No party argues for a different definition, and no party requested that the Commission collect data concerning other possible domestic like products in their comments on the Commission's draft questionnaires.[41] The record in these reviews does not indicate that the characteristics and uses of domestically produced CTL plate have changed since the original

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[39] *Original Determinations*, USITC Pub. 4664 at 13; *see also Preliminary Determinations,* USITC Pub. 4615 at 14-15. In the preliminary determinations, the Commission rejected contentions that carbon and alloy CTL plate are separate domestic like products, and that X-70 CTL plate used to produce oil and gas pipelines is a separate domestic like product. With respect to the former issue, the Commission found that carbon and alloy CTL plate shared certain physical characteristics, were produced in the same facilities, had the same channels of distribution, and were interchangeable to some extent. *Preliminary Determinations*, USITC Pub. 4615 at 14-15. With respect to the latter issue, the Commission found that X-70 CTL plate and other CTL plate shared common manufacturing facilities and channels of distribution, and that the X-70 CTL plate was not the sole type of CTL plate that had distinct characteristics that limited its interchangeability with other products and led to somewhat different purchaser perceptions. *Id.* at 16-17. In the final phase of the investigations, the Commission found that the record did not contain any additional information that would warrant reconsideration of these findings, nor had any respondents renewed the arguments on these particular issues. *Original Determinations*, USITC Pub. 4664 at 13 n.30.

In the final determinations, the Commission considered and rejected arguments that tool steel and high speed steel should be defined as separate products. The Commission found that, while tool steel and high speed steel have some distinctive physical characteristics, these characteristics are not always unique to tool steel and high speed steel and tool steel and high speed steel share other physical characteristics with other CTL plate. It further found that, although tool steel and high speed steel have specific uses, other CTL plate products are also designed for specific end uses. The Commission recognized that the evidence regarding manufacturing facilities, production processes, and employees as well as producer and customer perceptions was mixed and that the evidence regarding channels of distribution was limited. The Commission also observed that, although tool steel and high speed steel are generally not interchangeable with other CTL plate products, the same could be said for other specialized CTL plate products. The Commission observed that the information on pricing indicated that tool steel and high speed steel are priced differently and generally much higher than most types of CTL plate, but that there were other specific types of CTL plate that are also highly priced. Accordingly, the Commission concluded that the differences between tool steel and high speed steel and other types of CTL plate were insufficient to warrant separate domestic like product treatment. It therefore continued to define a single domestic like product corresponding to the scope of the investigations. *Original Determinations*, USITC Pub. 4664, at 13-18.

[40] Cleveland-Cliffs Prehearing Br. at 9-11.

[41] CR/PR at I-59.

investigations so as to warrant revisiting the definition of the domestic like product.[42] Consequently, we define a single domestic like product, consisting of CTL plate, coextensive with Commerce's scope definition.

### 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."[43] 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.

*Original Investigations*. In the original investigations, the Commission addressed two domestic industry issues. First, it addressed whether steel service centers engaged in sufficient production-related activities to be included in the domestic industry.[44] It noted that in the preliminary determinations, the Commission stated that "{t}here is no dispute that steel service center processors that transform steel plate products that do not correspond to the scope definition, *e.g.*, plate in coil, into CTL plate are part of the domestic industry."[45] For these reasons, in the final determinations, the Commission continued to find that the steel service center processors that transform out-of-scope products into CTL plate engage in domestic production.[46]

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[42] *See generally* CR/PR at I-50 to I-58.

[43] 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.

[44] *Original Determinations*, USITC Pub. 4664 at 20. In deciding whether a firm qualifies as a domestic producer of the domestic like product, the Commission generally analyzes the overall nature of a firm's U.S. production-related activities, although production-related activity at minimum levels could be insufficient to constitute domestic production. The Commission generally considers six factors: (1) source and extent of the firm's capital investment; (2) technical expertise involved in U.S. production activities; (3) value added to the product in the United States; (4) employment levels; (5) quantity and type of parts sourced in the United States; and (6) any other costs and activities in the United States directly leading to production of the like product. No single factor is determinative and the Commission may consider any other factors it deems relevant in light of the specific facts of any investigation. *Diamond Sawblades and Parts Thereof from China and Korea*, Inv. Nos. 731-TA-1092-93 (Final), USITC Pub. 3862 at 8-11 (July 2006).

[45] *Original Determinations*, USITC Pub. 4664 at 20; *Preliminary Determinations*, USITC Pub. 4615 at 17 n.71.

[46] *Original Determinations*, USITC Pub. 4664 at 20.

The Commission next addressed whether any party should be excluded from the domestic industry as a related party. The Commission found that five domestic producers *** qualified for possible exclusion under the related parties provision by directly importing subject merchandise during the period of investigation ("POI").[47] However, the Commission found that appropriate circumstances did not exist to exclude any of the firms from the domestic industry under the related parties provision.[48] The Commission therefore defined the domestic industry as all U.S. producers of CTL plate.[49]

*Current Reviews.* These reviews do not raise any domestic industry issues.[50] No domestic producer is subject to possible exclusion under the related parties provision. Additionally, there is no new information or argument in these reviews that would warrant revisiting the Commission's prior finding that service centers engage in sufficient production-related activities to qualify as domestic producers. Cleveland-Cliffs argues that Commission should again define the domestic industry to include all U.S. producers of CTL plate.[51] POSCO states that it agrees with the definition of the domestic industry that the Commission adopted in the original investigations.[52] Accordingly, consistent with our definition of the domestic like product, we define the domestic industry as all U.S. producers of CTL plate.

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[47] *Original Determinations*, USITC Pub. 4664 at 20; *Confidential Original Determinations*, EDIS Doc. 762600 (Feb. 7, 2021) ("*Confidential Original Determinations*") at 26.

[48] *Original Determinations*, USITC Pub. 4664, at 20-21; *Confidential Original Determinations* at 26-27. The Commission found that *** principal interests were in domestic production as there was no indication that the relatively small size of their subject imports relative to their domestic production shielded any of these domestic producers from subject imports to any significant degree. *Id.* at 20; *Confidential Original Determinations* at 26-27. Regarding ***, the Commission found that while *** had a higher ratio of subject imports to domestic production, that ratio remained below *** percent during the POI indicating that *** principal interest was in domestic production. *Confidential Original Determinations* at 27. The Commission also observed that there was no indication that there was a correlation between *** importation activities and its financial performance. *Id*.

[49] *Original Determinations*, USITC Pub. 4664 at 21.

[50] During the POR, no responding U.S. producers were related to exporters or U.S. importers of the subject merchandise, directly imported the subject merchandise, or purchased the subject merchandise from U.S. importers. CR/PR at I-61. While one U.S. producer (***) is related to a foreign producer of the subject merchandise, the related foreign producer reported that ***. CR/PR at IV-69 n.16; ***.

[51] Cleveland-Cliffs Prehearing Br. at 12.

[52] POSCO Prehearing Br. at 3.

## Cumulation

### A. Legal Standard

With respect to five-year reviews, section 752(a) of the Tariff Act provides as follows:

> the Commission may cumulatively assess the volume and effect of imports of the subject merchandise from all countries with respect to which reviews under section 1675(b) or (c) of this title were initiated on the same day, if such imports would be likely to compete with each other and with domestic like products in the United States market. The Commission shall not cumulatively assess the volume and effects of imports of the subject merchandise in a case in which it determines that such imports are likely to have no discernible adverse impact on the domestic industry.[53]

Cumulation therefore is discretionary in five-year reviews, unlike original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.[54] The Commission may exercise its discretion to cumulate, however, only if the reviews are initiated on the same day, the Commission determines that the subject imports are likely to compete with each other and the domestic like product in the U.S. market, and imports from each such subject country are not likely to have no discernible adverse impact on the domestic industry in the event of revocation. Our focus in five-year reviews is not only on present conditions of competition, but also on likely conditions of competition in the reasonably foreseeable future.

### B. Original Investigations

In its final determinations, the Commission found a reasonable overlap of competition between and among the domestic like product and subject imports from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Turkey, and Taiwan and cumulated subject imports from each of these 12 sources for its material injury

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[53] 19 U.S.C. § 1675a(a)(7).

[54] 19 U.S.C. § 1677(7)(G)(i); *see also*, *e.g.*, *Nucor Corp. v. United States*, 601 F.3d 1291, 1293 (Fed. Cir. 2010) (Commission may reasonably consider likely differing conditions of competition in deciding whether to cumulate subject imports in five-year reviews); *Allegheny Ludlum Corp. v. United States*, 475 F. Supp. 2d 1370, 1378 (Ct. Int'l Trade 2006) (recognizing the wide latitude the Commission has in selecting the types of factors it considers relevant in deciding whether to exercise discretion to cumulate subject imports in five-year reviews); *Nucor Corp. v. United States*, 569 F. Supp. 2d 1328, 1337-38 (Ct. Int'l Trade 2008).

determinations.[55] The Commission found that there was a sufficient degree of fungibility between and among subject imports from each subject source and the domestic product.[56] Regarding channels of distribution, the Commission observed that shipments of the domestic like product and imports from each subject source were directed to end users and distributors, with the majority of subject imports from Austria, Brazil, China, Italy, Japan, South Africa, Taiwan, and Turkey being sold to distributors and substantial portions of domestic producers' U.S. shipments as well as imports from Belgium, France, Germany, and Korea also sold to distributors.[57] It further found that domestically produced CTL plate was sold nationwide and that subject imports from all subject sources also were sold throughout the continental United States, with very limited exceptions.[58] Additionally, imports of CTL plate from all subject sources were present in the U.S. market in almost every month during the POI.[59] Accordingly, the Commission cumulated subject imports from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Turkey, and Taiwan for the purpose of its material injury analysis.[60]

### C. Party Arguments

Domestic Producers argue that the Commission should exercise its discretion to cumulate subject imports from all sources. They maintain that imports from all subject sources are not likely to have no discernible adverse impact and that there will likely be a reasonable overlap in competition among subject imports from each subject source and between the domestic like product and subject imports from each source if the orders are revoked. They further argue that imports from each subject source are likely to compete under similar conditions of competition upon revocation of the orders.[61]

USIMINAS and the GBR argue that the Commission should exercise its discretion not to cumulate subject imports from Brazil because they will likely compete under different conditions of competition and have no discernible adverse impact on the domestic industry

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[55] *Original Determinations*, USITC Pub. 4664 at 23-26.
[56] *Original Determinations*, USITC Pub. 4664 at 24-26.
[57] *Original Determinations*, USITC Pub. 4664 at 26.
[58] *Original Determinations*, USITC Pub. 4664 at 26.
[59] *Original Determinations*, USITC Pub. 4664 at 26.
[60] *Original Determinations*, USITC Pub. 4664 at 26.
[61] Cleveland-Cliffs Prehearing Br. at 12-28; Cleveland-Cliffs Posthearing Br. at 2-15, Responses to Commission Questions at 2-35; Cleveland-Cliffs Final Comments at 4-14; Nucor/SSAB Prehearing Br. at 8-88; Nucor/SSAB Posthearing Br. at 2-14, Response to Commission Questions at 4-64; Nucor/SSAB Final Comments at 2-13.

upon revocation of the order.[62] Dillinger argues that subject imports from France and Germany should not be cumulated with imports from other subject sources because they will likely compete under different conditions of competition and have no discernible adverse impact on the domestic industry upon revocation of the orders.[63] NLMK argues that subject imports from Italy should not be cumulated with imports from other subject sources because they are likely to have no discernible adverse impact, there will not be a likely reasonable overlap in competition among subject imports from Italy and between the domestic like product and subject imports from each source, and imports from Italy are likely to compete under different conditions of competition upon revocation of the order.[64] Japanese Respondents argue that subject imports from Japan should not be cumulated with imports from other subject sources because they are likely to have no discernible adverse impact, there will not be a likely reasonable overlap in competition among subject imports from Japan and between the domestic like product and subject imports from each source, and imports from Japan are likely to compete under different conditions of competition upon revocation of the order.[65] POSCO and the GOK argue that subject imports from South Korea should not be cumulated with imports from other subject sources because they are likely to have no discernible adverse impact, there will not be a likely reasonable overlap in competition among subject imports from South Korea and subject imports from each source and between the domestic like product, and imports from South Korea are likely to compete under different conditions of competition upon revocation of the order.[66] Salzgitter also argues that subject imports from South Korea are not likely to compete with imports from other subject sources, and therefore, the Commission should not cumulate subject imports from South Korea with imports from other subject sources.[67]

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[62] USIMINAS Prehearing Br. at 5-24; USIMINAS Posthearing Br. at 6-11, Responses to Commission Questions at 1-32; USIMINAS Final Comments at 4-12; GBR Prehearing Br. at 1-2; GBR Posthearing Br. at 1.

[63] Dillinger Prehearing Br. at 4-11; Dillinger Posthearing Br. at 1-8, Response to Commission Questions at 1-6; Dillinger Final Comments at 2-9.

[64] NLMK Prehearing Br. at 6-20; NLMK Posthearing Br. at 5-11.

[65] Japanese Respondents Prehearing Br. at 4-35; Japanese Respondents Posthearing Br. at 4-15, Responses to Commission Questions at 36-39.

[66] POSCO Prehearing Br. at 4-12; POSCO Posthearing Br. at 2-7, Responses to Commission Questions at 9-21; POSCO Final Comments at 6-11; GOK Prehearing Br. at 1-11.

[67] Salzgitter Prehearing Br. at 34-36.

### D. Analysis

In these reviews, the statutory threshold for cumulation is satisfied because all reviews were initiated on the same day, December 1, 2021.[68] In addition, we consider the following issues in deciding whether to exercise our discretion to cumulate the subject imports: (1) whether imports from any of the subject sources are precluded from cumulation because they are likely to have no discernible adverse impact on the domestic industry; (2) whether there is likely to be reasonable overlap of competition between and among subject imports from the subject sources and the domestic like product; and (3) whether subject imports from different sources are likely to compete in the U.S. market under different conditions of competition.

#### 1. Likelihood of No Discernible Adverse Impact

The statute precludes cumulation if the Commission finds that subject imports from a country are likely to have no discernible adverse impact on the domestic industry.[69] Neither the statute nor the Uruguay Round Agreements Act ("URAA") Statement of Administrative Action ("SAA") provides specific guidance on what factors the Commission is to consider in determining that imports "are likely to have no discernible adverse impact" on the domestic industry.[70] With respect to this provision, the Commission generally considers the likely volume of subject imports and the likely impact of those imports on the domestic industry within a reasonably foreseeable time if the orders are revoked. Our analysis for each of the subject sources takes into account, among other things, the nature of the product and the behavior of subject imports in the original investigations.

*Austria.* In the original investigations, the volume of subject imports from Austria increased from 50,292 short tons in 2013 to 52,031 short tons in 2014 before decreasing to 13,305 short tons in 2015. It was higher in interim 2016[71] at 14,564 short tons than in interim 2015 at 11,883 short tons.[72]

In the original investigations, the Commission received questionnaire responses from three producers/exports of CTL plate in Austria, which accounted for *** production of CTL

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[68] *Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey; Institution of Five-Year Reviews*, 86 Fed. Reg. 68269 (Dec. 1, 2021).

[69] 19 U.S.C. § 1675a(a)(7).

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

[71] In the original investigations, the interim period covered January-September. *See, e.g.*, *Original Determinations*, USITC Pub. 4664 at Table C-1.

[72] *Original Determinations*, USITC Pub. 4664 at Table C-1.

plate in Austria and *** of total U.S. imports of CTL plate from Austria in 2015.[73] Responding foreign producers in Austria reported production capacity of CTL plate was 782,893 short tons in 2013, 784,859 short tons in 2014, and 784,846 short tons in 2015.[74] The Austrian producers reported production of CTL plate was 624,112 short tons in 2013, 771,111 short tons in 2014, and 660,637 short tons in 2015.[75] From 2013 through 2015, responding Austrian producers' reported exports as a share of total shipments of CTL plate ranged from 82.1 percent to 84.4 percent, while their exports to the United States as a share of total shipments ranged from 1.9 percent to 8.5 percent.[76]

In the current reviews, the volume of subject imports from Austria decreased throughout the period of review ("POR") from 16,855 short tons in 2016, to 3,203 short tons in 2017, 775 short tons in 2018, and 240 short tons in 2019, before increasing to 820 short tons in 2020, and 1,078 short tons in 2021.[77] Subject imports from Austria accounted for 0.3 percent of apparent U.S. consumption in 2016, 0.1 percent in 2017, and less than 0.5 percent in 2018, 2019, 2020, and 2021.[78] Starting June 1, 2018, CTL plate originating in the European Union, including Austria, was subject to 25 percent duties under Section 232 of the Trade Expansion Act of 1962, as amended ("Section 232").[79] Effective January 1, 2022, CTL plate originating in European Union member countries, including Austria, have been subject to annual tariff-rate quota ("TRQ") limits under Section 232, which provide for limited volumes of imports to enter without Section 232 duties and impose 25 percent duties when imports enter above the limits.[80]

In these reviews, the Commission received questionnaire responses from four producers of CTL plate in Austria accounting for *** CTL plate production in Austria.[81] These producers reported that their combined production capacity remained constant throughout the period of review at *** short tons. It was *** short tons in interim 2021[82] and *** short tons interim 2022.[83] The Austrian producers' reported production decreased irregularly during the period of

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[73] Confidential Report, Memorandum INV-00-119, (Dec. 19, 2016), EDIS Doc. No. 762521, ("Confidential Report from the Original Investigations") at VII-3 and Table VII-1.

[74] Confidential Report from the Original Investigations at Table VII-2.

[75] Confidential Report from the Original Investigations at Tables VII-2 and VII-3.

[76] Confidential Report from the Original Investigations at Table VII-2.

[77] CR/PR at Tables I-32, IV-1, and C-1.

[78] CR/PR at Tables I-32, IV-1 and C-1.

[79] 19 U.S.C. §1862; *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9705, 83 Fed. Reg. 11625 (Mar. 8, 2018).

[80] CR/PR at I-44 and Table I-27. Austria's share of the European Union's TRQ is 5,828 short tons. *Id*.

[81] CR/PR at IV-40.

[82] In these reviews, the interim period covers January-June. *See, e.g.*, CR/PR at Table C-1.

[83] CR/PR at Table IV-12.

review and was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; it was *** short tons in interim 2021 and *** short tons in interim 2022.[84] Their reported capacity utilization decreased irregularly throughout the period of review and was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in interim 2021, and *** in interim 2022.[85] These producers reported production of out-of-scope merchandise on the same equipment and machinery used to produce CTL plate.[86] From 2016 to 2021, their exports as a share of total shipments of CTL plate ranged from *** percent to *** percent, with exports to the United States as a share of total shipments ranging from *** percent to *** percent.[87]

Exports of CTL plate from Austria decreased irregularly during the period of review and were 1.2 million short tons in 2016, 1.4 million short tons in 2017, 1.2 million short tons in 2018, 1.0 million short tons in 2019, 876,624 short tons in 2020, and 1.1 million short tons in 2021.[88] The largest export markets for CTL plate from Austria in 2021 were Germany, the Czech Republic, Switzerland, Italy, Poland, Hungary, the United Arab Emirates, and Belgium.[89]

In the original investigations, subject imports from Austria oversold the domestic like product in *** comparisons involving *** short tons.[90] During these reviews, subject imports from Austria undersold the domestic like product in *** involving *** short tons, with underselling margins ranging from *** percent to *** percent.[91]

In light of the foregoing, including the volume of subject imports from Austria and underselling by such imports in the original investigations, and the large size and volume of exports of the CTL plate industry in Austria, we find that revocation of the antidumping duty order on subject imports from Austria would not likely have no discernible adverse impact on the domestic industry.

*Belgium.* During the original investigations, subject imports from Belgium increased from 7,873 short tons in 2013 (or 0.1 percent of apparent U.S. consumption) to 32,400 short

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[84] CR/PR at Tables IV-12 and IV-16.

[85] CR/PR at Table IV-12.

[86] CR/PR at IV-50. ***. CTL plate accounted for over *** percent of total production on shared equipment throughout the POR. *Id.*

[87] CR/PR at Table IV-12.

[88] CR/PR at Tables IV-17 and IV-113.

[89] CR/PR at Table IV-16. providing Global Trade Atlas ("GTA") export data for exports from Austria under HS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91.

[90] CR/PR at V-42 n.7; Confidential Report from the Original Investigations at Table V-11, V-12.

[91] CR/PR at Table V-12.

tons in 2014 (or 0.3 percent of apparent U.S. consumption) before decreasing to 21,023 short tons in 2015 (which remained at 0.3 percent of apparent U.S. consumption).[92]

In the original investigations, the Commission received questionnaire responses from two producers/exporters of CTL plate in Belgium, which accounted for approximately *** of the CTL plate production in Belgium and *** U.S. imports of CTL plate from Belgium in 2015.[93] Responding Belgian producers reported production capacity of in-scope products to be 683,733 short tons in 2013, 2014, and 2015.[94] They also reported CTL plate production of 440,681 short tons in 2013, 490,951 short tons in 2014, and 477,381 short tons in 2015.[95] During the original investigations, responding Belgian producers' exports as a share of total shipments of CTL plate ranged from *** percent to *** percent, while their exports to the United States as a share of total shipments ranged from *** percent to *** percent.[96]

During the period of review, the volume of subject imports from Belgium decreased overall but remained in the U.S. market; the volume was 25,171 short tons in 2016, 12,531 short tons in 2017, 13,389 short tons in 2018, 7,658 short tons in 2019, 6,943 short tons in 2020, and 2,036 short tons in 2021.[97] Subject imports from Belgium accounted for 0.4 percent of apparent U.S. consumption in 2016, 0.2 percent in 2017 and 2018, 0.1 percent in 2019 and in 2020, and less than 0.05 percent in 2021.[98] Starting June 1, 2018, CTL plate originating in the European Union, including Belgium, was subject to 25 percent Section 232 duties. Effective January 1, 2022, CTL plate originating in European Union countries, including Belgium, have been subject to annual TRQ limits under Section 232, which provide for limited volumes of imports to enter without Section 232 duties and impose 25 percent duties when imports enter above the limits.[99]

In these reviews, the Commission received questionnaire responses from three producers of CTL plate in Belgium that accounted for over *** percent of CTL plate production in Belgium in 2021.[100] These producers reported that their combined production capacity was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; it was *** short tons in interim 2021 and

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[92] *Original Determinations*, USITC Pub. 4664 at Table C-1.

[93] CR/PR at IV-55.

[94] Confidential Report from the Original Investigations at Table VII-6.

[95] Confidential Report from the Original Investigations at Table VII-6.

[96] Confidential Report from the Original Investigations at Table VII-6.

[97] CR/PR at Tables I-32, IV-1, and C-1.

[98] CR/PR at Tables I-23, IV-1, and C-1.

[99] CR/PR at I-44 and Table I-27. Belgium's share of the European Union's annual TRQ is 14,449 short tons. *Id*.

[100] CR/PR at IV-55.

*** short tons in interim 2022.[101] Their reported production was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; it was *** short tons in interim 2021 and *** short tons in interim 2022.[102] Their reported capacity utilization fluctuated throughout the period of review and was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021; it was *** percent in interim 2021 and *** in interim 2022.[103] These producers reported production of out-of-scope merchandise on the same equipment and machinery used to produce CTL plate.[104] Their exports as a share of total shipments of CTL plate from 2016 to 2021 ranged from *** percent to *** percent, with exports to the United States as a share of total shipments ranging from *** percent to *** during this same period.[105]

Exports of CTL plate from Belgium were 1.7 million short tons in 2016, 1.6 million short tons in 2017, 1.7 million short tons in 2018, 1.4 million short tons in 2019, 1.3 million short tons in 2020, and 1.4 million short tons in 2021.[106] The largest export markets for CTL plate from Belgium in 2021 were Germany, the Netherlands, France, Poland, Sweden, Egypt, Denmark, and South Africa.[107]

In the original investigations, subject imports from Belgium undersold the domestic like product in *** of *** comparisons involving *** short tons with underselling margins ranging from *** to *** percent.[108] During the current reviews, subject imports from Belgium undersold the domestic like product in *** of *** comparisons involving *** short tons, with underselling margins ranging from *** percent to *** percent.[109]

In light of the foregoing, including the volume of subject imports from Belgium and underselling by such imports in the original investigations, the continued presence of subject imports from Belgium in the U.S. market during the POR, and the large capacity, including excess capacity, and volume of exports of the CTL plate industry in Belgium, we find that revocation of the antidumping duty order on subject imports from Belgium would not likely have no discernible adverse impact on the domestic industry.

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[101] CR/PR at Table IV-21.

[102] CR/PR at Tables IV-21 and IV-25.

[103] CR/PR at Table IV-21.

[104] CR/PR at IV-64. ***. CTL plate accounted for over *** percent of total production on shared equipment throughout the POR. *Id.*

[105] CR/PR at Table IV-21.

[106] CR/PR at Table IV-26, providing GTA export data for exports from Belgium under HS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91.

[107] CR/PR at Table IV-26.

[108] CR/PR at V-42 n.7; Confidential Report from the Original Investigations at Tables V-11, V-12.

[109] CR/PR at Table V-12.

*Brazil.* In the original investigations, the volume of subject imports from Brazil fluctuated throughout the POI; it was 22,152 short tons in 2013 (or 0.3 percent of apparent U.S. consumption), 137,460 short tons in 2014 (or 1.4 percent of apparent U.S. consumption), and 46,183 short tons in 2015 (or 0.6 percent of apparent U.S. consumption). The volume of subject imports from Brazil was lower in interim 2016 at 8,428 short tons (or 0.1 percent of apparent U.S. consumption) than in interim 2015 at 34,348 short tons (or 0.5 percent of apparent U.S. consumption).[110]

In the original investigations, the Commission received questionnaire responses from three producers/exporters of CTL plate in Brazil, which accounted for *** reported CTL plate production in Brazil and *** percent of U.S. imports of subject merchandise from Brazil in 2015.[111] These producers reported that their capacity was 2.2 million short tons in 2013, 2014, and 2015; it was 1.7 million short tons in interim 2015 and 1.1 million short tons in interim 2016.[112] Their reported production was 1.5 million short tons in 2013, 1.4 million short tons in 2014, 952,013 short tons in 2015, 782,761 short tons in interim 2015, and 462,478 short tons in interim 2016.[113] From 2013 through 2015, their reported exports as a share of their total shipments of CTL plate ranged from *** percent to *** percent, while their exports to the United States as a share of total shipments ranged from *** percent to *** percent.[114]

In the current reviews, the volume of subject imports from Brazil decreased from 7,442 short tons in 2016 to 169 short tons in 2017, and remained at minimal levels during the remainder of the POR at 28 short tons in 2018, 15 short tons in 2019, 34 short tons in 2020, 25 short tons in 2021, 12 short tons in interim 2021, and 42 short tons in interim 2022.[115] Subject imports from Brazil accounted for 0.1 percent of apparent U.S. consumption in 2016 and less than 0.05 percent of apparent U.S. consumption throughout the POR.[116] Instead of duties, subject imports from Brazil are subject to annual absolute import quotas under Section 232.[117]

In these reviews, the Commission received a questionnaire response from one firm, USIMINAS, which reported that it accounted for *** percent of CTL plate production in Brazil in

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[110] *Original Determinations*, USITC Pub. 4664 at Table C-1.

[111] CR/PR at IV-69.

[112] Confidential Report from the Original Investigations at Table VII-9.

[113] Confidential Report from the Original Investigations at Table VII-11.

[114] Confidential Report from the Original Investigations at Table VII-11.

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

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

[117] CR/PR at I-44 to I-45 & Table I-27. The quota is 10,049 short tons and became effective June 1, 2018. *Id*. The annual quota usage rate for the relevant HTS chapter 99 heading that covers CTL plate indicates that the quota was not entirely filled in 2021: for HTS 9903.80.11 (Plate in cut lengths), none of 9,116,198 kg was filled. CR/PR at I-45 n.38.

2021.[118] USIMINAS's production capacity remained relatively stable during the POR, although it was lower in interim 2022 than in interim 2021. Its capacity was *** short tons in 2016 and 2017, *** short tons in 2018, *** short tons in 2019 and 2020, and *** short tons in 2021; it was *** short tons in interim 2021 and *** short tons in interim 2022.[119] Its reported production fluctuated throughout the POR. It was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; it was *** short tons in interim 2021 and *** in interim 2022.[120] Its capacity utilization was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021; it was *** percent in interim 2021 and *** percent in interim 2022.[121] USIMINAS ***.[122] Its exports as a share of total shipments of CTL plate ranged from *** percent to *** percent during the POR, with exports to the United States as a share of total shipments accounting for *** percent during 2016 and *** for the rest of the POR.[123]

Export shipments of CTL plate from Brazil increased irregularly during the POR. Export shipments of CTL plate were *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; they were *** short tons in interim 2021 and *** short tons in interim 2022.[124] Brazil's largest export markets for CTL plate in 2021 were Argentina, Mexico, and Chile.[125] During the POR, certain CTL plate products from Brazil were subject to antidumping duty orders in the European Union, Taiwan, and Turkey and safeguard measures in the European Union.[126]

In the original investigations, subject imports from Brazil undersold the domestic like product in 31 of 55 comparisons involving 89,041 short tons with underselling margins ranging from 0.9 to 22.9 percent.[127] During the current reviews, subject imports from Brazil undersold the domestic like product in *** involving *** short tons with underselling margins ranging from *** percent to *** percent.[128]

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[118] CR/PR at IV-69. According to USIMINAS, Gerdau SA (Brazil) ***. USIMINAS Prehearing Br. at 12; Hearing Tr. at 207. Gerdau, which did not provide a questionnaire response, reported that ***. CR/PR at IV-69 n.16; ***.

[119] CR/PR at Table IV-31.

[120] CR/PR at Table IV-31.

[121] CR/PR at Table IV-31.

[122] CR/PR at IV-49.

[123] CR/PR at Table IV-31.

[124] CR/PR at Table IV-31.

[125] CR/PR at Table IV-36, providing GTA export data for exports from Brazil under HS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91.

[126] CR/PR at Table IV-112.

[127] Confidential Report from the Original Investigations at Tables V-11, V-12.

[128] CR/PR at Table V-12.

The record indicates that subject imports from Brazil maintained a limited presence in the U.S. market during the POR. Nevertheless, the industry in Brazil has excess capacity and would be able to export CTL plate to the U.S. market within Brazil's annual quota limit.[129] The volume of subject imports from Brazil allowed under the Section 232 absolute quota (10,049 short tons) is equivalent to approximately 0.19 percent of apparent U.S. consumption in 2021.[130] This potential loss in sales volume likely represents *** of revenue for the domestic industry.

In light of the volume of subject imports from Brazil during the original investigations, which fluctuated but increased overall, underselling by subject imports from Brazil during the original investigations, and the Brazilian industry's ability to increase exports to the United States, we find that revocation of the antidumping duty order on subject imports from Brazil would not likely have no discernible adverse impact on the domestic industry.

*China.* During the original investigations, subject imports from China increased from 29,221 short tons in 2013 (or 0.3 percent of apparent U.S. consumption) to 47,992 short tons in 2014 (or 0.5 percent of apparent U.S. consumption) and 72,239 short tons in 2015 (or 0.9 percent of apparent U.S. consumption); subject imports from China were 32,943 short tons in interim 2015 (or 0.5 percent of apparent U.S. consumption) and 37,718 short tons in interim 2016 (or 0.6 percent of apparent U.S. consumption).[131]

In the original investigations, the Commission received a foreign producer/exporter questionnaire from one firm, Jiangyin Xingcheng, which accounted for approximately *** percent of production of CTL plate in China during 2015, and approximately *** percent of U.S. imports of CTL plate from China in 2015.[132] Jiangyin Xingcheng reported a production capacity of *** short tons in 2013, 2014, and 2015; production capacity was *** short tons in interim 2015 and 2016.[133] Jiangyin Xingcheng reported production of *** short tons in 2013, *** short tons in 2014, and *** short tons in 2015; production was *** short tons in interim 2015 and *** short tons in interim 2016.[134] During the original investigations, Jiangyin Xingcheng's exports as a share of total shipments of CTL plate ranged from *** percent to *** percent,

[129] CR/PR at I-45 & Table I-27. In 2021, Brazilian imports totaled 25 short tons compared to its section 232 quota amount of 10,049 short tons, indicating that Brazil has the ability to increase its exports of CTL plate to the United States by approximately 10,024 short tons. *Derived from* CR/PR at Table IV-1.

[130] *Calculated from* CR/PR at Tables I-33, C-1.

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

[132] CR/PR at IV-84.

[133] Confidential Report from the Original Investigations at Table VII-15.

[134] Confidential Report from the Original Investigations at Table VII-15.

while their exports to the United States as a share of total shipments ranged from *** percent to *** percent.[135]

During the POR, the volume of subject imports from China were 37,312 short tons in 2016, 1,755 short tons in 2017, 788 short tons in 2018, 559 short tons in 2019, 236 short tons in 2020, and 4,513 short tons in 2021.[136] Subject imports from China ranged from *** percent to *** percent of apparent U.S. consumption during the POR.[137] Subject imports from China are currently subject to 25 percent *ad valorem* duties under Section 232 and 7.5 percent *ad valorem* duties under section 301.[138]

In these reviews, one producer in China, Jiangsu Tiangong Tools New Materials Co., LTD ("Jiangsu Tiangong Tools"), responded to the Commission's questionnaire.[139] In its response, Jiangsu Tiangong Tools did not provide an estimate as to its share of total CTL plate production in China and ***.[140] This producer reported production of out-of-scope merchandise on the same equipment and machinery used to produce CTL plate.[141] In 2016, its exports to the United States accounted for *** percent of U.S. imports of CTL plate from China.[142]

Given the limited coverage based on questionnaire responses, we have also considered industry data reported in ***. According to *** data, gross production and apparent gross consumption of reversing mill plate[143] in China fluctuated but increased overall during the POR from *** short tons in 2016 to *** short tons in 2021, respectively.[144] In 2022, gross production of reversing mill plate in China is projected to be *** short tons and apparent gross consumption is projected to be *** short tons.[145]

Exports of CTL plate from China decreased during the POR but continued to be substantial; exports were *** short tons in 2016, *** short tons in 2017, *** short tons in 2018,

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[135] Confidential Report from the Original Investigations at Table VII-15.

[136] CR/PR at Tables I-32 & C-1.

[137] CR/PR at Tables I-32 & C-1.

[138] CR/PR at Table I-27. Section 301 duties on CTL plate from China became effective February 14, 2020. CR/PR at I-46. Section 232 duties on CTL plate from China became effective March 23, 2018. CR/PR at I-43. As of August 1, 2021, China has cancelled export rebates for steel exports under in-scope HTS headings 7209, 7210, 7225, and 7226. *Id*. at IV-86, n.20.

[139] CR/PR at IV-84.

[140] CR/PR at IV-84.

[141] CR/PR at IV-64. ***. CTL plate accounted for over *** percent of total production on shared equipment throughout the POR. *Id.*

[142] CR/PR at IV-84.

[143] These data may be understated as the ***. CR/PR at IV-84 n.20; Email from ***. For more information on production and mill differences see CR/PR at I-54 to I-60.

[144] CR/PR at Table IV-37.

[145] CR/PR at Table IV-37.

*** short tons in 2019, *** short tons in 2020, and *** short tons in 2021.[146] The leading export markets for CTL plate from China in 2021 were Vietnam and South Korea.[147]

In the original investigations, subject imports from China undersold the domestic like product in *** of *** comparisons involving *** short tons with an underselling margin of *** percent.[148] In these reviews, subject imports from China undersold the domestic like product in *** of *** comparisons involving *** short tons with an underselling margin of *** percent.[149]

In light of the foregoing, including the volume of subject imports from China in the original investigations, the continued presence of subject imports from China in the U.S. market during the POR, and the large capacity in the reversing mill plate industry and large volume of exports of the CTL plate industry in China, we find that revocation of the countervailing and antidumping duty orders on subject imports from China would not likely have no discernible adverse impact on the domestic industry.

*France.* During the original investigations, subject imports from France increased from 87,727 short tons in 2013 (or 1.0 percent of apparent U.S. consumption) to 111,176 short tons in 2014 (or 1.1 percent of apparent U.S. consumption) and 217,558 short tons in 2015 (or 2.6 percent of apparent U.S. consumption); subject imports from France were 199,409 short tons in interim 2015 (or 3.0 percent of apparent U.S. consumption) and 104,263 short tons in interim 2016 (or 1.7 percent of apparent U.S. consumption).[150]

In the original investigations, the Commission received foreign producer/exporter questionnaires from three firms, which accounted for approximately *** percent of production of CTL plate in France, and *** U.S. imports of CTL plate from France in 2015.[151] The French producers reported a production capacity of *** short tons in 2013, *** short tons in 2014, and *** short tons in 2015; production capacity was *** short tons in interim 2015 and 2016.[152] Responding foreign producers in France reported production of *** short tons in 2013, *** short tons in 2014, and *** short tons in 2015; production was *** short tons in interim 2015 and *** short tons in interim 2016.[153] During the original investigations, responding French producers' exports as a share of total shipments of CTL plate ranged from *** percent to *** percent, while their exports to the United States as a share of total shipments ranged from ***

[146] CR/PR at Table IV-45, providing GTA export data for exports from China under HS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91.

[147] CR/PR at Table IV-45.

[148] CR/PR at V-42, n.7; Confidential Report from the Original Investigations at Tables V-11, V-12.

[149] CR/PR at Table V-12.

[150] *Original Determinations*, USITC Pub. 4664 at Table C-1.

[151] CR/PR at IV-100. The three firms were ArcelorMittal (FR), Dillinger France, and Entrepose. *Id.*

[152] Confidential Report from the Original Investigations at Table VII-19.

[153] Confidential Report from the Original Investigations at Table VII-19.

percent to *** percent.[154] Responding French producers' exports as a share of total shipments of CTL plate was *** percent in interim 2015 and *** percent in interim 2016, while their exports to the United States as a share of total shipments was *** in interim 2015 and *** in interim 2016.[155]

During the current reviews, the volume of subject imports from France was 107,855 short tons in 2016, 6,608 short tons in 2017, 4,197 short tons in 2018, 4,042 short tons in 2019, 1,375 short tons in 2020, and 1,595 short tons in 2021.[156] The percentage of apparent U.S. consumption of subject imports from France ranged from *** percent to *** percent throughout the POR.[157] Starting June 1, 2018, CTL plate originating in the European, including France, was subject to 25 percent Section 232 duties. Effective January 1, 2022, CTL plate originating in European Union countries, including France, have been subject to annual TRQ limits under Section 232, which provide for limited volumes of imports to enter without Section 232 duties and impose 25 percent duties when imports enter above the limits.[158]

In these reviews, the Commission received questionnaire responses from three producers of CTL plate in France, Dillinger France, Entreposem, and Industeel Franace, which accounted for *** of CTL plate production in France in 2021.[159] Reported CTL plate capacity in France was *** short tons in 2016-2018 and *** short tons in 2019-2021; it was *** short tons in interim 2021 and interim 2022.[160] Reported CTL plate production in France was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; it was *** short tons in interim 2021 and *** short tons in interim 2022.[161] Capacity utilization of the responding French producers was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021; it was *** percent in interim 2021 and *** percent in interim 2022.[162] *** responding French producers reported producing other products on the same equipment and machinery used to produce CTL plate.[163] Responding French producers' exports as a share of total shipments of CTL plate ranged from *** percent to *** percent during the

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[154] Confidential Report from the Original Investigations at Table VII-19.

[155] Confidential Report from the Original Investigations at Table VII-19.

[156] CR/PR at Tables I-33 & C-1.

[157] CR/PR at Tables I-33 & C-1.

[158] CR/PR at I-44 and Table I-27. The annual TRQ for imports of CTL plate originating in France is 81,427 short tons. *Id.*

[159] CR/PR at IV-100.

[160] CR/PR at Table IV-50.

[161] CR/PR at Table IV-50.

[162] CR/PR at Table IV-50.

[163] CR/PR at IV-110. ***. CTL plate accounted for over *** percent of total production on shared equipment throughout the POR. *Id.* ***. *Id*.

POR, with exports to the United States accounting for *** percent to *** percent of total shipments.[164]

Exports of CTL plate from France decreased irregularly during the POR; exports were 772,487 short tons in 2016, 908,617 short tons in 2017, 960,674 short tons in 2018, 863,077 short tons in 2019, 586,462 short tons in 2020, and 670,309 short tons in 2021.[165] The leading export markets for CTL plate from France in 2021 were Germany and Spain.[166]

In the original investigations, subject imports from France undersold the domestic like product in *** of *** comparisons involving *** short tons with underselling margins ranging from *** to *** percent.[167] In the current reviews, subject imports from France *** undersell the domestic like product in *** of its *** comparisons.[168]

In light of the foregoing, including the volume of subject imports from France and underselling by such imports in the original investigations, the continued presence of subject imports from France in the U.S. market during the POR, and the large capacity, including excess capacity, and volume of exports of the CTL plate industry in France, we find that revocation of the antidumping duty order on subject imports from France would not likely have no discernible adverse impact on the domestic industry.[169]

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[164] CR/PR at Table IV-50.

[165] CR/PR at Table IV-55, providing GTA export data for exports from France under HS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91.

[166] CR/PR at Table IV-55.

[167] CR/PR at V-42, n.7; Confidential Report from the Original Investigations at Tables V-11, V-12.

[168] CR/PR at Table V-12.

[169] We are unpersuaded by Dillinger's argument that the Commission should not cumulate subject imports from France with imports from other subject sources because such imports are likely to have no discernible adverse impact on the domestic industry after revocation. Dillinger Prehearing Br. at 6-9; Dillinger Posthearing Br. at 5-6 and Responses to Commission Questions at 1-4; Dillinger Final Comments at 6-7. First, Dillinger asserts that it focuses on supplying the EU, which it maintains should not be considered exports. We observe, however, that CTL plate producers in France reported exporting significant quantities of CTL plate to Asian markets and markets in the Americas other than the United States during the POR, including *** short tons to Asian markets and *** short tons to markets in the Americas other than the United States in 2021, demonstrating that the French industry exports significant quantities to markets other than the EU. CR/PR at Table IV-50.

Dillinger also maintains that the Section 232 TRQ will limit the volume of subject imports, although it acknowledges that subject imports from France above the TRQ are allowed with the payment of the 25 percent tariff. In this regard, Dillinger's reliance on the Commission's determinations in *Stainless Steel Bar*s is misplaced, as that determination involved an absolute quota on imports of stainless steel bars from Brazil. *Stainless Steel Bar from Brazil, India, Japan, and Spain*, Inv. Nos. 731-TA-678, 679, 681, and 682 (Fourth Review), USITC Pub.4820 (Sept. 2018). In any event, we observe that the quantity of reported exports of CTL plate from France declined from *** short tons in 2016 to *** in 2017 and remained at low levels prior to the imposition of the Section 232 TRQ, indicating that the antidumping duty order had a disciplining effect on the volume of exports of CTL plate from France. (Continued…)

*Germany.* In the original investigations, U.S. imports of subject merchandise from Germany decreased from 138,540 short tons in 2013 (or 1.6 percent of apparent U.S. consumption) to 72,631 short tons in 2014 (or 0.7 percent of apparent U.S. consumption), before increasing to 234,810 short tons in 2015 (or 2.8 percent of apparent U.S. consumption); the volume of subject imports from Germany was 205,366 short tons in interim 2015 (or 3.1 percent of apparent U.S. consumption) and 142,329 short tons (or 2.4 percent of apparent U.S. consumption) in interim 2016.[170]

In the original investigations, the Commission received questionnaire responses from six producers/exporters, which accounted for *** production of CTL plate in Germany during 2015 and *** of U.S. imports of CTL plate from Germany in 2015.[171] Responding German producers' reported capacity was *** short tons in 2013, *** short tons in 2014, *** short tons in 2015, *** short tons in interim 2015, and *** short tons in interim 2016.[172] Their reported production was *** short tons in 2013, *** short tons in 2014, *** short tons in 2015, *** short tons in interim 2015, and *** short tons in interim 2016.[173] Responding German producers' exports as a share of total shipments of CTL plate ranged from *** percent to *** percent, while their exports to the United States as a share of total shipments ranged from *** percent to *** percent during the original investigations.[174]

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CR/PR at Table IV-51. Moreover, despite the Section 232 measures, subject imports from France continued to maintain a presence in the United States during the POR, indicating that the French industry maintains U.S. customers and an interest in supplying the U.S. market. CR/PR at Tables I-33, IV-1, IV-50, IV-55, and C-1. Additionally, as discussed above, the volume of subject imports from France increased overall in the original investigations and subject imports from France undersold the domestic like product in the majority of comparisons, and we find that such behavior is likely to resume upon revocation of the order.

Dillinger also argues that its exports consist mostly of specialty, made-to-order CTL plate in larger dimensions and X-70 CTL plate. Even if true, U.S. producers also produce a wide range of specialty products that overlap with those produced by Dillinger, including X-70 CTL plate. *Compare* CR/PR at Table III-5 *with* CR/PR at Table IV-52. Indeed, two responding purchasers reported that the domestic like product was superior to subject imports from France in terms of the availability of grades/products needed while only one responding purchaser that reported the domestic like product to be inferior. CR/PR at II-17. Additionally, the Commission rejected the argument that domestic industry could not supply the U.S. market with X-70 CTL plate in its original determinations. *Original Determinations*, USITC Pub. 4664 at 34-36. Moreover, the record shows that French producers produced a wide range of CTL plate products in 2021, with a majority of their production consisting of carbon CTL plate and CTL plate in thicknesses under 4 inches. CR/PR at Tables IV-52, IV-53.

[170] *Original Determinations*, USITC Pub. 4664 at Table C-1.

[171] CR/PR at IV-115.

[172] Confidential Report from the Original Investigations at Table VII-24.

[173] Confidential Report from the Original Investigations at Table VII-24.

[174] Confidential Report from the Original Investigations at Table VII-24.

In the current reviews, subject imports from Germany decreased every year except 2020 and 2021. They declined from 147,626 short tons in 2016 to 10,981 short tons in 2017, 4,683 short tons in 2018, and 2,071 short tons in 2019, before increasing to 4,135 short tons in 2020 and 5,628 short tons in 2021.[175] Subject imports from Germany accounted for 2.4 percent of apparent U.S. consumption in 2016, 0.2 percent in 2017, 0.1 percent in 2018, less than 0.05 percent in 2019, and 0.1 percent in both 2020 and 2021.[176] Starting June 1, 2018, CTL plate originating in the European Union, including Germany, was subject to 25 percent Section 232 duties. Effective January 1, 2022, CTL plate originating in European Union countries, including Germany, have been subject to annual TRQ limits under Section 232, which provide for limited volumes of imports to enter without Section 232 duties and impose 25 percent duties when imports enter above the limits.[177]

In these five-year reviews, the Commission received questionnaire responses from four producers/exporters, which accounted for *** percent of production of CTL plate in Germany during 2021.[178] Reported CTL plate capacity in Germany was *** short tons in 2016, *** short tons in 2017 and 2018, *** short tons in 2019, and *** short tons in 2020 and 2021; it was *** short tons in interim 2021 and *** short tons in interim 2022.[179] Reported CTL plate production in Germany was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; it was *** short tons in interim 2021 and *** short tons in interim 2022.[180] Capacity utilization of the responding German producers was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021; it was *** percent in interim 2021 and *** percent in interim 2022.[181] Three of four responding German producers reported producing other products on the same equipment and machinery used to produce CTL plate.[182] Responding German producers' exports as a share of total shipments of CTL plate ranged from *** percent to *** percent during the POR, with exports to the United States accounting for *** percent to *** percent of total shipments.[183]

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

[176] CR/PR at Table I-33.

[177] CR/PR at I-44 and Table I-27. The annual TRQ for imports of CTL plate originating in Germany is 95,042 short tons. *Id.*

[178] CR/PR at IV-115.

[179] CR/PR at Table IV-60.

[180] CR/PR at Table IV-60.

[181] CR/PR at Table IV-60.

[182] CR/PR at IV-126. ***. CTL plate accounted for over *** percent of total production on shared equipment throughout the POR. *Id.* ***. *Id*. ***. *Id*.

[183] CR/PR at Table IV-60.

Exports of CTL plate from Germany decreased irregularly throughout the POR but remained substantial. Exports were 1.9 million short tons in 2016, 2.0 million short tons in 2017, 1.9 million short tons in 2018, 2.0 million short tons in 2019, 1.7 million short tons in 2020, and 1.8 million short tons in 2021.[184] The largest export markets for CTL plate from Germany in 2021 were the Netherlands and Belgium.[185] CTL plate from Germany is subject to antidumping duty orders and/or safeguard tariff rate quotas in Armenia, Belarus, Kazakhstan, Kyrgyz Republic, Russia, and Canada.[186]

In the original investigations, subject imports from Germany undersold the domestic like product in *** of *** comparisons involving *** short tons with underselling margins ranging from *** to *** percent.[187] In the current reviews, subject imports from Germany undersold the domestic like product in *** of *** comparisons involving *** short tons with underselling margins ranging from *** percent to *** percent.[188]

In light of the foregoing, including the volume of subject imports from Germany in the original investigations, the continued presence of subject imports from Germany in the U.S. market during the POR, and the large capacity, including excess capacity, and volume of exports of the CTL plate industry in Germany, we find that revocation of the antidumping duty order on subject imports from Germany would not likely have no discernible adverse impact on the domestic industry.[189]

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[184] CR/PR at Table IV-65, providing GTA export data for exports from Germany under HS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91.

[185] CR/PR at Table IV-165.

[186] CR/PR at Table IV-112.

[187] Confidential Report from the Original Investigations at Tables V-11, V-12.

[188] CR/PR at Table V-12.

[189] We are unpersuaded by Dillinger's argument that the Commission should not cumulate subject imports from Germany with imports from other subject sources because such imports are likely to have no discernible adverse impact on the domestic industry after revocation. Dillinger Prehearing Br. at 10-11; Dillinger Posthearing Br. at 8 and Responses to Commission Questions at 1-4; Dillinger Final Comments at 8-9. First, it asserts that Dillinger focuses on supplying the EU, which it maintains should not be considered exports. We observe, however, that CTL plate producers in Germany reported exporting significant and increasing quantities of CTL plate to Asian markets and markets in the Americas other than the United States during the POR, including *** short tons to Asian markets and *** short tons to markets in the Americas other than the United States in 2021, showing that the German industry exports significant quantities to markets other than the EU. CR/PR at Table IV-60.

Dillinger also maintains that the Section 232 TRQ will limit the volume of subject imports, although it acknowledges that subject imports from Germany above the TRQ are allowed with the payment of the 25 percent tariff. As discussed above, Dillinger's reliance on the Commission's determinations in *Stainless Steel Bar*s is therefore misplaced, as that determination involved an absolute quota on imports of stainless steel bars from Brazil. *Stainless Steel Bar from Brazil, India, Japan, and Spain*, Inv. Nos. 731-TA-678, 679, 681, and 682 (Fourth Review), USITC Pub.4820 (Sept. 2018). In any (Continued…)

*Italy.* In the original investigations, U.S. imports of subject merchandise from Italy increased from 46,508 short tons in 2013 (or 0.5 percent of apparent U.S. consumption) to 97,326 short tons in 2014 (or 1.0 percent of apparent U.S. consumption), before decreasing to 59,445 short tons in 2015 (or 0.7 percent of apparent U.S. consumption); the volume of subject imports from Italy was 55,472 short tons in interim 2015 (or 0.8 percent of apparent U.S. consumption) and 28,915 short tons in interim 2016 (or 0.5 percent of apparent U.S. consumption).[190]

In the original investigations, the Commission received questionnaire responses from four producers/exporters, which accounted for approximately *** percent of production of CTL plate in Italy during 2015 and approximately *** percent of U.S. imports of CTL plate from Italy in 2015.[191] These responding producers' reported capacity was *** short tons in 2013, *** short tons in 2014 and 2015, *** short tons in interim 2015, and *** short tons in interim 2016.[192] Their reported production was *** short tons in 2013, *** short tons in 2014, *** short tons in 2015, *** short tons in interim 2015, and *** short tons in interim 2016.[193] The responding Italian producers' exports as a share of total shipments of CTL plate ranged from

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event, we observe that the quantity of reported exports of CTL plate from Germany to the United States declined from *** short tons in 2016 to *** in 2017 and remained at low levels, prior to the imposition of the Section 232 TRQ, indicating that the antidumping duty order had a disciplining effect on the volume of exports of CTL plate from Germany. CR/PR at Table IV-50. Moreover, despite the Section 232 measures, subject imports from Germany continued to maintain a presence in the United States during the POR, indicating that the German industry maintains U.S. customers and an interest in supplying the U.S. market. CR/PR at Tables I-33, IV-1, IV-60, IV-65, and C-1. Additionally, as discussed above, the volume of subject imports from Germany increased overall in the original investigations, and we find that such behavior is likely to resume upon revocation of the order.

Dillinger also argues that its exports consist mostly of specialty, made-to-order CTL plate in larger dimensions and X-70 CTL plate. Even if true, U.S. producers also produce a wide range of specialty products that overlap with those produced by Dillinger, including X-70 CTL plate. *Compare* CR/PR at Table III-5 *with* CR/PR at Table IV-61. Indeed, two responding purchasers reported that the domestic like product was superior to subject imports from Germany in terms of the availability of grades/products needed and one responding purchaser reported the domestic like product to be comparable, with no responding purchaser reporting the domestic like product to be inferior. CR/PR at II-17. Additionally, the Commission rejected the argument that the domestic industry could not supply the U.S. market with X-70 CTL plate in its original determinations. *Original Determinations*, USITC Pub. 4664 at 34-36. Moreover, the record shows that German producers produced a wide range of CTL plate products in 2021, with a majority of their production consisting of carbon CTL plate and CTL plate in thicknesses under 4 inches. CR/PR at Tables IV-62, IV-63.

[190] *Original Determinations*, USITC Pub. 4664 at Table C-1.

[191] CR/PR at IV-130.

[192] Confidential Report from the Original Investigations at Table VII-29.

[193] Confidential Report from the Original Investigations at Table VII-29.

*** percent to *** percent, while their exports to the United States as a share of total shipments ranged from *** percent to *** percent during the POI.[194]

In the current reviews, the volume of subject imports from Italy decreased every year except 2020 and 2021. They declined from 29,193 short tons in 2016 to 12,907 short tons in 2017, 11,993 short tons in 2018, and 4,575 short tons in 2019, before increasing to 5,048 short tons in 2020 and 6,149 short tons in 2021.[195] Subject imports from Italy accounted for 0.5 percent of apparent U.S. consumption in 2016, 0.2 percent in both 2017 and 2018, and 0.1 percent in 2019, 2020, and 2021.[196] Starting June 1, 2018, CTL plate originating in the European Union, including Italy, was subject to 25 percent Section 232 duties. Effective January 1, 2022, CTL plate originating in European Union countries, including Italy, have been subject to annual TRQ limits under Section 232, which provide for limited volumes of imports to enter without Section 232 duties and impose 25 percent duties when imports enter above the limits.[197]

In these five-year reviews, the Commission received questionnaire responses from two producers/exporters, which accounted for *** of production of CTL plate in Italy during 2021 and approximately *** percent of U.S. imports of CTL plate from Italy in 2021.[198] Reported CTL plate capacity in Italy was *** short tons in 2016-2018, *** short tons in 2019 and 2020, and *** short tons in 2021; it was *** short tons in interim 2021 and *** short tons in interim 2022.[199] Reported CTL plate production in Italy was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; it was *** short tons in interim 2021 and *** short tons in interim 2022.[200] Capacity utilization of the responding Italian producers was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021; it was *** percent in interim 2021 and *** percent in interim 2022.[201] One of two responding Italian producers reported producing other products on the same equipment and machinery used to produce CTL plate.[202] Responding Italian producers' exports as a share of total shipments of CTL plate ranged from *** percent to *** percent during the POR, with exports to the United States accounting for *** percent to *** percent of total shipments.[203]

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[194] Confidential Report from the Original Investigations at Table VII-29.

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

[196] CR/PR at Table I-32.

[197] CR/PR at I-44 and Table I-27. The annual TRQ for imports of CTL plate originating in Italy is 24,769 short tons. *Id*.

[198] CR/PR at IV-130.

[199] CR/PR at Table IV-70.

[200] CR/PR at Table IV-70.

[201] CR/PR at Table IV-70.

[202] CR/PR at IV-141. ***. CTL plate accounted for over *** percent of total production on shared equipment throughout the POR. *Id.*

[203] CR/PR at Table IV-70.

Exports of CTL plate from Italy increased irregularly throughout the POR. Exports were 1.6 million short tons in 2016, 1.7 million short tons in 2017, 1.6 million short tons in 2018, 1.6 million short tons in 2019, 1.4 million short tons in 2020, and 1.6 million short tons in 2021.[204] The largest export markets for CTL plate from Italy in 2021 were Germany and Turkey.[205] CTL plate from Italy is subject to antidumping duty orders and/or safeguard tariff rate quotas in Armenia, Belarus, Kazakhstan, Kyrgyz Republic, Russia, and Turkey.[206]

In the original investigations, subject imports from Italy undersold the domestic like product in *** of *** comparisons involving 37,946 short tons with underselling margins ranging from *** to *** percent.[207] In these reviews, subject imports from Italy undersold the domestic like product in *** of *** comparisons involving *** short tons with underselling margins ranging from *** percent to *** percent.[208]

In light of the foregoing, including the volume of subject imports from Italy and underselling by such imports in the original investigations, the continued presence of subject imports from Italy in the U.S. market during the POR, and the large capacity and volume of exports of the CTL plate industry in Italy, we find that revocation of the antidumping duty order on subject imports from Italy would not likely have no discernible adverse impact on the domestic industry.[209]

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[204] CR/PR at Table IV-75, providing GTA export data for exports from Italy under HS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91.

[205] CR/PR at IV-141.

[206] CR/PR at Table IV-112.

[207] Confidential Report from the Original Investigations at Tables V-11, V-12.

[208] CR/PR at Table V-12.

[209] We are unpersuaded by NLMK's arguments that the Commission should not cumulate subject imports from Italy with imports from other subject sources because such imports are likely to have no discernible adverse impact on the domestic industry after revocation. NLMK Prehearing Br. at 6-17; NLMK Posthearing Br. at 1-15. NLMK disputes that the antidumping duty order has had a disciplining effect on subject imports from Italy and maintains that subject imports from Italy declined due to the imposition of Section 232 measures, and contends that Italy has reduced exports of commodity grade CTL plate from Italy, while maintaining exports of speciality CTL plate. As discussed above, however, the largest decrease in the volume of subject imports from Italy during the POR occurred from 2016 to 2017 and the volume remained at low levels, prior to the imposition of Section 232 measures. CR/PR at Table IV-1. Furthermore, as detailed below in Section III.D.2, we are not persuaded by NLMK's argument that there likely will be a lack of fungibility between the domestic like product and subject imports from Italy upon revocation due to the Italian industry's purported focus on specialty products. Given that we find that the record does not support NLMK's claim that subject imports from Italy are unlikely to be fungible with the domestic like product upon revocation of the orders and that there will likely be a reasonable overlap of competition, we are not persuaded that subject imports from Italy would likely have no discernible adverse impact on the domestic industry.
(Continued…)

*Japan.* In the original investigations, the volume of subject imports from Japan increased from 2013 to 2015 but was lower in interim 2016 than in interim 2015. The volume of subject imports from Japan was 48,325 short tons in 2013 (or 0.5 percent of apparent U.S. consumption), 76,002 short tons in 2014 (or 0.8 percent of apparent U.S. consumption), and 77,500 short tons in 2015 (or 0.9 percent of apparent U.S. consumption); it was 71,632 short tons (or 1.1 percent of apparent U.S. consumption) in interim 2015 and 31,959 short tons (or 0.5 percent of apparent U.S. consumption) in interim 2016.[210]

In the original investigations, the Commission received questionnaire responses from six producers/exporters of CTL plate in Japan, which accounted for *** CTL plate production in Japan and *** percent of U.S. imports of subject merchandise from Japan in 2015.[211] These producers reported that their capacity was 14.7 million short tons in 2013, 14.6 million short tons in 2014, and 14.0 million short tons in 2015; it was 10.6 million short tons in interim 2015 and 10.7 million short tons in interim 2016.[212] Their reported production was *** short tons in 2013, *** short tons in 2014, *** short tons in 2015, *** short tons in interim 2015, and *** short tons in interim 2016.[213] From 2013 through 2015, their reported exports as a share of their total shipments of CTL plate ranged from *** percent to *** percent, while their exports to the United States as a share of total shipments ranged from *** percent to *** percent.[214]

In the current reviews, the volume of subject imports from Japan decreased irregularly during the POR but was higher in interim 2022 than in interim 2021. It was 34,261 short tons in

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We similarly find unpersuasive NLMK's arguments that it will focus on its home and EU markets. As discussed above, subject imports from Italy continued to be present in the U.S. market throughout the POR, demonstrating a continued interest in suppling the U.S. market and Section 232 measures have not deterred this interest. CR/PR at Table IV-1. Additionally, subject producers reported substantial volumes of exports of CTL plate to Asian markets and markets in the Americas other than the United States during the POR, including *** short tons to Asian markets and *** short tons to markets in the Americas other than the United States in 2021, indicating that Italian CTL plate producers are not focused only on their home and EU markets. CR/PR at Table IV-70.

Finally, we are not persuaded by NLMK's arguments that the pricing data indicate that there is no incentive for subject imports to undersell the domestic like product due to the Section 232 TRQ. As discussed above, subject imports from Italy undersold the domestic like product in the majority of comparisons in the original investigations and continued to undersell the domestic like product in some comparisons in these reviews, even under the discipline of the order and the Section 232 measures. We also note that some of the underselling by subject imports from Italy in the quarterly pricing data in these reviews occurred as the prices for subject imports from Italy declined, which does not support NLKM's assertion that the underselling in these reviews merely reflects price increases by the domestic industry to which subject imports from Italy could not "catch up." *See, e.g.*, CR/PR at Tables V-7, V-8.

[210] *Original Determinations*, USITC Pub. 4664 at Table C-1.

[211] CR/PR at IV-146.

[212] Confidential Report from the Original Investigations at Table VII-34.

[213] Confidential Report from the Original Investigations at Table VII-34.

[214] Confidential Report from the Original Investigations at Table VII-34.

2016, 13,809 short tons in 2017, 1,652 short tons in 2018, 1,723 short tons in 2019, 618 short tons in 2020, and 237 short tons in 2021; the volume was 125 short tons in interim 2021 and 214 short tons in interim 2022.[215] Subject imports from Japan accounted for 0.6 percent of apparent U.S. consumption in 2016, 0.2 percent of apparent U.S. consumption in 2017, and less than 0.05 percent of apparent U.S. consumption throughout the rest of the POR.[216] Effective March 23, 2018, CTL plate originating in Japan were subject to 25 percent Section 232 duties. Effective April 1, 2022, CTL plate products originating in Japan have been subject to annual TRQ limits under Section 232, which provide for limited volumes of imports to enter without Section 232 duties and impose 25 percent duties when imports enter above the limits.[217]

In these reviews, the Commission received questionnaire responses from five firms believed to account for *** percent of CTL plate production in Japan in 2021.[218] These producers' production capacity was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018 and 2019, *** short tons in 2020, *** short tons in 2021, *** short tons in interim 2021, and *** short tons in interim 2022.[219]

Reported production fluctuated throughout the POR. It was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; it was *** short tons in interim 2021 and *** short tons in interim 2022.[220] Capacity utilization was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021; it was *** percent in interim 2021 and *** percent in interim 2022.[221] Three of five responding firms produced other products on the same equipment and machinery used to produce CTL plate.[222] Exports as a share of total shipments of CTL plate ranged from *** percent to *** percent during the POR, with exports to the United States as a share of total shipments accounting for *** percent in 2016, *** percent in 2017 and 2018, and *** percent for the rest of the POR.[223]

Export shipments of CTL plate from Japan fluctuated during the POR. They were *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; they were *** short tons in interim 2021 and

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

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

[217] CR/PR at I-44, Table I-27. The TRQ was 1,519 short tons for 2022. *Id*.

[218] CR/PR at IV-146.

[219] CR/PR at Table IV-80.

[220] CR/PR at Table IV-80.

[221] CR/PR at Table IV-80.

[222] CR/PR at IV-157 & Table IV-84. ***. CTL plate accounted for over *** percent of total production on shared equipment throughout the POR. *Id.*

[223] CR/PR at Table IV-80.

*** short tons in interim 2022.[224] The largest export markets for CTL plate from Japan in 2021 were China, South Korea, and Vietnam.[225] During the POR, certain CTL plate products from Japan were subject to antidumping duty orders in Australia and Turkey and safeguard measures in the European Union.[226]

In the original investigations, subject imports from Japan undersold the domestic like product in 17 of 43 comparisons involving 53,361 short tons with underselling margins ranging from 0.0 to 19.3 percent.[227] During these reviews, subject imports from Japan undersold the domestic like product in *** involving *** short tons with underselling margins ranging from *** to *** percent.[228]

In light of the foregoing, including the volume of subject imports from Japan and underselling by such imports in the original investigations, the continued presence of subject imports from Japan in the U.S. market during the POR, and the large capacity, including excess capacity, and volume of exports of the CTL plate industry in Japan, we find that revocation of the antidumping duty order on subject imports from Japan would not likely have no discernible adverse impact on the domestic industry.[229]

*South Africa.* In the original investigations, subject imports from South Africa increased throughout the period of investigation, from 48,325 short tons in 2013 (or 0.5 percent of apparent U.S. consumption), to 76,002 short tons in 2014 (or 1.0 percent of apparent U.S. consumption), and to 77,500 short tons in 2015 (or 0.9 percent of apparent U.S. consumption). They were lower in interim 2016 (31,959 short tons or 0.5 percent of apparent U.S.

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[224] CR/PR at Table IV-80.

[225] CR/PR at Table IV-85, providing GTA export data for exports from Japan under HS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91.

[226] CR/PR at Table IV-112.

[227] Confidential Report from the Original Investigations at Tables V-11, V-12.

[228] CR/PR at Table V-12.

[229] We are unpersuaded by the Japanese Respondents' argument that the Commission should not cumulate subject imports from Japan with imports from other subject sources because subject imports from Japan likely will have no discernible adverse impact on the domestic industry upon revocation of the order. Japanese Respondents Prehearing Br. at 6-20; Japanese Respondents Posthearing Br. at 10-14. Japanese Respondents claim that their exports will continue to be focused on Asian markets and be restrained by the Section 232 TRQ as well as high freight costs. *Id.* As discussed above, the record in these reviews indicates that subject imports from Japan continued to be present throughout the POR demonstrating a continued interest in supplying the U.S. market, despite the Section 232 measures. CR/PR at I-43 to I-44 & Tables I-33, IV-1. Additionally, producers in Japan exported significant quantities of CTL plate to European markets and markets in the Americas other than the United States, suggesting that Japanese producers are not entirely focused on Asian markets as Japanese Respondents claim. CR/PR at Table IV-80. Moreover, the Japanese producers' exports of CTL plate to markets in the Americas other than the United States contradict Japanese Respondents' claims that shipping costs would impede their ability to ship CTL plate to the U.S. market. CR/PR at Table IV-80.

consumption) than in interim 2015 (71,632 short tons or 1.1 percent of apparent U.S. consumption).[230]

In the original investigations, the Commission received questionnaire responses from two producers/exporters of CTL plate in South Africa, which accounted for *** production of CTL plate in South Africa and *** percent of U.S. imports of subject merchandise from South Africa in 2015.[231] These responding subject producers' reported production capacity of CTL plate was *** short tons in 2013, *** short tons in 2014, *** short tons in 2015, *** short tons in interim 2015, and *** short tons in interim 2016.[232] Their reported production of CTL plate was *** short tons in 2013, *** short tons in 2014, *** short tons in 2015, *** short tons in interim 2015, and *** short tons in interim 2016.[233] From 2013 through 2015, their reported exports as a share of their total shipments of CTL plate ranged from *** percent to *** percent, while their exports to the United States as a share of total shipments ranged from *** percent to *** percent.[234]

During the period of review, the volume of subject imports from South Africa was 93 short tons in 2016 and 3 short tons in 2017; there were no imports from South Africa in 2018, 2019, 2020, or 2021.[235] Subject imports from South Africa accounted for less than 0.05 percent of apparent U.S. consumption in 2016 and 2017, and zero in the remainder of the period of review.[236] Subject imports from South Africa are currently subject to 25 percent *ad valorem* duties under Section 232.[237]

In these reviews, no producer in South Africa responded to the Commission's questionnaire.[238] According to *** data, gross production of reversing mill plate[239] in South Africa decreased irregularly throughout the period of review from *** short tons in 2016, to *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; apparent gross consumption of reversing mill plate in South Africa increased irregularly throughout the period of review from *** short tons in 2016 to *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and ***

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[230] *Original Determinations,* USTIC Pub. 4664 at Table C-1.

[231] CR/PR at IV-161.

[232] Confidential Report from the Original Investigations at Table VII-43.

[233] Confidential Report from the Original Investigations at Tables VII-43 and VII-44.

[234] Confidential Report from the Original Investigations at Tables VII-43.

[235] CR/PR at Tables I-33, IV-1, and C-1.

[236] CR/PR at Tables I-33, IV-1, and C-1.

[237] CR/PR at Table I-27. Effective March 23, 2018, subject imports from South Africa became subject to Section 232 duties. CR/PR at I-43.

[238] CR/PR at IV-161.

[239] These data may be understated as the ***. CR/PR at IV-162, n.39; Email from ***. For more information on production and mill differences see CR/PR at I-54 to I-60.

short tons in 2021.[240] Gross production of reversing mill plate in South Africa is projected to be *** short tons while apparent gross consumption is projected to be *** short tons in 2022.[241]

Exports of CTL plate from South Africa increased from 26,175 short tons in 2016, to 27,395 short tons in 2017 and 38,942 short tons in 2018 before decreasing to 28,863 short tons in 2019, 23,361 short tons in 2020, and 23,055 short tons in 2021.[242] The largest export markets for CTL plate from South Africa were Zimbabwe, Zambia, Mozambique, and Botswana.[243] During the period of review, CTL plate from South Africa was subject to antidumping duties in Brazil and safeguard measures in the European Union.[244]

In the original investigations, subject imports from South Africa undersold the domestic like product in *** of *** comparisons involving 33,410 short tons with underselling margins ranging from *** to *** percent.[245] In these reviews, there were no pricing data reported for subject imports from South Africa.[246]

In light of the foregoing, including the increasing volume of subject imports from South Africa and underselling by such imports in the original investigations, and the capacity of the CTL plate industry in South Africa, we find that revocation of the antidumping duty order on subject imports from South Africa would not likely have no discernible adverse impact on the domestic industry.

*South Korea.* In the original investigations, the volume of subject imports from South Korea increased throughout the POI; it was *** short tons in 2013 (or *** percent of apparent U.S. consumption), *** short tons in 2014 (or *** percent of apparent U.S. consumption), and 313,336 short tons in 2015 (or *** percent of apparent U.S. consumption). The volume of subject imports from South Korea was higher in interim 2016 at *** short tons (or *** percent of apparent U.S. consumption) than in interim 2015 at *** short tons (or *** percent of apparent U.S. consumption).[247]

In the original investigations, the Commission received a questionnaire response from one producer/exporter of CTL plate in South Korea, POSCO, which accounted for approximately *** percent of CTL plate production in South Korea and *** subject imports from South Korea to the United States in 2015.[248] POSCO's reported production capacity was *** short tons in

[240] CR/PR at Table IV-86.

[241] CR/PR at Table IV-86.

[242] CR/PR at Table IV-88, providing GTA export data for exports from South Africa under HS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91.

[243] CR/PR at Table IV-88.

[244] CR/PR at Table IV-112.

[245] CR/PR at V-42 n.7; Confidential Report from the Original Investigations at Table V-11.

[246] CR/PR at V-42 n.8 and Table V-12.

[247] *Original Determinations*, USITC Pub. 4664 at Table C-1.

[248] CR/PR at IV-168.

2013, *** short tons in 2014, and *** short tons in 2015; it was *** short tons in interim 2015, and *** short tons in interim 2016.[249] Its reported production was *** short tons in 2013, *** short tons in 2014, *** short tons in 2015, *** short tons in interim 2015, and *** short tons in interim 2016.[250] From 2013 through 2015, POSCO's reported exports as a share of its total shipments of CTL plate ranged from *** percent to *** percent, while its exports to the United States as a share of total shipments ranged from *** percent to *** percent.[251]

In the current reviews, the volume of subject imports from South Korea decreased from *** short tons in 2016 to *** short tons in 2017 and then fluctuated during the remainder of the POR but remained below pre-order levels, with volumes of *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021.[252] The volume of subject imports from South Korea was *** short tons in interim 2021 and *** short tons in interim 2022.[253] Subject imports from South Korea accounted for *** percent of apparent U.S. consumption in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021; they accounted for *** percent in interim 2021 and *** percent in interim 2022.[254] Instead of duties, subject imports from South Korea are subject to annual absolute import quota under Section 232.[255]

In these reviews, the Commission received questionnaire responses from three firms, including POSCO, which estimated that it accounted for all subject CTL plate production in South Korea in 2021.[256] POSCO's production capacity remained stable during the POR at *** short tons in 2016 through 2021 and *** short tons in each interim period.[257] Its reported production fluctuated throughout the POR. It was *** short tons in 2016 and 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; it was *** short tons in interim 2021 and *** short tons in interim 2022.[258] Its capacity utilization was

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[249] Confidential Report from the Original Investigations at Table VII-38.

[250] Confidential Report from the Original Investigations at Table VII-38.

[251] Confidential Report from the Original Investigations at Table VII-38.

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

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

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

[255] CR/PR at I-44 to I-45 & Table I-27. The quota is 223,252 short tons and became effective June 1, 2018. *Id*. South Korea's annual quota usage rate for the relevant HTS chapter 99 heading that contain CTL plate indicates that the quota was almost entirely filled in 2021, of which *** short tons comprised subject imports from South Korea. The usage rate in 2021 of the Section 232 quota by imports from South Korea (subject and nonsubject) for HTS 9903.80.11: Plate in cut lengths was 99.6 percent of 202,530,628 kg filled. CR/PR at I-45 n.38.

[256] CR/PR at IV-167. The other two firms that responded to the Commission's questionnaire were resellers, and ***. CR/PR at IV-169 n.43.

[257] CR/PR at Table IV-96.

[258] CR/PR at Table IV-96.

*** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021; it was *** percent in interim 2021 and *** percent in interim 2022.[259] *** produced other products on the same equipment and machinery used to produce CTL plate.[260] The responding firms' exports as a share of their total shipments of CTL plate ranged from *** percent to *** percent during the POR, with exports to the United States as a share of total shipments ranging from *** percent to *** percent during the POR.[261]

Export shipments of CTL plate from South Korea decreased irregularly during the POR. Reported export shipments of CTL plate were *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; they were *** short tons in interim 2021 and *** short tons in interim 2022.[262] The largest export markets for CTL plate from South Korea in 2021 were Japan, China, and Vietnam.[263] During the POR, certain CTL plate products from South Korea were subject to antidumping duty orders in Brazil, Taiwan, and Turkey and safeguard measures in the European Union.[264]

In the original investigations, subject imports from South Korea undersold the domestic like product in 33 of 63 comparisons involving 342,220 short tons with underselling margins ranging from 0.2 percent to 27.1 percent.[265] During these reviews, subject imports from South Korea undersold the domestic like product in *** involving *** short tons with underselling margins ranging from *** percent to *** percent.[266]

In light of the foregoing, including the volume of subject imports from South Korea and underselling by such imports in the original investigations, the continued presence of subject imports from South Korea in the U.S. market during the POR, and the large capacity, including excess capacity, and volume of exports of the CTL plate industry in South Korea, we find that revocation of the antidumping and countervailing duty orders on subject imports from South Korea would not likely have no discernible adverse impact on the domestic industry.[267]

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[259] CR/PR at Table IV-96.

[260] CR/PR at IV-180. *** on the same machinery as it used to produce subject CTL plate, and subject CTL plate accounted for *** on this machinery throughout the POR. *Id.*

[261] CR/PR at Table I-96.

[262] CR/PR at Table IV-93.

[263] CR/PR at Table IV-98, providing GTA export data for exports from South Korea under HS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91.

[264] CR/PR at Table IV-112.

[265] Confidential Report from the Original Investigations at Tables V-11, V-12.

[266] CR/PR at Table V-12.

[267] We are unpersuaded by POSCO's and GOK's arguments that subject imports from South Korea will likely have no discernible adverse impact upon revocation. They claim that the absolute Section 232 quota limits the volume of subject imports to a level that could not have a discernible (Continued…)

*Taiwan.* During the original investigations, subject imports from Taiwan increased from 34,302 short tons in 2013 (or 0.4 percent of apparent U.S. consumption) to 58,742 short tons in 2014 (or 0.6 percent of apparent U.S. consumption), but then declined to 35,482 short tons in 2015 (or 0.4 percent of apparent U.S. consumption); subject imports from Taiwan were 30,610

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adverse impact on the domestic industry, particularly due to the fact that the quota covers both subject imports and nonsubject imports from South Korea, and the South Korean steel industry allocates the Section 232 quota among multiple producers in South Korea. POSCO Prehearing Br. at 4-10; POSCO Posthearing Br. at 2-7, 13-14; POSCO Final Comments at 6-8; GOK Prehearing Br. at 1-11. We note that the volume of subject imports from South Korea allowed under the Section 232 absolute quota (223,252 short tons) is equivalent to approximately 4.2 percent of apparent U.S. consumption in 2021. *Calculated from* CR/PR at Table I-33. Moreover, as discussed in more detail below in section III.D.3.b, allocations among South Korean producers are not necessarily fixed, such that subject imports from South Korea could increase beyond 2021 levels, which already comprised 2.2 percent of apparent U.S. consumption in 2021. CR/PR at Table I-33. The loss of sales volume after revocation, either up to the total quota amount or a lesser amount allocated to subject imports in the reasonably foreseeable future, and the associated lost revenues to the domestic industry, would not likely have no discernible adverse impact on the domestic industry. In addition, the continued presence of subject imports from South Korea also indicates that South Korean producers remain interested in the U.S. market and maintain U.S. customers and distribution networks, which would facilitate their sales in the U.S. market after revocation. Further, even if subject imports from South Korea were to remain at 2021 levels in the reasonably foreseeable future, given the underselling of domestic producers during the original investigations and in the current reviews, it is likely that absent the discipline of the antidumping and countervailing duty orders, underselling by subject imports from South Korea would intensify, increasing pricing pressure on the domestic industry, and therefore would not likely have no discernible adverse impact on the domestic industry.

POSCO also argues that subject producers in South Korea are not export-oriented, will focus on Asian markets, and did not have excess capacity during the POR. POSCO Prehearing Br. at 4-10; POSCO Posthearing Br. at 2-7, 13-14; POSCO Final Comments at 8-9. We observe that a substantial portion of the South Korean industry's total shipments were export shipments during the POR, with export shipments as a share of total shipments ranging from *** to *** percent during the POR. CR/PR at Table IV-93. In fact, South Korea was the third largest global exporter of CTL plate in 2021. CR/PR at Table IV-113 (including both subject and nonsubject exports of CTL plate). In addition, despite the alleged focus on Asian markets, subject imports from South Korea have remained in the U.S. market throughout the POR. CR/PR at Tables I-33, IV-1. Indeed, while the majority of the industry's exports were to the Asian market during the POR, it continued to export to European markets and American markets other than United States, in addition to the U.S. market throughout the POR. CR/PR at Table IV-93.

Furthermore, contrary to POSCO's claim that there is no incentive for subject imports from South Korea to undersell the domestic like product due to the Section 232 absolute quota, *see, e.g.*, POSCO Final Comments at 9-10, subject imports continued to undersell the domestic like product in the majority of available comparisons during the POR, as discussed above, including in *** comparisons after the Section 232 measures were implemented in early 2018. *See* CR/PR at Tables V-3, V-4, V-5, and V-8. Additionally, the capacity utilization rate of the South Korean industry ranged from *** percent to *** percent, indicating that it had excess capacity during the POR. CR/PR at IV-93.

short tons in interim 2015 (or 0.5 percent of apparent U.S. consumption) and 10,600 short tons in interim 2016 (or 0.2 percent of apparent U.S. consumption).[268]

In the original investigations, the Commission received questionnaire responses from three foreign producers/exporters of CTL plate in Taiwan, CSC, Shang Chen, and Tung Ho, which accounted for *** production of CTL plate in Taiwan during 2015, and *** of U.S. imports of CTL plate from Taiwan in 2015.[269] Responding foreign producers in Taiwan reported a production capacity of *** short tons in 2013, *** short tons in 2014, and *** short tons in 2015; production capacity was *** short tons in interim 2015 and *** short tons in interim 2016.[270] Responding foreign producers in Taiwan reported production of *** short tons in 2013, *** short tons in 2014, and *** short tons in 2015; production was *** short tons in interim 2015 and *** short tons in interim 2016.[271] During the original investigations, responding Taiwanese producers' exports as a share of total shipments of CTL plate ranged from *** percent to *** percent, while their exports to the United States as a share of total shipments ranged from *** percent to *** percent.[272] Responding Taiwanese producers' exports as a share of total shipments of CTL plate were *** percent in interim 2015 and *** percent in interim 2016, while their exports as a share of U.S. shipments was *** in interim 2015 and *** in interim 2016.[273]

During the current reviews, the volume of subject imports from Taiwan were 12,076 short tons in 2016, 937 short tons in 2017, 1,815 short tons in 2018, 1,685 short tons in 2019, 25 short tons in 2020, and zero short tons in 2021.[274] The volume of subject imports from Taiwan as a share of apparent U.S. consumption ranged from zero percent to 0.2 percent throughout the POR.[275] Subject imports from Taiwan are currently subject to 25 percent *ad valorem* duties under Section 232.[276]

In these reviews, no producer in Taiwan responded to the Commission's questionnaire.[277] According to *** data, gross production of reversing mill plate[278] in Taiwan decreased irregularly over the POR from *** short tons in 2016 to *** short tons in 2021, and

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[268] *Original Determinations*, USITC Pub. 4664 at Table C-1.

[269] CR/PR at IV-185. The responding producers were CSC, Shang Chen, and Tung Ho. *Id.*

[270] Confidential Report from the Original Investigations at Table VII-47.

[271] Confidential Report from the Original Investigations at Table VII-47.

[272] Confidential Report from the Original Investigations at Table VII-47.

[273] Confidential Report from the Original Investigations at Table VII-47.

[274] CR/PR at Tables I-33, IV-1 & C-1.

[275] CR/PR at Tables I-33, IV-1 & C-1.

[276] CR/PR at Table I-27. Effective March 23, 2018, subject imports from Taiwan became subject to Section 232 duties. CR/PR at I-45.

[277] CR/PR at IV-184.

[278] These data may be understated as the ***. CR/PR at IV-185 n.45; Email from ***. For more information on production and mill differences see CR/PR at I-54 to I-60.

apparent gross consumption of reversing mill plate in Taiwan increased irregularly from *** short tons in 2016 to *** short tons in 2021.[279] In 2022, gross production of reversing mill plate in Taiwan is projected to be *** short tons and apparent gross consumption is projected to be *** short tons.[280]

Exports of CTL plate from Taiwan decreased irregularly during the POR; exports were 131,263 short tons in 2016, 135,862 short tons in 2017, 153,231 short tons in 2018, 117,254 short tons in 2019, 78,690 short tons in 2020, and 85,238 short tons in 2021.[281] The leading export markets for CTL plate from Taiwan in 2021 were Japan and Vietnam.[282]

In the original investigations, subject imports from Taiwan undersold the domestic like product in *** of *** comparisons involving 40,631 short tons with underselling margins ranging from *** percent to *** percent.[283] In these reviews, subject imports from Taiwan undersold the domestic like product in the *** comparison involving *** short tons with an underselling margin of *** percent.[284]

In light of the foregoing, including the volume of subject imports from Taiwan and underselling by such imports in the original investigations, the large capacity in the reversing mill plate industry in Taiwan and the large volume of the industry's continued exports of CTL plate throughout the POR, we find that revocation of the antidumping duty order on subject imports from Taiwan would not likely have no discernible adverse impact on the domestic industry.

*Turkey*. In the original investigations, U.S. imports of subject merchandise from Turkey increased from 20,079 short tons in 2013 (or 0.2 percent of apparent U.S. consumption) to 116,494 short tons in 2014 (or 1.2 percent of apparent U.S. consumption), before decreasing to 23,281 short tons in 2015 (or 0.3 percent of apparent U.S. consumption); the volume was 15,070 short tons in interim 2015 (or 0.2 percent of apparent U.S. consumption) and 35,575 short tons in interim 2016 (or 0.6 percent of apparent U.S. consumption).[285]

In the original investigations, the Commission received a questionnaire response from one producer/exporter, which accounted for approximately *** percent of production of CTL plate in Turkey during 2015 and *** of U.S. imports of CTL plate from Turkey in 2015.[286] This responding producer's reported capacity was *** short tons in 2013, *** short tons in 2014,

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[279] CR/PR at Table IV-19.

[280] CR/PR at Table IV-99.

[281] CR/PR at Table IV-101, providing GTA export data for exports from Taiwan under HS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91.

[282] CR/PR at Table IV-101.

[283] CR/PR at V-42, n.7; Confidential Report from the Original Investigations at Tables V-11, V-12.

[284] CR/PR at Table V-12.

[285] *Original Determinations*, USITC Pub. at Table C-1.

[286] CR/PR at IV-191.

*** short tons in 2015, and *** short tons in interim 2015 and interim 2016.[287] Its reported production was *** short tons in 2013, *** short tons in 2014, *** short tons in 2015, *** short tons in interim 2015, and *** short tons in interim 2016.[288] The responding Turkish producer's exports as a share of total shipments of CTL plate ranged from *** percent to *** percent, while its exports to the United States as a share of total shipments ranged from *** percent to *** percent during the original investigations.[289]

In the current reviews, subject imports from Turkey decreased every year. They declined from 35,590 short tons in 2016 to 630 short tons in 2017, 121 short tons in 2018, 67 short tons in 2019, 63 short tons in 2020, and 3 short tons in 2021.[290] Subject imports from Turkey accounted for 0.6 percent of apparent U.S. consumption in 2016 and less than 0.05 percent for the remainder of the POR.[291] Subject imports from Turkey are subject to 25 percent *ad valorem* duties under Section 232.[292]

No CTL plate producers in Turkey responded to the Commission's questionnaires in these reviews.[293] According to *** data, gross production of reversing mill plate[294] in Turkey increased irregularly from *** short tons in 2016 to *** short tons in 2021, while apparent gross consumption increased overall from *** short tons to *** short tons during this same period.[295] Production of reversing mill plate in Turkey is projected to be *** short tons in 2022, while consumption is projected to be ***.[296]

Exports of CTL plate from Turkey increased irregularly throughout the POR. Exports were 263,153 short tons in 2016, 312,999 short tons in 2017, 333,338 short tons in 2018, 327,572 short tons in 2019, 305,112 short tons in 2020, and 271,963 short tons in 2021.[297] The largest export markets for CTL plate from Turkey in 2021 were Canada and Iraq.[298] CTL plate from Turkey is subject to antidumping duty orders and/or safeguard tariff rate quotas in Armenia, Belarus, Kazakhstan, Kyrgyz Republic, Russia, Canada, and the European Union.[299]

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[287] Confidential Report from the Original Investigations at Table VII-51.
[288] Confidential Report from the Original Investigations at Table VII-51.
[289] Confidential Report from the Original Investigations at Table VII-51.
[290] CR/PR at Table IV-1.
[291] CR/PR at Table I-32.
[292] CR/PR at Table I-27.
[293] CR/PR at IV-190.
[294] These data may be understated as the ***. CR/PR at IV-191 n.47; Email from ***. For more information on production and mill differences see CR/PR at I-54 to I-60.
[295] CR/PR at Table IV-102.
[296] CR Table IV-102.
[297] CR/PR at Table IV-104, providing GTA export data for exports from Turkey under HS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91.
[298] CR/PR at IV-192.
[299] CR/PR at Table IV-112.

In the original investigations, subject imports from Turkey undersold the domestic like product in *** of *** comparisons involving 146,240 short tons with underselling margins ranging from *** to *** percent.[300] In these reviews, subject imports from Turkey undersold the domestic like product in *** of *** comparisons involving *** short tons with underselling margins ranging from *** percent to *** percent.[301]

In light of the foregoing, including the volume of subject imports from Turkey and underselling by such imports in the original investigations, and the capacity of the reversing mill plate industry in Turkey and the large volume of exports of the CTL plate industry in Turkey, we find that revocation of the antidumping duty order on subject imports from Turkey would not likely have no discernible adverse impact on the domestic industry.

### 2. Likelihood of a Reasonable Overlap of Competition

The Commission generally has considered four factors intended to provide a framework for determining whether subject imports compete with each other and with the domestic like product.[302] Only a "reasonable overlap" of competition is required.[303] In five-year reviews, the relevant inquiry is whether there likely would be competition even if none currently exists because the subject imports are absent from the U.S. market.[304]

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[300] Confidential Report from the Original Investigations at Tables V-11, V-12.

[301] CR/PR at Table V-12.

[302] The four factors generally considered by the Commission in assessing whether imports compete with each other and with the domestic like product are as follows: (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality-related questions; (2) the presence of sales or offers to sell in the same geographical markets of imports from different countries and the domestic like product; (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and (4) whether subject imports are simultaneously present in the market with one another and the domestic like product. *See, e.g., Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int'l Trade 1989).

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

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

*Fungibility*. In its original determinations, the Commission found that there was at least a moderate-to-high degree of substitutability between domestically produced CTL plate and imports from subject sources for the majority of CTL plate volumes and that, on balance, the record indicated a sufficient degree of fungibility between and among subject imports from each subject country and the domestic like product to satisfy the "reasonable overlap" standard.[305]

The record in these reviews indicates that there is at least a moderately high degree of substitutability between and among domestically produced CTL plate and CTL plate from each subject source.[306] All responding U.S. producers reported that product from each subject source was always or frequently interchangeable with domestically produced CTL plate.[307] The responses of importers were mixed, but most responding importers reported that CTL plate from each of the twelve subject sources was always or frequently interchangeable with the domestic like product, and the remainder reporting that subject imports and the domestic like product were sometimes interchangeable, with the exception of CTL plate from Austria and China for which one importer each reported them to never be interchangeable.[308] Responses regarding the interchangeability of imports from different subject sources were also mixed but most responding importers reported that subject imports of CTL plate from different sources were at least sometimes interchangeable with each other.[309] All responding purchasers reported that CTL plate from domestic and subject sources were frequently or sometimes

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[305] *Original Determinations*, USITC Pub. 4664 at 24-26. The Commission was not persuaded by the Austrian Respondents' argument that there was limited fungibility between the domestic like product and subject imports from Austria because subject imports from Austria were often specialized grades not made in the United States. *Id.* at 24-25. The Commission found that, even assuming *arguendo* that the domestic industry could not make certain types of tool steel and high speed steel that are supplied by producers in Austria, the record indicated that the great majority of subject imports from Austria were not specialty products. *Id.* at 25. The Commission also was not persuaded by the argument that subject imports from Taiwan were not fungible with imports from other subject countries because two of the CTL producers in Taiwan did not make X-70 CTL plate and because one of those producers was limited in the dimensions in which it could produce CTL plate. *Id.* at 25-26. The Commission reaffirmed its finding from the preliminary determinations that CTL plate other than X-70 CTL plate represented substantial percentages of subject imports from both France and Germany and the majority of the domestic like product and subject imports from all other subject sources (including Taiwan), indicating a sufficient degree of overlap between and among subject imports from each subject source and the domestic like product to satisfy the "reasonable overlap" standard. *Id.* at 25.

[306] CR/PR at II-24.

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

[308] CR/PR at Table II-19.

[309] CR/PR at Table II-19. One importer each reported that subject imports from Austria were never interchangeable with imports from Belgium, China, France, Italy, South Africa, South Korea, Taiwan, and Turkey; one importer also reported that subject imports form Belgium were not interchangeable with subject imports from China and Italy. *Id.*

interchangeable, except that one purchaser reported that subject imports from South Korea and the domestic like product were always interchangeable; no purchaser reported that CTL plate from domestic and subject sources were never interchangeable.[310]

Purchaser responses comparing domestically produced CTL plate and CTL plate from each subject source with respect to sixteen purchasing factors were somewhat mixed.[311] However, with respect to the factors that more than half of the responding purchasers identified as very important – namely availability, availability of grades/products needed, delivery terms, delivery time, payment terms, price, product consistency, quality meets industry standards, and reliability of supply[312] – most responding purchasers reported that domestically produced CTL plate was comparable or superior compared to imports from each subject country.[313] Additionally, almost all purchasers reported that CTL plate from domestic and subject sources always or usually met minimum quality specifications.[314]

U.S. producers reported shipments of all steel types of CTL plate in 2021, with carbon plate as rolled accounting for the majority of their total U.S. shipments that year, followed by alloy plate heat-treated, carbon plate heat treated, and alloy plate as rolled.[315] Although U.S. shipments of each steel type of CTL plate were not reported for all subject sources in 2021, the record indicates that U.S. shipments of domestically produced CTL plate and imports from multiple subject countries overlapped with respect to each steel type, except for South Africa and Taiwan for which there were no reported U.S. shipments of CTL plate from those countries

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[310] CR/PR at Table II-20.

[311] CR/PR at Table II-17.

[312] CR/PR at II-26 & Table II-14.

[313] CR/PR at Table II-17. There were some limited exceptions across all the factors for all twelve subject countries. The sole responding purchaser reported the domestic like product to be inferior to subject imports from Austria and Belgium in terms of delivery terms. One purchaser each reported the domestic like product to be superior and inferior to subject imports from Brazil on delivery terms. With respect to subject imports from China, most purchasers reported the domestic like product to be inferior in terms of price; and one purchaser each reported the domestic like product to be superior and inferior in terms of reliability of supply. With respect to subject imports from Germany, one purchaser each reported the domestic like product to be comparable and inferior in terms of product consistency. An equal number of purchasers reported the domestic like product to be comparable and inferior to subject imports from Japan on price. The sole responding purchaser reported the domestic like product to be inferior to subject imports from South Africa in terms of price. With respect to subject imports from Taiwan, most purchasers reported the domestic like product to be inferior in terms of price. Finally, an equal number of purchasers reported the domestic like product to be comparable and inferior to subject imports from Turkey in terms of price. *Id.*

[314] CR/PR at Table II-15. One purchaser each reported that subject imports from China and Turkey only sometimes met minimum quality specifications. *Id.* There were no responses with respect to subject imports from South Africa. *Id.*

[315] CR/PR at Table IV-2.

in 2021.[316] With respect to plate thickness, there were U.S. shipments of domestically produced CTL plate and subject imports from Austria, Germany, Japan, and South Korea reported for each thickness (less than one inch, more than one inch but less than 4 inches, and greater than 4 inches) in 2021.[317] Again, although U.S. shipments of CTL plate from the remaining subject sources were not reported across all thicknesses, there is overlap between U.S. shipments of domestically produced CTL plate and subject imports from multiple sources with respect to each of the respective plate thickness, except for South Africa and Taiwan, from which there were no reported imports of CTL plate in 2021.[318]

NLMK argues that subject imports from Italy are not fungible with the domestic like product, claiming that imports of carbon CTL plate as rolled (*i.e.*, commercial grade CTL plate) from Italy declined during the POR, while subject producers in Italy continued to supply high value, niche heat-treated alloy CTL plate products that are undersupplied by the domestic industry.[319] The record, however, does not support NLMK's claim that there is likely to be a lack of fungibility between subject imports from Italy and the domestic like product upon revocation of the orders. First, while carbon CTL plate as rolled accounted for the majority of the domestic industry's U.S. shipments in 2021, as NLMK alleges, the domestic industry also shipped a substantial volume of heat-treated alloy CTL plate. Indeed, the domestic industry was the largest supplier to the U.S. market of both carbon CTL plate as rolled and heat-treated alloy CTL plate in 2021, accounting for *** percent and *** percent of total U.S. shipments, respectively.[320] Further, imports of CTL plate from Italy were not limited to heat-treated alloy CTL plate; rather, a sizeable minority of U.S. shipments of subject imports from Italy in 2021 were of carbon CTL plate as rolled.[321] That there was at least some degree of overlap in the CTL plate products offered by U.S. and Italian producers in the U.S. market was confirmed by responding purchasers, an equal number of which rated the domestic like product to be superior, comparable, and inferior as compared to subject imports from Italy in terms of availability of grades/products needed and product range.[322] Consistent with this evidence, there is substantial overlap in the product offerings by both U.S. producers and subject producers in Italy, although U.S. producers reported the availability of a broader range of

[316] CR/PR at Table IV-2.

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

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

[319] NLMK Prehearing Br. at 18-19.

[320] CR/PR at Table IV-2.

[321] CR/PR at Table IV-2. In 2021, U.S. shipments of CTL plate from Italy consisted of *** short tons (*** percent) of carbon plate as rolled and *** short tons of alloy plate heat treated (*** percent). *Id.*

[322] CR/PR at Table II-17.

products.[323] Moreover, subject producers in Italy reported that carbon CTL plate as rolled accounted for the majority of their total shipments, while heat treated alloy CTL plate accounted for the smallest share.[324] Furthermore, during the original POI, subject imports from Italy consisted overwhelmingly of CTL plate products other than tool and high speed steel.[325] The existence of available pricing comparisons in the pricing data collected in these reviews likewise shows that there is at least some overlap in the products offered by the domestic industry and subject imports from Italy.[326] Accordingly, the record does not support NLMK's claim that subject imports from Italy are unlikely to be fungible with the domestic like product upon revocation of the orders.

Japanese Respondents contend that there is insufficient fungibility between the domestic like product and subject imports from Japan to support cumulating subject imports from Japan. Specifically, they maintain that Japanese imports consist predominantly of high value, specialty CTL plate products for oil and gas applications, which are not offered in sufficient quantities or quality by U.S. producers and therefore have been granted exemptions from the Section 232 measures.[327] The record, however, does not support Japanese Respondents' claim that there is likely to be a lack of fungibility with the domestic like product upon revocation of the orders. First, while *** subject imports from Japan consisted of alloy CTL plate as rolled in 2021, as Japanese Respondents allege, the domestic industry also shipped a substantial volume of alloy CTL plate as rolled that year. Indeed, the domestic industry was the largest supplier to the U.S. market of alloy CTL plate as rolled in 2021, accounting for *** percent of total U.S. shipments that year.[328] Responding purchasers confirmed that there was at least some degree of overlap in the CTL plate products offered by U.S. and Japanese producers in the U.S. market.[329] Notably, all responding purchasers reported that the domestic like product was either comparable or superior to subject imports from Japan in terms of availability of grades/products needed and most reported that the domestic like product was

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[323] *Compare* CR/PR at Tables III-5, III-6 *with* CR/PR at Tables IV-71, IV-72.

[324] CR/PR at Table IV-73. In 2021, responding producers in Italy reported shipping *** short tons of carbon CTL plate as rolled, accounting for *** percent of total shipments, and *** short tons of alloy CTL plate heat treated, accounting for *** percent of total shipments. *Id.*

[325] *Compare Original Determinations*, USITC Pub. 4664 at Table C-2 (showing nine short tons of tool and high speed steel CTL plate imports from Italy in 2013, none in 2014, and two short tons in 2015; and showing two short tons in interim 2015 and none in interim 2016) *with id.* at Table C-3 (showing 46,699 short tons of other (*i.e.*, non-tool or high speed steel) CTL plate imports from Italy in 2013, 97,326 short tons in 2014, and 59,453 short tons in 2015; and showing 55,470 short tons in interim 2015 and 28,915 short tons in interim 2016).

[326] CR/PR at Table V-12.

[327] Japanese Respondents Prehearing Br. at 28-29.

[328] CR/PR at Table IV-2.

[329] CR/PR at Table II-17.

comparable in terms of product range.[330] Indeed, there is substantial overlap in the product offerings by both U.S. producers and subject producers in Japan.[331] The existence of available pricing comparisons in the pricing data collected in these reviews likewise shows that there was at least some overlap in the products offered in the U.S. market by the domestic industry and subject imports from Japan during the POR even with the orders in place.[332] Moreover, subject producers in Japan reported that carbon CTL plate accounted for the majority of their total shipments, while alloy CTL plate as rolled accounted for the smallest share.[333] Furthermore, during the original POI, subject imports from Japan consisted overwhelmingly of CTL plate products other than tool and high speed steel.[334] Accordingly, regardless of the Section 232 exclusions importers may have been able to obtain for certain products from Japan during the POR,[335] on balance, the record shows that subject imports from Japan are likely to be sufficiently fungible with the domestic like product upon revocation of the orders for purposes of cumulation.

Finally, to the extent that POSCO is arguing that there is likely to be a lack of fungibility between subject imports from South Korea and CTL plate from domestic and other subject sources because POSCO is increasingly focused on serving demand in the wind tower manufacturing sector that domestic producers are allegedly unable to satisfy,[336] the record does not support such a finding. First, in 2021, U.S. shipments of the domestic like product and subject imports from South Korea consisted mostly of carbon CTL plate as rolled, a category in which there were also reported imports from several other subject sources.[337] Responding purchasers confirmed that there was at least some degree of overlap in the CTL plate products offered by U.S. and subject producers in South Korea in the U.S. market.[338] Notably, all responding purchasers reported that the domestic like product was either comparable or

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[330] CR/PR at Table II-17.

[331] *Compare* CR/PR at Tables III-5, III-6 *with* CR/PR at Tables IV-81, IV-82.

[332] CR/PR at Table V-12.

[333] CR/PR at Table IV-83. In 2021, responding producers in Japan reported shipping *** short tons of carbon CTL plate, accounting for *** percent of total shipments, and *** short tons of alloy CTL plate as rolled, accounting for *** percent of total shipments. *Id.*

[334] *Compare Original Determinations*, USITC Pub. 4664 at Table C-2 (showing 85 short tons of tool and high speed steel CTL plate imports from Japan in 2013, 434 short tons in 2014, and 305 short tons in 2015; and showing 292 short tons in interim 2015 and 169 short tons in interim 2016) *with id.* at Table C-3 (showing 48,240 short tons of other (*i.e.*, non-tool or high speed steel) CTL plate imports from Japan in 2013, 75,568 short tons in 2014, and 77,195 short tons in 2015; and showing 71,340 short tons in interim 2015 and 31,790 short tons in interim 2016).

[335] Japanese Respondents Prehearing Br., Exhibit 21.

[336] POSCO Prehearing Br. at 10-11.

[337] CR/PR at Table IV-2.

[338] CR/PR at Table II-17.

superior to subject imports from South Korea in terms of availability of grades/products needed and most reported that the domestic like product was comparable in terms of product range.[339] Indeed, there is substantial overlap in the product offerings by both U.S. producers and subject producers in South Korea, although U.S. producers offer a considerably broader range of all product types listed.[340] The available pricing comparisons in the pricing data collected in these reviews likewise shows that there was at least some overlap in the products offered in the U.S. market by the domestic industry and subject imports from South Korea during the POR.[341] Accordingly, we find that subject imports from South Korea are likely to be sufficiently fungible with the domestic like product and imports from other subject sources upon revocation of the orders for purposes of cumulation.

*Geographic Overlap*. In the original investigations, the Commission found that domestically produced CTL plate was sold nationwide and that subject imports from all subject sources also were sold throughout the continental United States, with very limited exceptions.[342] In these reviews, domestically produced CTL plate continues to be sold nationwide.[343] CTL plate from all subject sources, except for South Africa, was also sold in overlapping regions throughout the continental United States.[344]

The record does not support POSCO's assertion that there is not likely to be a reasonable overlap of competition between the domestic like product, which is sold throughout the United States, and subject imports from Korea, which POSCO claims are concentrated in the Central Southwest, Pacific Coast, and Southeast regions of the U.S. market.[345] Responding importers reported selling subject imports from South Korea ***.[346] Even assuming *arguendo* that subject imports from South Korea were concentrated in the Central Southwest, Pacific Coast, and Southeast regions, the domestic like product is also sold in those specific geographic

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[339] CR/PR at Table II-17. Additionally, all U.S. producers, all purchasers and the vast majority of importers reported that subject imports from South Korea were at least sometimes interchangeable with the domestic like product and imports from each other subject country. Only *** importer reported that subject imports from Austria were never interchangeable with subject imports from South Korea. *Id.*

[340] *Compare* CR/PR at Tables III-5, III-6 *with* CR/PR at Tables IV-94, IV-95.

[341] CR/PR at Table V-12.

[342] *Original Determinations*, USITC Pub. 4664 at 24.

[343] CR/PR at Table II-4.

[344] CR/PR at Table II-4. There were minimal volumes of subject imports from South Africa in the U.S. market in 2016 and 2017 and none for the remainder of the POR. CR/PR at Table IV-1.

[345] POSCO Prehearing Br. at 10-11.

[346] CR/PR at Table II-4. The only region where importers did not report sales of subject imports from South Korea was the "other" region consisting of non-contiguous U.S. states and territories. *Id.*

areas as it is shipped throughout the United States.[347] Additionally, subject imports from other sources were also shipped to those specific regions.[348]

*Channels of Distribution*. In the original investigations, the Commission found that shipments of the domestic like product and imports from each subject source were directed to end users and distributors. The majority of subject imports from Austria, Brazil, China, Italy, Japan, South Africa, Taiwan, and Turkey were sold to distributors and substantial portions of domestic producers' U.S. shipments as well as imports from Belgium, France, Germany, and Korea also were also sold to distributors.[349]

In these reviews, shipments of the domestic like product and subject imports from each subject source for which information is available continue to be sold through overlapping channels of distribution. Throughout the POR, the domestic industry shipped the domestic like product to all three channels of distribution. Subject imports from Germany were also sold through all three channels of distribution in each year of the POR. Subject imports from Austria, France, and South Korea were also sold through all three channels of distribution during the POR, although they were not present in each channel in every year of the POR. Subject imports from Belgium, Brazil, China, Italy, Taiwan, and Turkey were sold to other end users and distributors during the POR, although with the exception of imports from Belgium, imports from each of these sources were not present in both channels during every year of the POR.[350]

The record does not support POSCO's assertion that there would likely be a lack of competitive overlap after revocation because it purportedly concentrates on selling CTL plate to distributors while domestic producers *** to other channels.[351] Although the domestic industry sold some shipments to construction end users and other end users, the majority of its U.S. shipments throughout the POR were to distributors.[352] Moreover, U.S. shipments of subject imports from South Korea were also made to construction end users and other end users throughout the POR, and therefore were not exclusively concentrated in the distributor channel.[353] Thus, the record confirms that the domestic like product and subject imports from South Korea were sold in overlapping channels of distribution throughout the POR.

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[347] CR/PR at Table II-4.

[348] CR/PR at Table II-4.

[349] Confidential Report from the Original Investigations at Table II-1.

[350] CR/PR at Table II-3. There were no reported shipments of subject imports from South Africa.

[351] POSCO Prehearing Br. at 11.

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

[353] CR/PR at Table II-3. There were no reported U.S. shipments of subject imports from South Korea to construction end users in 2020 and to other end users in interim 2021. *Id.*

*Simultaneous Presence in Market*. In the original investigations, the Commission found that imports of CTL plate from all subject sources were present in the U.S. market in almost every month during the POI.[354]

In these reviews, the domestic like product and imports of CTL plate from Belgium and Germany were present in the U.S. market in every month during the POR.[355] The monthly data also indicate that imports of CTL plate from South Korea were also present in every month of the POR.[356] Subject imports from Austria and Japan were present in every month, except September 2019 and November 2020, respectively, while subject imports from France, Italy, and China were present in a majority of the 78 months during the POR.[357] Subject imports from Taiwan were present in one-half of the months and subject imports from Turkey were present in 27 of the 78 months.[358] Subject imports from Brazil were present in four months in 2016, one month in 2017, and one month in 2021 and 2022, while subject imports from South Africa were present in only January 2016 and November 2017.[359] However, nothing in the record indicates that subject imports from each source would not increase their presence in the U.S. market after revocation and more often be simultaneously present in the U.S. market along with imports from other subject sources and the domestic like product.

*Conclusion*. We find there would likely be a reasonable overlap of competition among subject imports from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey and between the domestic like product and subject imports from each source following revocation of the orders. Notwithstanding NLMK's, Japanese Respondents' and POSCO's arguments to the contrary, there is likely to be a reasonable degree of fungibility among subject imports from each source and with the domestic like product. There were U.S. shipments of all types of CTL plate from domestic and subject sources during the original investigations and POR. Further, most responding purchasers confirmed that the domestic like product is superior or comparable to subject imports from Italy, Japan, and South Korea in terms of availability of grades/products needed and range of products. That there is a moderately high degree of substitutability between CTL

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[354] *Original Determinations*, USITC Pub. 4664 at 24.

[355] CR/PR at IV-23 and Table IV-5.

[356] CR/PR at IV-23 and Table IV-5. While we acknowledge that the monthly data may overstate the number of months subject imports from South Korea were present because it includes nonsubject imports, other record information indicates that subject imports from South Korea were present throughout the POR. *See, e.g.*, CR/PR at Tables V-3, V-4, V-5, V-8.

[357] CR/PR at IV-23 and Table IV-5. Subject imports from France were present in 71 months, subject imports from Italy were present in 66 months for Italy, and subject imports from China were present in 63 months of the POR. *Id.*

[358] CR/PR at IV-23 and Table IV-5.

[359] CR/PR at IV-23 and Table IV-5.

plate from domestic and all subject sources is reflected in the degrees of interchangeability reported by responding market participants and the fact that most purchasers reported that domestically produced CTL plate is comparable with subject imports from each source with respect to most purchasing factors.

Although there were some differences in the channels of distribution among the subject sources during the review period, on balance, the record demonstrates that there is sufficient overlap in the channels of distribution in which the domestic like product and imports from each subject source are shipped to indicate a reasonable overlap of competition. Similarly, although imports from each subject source were not simultaneously present throughout the POR under the discipline of the orders, the record indicates some overlap in terms of this factor.

For all these reasons, we find that there would likely be a reasonable overlap of competition among subject imports from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey and between the domestic like product and subject imports from each source, if the orders were revoked.

### 3. Likely Conditions of Competition[360]

In determining whether to exercise our discretion to cumulate the subject imports, we assess whether subject imports from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey would likely compete under similar or different conditions of competition. As discussed below, we find that subject imports from Brazil are likely to compete in the U.S. market under conditions of competition that are different than the conditions that apply to subject imports from the other subject sources, including Austria, Belgium, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey. We consequently exercise our discretion not to cumulate subject imports from Brazil with the other subject sources for purposes of our analysis in these reviews.[361]

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[360] Commissioners Schmidtlein and Stayin do not join this section. *See* Dissenting Views of Commissioners Rhonda K. Schmidtlein and Randolph J. Stayin

[361] In determining whether to exercise our discretion, the Commission has historically looked at a number of different likely conditions of competition. As discussed above in the Legal Standard for Cumulation, the Federal Circuit in *Nucor* affirmed that the Commission has wide latitude in selecting the types of factors it considers relevant in deciding whether to exercise discretion to cumulate subject imports in five-year reviews. *Nucor,* 601 F.3d at 1292; *see also Nucor Corp. v. United States*, 605 F. Supp. 2d 1361, 1371, n. 13 (Ct. Int'l Trade 2009) (*citing Nucor Corp. v. United States,* 569 F. Supp.2d 1328, 1338 n.5 (Ct. Int'l Trade 2008)); *Cut-to-Length Carbon Steel Plate from China, Russia, South Africa, and Ukraine*, Inv. Nos. 731-TA-753-756 (Review), USITC Pub. 3626 (September 2003) at 16-17 (Commission declining to exercise its discretion to cumulate subject imports from South Africa with other subject (Continued…)

Because imports from all other subject sources are likely to compete under similar conditions of competition after revocation, we exercise our discretion to cumulate imports from those countries for purposes of our analysis in these reviews.

**a) Brazil**

We find that subject imports from Brazil would likely compete under different conditions of competition than imports from other subject sources in the event of revocation given the effects of the Section 232 quota with respect to CTL plate from Brazil. Unlike all but one of the other subject sources, CTL plate from Brazil is subject to an absolute quota limit imposed under Section 232. The Section 232 quota took effect in June of 2018 and is an absolute cap on the annual volume of subject imports from Brazil. The quota is set at 10,049 short tons per year for 2022, equivalent to 0.19 percent of apparent U.S. consumption in 2021.[362] Even prior to the establishment of the quota in June of 2018, subject imports from Brazil were limited during the POR.[363]

By comparison, subject imports from China, South Africa, Taiwan, and Turkey have no quota limits but are subject instead to 25 percent *ad valorem* tariffs.[364] Moreover, while CTL plate from Austria, Belgium, France, Germany, Italy, and Japan are subject to TRQs, the TRQs are not an absolute cap on the volume of imports.[365] The TRQs for Austria, Belgium, France, Germany, Italy, and Japan permit unlimited volumes of subject imports from each of these subject sources to enter the United States with 25 percent Section 232 duty rates applied for any volumes in excess of the TRQ limits.[366]

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imports based, in part, on South Africa's exemption from safeguard measures). Consistent with this latitude and prior Commission decisions in five-year reviews identifying trade restricting measures to be relevant with respect to the finding that subject imports are likely to compete under different condition of competition, we find that the absolute quota on imports from Brazil is a factor that is not faced by, or not faced to a similar degree, by imports from other subject sources, the effect of which is that subject imports from Brazil are likely to compete under different conditions of competition in the U.S. market.

[362] CR/PR at I-45 & Table I-27.

[363] CR/PR at Tables I-33, IV-1, C-1. The volume of subject imports from Brazil decreased from 7,442 short tons in 2016 to 169 short tons in 2017. *Id.* The volume remained at minimal levels during the remainder of the POR at 28 short tons in 2018, 15 short tons in 2019, 34 short tons in 2020, 25 short tons in 2021, 12 short tons in interim 2021, and 42 short tons in interim 2022. *Id.*

[364] CR/PR at I-45 to I-48 & Table I-27.

[365] CR/PR at I-45 to I-48 & Table I-27.

[366] CR/PR at I-45 to I-48 & Table I-27. Currently, the TRQs are 5,828 short tons for CTL plate from Austria, 14,449 short tons for CTL plate from Belgium, 81,427 short tons for CTL plate from France, 95,042 short tons for CTL plate from Germany, 24,769 short tons for CTL plate from Italy, and 1,519 short tons for CTL plate from Japan. CR/PR at Table I-27.

Further, although imports of CTL plate from South Korea are also currently subject to an absolute quota, there are important differences between the level of South Korea's quota and presence of subject imports from South Korea during the POR compared to subject imports from Brazil. The annual absolute quota on subject imports from South Korea is 223,252 short tons (equivalent to 4.2 percent of apparent U.S. consumption in 2021), whereas the absolute quota on Brazil is only 10,049 short tons (equivalent to 0.19 percent of apparent consumption in 2021).[367] In other words, the absolute quota on subject imports from South Korea is approximately twenty-two times larger than the absolute quota on subject imports from Brazil. Further, subject imports from South Korea maintained a considerable presence in the U.S. market throughout the POR.[368] In contrast, subject imports from Brazil decreased from 2016 to 2017 before maintaining only a minimal presence in the U.S. market for the remainder of the POR.[369]

Given the absolute quota applicable to subject imports from Brazil, even if subject imports from Brazil were to fill the quota after revocation, the substantially larger quota applicable to subject imports from South Korea and the absence of an absolute quota on imports from other subject sources means that subject imports from countries other than Brazil would be in a position to compete for a far greater number of sales at larger volumes than subject imports from Brazil. As a result, the small absolute quota applicable to subject imports from Brazil would likely prevent Brazilian exporters from competing under similar conditions of competition as exporters in other subject sources.[370] We also observe that the very small

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[367] *Calculated from* CR/PR at Table I-33.

[368] In the current reviews, the volume of subject imports from South Korea decreased from *** short tons in 2016 to *** short tons in 2017 before increasing to *** short tons in 2018 and *** short tons in 2019 and then decreasing *** short tons in 2020 before increasing again to *** short tons in 2021. CR/PR at Tables IV-1, C-1.

[369] CR/PR at Tables I-33, IV-1, C-1. The Brazilian industry also produces and exports far less CTL plate than the industry in South Korea. *Compare* CR/PR Tables IV-31 (Brazilian production of CTL plate of *** short tons in 2021 and reported total exports of CTL plate of *** short tons in 2021), IV-33 (GTA data showing total exports of 120,885 short tons in 2021) *with* Tables IV-93 (South Korean production of subject CTL plate of *** short tons in 2021 and reported total exports of subject CTL plate of *** short tons in 2021), IV-98 (GTA data showing total exports of 2.6 million short tons in 2021). We recognize that the GTA data is overstated. CR/PR at Table IV-98 note.

[370] Domestic Producers argue that these reviews present different facts from those in *Cold-Rolled Steel* and *Hot-Rolled Steel* that warrant reaching a different result here. Specifically, they contend that the CTL plate market is smaller than the hot rolled and cold rolled steel markets, that demand for CTL plate is declining, and that sales of CTL plate tend to be project-based, involving smaller quantities. Nucor/SSAB Posthearing Br. at 2-7; Nucor/SSAB Final Comments at 3-4; Cleveland-Cliffs Posthearing Br. at 8-9. We disagree that these facts establish that subject imports from Brazil are likely to compete under similar conditions of competition with imports from other subject sources in the event of (Continued…)

absolute quota allocated to Brazil will greatly constrain Brazilian producers' ability to use the U.S. market as an outlet for excess capacity as producers in other countries may do during period of low demand.

In addition, the absolute quota on subject imports from Brazil is administered on a quarterly basis, and subject imports from Brazil count against the quota as they arrive, with imports equivalent to no more than 30 percent of the already small annual quota permitted in any quarter.[371] The administration of the quota coupled with the small quarterly limit (at most 3,316 short tons) is likely to introduce some uncertainty into the market as to whether an importer's arriving shipment of subject imports from Brazil will be permitted entry in a particular quarter. This uncertainty creates an additional obstacle for subject imports from Brazil, making planning to take advantage of even the small quota amounts available more difficult for importers of CTL plate from Brazil.[372]

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revocation. Although the CTL plate market may be smaller than those respective markets, the absolute quota applicable to Brazil is likewise smaller and equated to a smaller share of apparent consumption in 2021 at 0.19 percent, than in the reviews for hot rolled steel, in which it equated to 0.25 percent of apparent U.S. consumption, and in the reviews for cold rolled steel, in which it equated to 0.20 percent of apparent U.S. consumption. *Calculated from* CR/PR at I-33; *see also Hot Rolled Steel*, USITC Pub. at 87; *Cold Rolled Steel*, USITC Pub. at 44. Moreover, even though apparent U.S. consumption declined overall during the POR, even at its lowest level in 2020 during the height of the COVID-19 pandemic, the absolute quota still only equated to 0.20 percent. *Calculated from* CR/PR at I-33. Finally, while domestic producers provided some evidence that some CTL plate sales are project-based and for relatively small volumes, the evidence provided is insufficient to substantiate that this means that the absolute quota on Brazilian imports of CTL plate is not likely to act as a different condition of competition compared to other subject imports. Nucor/SSAB Posthearing Br., Responses to Commission Questions at 87-88 & Exhibits 3, 12; Cleveland Cliffs Posthearing Br., Responses to Commission Questions at 17-18 & Exhibit 4. Rather, as USIMINAS explained, the absolute quota and quarterly administration impacts its ability to compete for project-based sales. USIMINAS Posthearing Br., Responses to Commission Questions at 10-11 & Exhibit 2; USIMINAS Final Comments at 11-12.

[371] USIMINAS Posthearing Br. at 7 & Exhibit 2; USIMINAS Final Comments at 5.

[372] We are not persuaded by Cleveland-Cliffs' assertions that the quota actually provides predictability for U.S. importers and that "significant volumes of CTL plate from Brazil and Korea often '{come} in early and sit{} in a free trade zone at a port and then transfer{} to {the customer} on the first day of the quarter. . . .'" Cleveland-Cliffs Posthearing Br., Responses to Commission Questions at 23 (citing Tr. at 148 (Williamson)). As discussed above, subject imports from Brazil maintained only a minimal presence in the U.S. market since 2018, and therefore did not enter the U.S. market in significant volumes. According to USIMINAS, the quarterly administration of the annual quota restricts imports and prohibits large shipments that creates uncertainty for purchasers in terms of when, or whether, CTL plate will enter the U.S. market, which is reflected in the underutilization of the quota. USIMINAS Posthearing Br. at 7, Exhibit 2; USIMINAS Final Comments at 5. USIMINAS further maintains that imports of CORE and slabs from Brazil did not fill the respective quotas immediately at the beginning of the quarter in most quarters which suggests that the small absolute quota for CTL plate from Brazil may not be filled, even if the order is revoked. USIMINAS Prehearing Br. at Exhibit 6; (Continued…)

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

### b) Austria, Belgium, China, France, Germany, Italy, South Africa, South Korea, Taiwan, and Turkey

We also find that the record in these reviews does not indicate that there would likely be significant differences in the conditions of competition between subject imports from Austria, Belgium, China, France, Germany, Italy, South Africa, South Korea, Taiwan, and Turkey if the orders were revoked. While respondents cite various factors that in their view indicate that subject imports from certain countries are likely to compete under different conditions of competition, we are unpersuaded that any of the factors cited indicate that subject imports from these countries are likely to compete under different conditions of competition in the

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USIMINAS Posthearing Br. at 4, 7, Responses to Commission Questions at 24 & Exhibits 3, 4. USIMINAS also reported that, since revocation of the orders on cold- and hot-rolled steel from Brazil, it has made only one sale of cold-rolled steel and *** of hot-rolled steel. USIMINAS Posthearing Br., Responses to Commission Questions at 24 & Exhibit 2; *see also* USIMINAS Final Comments at 9.

event of revocation.[373] [374] [375] [376] Further, as discussed in section III.D.1. above, during the original investigations the volume of imports from each of these subject sources was

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[373] Dillinger argues that subject imports from France will likely compete under different conditions of competition than imports from other subject sources upon revocation. It claims that the bulk of these imports consist of X-70 CTL plate and other line pipe plate in larger dimensions sold to an affiliated U.S. pipe producer, that the CTL plate industry in France has low levels of excess capacity, and that it *** during the POR. Dillinger Prehearing Br. at Prehearing Br. at 4-5; Dillinger Posthearing Br. at 4-5; Dillinger Final Comments at 3-5. However, as discussed above, U.S. producers also produce a wide range of specialty products that overlap with those produced by Dillinger, including X-70 CTL plate; and most responding purchasers reported that the domestic like product was superior to subject imports from France in terms of the availability of grades/products needed. Additionally, subject producers in other countries also produce X-70 CTL plate and other products that overlap with those produced in France. *See, e.g.,* CR/PR at Table IV-13, IV-14, IV-15, IV-61, IV-62, IV-63, IV-81, IV-82, and IV-83. Additionally, the majority of CTL plate production in France in 2021 consisted of carbon CTL plate and CTL plate in thicknesses under 4 inches, which shows that French producers continue to produce products in addition to X-70 CTL plate and other line pipe in larger dimensions. CR/PR at Table IV-53. We note that, in the original investigations, the Commission found that CTL plate other than X-70 CTL plate represented a substantial percentage of subject imports from France as well as majority of the domestic like product and imports from all other subject sources. *Original Determinations*, USITC Pub. 4664 at 25. We also observe that the capacity utilization rates of the subject producers in France fluctuated considerably during the POR, ranging from *** percent to *** percent, indicating that it had excess capacity during the POR, and that subject imports from France engaged in aggressive underselling during the POI. CR/PR at Table IV-50; Confidential Report from the Original Investigations at Tables V-11, V-12. Regardless of the distinctions emphasized by Dillinger, we find it likely that subject imports from France would compete under similar conditions of competition with imports from other subject sources (except Brazil) if the orders were revoked.

[374] Dillinger also argues that subject imports from Germany will likely compete under different conditions of competition than imports from other subject sources upon revocation, claiming that its product mix consists mostly of X-70 CTL plate and other line pipe plate in larger dimensions sold to an affiliated U.S. pipe producer, the capacity of the CTL plate industry in Germany declined, and subject imports from Germany *** during the POR. Dillinger Prehearing Br. at 9-10; Dillinger Posthearing Br. at 6-8; Dillinger Final Comments at 7-8. However, as discussed above, U.S. producers also produce a wide range of specialty products that overlap with those produced by Dillinger, including X-70 CTL plate; all responding purchasers reported that the domestic like product was superior or comparable to subject imports from Germany in terms of the availability of grades/products needed. Additionally, subject producers in other countries also produce X-70 CTL plate and other products that overlap with those produced in Germany. *See, e.g.,* CR/PR at Table IV-13, IV-14, IV-15, IV-51, IV-62, IV-63, IV-81, IV-82, and IV-83. Additionally, the majority of CTL plate production in Germany in 2021 consisted of carbon CTL plate and CTL plate in thicknesses under 4 inches, which shows that German producers continue to produce products in addition to X-70 CTL plate and other line pipe plate in larger dimensions. CR/PR at Table IV-53. We note that, in the original investigations, the Commission found that CTL plate other than X-70 CTL plate represented a substantial percentage of subject imports from Germany as well as majority of the domestic like product and imports from all other subject sources. *Original Determinations*, USITC Pub. 4664 at 25. We find it likely that German producers would resume exports

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of such products in appreciable quantities upon revocation such that they would compete under similar conditions of competition with the domestic like product and imports from other subject sources, except Brazil. We also observe that the capacity utilization rates of the subject industry in Germany fluctuated during the POR, ranging from *** percent to *** percent, indicating that it had at least some excess capacity during the POR, that despite capacity reductions the volume of subject imports from Germany increased from 2020 to 2021, and that there were some instances of underselling at high margins during the POR. CR/PR at Tables IV-60, V-7, V-8, C-1. Regardless of the distinctions emphasized by Dillinger, we find it likely that subject imports from Germany will compete under similar conditions of competition with imports from other subject sources (except Brazil) if the orders were revoked.

[375] NLMK argues that subject imports from Italy would compete under different conditions of competition, emphasizing that the volume of imports allowed under the TRQ equated to 0.46 percent of apparent consumption and claiming that subject producers do not have an incentive to increase exports to the United States given their focus on the home and EU markets. NLMK Prehearing Br. at 17-20. We have explained that, unlike the small absolute quota applicable to subject imports from Brazil, TRQs permit unlimited volumes of subject imports from Italy to enter the United States with 25 percent Section 232 duty rates applied to any volumes in excess of the TRQ limit. We have also explained that the continued presence of subject imports from Italy in the U.S. market along with the substantial volume of Italian exports to Asian and markets in the Americas other than the United States belies NLMK's assertion that the Italian industry is not likely to have an incentive to increase exports of CTL plate to the United States, given its focus on its home and EU markets.

[376] POSCO argues that subject imports from South Korea would compete under unique conditions of competition upon revocation of the orders due to the absolute Section 232 quota, limited available capacity, and its low antidumping and countervailing duty rates. POSCO Prehearing Br. at 4-10. As we have explained, the annual absolute quota on subject imports from South Korea is 223,252 short tons (equivalent to 4.2 percent of apparent U.S. consumption in 2021), which is approximately twenty-two times larger than the absolute quota on subject imports from Brazil, and subject imports from South Korea maintained a considerable presence in the U.S. market throughout the POR. Accordingly, given the substantially larger quota and the South Korean producers' continued interest in the U.S. market, imports from South Korea would be in a position to compete for a greater number of sales at larger volumes than subject producers in Brazil upon revocation of the orders.

We are also unpersuaded by POSCO's arguments that subject imports allowed under the quota will be capped at less than the full amount allowable due to the manner in which the quota is allocated among CTL plate producers in South Korea (of which only exports from POSCO are considered subject imports) by the South Korean steel industry, as represented by the Korean Iron & Steel Association ("KOSA"). POSCO Posthearing Br. at App-18 to App-21. As POSCO explains, however, the allocations as determined by KOSA ***. *Id.* at App-19. Indeed, POSCO acknowledges that the allocation between subject and nonsubject imports of CTL plate from South Korea fluctuated during the POR, with the share of subject imports ranging from *** percent to *** percent during the POR. *Id.* at App-20. In any event, even under KOSA's allocation, subject imports from South Korea still represented the largest share of apparent U.S. consumption of all subject sources, accounting for *** percent of apparent U.S. consumption in 2021. CR/PR at Tables I-33, C-1.

We also disagree that the low antidumping and countervailing duty rates that POSCO has received indicate that it is likely to compete under different conditions of competition in the event of revocation of the order.

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substantial, and in many cases increasing, and subject imports from each of these sources, with the exception of Austria, undersold the domestic like product at least to some extent.[377] In addition, subject producers in each of these subject sources has shown a continued interest and incentive to compete in the U.S. market, an ability to compete in the U.S. market in larger quantities given their production capacity and the nature of Section 232 measures, and the ability to export substantial quantities of CTL plate.[378] We have also explained that, contrary to respondents' arguments, there is likely to be a reasonable overlap of competition between subject imports from different sources if the orders were revoked. Accordingly, we do not find differences in the conditions of competition sufficient to warrant exercising our discretion not to cumulate subject imports from Austria, Belgium, China, France, Germany, Italy, South Africa, South Korea, Taiwan, and Turkey.

#### 4. Conclusion

We have determined that if the orders were revoked, subject imports from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Korea, South Africa, Taiwan, and Turkey would not be likely to have no discernible adverse impact on the domestic industry. We have also found that there would likely be a reasonable overlap of competition between the subject imports from each of these countries and the domestic like product and among the subject imports from these countries after revocation. In addition, we find that imports from each subject source except Brazil are likely to compete in the U.S. market under similar conditions of competition should the orders be revoked. We therefore exercise our discretion to cumulate subject imports from Austria, Belgium, China, France, Germany, Italy, Japan, South

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Nor are we persuaded that the volume of subject imports from South Korea permitted under the absolute quota will be reduced by the grant of any product exclusions. GOK Posthearing Br. at 1-3. These "quota exclusion entries" do count toward filling the absolute quotas for South Korea, effective August 30, 2018. Exclusion quantities are counted against the quarterly quota in place at the time of entry and count towards the annual quota. However, they are excluded from the tariff once the quarterly and annual quotas are filled. CR/PR at I-51.

We are likewise not persuaded by Salzgitter's arguments that subject imports from South Korea exhibited differences in volume and pricing during the POR shows that subject imports from South Korea will compete differently if the orders were revoked. Salzgitter Prehearing Br. at 34-36. Nor are we persuaded that subject imports from South Korea will compete under different conditions of competition due to alleged differences in product mix. *Id.* at 34-35. Notwithstanding some distinctions in the types of products offered by subject sources during the POR, the record shows that subject imports from South Korea consist of types of CTL plate that are also offered by the domestic industry as well as subject sources, including ***. CR/PR at Table IV-2.

[377] Confidential Report from the Original Investigations at Tables V-3 through V-8 & C-1.

[378] CR/PR at Tables IV-17, IV-21, IV-26, IV-40, IV-45, IV-50, IV-55, IV-60, IV-65, IV-70, IV-75, IV-80, IV-85, IV-88, IV-93, IV-98, IV-101, and IV-104.

Korea, South Africa, Taiwan, and Turkey for purposes of our analysis in these reviews. As discussed above, however, we find that subject imports from Brazil are likely to compete under different conditions of competition than imports from the other subject sources if the orders were revoked, and we therefore exercise our discretion not to cumulate subject imports from Brazil with imports from any other subject sources.[379]

## [redacted] Whether Revocation of the Antidumping and Countervailing Duty Orders Would Likely Lead to Continuation or Recurrence of Material Injury Within a Reasonably Foreseeable Time

### A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order "would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time."[380] The SAA states that "under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports."[381] Thus, the likelihood standard is prospective in nature.[382] The U.S. Court of International Trade has found that

[379] Commissioners Schmidtlein and Stayin determine that subject imports from each country would likely compete under similar conditions of competition upon revocation of the orders and exercise their discretion to cumulate imports from all subject countries for their analysis in these reviews.

[380] 19 U.S.C. § 1675a(a).

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

[382] 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.

"likely," as used in the five-year review provisions of the Act, means "probable," and the Commission applies that standard in five-year reviews.[383]

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."[384] 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."[385]

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."[386] 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).[387] The statute further provides

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[383] *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'").

[384] 19 U.S.C. § 1675a(a)(5).

[385] 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*.

[386] 19 U.S.C. § 1675a(a)(1).

[387] 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings. Certain Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, the People's Republic of China, France, the Federal Republic of Germany, Italy, Japan, the Republic of Korea, South Africa, Taiwan, and the Republic of Turkey: Final Results of the Expedited Sunset Reviews of the Antidumping Duty Orders, 87 Fed. Reg. 17066 (Mar. 25, 2022) and accompanying Issues and Decision Memorandum.

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.[388]

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.[389] In doing so, the Commission must consider "all relevant economic factors," including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.[390]

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.[391]

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.[392] All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are

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[388] 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

[389] 19 U.S.C. § 1675a(a)(2).

[390] 19 U.S.C. § 1675a(a)(2)(A-D).

[391] *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.

[392] 19 U.S.C. § 1675a(a)(4).

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.[393]

### B. Conditions of Competition and the Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[394] The following conditions of competition inform our determinations.

#### 1. Demand Conditions

*Original Investigations*. In its original determinations, the Commission found demand for CTL plate was dependent on the demand for U.S.-produced downstream products and that CTL plate was used in construction, infrastructure, heavy industrial production, line pipe, shipbuilding, barges, tanks, railcars and rail transportation, tractors, wind towers, electricity transmission poles, and oil and gas structures.[395] Responses from U.S. producers, importers, and purchasers were mixed regarding how U.S. demand for CTL plate had changed between January 2013 and December 2014.[396] Apparent U.S. consumption of CTL plate increased from 8.8 million short tons in 2013 to 9.9 million short tons in 2014, before decreasing to 8.3. million short tons in 2015; it was 6.6 million short tons in interim 2015 and 6.0 million short tons in interim 2016.[397]

*Current Reviews.* In the current reviews, as in the original investigations, the main driver of demand for CTL plate is demand for U.S.-produced downstream products (*i.e.*, demand for construction, infrastructure, heavy industrial production, line pipe, shipbuilding, barges, tanks, railcars and rail transportation, tractors, wind towers, electricity transmission poles, and oil and gas structures).[398] The domestic industry's shipments of CTL plate to end users were ***

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[393] 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.

[394] 19 U.S.C. § 1675a(a)(4).

[395] *Original Determinations*, USITC Pub. 4664 at 31.

[396] *Original Determinations*, USITC Pub. 4664 at 31.

[397] *Original Determinations*, USITC Pub. 4664 at 31.

[398] CR/PR at II-13.

shipped to the construction and contractor market, accounting for *** percent of their total U.S. shipments in 2019, *** percent in 2020, and *** percent in 2021.[399]

Several factors influenced demand for CTL plate during the POR. Generally, the value of seasonally adjusted residential and non-residential construction spending and the total value of annualized construction spending increased from January 2016 to June 2022.[400] The COVID-19 pandemic reduced U.S. demand for CTL plate in the beginning of 2020; however, demand began recovering in the second half of 2020.[401]

The majority of U.S. producers and a plurality of importers reported in their questionnaire responses that U.S. demand for CTL plate fluctuated during the POR, while a plurality of purchases reported that U.S. demand for CTL plate increased.[402] Domestic Producers assert that while demand for CTL plate in the United States fluctuated, it declined overall during the POR as a result of the pandemic and general economic trends.[403]

With respect to future demand for CTL plate, half of responding U.S. producers expect U.S. demand for CTL plate to fluctuate while a plurality of U.S. importers, the majority of responding purchasers, and the majority of foreign producers expect U.S. demand for CTL plate to increase.[404] However, Domestic Producers argue that demand will continue to be impacted

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[399] CR/PR at II-13-14, Table II-7. The rail transportation market accounted for *** percent of the domestic industry's total U.S. shipments in 2019, *** percent in 2020, and *** percent in 2021. *Id*. The automotive market accounted for *** percent in 2019, *** percent in 2020, and *** percent in 2021. *Id.* The machinery, industrial equipment, and tolls market accounted for *** percent in 2019, *** percent in 2020, and *** percent in 2021. *Id.* The oil and gas industry (drilling and transportation, shortage tanks, and process vessels) accounted for *** percent in 2019, *** percent in 2020, and *** percent in 2021. *Id*. The agricultural and electrical equipment market accounted for *** percent in 2019, *** percent in 2020, and *** percent in 2021. *Id*. The market for steel for converting and processing accounted for *** percent in 2019, *** percent in 2020, and *** percent in 2021. *Id.* Lastly, the shipbuilding and marine equipment market accounted for *** percent of the domestic industry's U.S. shipments in 2019, *** percent in 2020, and *** percent in 2021. *Id.*

[400] CR/PR at II-19, Fig. II-2 and Table II-11.

[401] CR/PR at I- 66, II-15, Figs. II-1 (real U.S. GDP), II-2 (construction spending), and Tables II-8 and Table II-11. Apparent U.S. consumption decreased by 14.5 percent from 2019 to 2020 before increasing by 8.9 percent from 2020 to 2021. CR/PR at Tables I-33 and C-1. Likewise, U.S. real GDP increased in each full year of the POR except during the first and second quarters of 2020 and ended higher in the second quarter of 2022 than the first quarter of 2016. CR/PR at II-15, Fig. II-1, and Table II-8.

[402] CR/PR at Table II-9. In their prehearing brief Brazilian Respondent USMINAS argues that demand is currently strong and is projected to remain strong. USIMINAS Prehearing Br. at 37.

[403] Nucor/SSAB Prehearing Br. at 99-103; Cleveland-Cliffs Prehearing Br. at 92-93.

[404] *See* CR/PR at Table II-10.

by the ongoing pandemic, supply chain issues, increasing inflation and interest rates, the war in Ukraine, and a possible recession.[405]

Apparent U.S. consumption decreased irregularly during 2016-2021, ending 11.7 percent lower in 2021 than in 2016; it was 13.6 percent lower in interim 2022 compared to interim 2021.[406] Apparent U.S. consumption measured in short tons was 6.1 million in 2016, 5.9 million in 2017, 6.2 million in 2018, 5.8 million in 2019, 4.9 million in 2020, 5.4 million in 2021, 2.8 million in interim 2021, and 2.4 million in interim 2022.[407]

### 2. Supply Conditions

*Original Investigations*. In the original investigations, the domestic industry's share of apparent U.S. consumption decreased from 89.8 percent in 2013 to 82.1 percent in 2014 and remained at that level in 2015; it was 81.5 percent in interim 2015 and 83.6 percent in interim 2016.[408] The domestic industry's production capacity declined from 12.9 million short tons in 2013 to 12.5 million short tons in 2014 and remained at that level in 2015; it was 9.3 million short tons in both interim 2015 and 2016.[409]

The domestic industry reported a number of changes during the POI. Five U.S. producers -- AMUSA, Cargill, EVRAZ, Gerdau, and Kloeckner -- closed facilities; one U.S. producer (Optima) filed for bankruptcy; and six domestic producers (AMUSA, CMC, JSW, Nucor, and Universal) reported shutdowns or curtailments in the production of CTL plate.[410] One domestic producer (Metals USA) reported an expansion in production capacity, one domestic producer (Cargill) added a facility, and four producers (AMUSA, Nucor, Ryerson, and SSAB) reported capital investments and improvements to production facilities.[411] Lastly, Nucor acquired the U.S. producer Joy Global.[412]

The Commission found that cumulated subject imports were the second largest source of supply to the U.S. market during the POI.[413] Cumulated subject imports' share of apparent

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[405] Nucor/SSAB Prehearing Br. at 99-103; Nucor/SSAB Posthearing Br. at 3, 15, 64 ; Nucor/SSAB Final Comments at 2, 6, 14; Cleveland-Cliffs Prehearing Br. at 92-93; Hearing Tr. at 24-25 (Gerrish), 49-50 (Behr).

[406] CR/PR at I-66 and Tables I-33 and C-1.

[407] CR/PR at Tables I-33 and C-1.

[408] *Original Determinations*, USITC Pub. 4664 at 31.

[409] *Original Determinations*, USITC Pub. 4664 at 31.

[410] *Original Determinations*, USITC Pub. 4664 at 31.

[411] *Original Determinations*, USITC Pub. 4664 at 31.

[412] *Original Determinations*, USITC Pub. 4664 at 31.

[413] *Original Determinations*, USITC Pub. 4664 at 32.

U.S. consumption increased throughout the POI from *** percent in 2013 to *** percent in 2015.[414]

Nonsubject imports had a smaller presence in the U.S. market than either the domestic industry or cumulated subject imports throughout the POI, and their share of apparent U.S. consumption fluctuated throughout the period.[415] The largest sources of nonsubject imports were Canada and Mexico. The Commission also observed that CTL plate products from China, India, Indonesia, Korea, Russia, and Ukraine were subject to suspension agreements, antidumping duty orders, and/or countervailing duty orders in the United States during the POI.[416]

*Current Reviews*. During the current review period, the domestic industry continued to be the largest supplier to the U.S. market.[417] U.S. producers' share of apparent U.S. consumption increased irregularly during the POR from 80.8 percent in 2016, to 86.8 percent in 2017, 90.4 percent in 2018, 90.8 percent in 2019, and 93.7 percent in 2020, before decreasing to 90.3 percent in 2021; it was lower in interim 2022 (88.8 percent) than in interim 2021 (91.2 percent).[418]

There were several changes to the domestic industry including plant openings, expansions, and acquisitions during the POR. ArcelorMittal idled its rolling mill in Conshohocken, Pennsylvania,[419] and Cleveland-Cliffs *** in 2020.[420] Additionally, ***.[421] Kloeckner Metals completed the expansion of its steel and aluminum processing facility in Greenville, South Carolina in 2017 and JSW Steel and SSAB both announced expansions to their respective facilities in 2018, with JSW Steel announcing the second phase of its upgrades in 2021.[422] In 2017, Metal One Corp. acquired Cargill Metals Supply Chain's U.S. metal business in Windsor, Colorado, and Olympic Steel Inc. announced the opening of a new flat-rolled

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[414] *Original Determinations*, USITC Pub. 4664 at 32. Cumulated subject imports' share of apparent U.S. consumption increased from *** percent in 2014 to *** percent in 2014, and to *** percent in 2015; it was *** percent in interim 2015 and *** percent in interim 2016. *Confidential Original Determinations* at 44.

[415] *Original Determinations*, USITC Pub. 4664 at 32. Nonsubject imports share of apparent U.S. consumption increased from *** percent in 2014 to *** percent in 2014 before declining to *** percent in 2015; it was *** percent in interim 2015 and *** percent in interim 2016. *Confidential Original Determinations* at 45.

[416] *Original Determinations*, USITC Pub. 4664 at 32.

[417] CR/PR at Tables I-33 and C-1.

[418] CR/PR at Tables I-33 and C-1.

[419] CR/PR at Table III-1.

[420] CR/PR at Tables III-1 and III-2.

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

[422] CR/PR at Table III-1.

fabricating facility in Buford, Georgia.[423] ***.[424] Nucor began construction in October 2020 of a plate mill in Brandenburg, Kentucky with an annual production capacity of 1.2 million short tons and an anticipated completion data of December 2022.[425] In November 2021, Nucor announced the addition of a blast and prime line with an annual production capacity of 120,000 short tons per year at the new Brandenburg, Kentucky facility.[426] ***.[427]

During the period of review, the domestic industry's capacity increased irregularly by 0.5 percent from 2016 to 2021, increasing from 8.25 million short tons in 2016 to 8.29 million short tons in 2017, and 8.31 million short tons in 2018 and 2019, before decreasing to 8.29 million short tons in 2020 and 2021.[428] The domestic industry's reported capacity utilization fluctuated throughout the POR, increasing from 68.7 percent in 2016 to 70.9 percent in 2017 and 75.0 percent in 2018, before decreasing to 70.0 percent in 2019 and 64.7 percent in 2020, and then increasing to 66.4 percent in 2021; it was lower in interim 2022 (58.6 percent) than in interim 2021 (68.4 percent).[429]

After 2016, cumulated subject imports were the smallest source of supply to the U.S. market.[430] Cumulated subject imports' share of apparent U.S. consumption declined from *** percent in 2016 to *** percent in 2021; it was higher in interim 2022 (*** percent) than in interim 2021 (*** percent).[431]

Beginning in 2017, imports from nonsubject countries were the second largest source of supply to the U.S. market during the POR.[432] Nonsubject imports' share of apparent U.S. consumption decreased irregularly during the POR from *** percent of apparent U.S. consumption in 2016 to *** percent in 2021.[433] The largest source of nonsubject imports during the POR was Canada, which accounted for over 80 percent of nonsubject imports during the POR.[434]

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[423] CR/PR at Table III-1

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

[425] CR/PR at Table III-1.

[426] CR/PR at Table III-1.

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

[428] CR/PR at Tables III-4 and C-1. The changes in capacity from 2016-19 largely reflect ***. *Id*. at III-5.

[429] CR/PR at Tables III-4 & C-1.

[430] CR/PR at Tables I-33 & C-1.

[431] CR/PR at Tables I-33 & C-1.

[432] CR/PR at Tables I-33 & C-1.

[433] CR/PR at Tables I-33 & C-1. Nonsubject imports' share of apparent U.S. consumption was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent 2020, and *** percent in 2021. *Id*.

[434] CR/PR at II-12.

Five of six U.S producers and 25 of 41 importers reported that they had not experienced supply constraints; however, 16 importers and 9 of 13 responding purchasers reported experiencing supply constraints, since January 1, 2016.[435] Four out of six domestic producers, including two of the three largest firms, reported that the COVID-19 pandemic had an impact on production, particularly in 2020.[436] The Domestic Producers assert that in the wake of the COVID-19 pandemic, a broader economic recovery occurred more rapidly than expected, creating transitory supply and demand imbalances and higher prices that have since declined as supply and demand rebalanced.[437] Importers reported supply constraint issues including higher demand, shipping constrains, the availability of specialized products, and constraints related to the section 232 measures and the antidumping and countervailing duty orders.[438] Purchasers that reported that they had been declined orders cited allocations, controlled-order entry, limited capacity of certain mills due to outages and COVID-related labor shortages, and tightness of supply.[439] Certain foreign producers assert that the domestic market has restructured, expanded, and reinvested since the original POI and that the impositions of Section 232 measures has had an impact on supply in the U.S. market.[440]

### 3. Substitutability and Other Conditions

*Original Investigations*. The Commission found that there was a moderate-to-high degree of substitutability between the domestic like product and cumulated subject imports and that price was an important factor for purchasers.[441] It observed that most responding U.S. purchasers reported that product from all sources was always or frequently interchangeable while producers and importers reported that these products were sometimes or frequently interchangeable.[442]

The Commission found that price was an important consideration in purchasing decisions. When asked whether differences other than price are ever significant in their sales of CTL plate from different sources, nearly all U.S. producers and most importers and purchaser reported that differences other than price were only sometimes or never important. The majority of purchasers also reported that the domestic like product and imports from each

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[435] CR/PR at II-12.

[436] CR/PR at III-6.

[437] CR/PR at II-15 & Table III-16; Nucor/SSAB Prehearing Br. at 146-47; Cleveland-Cliffs Prehearing Br. at 117-18.

[438] CR/PR at II-12.

[439] CR/PR at II-13.

[440] *See* Japanese Respondents Prehearing Br. at 37-42; USIMINAS Prehearing Br. at 28-30; USIMINAS Posthearing Br. at 11-12; POSCO Prehearing Br. at 14-15.

[441] *Original Determinations*, USITC Pub. 4664 at 32-33.

[442] *Original Determinations*, USITC Pub. 4664 at 32.

subject source were comparable with respect to a majority of 17 non-price factors except for availability, delivery terms, delivery time, and price.[443]

The Commission observed that prices for the primary raw materials constituted a substantial portion of the final cost of producing CTL plate. These costs as a share of cost of goods sold ("COGS") decreased from 62.7 percent in 2013 to 57.0 percent in 2015.[444] It found that prices for the primary raw material used to produce CTL plate fluctuated over the POI.[445]

The Commission observed that a majority of responding U.S. producers and importers reported selling more than half of their product in the spot market in 2015, with importers reportedly selling nearly two-thirds of their product in the spot market. The rest of the U.S. producers' and importers' sales were made pursuant to short-term contracts.[446]

*Current reviews.* In these reviews, we find that there is at least a moderate to high degree of substitutability between domestically produced CTL plate and CTL plate from subject sources.[447] As discussed above, all responding U.S. producers reported that product from each subject source was always or frequently interchangeable with the domestic product.[448] Although responses from importers were mixed, most reported that CTL plate from each of the twelve subject sources was always or frequently interchangeable with the domestic like product and the remainder reporting that subject imports and the domestic like product were sometimes interchangeable, with the exception of CTL plate from Austria and China for which one importer each reported them to never be interchangeable.[449] Responses regarding the interchangeability of subject imports from different sources were also mixed but most responding importers reported that subject imports of CTL plate from different countries were at least sometimes interchangeable with each other.[450] All responding purchasers but one reported that CTL plate from domestic and subject sources was frequently or sometimes interchangeable, and no purchaser reported that CTL plate from domestic and subject sources was never interchangeable.[451] Purchaser responses comparing domestically produced CTL plate and CTL plate from each subject source with respect to sixteen purchasing factors were mixed overall.[452] With respect to the purchasing factors that more than half of the responding

[443] *Original Determinations*, USITC Pub. 4664 at 33.
[444] *Original Determinations*, USITC Pub. 4664 at 33.
[445] *Original Determinations*, USITC Pub. 4664 at 33.
[446] *Original Determinations*, USITC Pub. 4664 at 33.
[447] CR/PR at II-24.
[448] CR/PR at Table II-18.
[449] CR/PR at Table II-19.
[450] CR/PR at Table II-19.
[451] CR/PR at Table II-20.
[452] CR/PR at Table II-17.

purchasers identified as very important,[453] however, most responding purchasers reported the domestic like product to be comparable or superior to subject imports from each subject source.[454]

We also find that price is an important factor in purchasing decisions. Price was most frequently identified as one of responding purchasers' top three factors in purchasing decisions, with 14 firms listing price/cost as a top three purchasing factor followed by quality (10 firms), availability/supply (five firms), and delivery performance (four firms).[455] Price was also one of the factors most frequently identified as very important. Thirteen purchasers identified price, as well as availability, delivery time, and product consistency, as very important.[456] Market participants' responses regarding the significance of factors other than price varied.[457] Most responding purchasers reported that they sometimes purchase the lowest-priced product.[458]

The primary raw materials for CTL plate are iron and steel scrap, and to a lesser extent, coal and iron ore.[459] Raw material costs represent the largest component of total COGS; as a percentage of total COGS, raw material costs increased irregularly from 53.1 percent in 2016 to 65.4 percent in 2021 and were higher in interim 2022 (66.0 percent) than in interim 2021 (65.5 percent).[460] On a per-short ton basis, U.S. producers' raw material costs increased irregularly from $301 per short ton in 2016 to $572 per short ton in 2021, and were higher in interim 2022 ($695 per short ton) than in interim 2021 ($510 per short ton).[461] During the POR, prices for iron ore, coal, and iron and steel scrap fluctuated but increased overall, with prices for iron and steel scrap increasing by 161.7 percent between January 2016 and June 2022, and prices for iron ore and coal increasing by 81.9 percent and 57.5 percent, respectively.[462] Industrial electricity prices fluctuated but increased overall by 39.1 percent from January 2016 to June 2022; natural gas prices also fluctuated during this period but increased overall by 166.9

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[453] As discussed above, these factors were availability, availability of grades/products needed, delivery terms, delivery time, payment terms, price, product consistency, quality meets industry standards, and reliability of supply. CR/PR at Table II-14.

[454] CR/PR at Table II-17.

[455] CR/PR at Table II-13.

[456] CR/PR at Table II-14. The other factors that were identified as very important by more than half of responding purchasers included availability of grades/products needed (10 firms), payment terms (seven firms), quality meets industry standards (12 firms), and reliability (11 firms). *Id.*

[457] CR/PR at II-52 & Table II-21.

[458] CR/PR at II-26.

[459] CR/PR at V-1. Steel or iron scrap, which is used in EAF furnace production of CTL plate, was reported by ***. CR/PR at III-41. Steel slabs were reported as raw material inputs by ***. *Id.* ***. *Id.*

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

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

[462] CR/PR at V-1, Fig. V-1, Table E-1.

percent.[463] Most responding purchasers (12 of 14) reported that they were familiar with the raw material prices for CTL plate and indicated that information on raw material prices affected their negotiations or contracts to purchase CTL plate since 2016.[464]

All responding U.S. producers and a large majority of importers sell CTL plate on a transaction-by-transaction basis. Five of the six responding U.S. producers also sell pursuant to contracts, whereas less than one-quarter of importers do. A few producers and importers use set price lists or some other method of price setting, such as referencing competing import or market prices, or using short-term, back-to-back contracts.[465]

U.S. producers reported selling half of their product in the spot market and reported that most of their remaining sales were via short-term (*** percent) and annual contracts (*** percent) followed by long-term contracts (*** percent).[466] Importers reported selling nearly all of their product in the spot market (*** percent), followed by short-term contracts (*** percent) and annual and long-term contracts (*** percent each).[467] A majority of U.S. producers' and *** importers' short-term contracts do not allow for price renegotiation, but *** importers' and *** producers' annual contracts and long-term contracts do. A majority of their short-term contracts fix both price and quantity. *** of the U.S. producers and *** importers fix both price and quantity on annual and long-term contracts.[468]

Domestic producers were mixed in terms of their reliance on CTL plate price indices such as CRU. According to Cleveland-Cliffs, it uses CRU indices in negotiations and ***.[469] SSAB indicated that its long-term contracts are at times adjusted based on price indices including CRU, however, SSAB also explained that it generally does not rely on CRU indices due to a lack of reliability and consistency.[470] Nucor similarly cited "significant deficiencies in CRU's ability to accurately reflect what the market price is, especially in plate, in part, because of the size of the market, which is small, and the number of data points they have."[471] Consequently, Nucor reported that it relies on its own published prices, indicating that "{o}ne of the reasons why we did that is because the CRU price simply did not reflect reality."[472]

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[463] CR/PR at V-3, Fig. V-3, Table E-3.
[464] CR/PR at V-2.
[465] CR/PR at V-4, Table V-2.
[466] CR/PR at V-4, Table V-2.
[467] CR/PR at V-4, Table V-1.
[468] CR/PR at V-4 to V-5.
[469] Tr. at 73 (Goncalves); Cleveland-Cliffs Posthearing Br., Exhibit 4; Final Comments at 5-6.
[470] Tr. at 43, 139 (Moskaluk).
[471] Tr. at 140 (Behr).
[472] Tr. at 140 (Behr). Notwithstanding this testimony, Nucor also reported in its questionnaire response that ***. Nucor Domestic Producer Questionnaire at IV-7 note, EDIS Doc. No. 780342.

Effective February 14, 2020, subject imports from China became subject to an additional 7.5 percent *ad valorem* duty under Section 301 of the Trade Act of 1974[473] ("Section 301 tariffs").[474] As discussed above, during the POR, under Section 232, CTL plate imports from China, South Africa, Taiwan, and Turkey became subject to 25 percent *ad valorem* duties; CTL plate imports from Japan were subject to these Section 232 duties until April 1, 2022, when they became subject to TRQs; CTL plate from South Korea and Brazil have been subject to annual absolute quotas since May 1, 2018 and June 1, 2018, respectively; and CTL plate from Austria, Belgium, France, Germany, and Italy, as members of the EU, were subject to Section 232 duties starting June 1, 2018, but as of January 1, 2022, imports from the EU became subject to TRQs.[475] CTL plate from these countries may enter under product specific exclusions from Section 232 duties, which apply only with respect to specific products generally defined more narrowly than 10-digit HTS subheadings and to the specific requestor/importer.[476] Although the parties disagree,[477] the record in these reviews does not indicate that the Section 232 trade actions, as they relate to the cumulated subject imports, will be terminated in the reasonably foreseeable future.

U.S. producers, importers, and purchasers were asked to report the impact of sections 232 measures and 301 tariffs on overall demand, supply, prices, or raw material costs. With respect to the section 232 measures, most firms reported either an increase or no change in the domestic supply of CTL plate, a decrease in the supply of imports and an increase in prices. Responses were mixed with respect to overall demand and raw material costs. With respect to the section 301 tariffs, most firms reported either an increase or no change in the domestic supply of CTL plate, a decrease or no change in supply of imports from China, an increase or no change in supply of imports from other sources, and an increase or no change to prices. Responses were mixed with respect to overall demand and raw material costs. Eight of the 42 responding importers reported seeking section 232 exclusions and *** reported seeking section 301 exclusions.[478]

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[473] 19 U.S.C. § 2411.

[474] CR/PR at I-46.

[475] 19 U.S.C. §1862; *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9705, 83 Fed. Reg. 11625 (Mar. 8, 2018); CR/PR at I-44 to I-46 & n.35, Table I-27.

[476] CR/PR at I-49 to I-50. CTL plate is not eligible for generally applicable exclusions ("GAEs"), as CTL plate is reported and enters the United States under HTS statistical reporting numbers that are not included among those that are subject to GAEs. *Id*.

[477] *See, e.g.*, Cleveland-Cliffs Posthearing Br. at 8-9; Nucor/SSAB Prehearing Br. at 29-31; USIMINAS Final Comments at 1-2; USIMINAS Posthearing Br. at 7-8; USIMINAS Prehearing Br. a 6-8.

[478] CR/PR at II-1 & Table II-1.

### C. Revocation of the Countervailing Duty and Antidumping Duty Orders on Subject Imports from Austria, Belgium, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey Would Likely Lead to the Continuation or Recurrence of Material Injury Within a Reasonably Foreseeable Time

#### 1. Likely Volume of Subject Imports

*Original investigations.* In the original investigations, the Commission found that the volume and increase in volume of cumulated subject imports were significant, both in absolute terms and relative to consumption in the United States.[479] It found that, between 2013 and 2014, the increase in the market share of cumulated subject imports came directly at the expense of the domestic industry.[480] Cumulated subject imports increased from *** short tons in 2013 to *** million short tons in 2014 before declining slightly to *** million short tons in 2015. Subject imports were *** short tons in interim 2015 and *** short tons in interim 2016.[481] The volume of cumulated subject imports rose at a much faster rate than the growth in apparent U.S. consumption from 2013 to 2014, increasing by *** percent during that time, and decreasing only slightly (by *** percent) from 2014 to 2015, for an overall increase of *** percent between 2013 and 2015.[482]

Cumulated subject imports increased their market share (by quantity) from *** percent in 2013 to *** percent in 2014 and *** percent in 2015.[483] The market share of subject imports was *** percent in interim 2015 and *** percent in interim 2016.[484] The Commission therefore concluded that the volume and increase in volume of cumulated subject imports were significant, both in absolute terms and relative to consumption in the United States.[485]

In rejecting respondents' arguments that the cumulated subject imports increased due to supply constraints experienced by the domestic industry, the Commission pointed to the domestic industry's capacity utilization rate of 74.1 percent in 2014, which suggested that the industry was capable of supplying at least a significant share of the domestic market that subject imports captured in 2014 and largely retained thereafter.[486] The Commission also rejected respondents' arguments that changes in market share should have been calculated

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[479] *Original Determinations*, USITC Pub. 4664 at 37.
[480] *Original Determinations*, USITC Pub. 4664 at 34.
[481] *Original Determinations*, USITC Pub. 4664 at 33; *Confidential Original Determinations* at 47.
[482] *Original Determinations*, USITC Pub. 4664 at 33-34; *Confidential Original Determinations* at 47-48.
[483] *Original Determinations*, USITC Pub. 4664 at 34.
[484] *Original Determinations*, USITC Pub. 4664 at 34.
[485] *Original Determinations*, USITC Pub. 4664 at 37.
[486] *Original Determinations*, USITC Pub. 4664 at 35.

using lag import data instead of official import statistics, and that subject imports of X-70 CTL plate should have been excluded from the volume of subject imports due to the domestic industry's allegedly insufficient production of such products.[487]

*Current reviews.* Cumulated subject imports have maintained a presence in the U.S. market under the disciplining effects of the orders throughout the POR, though at much lower levels than during the original investigations. Cumulated subject import volume declined from *** short tons in 2016 to *** short tons in 2017, increased to *** short tons in 2018, declined to *** short tons in 2019 and *** short tons in 2020, and then increased to *** short tons in 2021; it was *** short tons in interim 2021 and *** short tons in interim 2022.[488] Cumulated subject imports as a share of apparent U.S. consumption declined from *** percent in 2016 to *** percent in 2017 and 2018, increased to *** percent in 2019, declined to *** percent in 2020, and then increased to *** percent in 2021; it was *** percent in interim 2021 and *** percent in interim 2022.[489] We find that the lower volume and market share of cumulated subject imports during the POR reflects the disciplining effects of the orders.

The cumulated subject producers have the ability to export significant volumes of subject merchandise to the United States in the event of revocation of the orders. The cumulated subject producers possessed significant production capacity throughout the period of review, including capacity of *** short tons in 2021, although their capacity declined *** over the period.[490] Because the cumulated subject producers' production fluctuated at levels

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[487] *Original Determinations*, USITC Pub. 4664 at 34-36.

[488] *Calculated from* CR/PR at Table I-33 (subtracting subject imports from Brazil). Commissioners Schmidtlein and Stayin note that including Brazil, cumulated subject import volumes followed the same trend; such volumes were *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, and *** short tons in interim 2022 compared to *** short tons in interim 2021. *Id.*

[489] *Calculated from* CR/PR at Table I-33 (subtracting subject imports from Brazil). Commissioners Schmidtlein and Stayin note that including Brazil does not change the shares of cumulated subject imports with the exception of 2016 when subject imports from Brazil accounted for 0.1 percent of apparent U.S. consumption. *Id.*

[490] *Calculated from* CR/PR at Table IV-106 (subtracting Brazilian industry data). Cumulated subject producers' capacity was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; it was *** short tons in interim 2021 and *** short tons in interim 2022. *Id.*

Commissioners Schmidtlein and Stayin note that including Brazil, cumulated subject producers reported CTL plate production capacity of *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021. Reported capacity was *** short tons in interim 2022 compared to *** short tons in interim 2021. *Id.*

well below their capacity during the POR,[491] their capacity utilization ranged from *** percent to *** percent during the period, and was *** percent in 2021.[492] The cumulated subject producers' excess capacity of *** short tons in 2021 was equivalent to *** percent of apparent U.S. consumption (*** short tons) that year.[493] Responding subject producers also maintained substantial end-of-period inventories throughout the POR, including end-of-period inventories of *** short tons in 2021 that were equivalent to *** percent of apparent U.S. consumption that year.[494] As discussed in section III.D. above, subject producers in Austria, Belgium, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey also have the ability to increase production of CTL plate for export to the United States by shifting production from out-of-scope products on the same equipment.[495]

Cumulated subject producers are also export oriented. The combined subject industries exported substantial volumes of CTL plate throughout the POR, including *** short tons in 2021.[496] Exports as a share of their total shipments ranged from *** to *** percent during the POR, and were *** percent in 2021. Due to the restraining effect of the orders, the cumulated

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[491] Cumulated subject producers' reported CTL plate production was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; it was *** short tons in interim 2021 and *** short tons in interim 2022. *Calculated from* CR/PR at Table IV-106 (subtracting Brazilian industry data).

Commissioners Schmidtlein and Stayin note that including Brazil, cumulated subject producers' reported CTL plate production was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021; it was *** short tons in interim 2022 compared to *** short tons in interim 2021. CR/PR at Table IV-106.

[492] *Calculated from* CR/PR at Table IV-106 (subtracting Brazilian industry data). Commissioners Schmidtlein and Stayin note that including Brazil, cumulated subject producers reported capacity utilization rates ranging from *** percent to *** percent during 2016-2021 and *** percent in 2021. *Id.*

[493] *Calculated from* CR/PR at Table IV-106 (subtracting Brazilian industry data); CR/PR at Table C-1. Commissioners Schmidtlein and Stayin note that including Brazil, cumulated subject producers reported *** short tons of excess capacity in 2021. *Id.*

[494] Total end-of-period inventories of cumulated subject imports held by subject producers were *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; they were *** short tons in interim 2021 and *** short tons in interim 2022. *Calculated from* CR/PR at Table IV-106 (subtracting Brazilian industry data).

[495] CR/PR at Tables IV-16, IV-25, IV-44, IV-54, IV-64, IV-74, IV-84, IV-97.

[496] *Calculated from* Table IV-106 (subtracting Brazilian industry data). The cumulated subject industries' combined exports were *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; they were *** short tons in interim 2021 and *** short tons in interim 2022. *Id.*

Commissioners Schmidtlein and Stayin note that including Brazil, cumulated subject producers reported exporting *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, and *** short tons in interim 2022 compared to *** short tons in interim 2021. *Id.* Exports by responding cumulated subject producers, including Brazil, accounted for *** to *** percent of total shipments annually during the POR. *Id.*

subject producers' exports to the United States declined irregularly as a share of their total shipments from *** percent in 2016 to *** percent in 2021, and were *** percent in interim 2021 and *** percent in interim 2022.[497]

The U.S. market remains an attractive export market for cumulated subject producers, providing them with the incentive to export significant volumes of subject merchandise to the United States in the event of revocation. Cumulated subject imports maintained a presence in the U.S. market throughout the POR, thereby retaining U.S. customers and ready distribution networks in the United States through affiliated importers and sales agents.[498] Furthermore, the United States is a large market that offers relatively higher CTL plate prices than third-country markets.[499] Moreover the existence of third-country trade barriers to subject imports from China, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey would enhance the relative attractiveness of the U.S. market to subject producers in those countries in the event of revocation.[500]

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

### 2. Likely Price Effects

*Original Investigations.* In the original investigations, the Commission found that there was a moderate-to-high degree of substitutability between domestically produced CTL plate and cumulated subject imports and that price was an important factor in purchasing decisions.[501] It found significant underselling of the domestic like product by cumulated subject imports over the POI, observing that subject imports undersold the domestic like product in 193 of 371 possible comparisons (involving 747,331 short tons) and oversold the domestic like

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[497] *Calculated from* CR/PR at Tables IV-106, IV-107 (subtracting Brazilian industry data).

[498] *Calculated from* CR/PR at Table IV-107 (subtracting Brazilian industry data).

[499] *Calculated from* CR/PR at Table IV-107 (subtracting Brazilian industry data). The AUVs of the cumulated subject producers' exports to the United States were generally higher than the AUVs of their exports to home and third-country markets throughout the POR. CR/PR at Tables IV-106, IV-107.

For the same reasons, Commissioners Schmidtlein and Stayin find that the United States is an attractive market for cumulated subject producers including Brazil. *See* CR/PR at Tables IV-106, IV-107, IV-111.

[500] CR/PR at Table IV-112.

[501] *Original Determinations*, USITC Pub. 4664 at 37.

product in the remaining 178 instances (280,632 short tons).[502] It observed that underselling was particularly prevalent during 2014 when subject imports gained substantial market share in the U.S. market and that purchasers confirmed shifting from the domestic like product to subject imports due to their lower prices.[503]

The Commission did not find that subject imports depressed U.S. producers' prices to significant degree. The Commission observed that while prices for the domestic like product increased from 2013 to 2014, and then declined in 2015 and the first quarter of 2016 before recovering somewhat in the second and third quarters of 2016, these price declines coincided with substantial declines in demand for CTL plate.[504] The Commission also did not find that cumulated subject imports prevented price increases that otherwise would have occurred to a significant degree. It observed that from 2013 to 2014, the domestic industry's ratio of COGS to net sales decreased, rendering the industry more than capable of recovering any increasing costs in 2014.[505]

In sum, the Commission found that significant underselling enabled the subject imports to gain market share at the expense of the domestic industry. It therefore concluded that low-priced cumulated subject imports had significant price effects.[506]

*Current reviews.* As discussed in section IV.C.2. above, we have found that there is at least a moderate-to-high degree of substitutability between domestically produced CTL plate and subject imports and that price is an important factor in purchasing decisions.

The Commission requested pricing data on six pricing products in these reviews.[507] Four U.S. producers and 18 importers provided usable pricing data for sales of the requested

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[502] *Original Determinations*, USITC Pub. 4664 at 38.

[503] *Original Determinations*, USITC Pub. 4664 at 38.

[504] *Original Determinations*, USITC Pub. 4664 at 38-39.

[505] *Original Determinations*, USITC Pub. 4664 at 39. The Commission did acknowledge that the domestic industry's ratio of COGS to net sales increased from 2014 to 2015 but found that price increases were unlikely in 2015 and interim 2015 in light of the declines in both apparent consumption and COGS. *Id*. at 39-40.

[506] *Original Determinations,* USITC Pub. 4664 at 40.

[507] The Commission requested pricing data on the following products:

**Product 1.**-- Hot-rolled CTL carbon steel plate, ASTM A-36 or equivalent as rolled, mill edge, not heat treated, not cleaned or oiled, in random cut lengths, from 72" through 96" in width, and 0.250" thick;
**Product 2.**-- Hot-rolled CTL carbon steel plate, ASTM A-36 or equivalent as rolled, mill edge, not heat treated, not cleaned or oiled, in random cut lengths, from 72" through 120" in width, and from 0.375" through 3.00" in thickness;
**Product 3.**-- Hot-rolled CTL carbon steel plate, high strength low alloy (HSLA), ASTM A-572, Grade 50, mill edge, not cleaned or oiled, in random cut lengths, from 72"

(Continued…)

products, although not all firms reported pricing for all products for all quarters. Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. shipments of CTL plate in 2021, and *** percent of U.S. shipments of subject imports from Belgium; *** percent of U.S. shipments of subject imports from Germany; *** percent of U.S. shipments of subject imports from Italy; and *** percent of U.S. shipments of subject imports from South Korea that same year.[508]

The pricing data indicate a mixed pattern of over- and underselling in terms of quarterly comparisons but predominant underselling in terms of reported sales volume. Cumulated subject imports undersold the domestic like product in 89 out of 216 quarterly comparisons (or 41.2 percent of the time), accounting for reported sales of *** short tons, at margins ranging from 0.1 to 99.9 percent and averaging 19.9 percent.[509] Cumulated subject imports oversold the domestic like product in 127 out of 216 quarterly comparisons (or 58.8 percent of the time), accounting for reported sales of *** short tons, at margins ranging from 0.5 to 510.8 percent and averaging 103.6 percent.[510] Thus, notwithstanding the discipline of the orders, cumulated subject imports undersold the domestic like product in an appreciable number of quarterly comparisons that corresponded to the vast majority, *** percent, of reported subject import sales volume.

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through 120" in width, and from 0.5" through 1.5" in thickness;
**Product 4.**— Hot-rolled CTL plate, AISI A2 or equivalent as rolled, mill edge, annealed, de-scaled, in random cut lengths from 120" through-780", 60" through-120" in width and from 0.187" through 3.5" in thickness;
**Product 5.**-- Hot-rolled CTL carbon steel plate, ASTM A-829 Grade 4142 or equivalent as rolled, mill or cut edge, heat treated, not descaled, in random cut lengths, 60" through 72" in width, and from 0.375" through 5.375" in thickness; and
**Product 6.**-- Hot-rolled CTL carbon steel plate, ASTM A-516 or equivalent, heat treated, in random cut lengths, 96" through 120" in width, and from 0.25" through 8" in thickness.

CR/PR at V-7.

[508] CR/PR at V-7 to V-8. Pricing coverage is based on U.S. shipments reported in questionnaires. Pricing data was not reported for South Africa. Pricing data was reported for Austria, Brazil, China, France, Japan, Taiwan, and Turkey during the POR, but not in 2021. CR/PR at V-8 n.5.

[509] CR/PR at Table V-11, V-12. For cumulated subject imports, there were 15 quarters of underselling out of 19 total available comparisons in 2021. *Id.*

Commissioners Schmidtlein and Stayin note that including Brazil, cumulated subject imports undersold the domestic like product in 91 of 218 quarterly comparisons (41.7 percent), with 263,964 of 362,795 short tons of subject imports (72.8 percent) in the quarters associated with underselling. *Id.*

[510] *Calculated from* CR/PR at Table V-12 (subtracting pricing data for subject imports from Brazil).

We have also considered price trends. Over the POR, sales prices for all six domestically produced pricing products increased overall between *** to *** percent.[511] Sales prices for all six subject imported pricing products also generally increased over the period, with some exceptions.[512]

We find that cumulated subject imports are likely to undersell the domestic like product to a significant degree if the orders were revoked, based on the underselling observed during the original POI and during the POR with the orders in place, the moderate-to-high degree of substitutability between the domestic like product and subject imports, and the importance of price to purchasing decisions. Absent the discipline of the orders, the significant volumes of low-priced cumulated subject imports would likely force the domestic industry either to lower prices, restrain price increases necessary to cover increasing costs, or else lose sales and market share to subject imports, as they did in the original investigations.[513] Consequently, we find

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[511] CR/PR at V-37.

[512] CR/PR at Tables V-3 to V-8.

[513] Certain respondents argue that the Commission should give dispositive weight to the overselling that occurred during the POR and the fact that underselling did not prevent prices for the domestic like product from increasing during that time, and find that Section 232 duties would likely preclude adverse price effects after revocation. *See, e.g.,* Dillinger Prehearing Br. at 14; Dillinger Posthearing Br. at 12-13; NLMK Prehearing Br. at 26-28; Japanese Respondents Prehearing Br. at 54-55; POSCO Prehearing Br. at 47-49, 52-53; POSCO Posthearing Br. at 11. Contrary to respondents' argument, even under the disciplining effect of the orders, cumulated subject imports undersold the domestic like product in *** percent of quarterly comparisons, corresponding to the vast majority of reported subject import sales volume. We find that the pattern of underselling prior to the orders, in which cumulated subject imports used significant underselling to capture market share from the domestic industry, to be more indicative of pricing behavior if the orders were revoked. *See* SAA at 884 ("{t}his period is the most recent time during which imports of subject merchandise competed in the U.S. market free of the discipline of an order or agreement.").

We are also unpersuaded by respondents' argument that the Section 232 measures will support domestic prices for CTL plate and preclude adverse price effects. Although most responding domestic producers and most responding importers and purchasers reported that Section 232 duties caused prices to increase, CR/PR at Table II-1, imposition of the duties in March 2018 did not appreciably reduce the incidence of underselling by cumulated subject imports, which was greater in 2021 (at 78.9 percent of quarterly comparisons) than for the POR as a whole. CR/PR at V-3 to V-8. Furthermore, the significant subject import volume that is likely after revocation will likely adversely affect domestic producers' ability to make sales, maintain prices, or obtain needed price increases, given the degree of substitutability between cumulated subject imports and the domestic like product and the importance of price in purchasing decisions. Nor is there any clear correlation between the imposition of Section 232 duties and domestic price trends; CTL plate prices increased prior to the imposition of Section 232 measures, and while CTL plate prices rose further after Section 232 duties were imposed in March 2018, prices for pricing products 1, 2, and 3 began declining shortly thereafter, falling below 2018 price levels in 2019. See CR/PR at Figs. V-4 to V-6, V-9. Finally, although Section 232 duties impose additional duties on imports, these measures operate differently than antidumping and countervailing duty orders, which (Continued…)

that, if the orders were revoked, cumulated subject imports would likely have significant price effects within a reasonably foreseeable time.

### 3. Likely Impact

*Original investigations.* In the original investigations, the Commission found that many of the domestic industry's performance indicators declined during the POI.[514] The Commission observed that despite the robust growth in apparent U.S. consumption between 2013 and 2014, the domestic industry's shipments grew only modestly as subject imports, which pervasively undersold the domestic like product in 2014, captured much of the additional demand.[515] The Commission found that subject imports prevented the domestic industry from performing as well as would have been expected during the 2013-2014 period of growing demand. The Commission further found that in 2015, when demand collapsed, the volume and market share of cumulated subject imports remained elevated, while the domestic industry's production, shipments, revenues, and financial performance all fell sharply.[516] Due to the market share captured by subject imports in 2015, the Commission found, the domestic industry's production, shipments, and sales revenues all declined and the domestic industry's net sales value fell to a greater extent than its costs, leading to reduced profitability for the industry.[517] The Commission found that the significant volume of low-priced cumulated subject imports had a significant impact on the domestic industry.[518]

The Commission rejected respondents' arguments that there was no correlation between the increase in subject imports in 2014 and the domestic industry's deterioration in 2015, noting that subject import volume and market share remained elevated in 2015. The Commission was also unpersuaded by respondents' argument that underselling by subject imports had no adverse impact because most of the quantity involved was concentrated in 2014, when the domestic industry experienced its best performance of the POI. As the Commission explained, subject import underselling throughout the POI allowed subject imports to gain significant market share at the expense of the domestic industry.[519]

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have distinct restraining effects. *See, e.g., Certain Corrosion-Resistant Steel Products from China, India, Italy, South Korea, and Taiwan*, Inv. Nos. 701-TA-534-537 and 731-TA-1274-1278 (Review), USITC Pub. 5337 (Aug. 2022) at 51. For all these reasons, we find that Section 232 duties are unlikely to prevent significant underselling or price effects by cumulated subject imports after revocation of the orders.

[514] *Original Determinations,* USITC Pub. 4664 at 42-44.
[515] *Original Determinations,* USITC Pub. 4664 at 42.
[516] Original Determinations, USITC Pub. 4664 at 42.
[517] Original Determinations, USITC Pub. 4664 at 43.
[518] Original Determinations, USITC Pub. 4664 at 44.
[519] *Original Determinations*, USITC Pub. 4664 at 44-45.

For purposes of non-attribution, the Commission found that the increase in the volume of nonsubject imports could not explain the industry's loss of market share because the increase in the volume of nonsubject imports occurred at a lower rate and nonsubject imports did not capture as much market share from the domestic industry as subject imports.[520] The Commission also considered the decline in demand for CTL plate after 2014, finding that declining demand could not explain the magnitude of the domestic industry's decline in output and shipments over the POI. Accordingly, the Commission found that neither nonsubject imports nor trends in demand explained the magnitude of the domestic industry's loss of market share and revenues due to underselling by cumulated subject imports.[521]

*Current reviews.* The domestic industry's trade indicators were mixed during the POR. Its capacity fluctuated within a relatively narrow range 2016 to 2021 and was flat between the interim periods.[522] Its production decreased by 2.9 percent from 2016 to 2021 and was 14.3 percent lower in interim 2022 compared to interim 2021.[523] The decrease in production caused the domestic industry's capacity utilization rate to decline by 2.3 percentage points from 2016 to 2021, from 68.7 percent in 2016 to 66.4 percent in 2021, and it was 9.8 percentage points lower in interim 2022, at 58.6 percent, than in interim 2021, at 68.4 percent.[524]

The domestic industry's U.S. shipments, by quantity, fell by 1.2 percent from 2016 to 2021, and was 15.8 percent lower in interim 2022 than in interim 2021.[525] The domestic industry's ending inventories increased by 70.9 percent from 2016 to 2021, although they were 12.6 percent lower in interim 2022 than in interim 2021.[526] The domestic industry's market share increased from 80.8 percent in 2016 to 86.8 percent in 2017, 90.4 percent in 2018, 90.8

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[520] *Original Determinations*, USITC Pub. 4664 at 45.

[521] *Original Determinations*, USITC Pub. 4664 at 45.

[522] CR/PR at Table C-1. The domestic industry's capacity was approximately 8.3 million short tons throughout the full years of the POR and was 4.2 million short tons in both interim periods. *Id.*

[523] CR/PR at Table C-1. The domestic industry's production was 5.7 million short tons in 2016, 5.9 million short tons in 2017, 6.2 million short tons in 2018, 5.8 million short tons in 2019, 5.4 million short tons in 2020, and 5.5 million short tons in 2021; it was 2.9 million short tons in interim 2021 and 2.5 million short tons in interim 2022. *Id.*

[524] CR/PR at Table C-1. The domestic industry's capacity utilization was 68.7 percent in 2016, 70.9 percent in 2017, 75.0 percent in 2018, 70.0 percent in 2019, 64.7 percent in 2020, and 66.4 percent in 2021; it was 68.4 percent in interim 2021 and 58.6 percent in interim 2022. *Id.*

[525] CR/PR at Table C-1. The domestic industry's U.S. shipments were 4.9 million short tons in 2016, 5.1 million short tons in 2017, 5.6 million short tons in 2018, 5.2 million short tons in 2019, 4.6 million short tons in 2020, and 4.8 million short tons in 2021; they were 2.5 million short tons in interim 2021 and 2.1 million short tons in interim 2022. *Id.*

[526] CR/PR at Table C-1. The domestic industry's ending inventories were 239,992 short tons in 2016, 240,676 short tons in 2017, 279,440 short tons in 2018, 326,776 short tons in 2019, 448,931 short tons in 2020, and 410,076 short tons in 2021; they were 461,299 short tons in interim 2021 and 403,038 short tons in interim 2022. *Id.*

percent in 2019, and 93.7 percent in 2020, before decreasing to 90.3 percent in 2021; it was 91.2 percent in interim 2021 and 88.8 percent in interim 2022.[527]

The domestic industry's employment indicators were mixed during the POR. The number of production related workers ("PRWs") decreased irregularly from 2016 to 2021 but were higher in interim 2022 compared to interim 2021.[528] Hours worked decreased irregularly from 2016 to 2021 but were higher in interim 2022 than in interim 2021.[529] Wages paid increased irregularly during the POR, while productivity fluctuated but increased overall during the full years of the POR, but was lower in interim 2022 than in interim 2021.[530]

Most of the domestic industry's financial performance indicators fluctuated during the POR, generally improving from 2016 to 2018, declining from 2018 to 2020, and then rebounding strongly in 2021. Although the domestic industry's COGS increased irregularly by 50.2 percent from 2016 to 2021,[531] its net sales value increased by 96.9 percent during that time, causing the industry's ratio of COGS to net sales to decline.[532] As a result, the domestic industry's gross profits increased 1,229.6 percent during the period.[533] The domestic industry's operating income and net income, along with operating and net income margins, increased irregularly from losses in 2016 and 2017 to profits in 2018 and 2019 before falling to losses in

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

[528] CR/PR at Table C-1. The number of PRWs was 3,160 in 2016, 3,102 in 2017, 3,093 in 2018, 3,153 in 2019, 2,880 in 2020, and 2,846 in 2021; it was 2,625 in interim 2021 and 2,716 in interim 2022. *Id.*

[529] CR/PR at Table C-1. Hours worked were 6.6 million hours in 2016, 6.9 million hours in 2017, 7.0 million hours in 2018, 6.9 million hours in 2019, 6.2 million hours in 2020, and 6.3 million hours in 2021; they were 3.1 million hours in interim 2021 and 3.4 million hours in interim 2022. *Id.*

[530] CR/PR at Table C-1. Wages paid were $254.9 million in 2016, $271.6 million in 2017, $290.0 million in 2018, $290.7 million in 2019, $265.8 million in 2020, and $283.7 million in 2021; they were $135.0 million in interim 2021 and $149.1 million in interim 2022. *Id.* Productivity was 863.1 short tons per 1,000 hours in 2016, 856.3 short tons per 1,000 hours in 2017, 891.2 short tons per 1,000 hours in 2018, 846.6 short tons per 1,000 hours in 2019, 869.2 short tons per 1,000 hours in 2020, and 870.6 short tons per 1,000 hours in 2021; it was 915.2 short tons per 1,000 hours in interim 2020 and 733.9 short tons per 1,000 hours in interim 2021. *Id.*

[531] CR/PR at Table C-1. The domestic industry's COGS were $3.2 billion in 2016, $4.0 billion in 2017, $4.7 billion in 2018, $4.4 billion in 2019, $3.5 billion in 2020, and $4.9 billion in 2021; they were $2.2 billion in interim 2021 and $2.6 billion in interim 2022. *Id.*

[532] CR/PR at Table C-1. The domestic industry's net sales value was $3.4 billion in 2016, $4.1 billion in 2017, $5.4 billion in 2018, $5.0 billion in 2019, $3.5 billion in 2020, and $6.7 billion in 2021; it was $2.7 billion in interim 2021 and $4.3 billion in 2022. *Id.*

[533] CR/PR at Table C-1. The domestic industry's gross profits were $133.0 million in 2016, $124.9 million in 2017, $687.1 million in 2018, $617.2 million in 2019, $42.7 million in 2020, and $1.8 billion in 2021; they were $504.2 million in interim 2021 and $1.7 billion in interim 2022. *Id.*

2020 and then rebounding strongly to the highest profitability of the POI in 2021.[534] These measures of the industry's financial performance were all stronger in interim 2022 than in interim 2021.[535] The domestic industry's capital expenditures fluctuated but increased *** during the POR, while research and development ("R&D") expenses decreased.[536]

In assessing the vulnerability of the domestic industry, we observe that certain performance indicators showed improvements during the POR, including capacity, wages paid, productivity, and capital expenditures, while other indicators such as production, capacity utilization, PRWs, hours worked, and R&D expenses declined. Financial indicators such as net sales revenue, gross profits, operating and net income, and operating and net income margins, fluctuated during the 2016-2020 period before strengthening markedly in 2021 and in interim 2022 compared to interim 2021.[537] On the basis of the record as a whole, we do not find that the domestic industry is currently vulnerable.

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[534] CR/PR at Table C-1. The domestic industry's operating income was negative $111.5 million in 2016, negative $97.4 million in 2017, $386.8 million in 2018, $322.5 million in 2019, $negative 183.6 million in 2020, and $1.5 billion in 2021; it was $381.8 million in interim 2021 and $1.6 billion in interim 2022. *Id.* The domestic industry's net income was $*** in 2016, $*** in 2017, $*** in 2018, $*** in 2019, $*** in 2020, and $*** in 2021; it was $*** in interim 2021 and $*** in interim 2021. *Id.* The domestic industry's operating margins were negative 3.3 percent in 2016, negative 2.4 percent in 2017, 7.1 percent in 2018, 6.4 percent in 2019, negative 5.2 percent in 2020, and 22.6 percent in 2021; they were 14.0 percent in interim 2021 and 36.3 percent in interim 2022. *Id.* Its net income margins were *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021; they were *** percent in interim 2021 and *** percent in interim 2022. *Id.*

[535] CR/PR at Table C-1. The domestic industry's return on assets were *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021. CR/PR at Table III-23.

[536] CR/PR at Table C-1. The domestic industry's capital expenditures were $*** in 2016, $*** in 2017, $*** in 2018, $*** in 2019, $*** in 2020, and $*** in 2021; they were $*** in interim 2021 and $*** in interim 2022. *Id.* Its R&D expenses were $*** in 2016, $*** in 2017, $*** in 2018, $*** in 2019, $*** in 2020, and $*** in 2021; they were $*** in interim 2021 and $*** in interim 2022. *Id.*

[537] We find that the domestic industry's improved condition during the POR compared to its condition during the original investigation is due at least in part to the antidumping and countervailing duty orders under review. Following imposition of the orders, the domestic industry's production, capacity utilization, U.S. shipments, and net sales value all increased from 2016 to 2017 and the domestic industry was also able to increase its market share, as the volume and market share of cumulated subject imports declined. The domestic industry's COGS, however, increased to a greater extent during that time, and therefore, the domestic industry continued to experience losses, although there was some mitigation of the negative profitability indicators. CR/PR at Table C-1. We note that these improvements in the domestic industry's performance occurred prior to the implementation of the Section 232 measures, and its performance improved further during the POR, as cumulated subject imports continued at minimal levels, with the exception of a transitory dip in performance in 2020 due to the effects of the COVID-19 pandemic. CR/PR at Table C-1.

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

We have also considered the role of factors other than subject imports so as not to attribute likely injury from other factors to the subject imports. The volume of nonsubject imports decreased irregularly from 2016 to 2021, although it was higher in interim 2022 compared to interim 2021.[538] The share of apparent U.S. consumption held by nonsubject imports also fluctuated but decreased irregularly from *** percent in 2016 to *** percent in 2021, but was higher in interim 2022, at *** percent, than in interim 2021, at *** percent.[539] Although nonsubject imports would be likely to remain in the U.S. market after revocation of the orders, their market share remains relatively modest compared to the domestic industry's market share of 90.3 percent in 2021. Given the domestic industry's large share of the U.S. market, the moderate-to-high degree of substitutability between cumulated subject imports and the domestic like product, and the importance of price in purchasing decisions, the likely significant volume of low-priced cumulated subject imports would likely take market share from the domestic industry, as well as nonsubject imports, or force the domestic industry to reduce prices or forego price increases that otherwise would occur to retain sales and market share. We find that the presence of nonsubject imports would not preclude cumulated subject imports from capturing market share from the domestic industry or depressing or suppressing prices for the domestic like product. We therefore find that the injury attributable to cumulated subject imports would be distinct from any injury caused by nonsubject imports.

We have also considered the likely effects of demand trends on the domestic industry. Apparent U.S. consumption declined irregularly during the POI from 6.1 million short tons in

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[538] CR/PR at Table C-1. The volume of nonsubject imports was *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; it was *** short tons in interim 2021 and *** in interim 2022. *Id.*

[539] CR/PR at Table C-1. Nonsubject import market share was *** percent in 2016, *** percent in 2017. *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021; it was *** percent in interim 2021 and *** percent in interim 2022. *Id.*

2016 to 5.4 million short tons in 2021, and was lower in interim 2022, at 2.4 million short tons, than in interim 2021, at 2.8 million short tons.[540] Although apparent U.S. consumption recovered more quickly in 2021 than expected after the sharp drop in demand caused by the COVID-19 pandemic in 2020, there is little indication that such strong demand growth will persist in the reasonably foreseeable future, particularly in light of weakening demand and prices in interim 2022 compared to interim 2021. Half of responding U.S. producers expect U.S. demand for CTL plate to fluctuate while a plurality of U.S. importers, the majority of responding purchasers, and the majority of foreign producers expect U.S. demand for CTL plate to increase.[541] Other information on the record indicates that future demand for CTL plate is uncertain due to global supply chain issues, the COVID-19 pandemic, rising inflation and interest rates, the war in Ukraine, and a possible global recession.[542] The significant volume of low-priced cumulated subject imports that is likely after revocation would exacerbate any injury caused by stagnant or weak demand, and negatively impact the domestic industry by further reducing the industry's sales and placing additional downward pressure on domestic CTL plate prices. Given these considerations, we find that the likely effects attributable to the cumulated subject imports are distinguishable from any likely effects of demand if the orders were revoked.

In sum, we conclude that if the relevant antidumping and countervailing duty orders were revoked, cumulated subject imports from Austria, Belgium, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey would likely have a significant impact on the domestic industry within a reasonably foreseeable time.[543]

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[540] CR/PR at Tables I-33 and C-1.

[541] *See* CR/PR at Table II-10.

[542] Domestic Interested Parties Prehearing Br. at 99-103; Domestic Interested Parties Posthearing Br. at 3, 15, 64; Domestic Interested Parties Final Comments at 2, 6, 14; Cleveland-Cliffs Prehearing Br. at 92-93; Hearing Tr. at 24-25 (Gerrish), 49-50 (Behr).

[543] Commissioners Schmidtlein and Stayin find that if the antidumping and countervailing duty orders were revoked, cumulated subject imports from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey would likely have a significant impact on the domestic industry within a reasonably foreseeable time. They do not join the remainder of the Commission's Views.

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

### 1. Likely Volume of Subject Imports

In the original investigations, the volume of subject imports from Brazil fluctuated throughout the POI; it was 22,152 short tons in 2013 (or 0.3 percent of apparent U.S. consumption), 137,460 short tons in 2014 (or 1.4 percent of apparent U.S. consumption), and 46,183 short tons in 2015 (or 0.6 percent of apparent U.S. consumption). The volume of subject imports from Brazil was lower in interim 2016, at 8,428 short tons (or 0.1 percent of apparent U.S. consumption), than in interim 2015, at 34,348 short tons (or 0.5 percent of apparent U.S. consumption).[544]

In the current reviews, subject imports from Brazil had a minimal presence in the U.S. market. The volume of subject imports from Brazil decreased from 7,442 short tons in 2016 to 169 short tons in 2017, and remained at minimal levels during the remainder of the POR, including 28 short tons in 2018, 15 short tons in 2019, 34 short tons in 2020, 25 short tons in 2021, 12 short tons in interim 2021, and 42 short tons in interim 2022.[545] Subject imports from Brazil accounted for 0.1 percent of apparent U.S. consumption, by quantity, in 2016 and less than 0.05 percent of apparent U.S. consumption, by quantity, throughout the rest of the POR.[546]

The record in these reviews shows that the Brazilian CTL plate industry is focused predominantly on serving its domestic market.[547] An overwhelming share of the Brazilian industry's total shipments were made to home market customers, with home market shipments as a share of total shipments ranging from *** to *** percent during the POR.[548]

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[544] *Original Determinations*, USITC Pub. 4664 at Table C-1.

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

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

[547] As indicated above, in these reviews, the Commission received a response to its questionnaire from USIMINAS, which estimates that it accounted for *** percent of CTL plate production in Brazil. CR/PR at IV-69. According to USIMINAS, Gerdau SA (Brazil) ***. USIMINAS Prehearing Br. at 12; Hearing Tr. at 207. Gerdau, which did not provide a questionnaire response, reported that ***. CR/PR at IV-69 n.16; ***. Gerdau SA (Brazil) reportedly started producing in 2016 and has no record of ***. USIMINAS Prehearing Br., Exhibit 27.

[548] CR/PR at Table IV-31. Home market shipments as a share of total shipments by the Brazilian industry were *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021; they were *** percent in interim 2021 and *** percent in interim 2022. *Id.*

Conversely, the share of total shipments that were exported by the Brazilian industry ranged from *** to *** percent.[549]

The record in these reviews also indicates that the Brazilian industry's limited exports have been focused largely and increasingly on nearby Latin American markets.[550] Export shipments to markets in the Americas other than the United States as a share of total shipments by the Brazilian industry increased overall during the POR.[551] According to GTA data, the top export destination markets for exports of CTL plate from Brazil in 2021 were Argentina, Mexico, and Chile.[552] As USIMINAS explained, these nearby Latin American markets are particularly attractive markets for CTL plate producers in Brazil due to regional proximity and tariff preference programs.[553]

Additionally, the data in the record of these reviews show that the AUVs for the Brazilian industry's domestic shipments, particularly for the commercial shipments that accounted for the large majority of home market shipments, were generally higher than for its export shipments.[554] Moreover, to the extent that the Brazilian industry's export AUVs were higher than its home market shipment AUVs, such AUVs were for export shipments to markets in the Americas other than the United States.[555] The higher AUVs for CTL plate shipped to these markets reinforces the relative attractiveness of home and Latin American markets to the Brazilian industry. The Brazilian industry's focus on its domestic and regionally proximate Latin American markets is likely to continue in the reasonably foreseeable future, given the projected

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[549] CR/PR at Table IV-31. Export shipments as a share of total shipments by the Brazilian industry were *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021; they were *** percent in interim 2021 and *** percent in interim 2022. *Id.* We also observe that GTA data indicate that, after initially increasing from 2016, total exports of CTL plate from Brazil declined overall; total exports of CTL plate were 81,879 short tons in 2016, 220,205 short tons in 2017, 204,033 short tons in 2018, 137,741 short tons in 2019, 98,204 short tons in 2020, and 120,885 short tons in 2021. CR/PR at Table IV-36.

[550] CR/PR at Tables IV-31, IV-36; USIMINAS Prehearing Br. at 13-16; USIMINAS Posthearing Br. at 8-9, Responses to Commission Questions at 14-15; USIMINAS Final Comments at 11-12.

[551] CR/PR at Table IV-31. They accounted for *** percent of total shipments in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** in 2021; they were *** percent in interim 2021 and *** percent in interim 2022. *Id.*

[552] CR/PR at Table IV-36. We recognize that, despite being subject to antidumping duty orders and safeguard measures in the EU, Belgium was one of Brazil's top export destinations during the earlier part of the POR; however, the volume of such exports declined substantially overall from 2018 to 2021 from its highest levels in 2016 and 2017. CR/PR at Tables IV-36, IV-112.

[553] USIMINAS Prehearing Br. at 16-18, Exhibits 22-25; USIMINAS Posthearing Br. at 8-9, Responses to Commission Questions at 14-15

[554] CR/PR at Table IV-31.

[555] CR/PR at Table IV-31.

demand growth, particularly for wind energy, construction, and oil sectors, in Brazil, as well as a significant pipeline project in Argentina.[556]

Furthermore, the Brazilian industry's focus on its home and nearby regional markets persisted throughout the POR and its exports to other markets did not substantially increase notwithstanding the existence of available capacity during the POR. The record shows that the Brazilian industry's capacity, production, and capacity utilization rates fluctuated during the POR.[557] However, despite maintaining available capacity throughout the POR, including *** short tons in 2021, the Brazilian industry's exports peaked in 2018 before declining irregularly through 2021.[558] Similarly, GTA data show that exports of CTL plate from Brazil peaked in 2017 before declining irregularly through 2021.[559] Given this, we find that CTL plate producers in Brazil are not likely to increase exports significantly in the reasonably foreseeable future if the order is revoked, despite the existence of available capacity.

Brazilian producers will also be limited in their ability to export CTL plate to the United States after revocation by the absolute quota, administered on a quarterly basis, imposed under Section 232 that limits subject imports from Brazil to 10,049 short tons per year as of

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[556] USIMINAS Prehearing Br., Exhibits 24, 25, USIMINAS Posthearing Br., Responses to Commission Questions at 11-12, 24-27.

[557] CR/PR at Table IV-31. The Brazilian industry's capacity and production fluctuated within a narrow range during the POR and were *** lower in 2021, at *** and *** short tons, respectively, than in 2016, at *** and *** short tons, respectively. *Id.* Similarly, the Brazilian industry's capacity utilization fluctuated between *** and *** percent during the 2016-2021 period, and was *** percent in 2021. *Id.* In interim 2022 compared to interim 2021, the industry's capacity declined by more than production, resulting in a capacity utilization rate of *** percent in interim 2022. *Id.*

We have also considered the potential for product shifting and inventories in our analysis of likely subject import volume. USIMINAS ***. *Id.* at IV-79. The Brazilian industry's end-of-period inventories were *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, *** short tons in interim 2021, and *** short tons in interim 2022. CR/PR at Table IV-31. Its ratio of inventories to production was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in interim 2021, and *** percent in interim 2022. *Id*. Its ratio of inventories to total shipments was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in interim 2021, and *** percent in interim 2022. *Id*. U.S. importers' inventories of subject merchandise from Brazil were *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, *** short tons in interim 2021, and *** short tons in interim 2022. CR/PR at Table IV-6. The ratio of inventories to U.S. shipments of imports was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in interim 2021, and *** percent in interim 2022. *Id*. The ratio of inventories to total shipments was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in interim 2021, and *** percent in interim 2022. *Id*.

[558] CR/PR at Table IV-31.

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

June 1, 2018.[560] Subject imports from Brazil remained below the quota limit throughout the POR, as none of the quota levels were filled.[561] Thus, even if in the event of revocation subject imports from Brazil increased, they would remained capped at 10,049 short tons per year, equivalent to only 0.19 percent of apparent U.S. consumption in 2021.[562]

Although the parties disagree with each other regarding the outlook for the Section 232 trade measure,[563] the record in these reviews does not indicate that the Section 232 trade measure as it relates to CTL plate from Brazil, an absolute quota, will likely be terminated or significantly relaxed in the reasonably foreseeable future. The President stated in his May 2018 Proclamation his "determination to exclude, on a long-term basis," these imports of CTL plate from Brazil from the tariffs originally imposed in March 2018 and instead impose the quota.[564] This quota has been in place since that time, and there has been no announcement by the current Administration that it is considering revising or removing the quota on CTL plate from Brazil. Therefore, based on the record, we conclude that the Section 232 trade measure, as it is currently structured and enforced, likely will continue into the reasonably foreseeable future.

We are also unpersuaded by the Domestic Producers' argument that the Brazilian industry will likely be able to increase export volumes above the 10,049 short ton quota by obtaining product exclusions from Commerce.[565] Commerce's exclusion process provides that an exclusion request will only be granted after determining the CTL plate article "not to be produced in the United States in a sufficient and reasonably available amount or of a

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[560] CR/PR at I-44 to I-45 & Table I-27.

[561] CR/PR at I-45 n.38. The quota is likely to remain unfilled in the reasonably foreseeable future. In addition to the *** short tons of subject imports from Brazil reported for interim 2022, arranged imports were reported in the amount of *** short tons for the remainder of 2022 and *** short tons were reported to be arranged for January through June 2023. CR/PR at Table IV-7. These imports, totaling *** short tons and spanning across two years fall well below the 10,049 short ton quota limit.

[562] *Calculated from* CR/PR Tables I-27, IV-1, C-1.

[563] *See, e.g.,* Cleveland-Cliffs Posthearing Br. at 8-9, Responses to Commission Questions at 23-25; Cleveland-Cliffs Final Comments at 6-7; Domestic Interested Parties Prehearing Br. at 29-30, 90-91, Exhibits 23-24; Domestic Interested Parties Posthearing Br. at 7; USIMINAS Posthearing Br., Response to Commission Questions at 2-4, Exhibit 2.

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

[565] Domestic Interested Parties Prehearing Br. at 32.

satisfactory quality" or when warranted based upon specific national security considerations.[566] Commerce may take months to review a request, and generally denies the request whenever a domestic interested party makes a valid objection.[567] Moreover, according to USIMINAS, there were very few exclusions for Brazilian products requested under the tariff codes covering CTL plate and they have expired; currently, there are no 232 exclusions nor GAEs that cover CTL plate from Brazil.[568]

Thus, given the absolute cap on the volume of subject imports from Brazil imposed by the Section 232 quota, equivalent to only 0.19 percent of apparent U.S. consumption, the Brazilian industry's consistent and dedicated focus on its home market and the minimal level of Brazilian exports to markets outside of Latin America, despite excess capacity, and projected demand growth in its home and Latin American markets, the Brazilian industry has little incentive or ability to export significant volumes of CTL plate to the U.S. market after revocation. Accordingly, we find that the likely volume of subject imports from Brazil would not be significant, either in absolute terms or relative to U.S. consumption, if the order were revoked.

**2. Likely Price Effects**

As discussed above, we have found that there is at least a moderately high degree of substitutability between domestically produced CTL plate and CTL plate from subject sources, including subject imports from Brazil, and that price is an important purchasing factor. In these reviews, there is only limited pricing data specific to CTL plate from Brazil from the first two quarters of 2016, and we do not find these data particularly instructive for our analysis.[569]

Given our finding that the volume of subject imports from Brazil is not likely to be significant after revocation, any likely volume of subject imports from Brazil would be too small

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[566] *See, e.g.*, CR/PR at I-49 to I-59.

[567] *See, e.g.*, USIMINAS Posthearing Br. at 8, Responses to Commission Questions at 6-8; USIMINAS Final Comments at 5-6.

[568] USIMINAS Prehearing Br. at 8-9; USIMINAS Posthearing Br. at 8, Responses to Commission Questions at 6-8; USIMINAS Final Comments at 5-6. We also observe that the record in these reviews indicates that only a miniscule amount of CTL plate that was not subject to chapter 99 provisions entered the U.S. market during the POR. CR/PR at Table F-3 (showing one short ton of CTL plate that was not subject to chapter 99 provisions).

[569] In the original investigations, subject imports from Brazil undersold the domestic like product in 31 of 55 comparisons (56.4 percent) involving 89,041 short tons (78.2 percent of the total volume of quarterly comparisons) with underselling margins ranging from 0.9 to 22.9 percent. Confidential Report from the Original Investigations at Table V-12. During these reviews, subject imports from Brazil undersold the domestic like product in *** with ***. CR/PR at Table V-12. We note that these quarterly comparisons occurred ***, prior to the implementation of the Section 232 quota. CR/PR at Table V-3.

to have a significant effect on prices for the domestic like product.[570] As discussed above, the Brazilian industry is focused on supplying its home market and its limited exports are almost exclusively destined for regional Latin American markets, with its exports to the United States limited to 2016 and equivalent to only *** percent of its total shipments that year.[571] Given this, and the small volume of subject imports from Brazil permitted under the Section 232 quota, the Brazilian industry would have little incentive to use underselling to gain sales in the U.S. market after revocation.[572] Instead, to the extent that subject producers in Brazil export

[570] We are not persuaded by Domestic Producers' arguments that even the small volume of CTL plate from Brazil allowed under the absolute quota would have significant price effects because the CTL plate market is characterized by many sales involving small volumes of CTL plate and small volume sales at low prices can reverberate throughout the market by affecting the CRU price index. Cleveland-Cliffs Posthearing Br. at 8-9, Responses to Commission Questions at 17-22, Exhibit 4; Cleveland-Cliffs Final Comments at 5-6; Domestic Interested Parties Prehearing Br. at 32; Domestic Interested Parties Posthearing Br. at 4-5; Domestic Interested Parties Final Comments 2-4. First, even if sales of CTL plate in the U.S. market were to be in relatively smaller volumes, the absolute quota caps the total volume of sales that CTL plate from Brazil can obtain in a given quarter and year, limiting the impact any sales from Brazil could have on the market.

Second, we observe that the record is mixed regarding the extent to which domestic producers rely on the CRU in price negotiations. As discussed in section IV.B.3. above, although Cleveland-Cliffs reported that it uses CRU indices in negotiations, ***, and SSAB indicated that its contracts are at times adjusted based on price indices including CRU, SSAB and Nucor also explained that they generally do not rely on CRU indices due to a lack of reliability and consistency. We also observe that only one purchaser reported in their questionnaire responses specifically relying upon CRU in contract negotiations. *See* *** Purchaser Questionnaire, EDIS Doc. 780269. The record also shows that the CRU price index takes into account the volume of actual sales and excludes abnormally low (or high) prices. See Japanese Respondents Posthearing Br., Exhibit 7 (indicating that CRU calculates prices using volume-weighted average prices of actual weekly spot market transactions and excludes prices assessed to be out of range). Therefore, even if CTL plate from Brazil were to be priced lower than the domestic like product, the likely small volume and limited availability of subject imports from Brazil due to the quota would likely mitigate their effect on prices and limit the ability of purchasers to use any such low-priced CTL plate from Brazil to extract price concessions from domestic producers.

[571] CR/PR at Table IV-31.

[572] We are unpersuaded by the Domestic Producers' arguments that Brazilian exporters will likely "rush in" imports of CTL plate and compete with each other aggressively on price to fill the limited quota as quickly as possible, as allegedly occurred following revocation of the order on cold rolled steel from Brazil. Domestic Interested Parties Prehearing Br. at 32; Domestic Interested Parties Posthearing Br. at 36. As discussed above, we find that even if low priced CTL plate were to enter the U.S. market, the absolute quota, which is administered on a quarterly basis such that imports in each quarter cannot exceed 30 percent of the annual limit, would constrain the likely volume to levels that would be too small to have significant price effects.

CTL plate to the United States, they are likely to focus that limited quantity of exports on higher-value CTL plate products to maximize their profits.[573]

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

#### 3. Likely Impact

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

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

## ■ Conclusion

For the above reasons, we determine that revocation of the countervailing duty orders on CTL plate from China and South Korea and the antidumping duty orders on CTL plate from Austria, Belgium, China, France, Germany, Italy, South Africa, South Korea, Taiwan, and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. We also determine that revocation of the antidumping duty order on CTL plate from Brazil would not be likely to lead to a continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

[573] USIMINAS Prehearing Br. at 24; USIMINAS Posthearing Br. at 4-5, 10-11, Responses to Commission Questions at 23-24; USIMINAS Final Comments at 8-9.

## Dissenting Views of
## Commissioners Rhonda K. Schmidtlein and Randolph J. Stayin

Commissioners Schmidtlein and Stayin disagree with the Majority's decision not to cumulate Brazil with the remaining subject countries for the purposes of analyzing the likely volume and effects of subject imports in these reviews.[1] Based on our review of the record, we find that there would not likely be significant differences in the conditions of competition under which subject imports from each country would likely compete if the orders were revoked. Consequently, we exercise our discretion to cumulate subject imports from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey.

Subject imports from each of the 12 countries generally exhibited similar behavior during the original investigations. Subject imports from each country increased at times during the POI,[2] and multiple purchasers reported buying subject imports from each country instead of the domestic like product due primarily to the lower price of the imports.[3] Additionally, subject imports from each country declined significantly after the orders were imposed.[4] As explained in the Majority views, the Commission has already determined that producers in each subject country have the ability to export CTL plate to the United States in volumes that would have a discernible adverse impact on the domestic industry if the orders were revoked, and that subject imports from each country would compete with each other and with the domestic like product for sales in the U.S. market. Imports from each subject country would likely be competing for similar sales with reasonably fungible products, in similar channels of distribution to similar customers, and would likely use aggressive prices to gain sales as they did during the original investigations.[5]

We are not persuaded by USIMINAS's argument that subject imports from Brazil are likely to compete under different conditions of competition than other subject imports in the event of revocation due to the Brazilian industry's focus on its home market or differences in

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

[2] *See* Confidential Report, Memorandum INV-UU-123 (Dec. 14, 2022) as modified by Memorandum INV-UU-125 (Dec. 20, 2022) ("CR") and Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey, Inv. Nos. 701-TA-560-561 and 731-TA-1317-1328 (Review) USITC Pub. 5399 (Jan. 2023) ("PR") at Table C-1 (2013-Sept. 2016). While imports from subject sources displayed varying year-to-year volume trends during the POI, subject imports from each country except Austria increased overall from 2013 to 2015, and subject imports from Austria increased from 2013 to 2014. *See id*.

[3] *Original Determinations*, USITC Pub. 4664 at Table V-16.

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

[5] We note that price/cost was the most important purchasing factor reported by responding purchasers in these reviews. CR/PR at Table II-13.

applicable Section 232 measures.[6] Brazilian CTL plate producers have demonstrated a strong interest in exporting to the U.S. market, similar to producers in other subject countries. Subject imports from Brazil increased rapidly during the POI, from 22,152 short tons in 2013 to 137,460 short tons in 2014, before decreasing to 46,183 short tons in 2015, still more than twice the volume in 2013.[7] Following the same trend, subject imports from Brazil increased irregularly as a share of apparent U.S. consumption, from 0.3 percent in 2013 to 1.4 percent in 2014 and 0.6 percent in 2015.[8] This occurred as subject imports from Brazil undersold the domestic like product in 31 of 55 quarterly comparisons (56.4 percent), with 78.2 percent of the volume of imports in the quarters associated with underselling.[9] The antidumping duty order had a significant restraining effect on the volumes of subject imports from Brazil, as such imports declined from 7,442 short tons in 2016 to 169 short tons in 2017 and were less than 50 short tons annually for the remainder of the POR, significantly lower than their volumes during the POI.[10]

Although the export shipments for USIMINAS, the only responding Brazilian producer in these reviews,[11] were substantially smaller than its home market shipments during the POR, that was also the case for the Brazilian CTL plate industry during the original investigation period, and the volume of subject imports from Brazil still increased significantly from 2013 to 2014 by 115,308 short tons (520.5 percent) and more than doubled between 2013 and 2015.[12] Brazil also exported substantial quantities of CTL plate during the POR despite any focus on its

[6] USIMINAS Prehearing Br. at 6-17.

[7] CR/PR at Table C-1 (2013-Sept. 2016); *Original Determinations*, USITC Pub. 4664 at Table IV-2.

[8] CR/PR at Table C-1 (2013-Sept. 2016); *Original Determinations*, USITC Pub. 4664 at Table IV-21.

[9] *Original Determinations*, USITC Pub. 4664 at Tables V-11–V-12.

[10] CR/PR at Tables I-33 and C-1 (2013-Sept. 2016); *Original Determinations*, USITC Pub. 4664 at Table IV-2.

[11] The Commission issued questionnaires to four producers in Brazil believed to produce CTL plate and only received a response from USIMINAS, who reports that it accounted for *** percent of CTL plate production in Brazil in 2021 and that Gerdau SA (Brazil) ("Gerdau") ***. CR/PR at IV-69 & n.16. While USIMINAS reported that it did not export CTL plate to the United States after 2016 and ***, subject imports from Brazil were reported in small quantities in every year of the POR. CR/PR at IV-69 n.16, Tables IV-1 and IV-31.

[12] CR/PR at Tables IV-31 and C-1 (2013-Sept. 2016). Exports as a share of total shipments for the three responding Brazilian producers ranged between *** and *** percent from 2013 to 2015, before Gerdau started production in 2016. Confidential Report from the Original Investigations at Table VII-11; Hearing Tr. at 207 (Tavares). That subject imports from Brazil were able to significantly increase during the POI despite Brazilian producers shipping a large majority of their production to their home market suggests that a lower degree of export orientation will not prevent the Brazilian industry from increasing its exports to the United States following revocation of the order in the reasonably foreseeable future, along with subject imports from the other countries.

home market,[13] and USIMINAS reported considerable excess capacity throughout the POR with which it can increase exports to the attractive U.S. market following revocation of the order.[14] Thus, we do not find that subject imports from Brazil are likely to compete under different conditions of competition due to any alleged difference in export orientation among the CTL plate industries in each subject country.[15]

We also do not find that any differences in the applicable Section 232 measures constitute different conditions of competition that warrant analyzing subject imports from Brazil on a decumulated basis. The fact that certain imports may be subject to absolute quotas while others are subject to tariffs or tariff-rate quotas does not affect the conditions of competition facing these imports in the U.S. market, nor does it suggest that the imports will not compete with each other and with the domestic product after revocation of the orders.[16] The differences in measures do not affect the types of products that may be sold in the U.S. market, nor do they affect the locations or channels of distribution through which the imports may be sold.[17] Simply put, any differences in these Section 232 measures will not result in the imports from different subject countries competing differently in the marketplace.[18] [19]

We also do not find that the size of the Section 232 absolute quota for CTL plate from Brazil would cause subject imports from Brazil to compete under significantly different conditions of competition than subject imports from other countries after revocation of the

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[13] *See* CR/PR at Tables IV-31 and IV-36. Official HS export statistics show exports of CTL plate from Brazil totaling 120,885 short tons in 2021. CR/PR at Table IV-36. USIMINAS submitted data for the industry in Brazil compiled by the Brazilian Steel Institute purporting to account for non-responding CTL plate producers, which show Brazil exporting *** short tons of CTL plate in 2021 and USIMINAS accounting for *** percent of exports from Brazil that year. USIMINAS Prehearing Br. at Exh. 14.

[14] CR/PR at Table IV-31.

[15] Indeed, Brazil was not the only subject country that reported a larger share of home market shipments than export shipments. *See* CR/PR at Tables IV-80 (Japan) and IV-93 (South Korea).

[16] *See* 19 U.S.C. § 1675a(a)(7).

[17] Most importers reported that subject imports from Brazil are always or frequently interchangeable with subject imports from each of the other subject countries and with the domestic product, and no importer reported that they are never interchangeable. CR/PR at Table II-19.

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

[19] For these same reasons, we are unpersuaded by POSCO's argument that the Section 232 quota on imports from South Korea is a different condition of competition that warrants decumulating subject imports from South Korea. *See* POSCO Prehearing Br. at 11.

orders. The annual absolute quota for imports of CTL plate originating in Brazil is 10,049 short tons (equivalent to 0.2 percent of apparent U.S. consumption in 2021), administered on a quarterly basis.[20] We are unpersuaded that the size of this quota would significantly restrict the Brazilian industry's ability to compete for sales in the U.S. market if the order were revoked. Domestic producers provided evidence showing that sales in this market are frequently for small quantities of CTL plate. The *** order sizes for CTL plate in January-November 2022 at ***.[21] Cleveland-Cliffs also stated that it *** and provided ***.[22] The pricing product data collected by the Commission in the original investigations seem generally consistent with this evidence regarding small-scale sales of CTL plate, with many quarters of pricing product data showing relatively small shipment quantities of subject imports.[23] Given the prevalence of smaller-volume sales and shipment quantities of CTL plate, the Section 232 quota on imports from Brazil likely will not significantly impede the Brazilian industry's ability to compete for CTL plate sales in the U.S. market and therefore will not cause imports from Brazil to compete significantly differently than subject imports from other countries.[24]

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[20] CR/PR at 1-45, Table I-27 (quota limit for Quota ID 9903.80.11). Imports cannot exceed 30 percent of the annual limit in a given quarter. *See* CR/PR at 1-45, I-51; USIMINAS Posthearing Br. at Exh. 2 para. 5. CTL plate may also enter under HTS subheadings for tool steel and high-speed steel which are included along with out-of-scope products in Quota ID 9903.80.56, which has an annual absolute quota limit for imports from Brazil of 10,391 short tons. CR/PR at I-45 n.38.

[21] Domestic Producers Posthearing Br. at Exh. 3. *** provided the following figures: *** *Id*.

[22] Cleveland-Cliffs Posthearing Br. at Exh. 4.

[23] For example, below are the number of quarters with shipments of the individual pricing products from each subject source in which the quarterly volume was less than 2,500 short tons, compared to the total number of quarters that contained pricing product data from that source: Austria: *** quarters (*** percent); Belgium: *** quarters (*** percent); Brazil: *** quarters (*** percent); China: *** quarters (*** percent); France: *** quarters (*** percent); Germany: *** quarters (*** percent); Italy: *** quarters (*** percent); Japan: *** quarters (*** percent); South Korea (POSCO): *** quarters (*** percent); South Africa: *** quarters (*** percent); Taiwan: *** quarters (*** percent); Turkey: *** quarters (*** percent). *Derived from* Confidential Report from the Original Investigations at Tables V-3 to V-8.

We recognize that these quarterly shipment volumes are for individual pricing products and do not represent the total quarterly shipment volume from each source, nor do they necessarily represent individual sales, but we nevertheless find them to be probative of the quarterly volumes of importers' shipments of subject imports in this market and the sizes of sales for which subject imports competed when not under discipline of the orders.

[24] While USIMINAS contends that the size of the quarterly import quota prohibits large shipments and creates uncertainty for potential customers, the available information suggests that the quota will not significantly restrict Brazilian producers' ability to compete for sales. USIMINAS Posthearing Br. at 7 and Exh. 2. As discussed above, the record shows that small-volume sales are common in the CTL plate market. Moreover, despite quarterly administration of the quota among multiple CTL plate producers in South Korea, imports from South Korea filled 99.6 percent and 100.0 percent of the relevant Section 232 Quota IDs in 2021, suggesting that quarterly quota administration is (Continued…)

Additionally, project-based sales are common in the CTL plate market, wherein delivery of the plate occurs over a period of time, typically six to nine months.[25] Domestic producers assert that project-based sales are typically for relatively small volumes,[26] and that project-based purchasers will source from more than one mill, including from import sources.[27] We note that USIMINAS reports participating in project-based sales, in types of projects similar to those reported to be served in the U.S. market by domestic producers (e.g., wind energy,

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not a serious obstacle to increased imports. *See* CR/PR at I-45 n.38 (U.S. imports of CTL plate from South Korea in 2021 filled all but 893 short tons of the 223,252 short ton annual quota); *see also* Hearing Tr. at 133 (Nordhues) ("it's pretty common practice to bunch the shipments, it's pretty common practice, as well, to ship it all on the same vessel and throw it into bond, and it will just sit there for a period of time until the next quarter takes over, and then they are able to receive it at that point in time."); 148 (Williamson) ("with the quotas, a lot of that material comes in early and sits in a free trade zone at a port and then transfers to the customer on the first day of the quarters. So the customer who's placing that purchase knows that the material will be produced, will arrive in country, and then they can take ownership of it on the first day of the following quarter. That's the way a lot of that is transacted.").

We also are not persuaded by USIMINAS's argument that the small volume of imports from Brazil and underutilization of its quota are due to uncertainty in the market caused by the quarterly administration of its quota. *See* USIMINAS Final Comments at 5. As an initial matter, subject imports from Brazil declined to 169 short tons in 2017, following the imposition of the antidumping duty order and well before the Section 232 quota was established. CR/PR at Table IV-1. Examples submitted by USIMINAS show U.S. imports of other products from Brazil entering despite applicable Section 232 quarterly quotas and such imports filling those quotas, sometimes within a week of the start of a new quarter, and domestic producers provided further examples of imports from Brazil exceeding their quota limits. USIMINAS Prehearing Br. at Exh. 6; USIMINAS Posthearing Br. at Exh. 3; Domestic Producers Posthearing Br., Exh. 1 at 94. Thus, rather than any alleged uncertainty created by the quarterly allocations having an impact on the Brazilian producers' ability to compete in the U.S. market, we find it more likely that the 74.52 percent antidumping duties applicable to imports of CTL plate from Brazil have limited the volume of such imports in the market in recent years. *See Original Determinations*, USITC Pub. 4664 at Table I-4. *Compare with* the lower antidumping/countervailing duty margins applicable to subject imports from South Korea since the orders were imposed. *See* USITC Pub. 4691 at I-4 and Table I-1; CR/PR at Tables I-10, I-11.

[25] Hearing Tr. at 42 (Moskaluk), 84 (Behr) ("A significant part of any of our order books will be project pricing…. And these projects can be a wind farm, it could be a bridge, it could be a fleet of barges that somebody wants to build. It's for a finite bucket of tons over a finite period."), 239 (Yang); Domestic Producers Posthearing Br. at Exh. 3 (*** estimates that roughly *** of CTL plate in 2022 to date have been project-based sales), Exh. 12.

[26] Hearing Tr. at 84 (Behr) ("Those projects are routinely for a few hundred tons. So, if any one of us sell a lot of plate, we do it in very small chunks. And so a project that's 2,000 or 3,000 tons is gigantic. So the idea that with that level of quota they can't compete for the high-volume business, that's just not what life in plate is like."); Domestic Producers Posthearing Br. at Exh. 12 (SSAB states that it ***. For these ***).

[27] Hearing Tr. at 82 (Moskaluk); Domestic Producers Posthearing Br. at Exh. 3.

shipbuilding, non-residential construction).[28] This evidence further supports the conclusion that the size of Brazil's quota is unlikely to significantly impede or otherwise affect Brazil's ability to compete in the U.S. market against domestic producers and other import sources for these small-volume, project-based sales, and therefore the quota will not serve as a significant difference in the conditions of competition facing imports from Brazil if the order were to be revoked.

We disagree with the Majority's view that the difference in the quota volumes between Brazil and South Korea constitutes a different condition of competition that will result in imports from Brazil operating differently in the U.S. market.[29] Although the quota limit for imports from Brazil is smaller than for imports from South Korea, the Brazilian CTL plate producers competing for approximately 0.2 percent of apparent consumption in the U.S. market have the same incentive to price aggressively to gain sales as the producers in South Korea who are competing for approximately 4.2 percent of apparent consumption under their quota limit. During the original POI, subject imports from Brazil were priced just as aggressively, if not more so, than subject imports from South Korea.[30] There are multiple CTL plate producers in both Brazil and South Korea that would seek to increase exports to the United States and maximize sales under their respective quotas after revocation of the orders.[31]

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[28] USIMINAS Posthearing Br., Attach. 1 at 11 ("A *** portion of USIMINAS's CTL plate sales is project-based. During the POI and the POR, USIMINAS's project-based sales of CTL plate (in sectors like wind energy, shipbuilding, oil and gas, and non-residential construction) represented between *** of total CTL plate sales. Among exports, project-based sales of CTL plate *** since 2019."); *see* Hearing Tr. at 42 (Moskaluk), 84 (Behr).

[29] The annual absolute quota for CTL plate imports originating in South Korea is 223,252 short tons, administered on a quarterly basis (Quota ID 9903.80.11). CR/PR at I-45, Table I-27. The annual absolute quota for Quota ID 9903.80.56 for South Korea is 935 short tons. *Id*.

[30] In the original investigations, subject imports from Brazil undersold the domestic product in 31 of 55 quarters (56.4 percent) with 78.2 percent of the volume of imports in the underselling quarters. *Original Determinations*, USITC Pub. 4664 at Tables V-11–V-12. Subject imports from South Korea undersold the domestic product in 33 of 93 quarters (35.5 percent) with 73.9 percent of the volume of imports in the underselling quarters. *Id*.

During the POR, subject imports from South Korea mostly undersold the domestic product *** while subject imports from Brazil largely exited the market after the imposition of the antidumping duty order. CR/PR at V-42, Tables I-33, V-12.

[31] *See* CR/PR at I-37 n.32, I-45 n.37, IV-69. While USIMINAS argues that upon revocation its exports to the United States will likely consist of "high-value, low volume niche products," it reported production of a range of CTL plate products in 2021 and has a similar incentive as producers in other subject countries to make sales to the U.S. market given its excess capacity and the higher prices available in the U.S. market than in Brazil's home market or other export markets. USIMINAS Posthearing Br. at Exh. 2; CR/PR at Tables IV-33 and IV-34; *see* CR/PR at Tables III-9, IV-31, and IV-36 (the average unit value ("AUV") of U.S. producers' U.S. shipments in 2021 was $1,199 per short ton while the AUV of USIMINAS's home market shipments was $*** per short ton, the AUV of its export shipments (Continued…)

The quota did not prevent subject imports from South Korea from increasing in volume and market share during the POR.[32] Brazil's quota likewise will not prevent subject imports from Brazil from increasing or underselling the domestic product following revocation of the order.[33]

We also disagree with the Majority that Brazil's smaller quota volume will significantly affect Brazilian CTL plate producers' ability to compete for sales in the U.S. market. As described previously, the evidence on this record, as well as the pricing product data from the original investigations, show that small-volume sales are fairly common in the CTL plate market.[34] We do not see evidence of purchasers frequently requiring large volumes of specific products from a single import source in a single quarter such that the quarterly quota volume would prohibit producers in Brazil from being able to compete for a significant portion of sales. While USIMINAS compares Brazil's absolute quota volume to the size of some project-based sales, available evidence indicates that projects may be supplied by more than one source, including import sources.[35] These types of sales permit small quantities of imports from Brazil to compete similarly to and directly with imports from other subject countries and with the domestic like product.[36] Thus, despite the quota restricting subject imports from Brazil to a

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was $*** per short ton, and the AUV of Brazil's exports of CTL plate based on HS export data was $720 per short ton in 2021).

[32] After decreasing from *** short tons and *** percent market share in 2016 to *** short tons and *** percent market share in 2017 following the imposition of the orders, subject imports from South Korea increased to *** short tons (*** percent of the market) in 2018 and *** short tons (*** percent of the market) in 2019. CR/PR at Table I-33.

[33] USIMINAS refers to *Stainless Steel Bar from Brazil, India, Japan, and Spain*, Inv. Nos. 731-TA-678, 679, 681, and 682 (Fourth Review), USITC Pub. 4820 (Sept. 2018), in which the Commission did not cumulate subject imports from Brazil from the other subject countries due to a Section 232 absolute quota. USIMINAS Prehearing Br. at 22. However, while the Commission did rely on the Section 232 measures as a basis not to cumulate Brazil in the *Stainless Steel Bar* Review, this was due to a finding of no discernable adverse impact. In those reviews, the Commission found that subject imports from Brazil would have to decline from their volumes during the POR once the Section 232 absolute quota was imposed because the quota limit was smaller than the volumes of subject imports from Brazil during each year of the POR. *See Stainless Steel Bar*, USITC Pub. 4820 at 16. Once the Commission reached this finding of no discernible adverse impact it was precluded from cumulating imports from Brazil with imports from other subject countries. *See* 19 U.S.C. § 1675a(a)(7). Here, we agree with the Majority that subject imports from Brazil are likely to *increase* in the event of revocation of the orders and that such increase would not likely have no discernable adverse impact on the U.S. industry. *See* Commission Views at section III.D.1.

[34] *See supra* n.23.

[35] *See* Hearing Tr. at 82 (Moskaluk); Domestic Producers Posthearing Br. at Exh. 3 ("On medium- and large-size projects, multiple producers of cut-to-length plate (including foreign producers) may supply plate on the same project.").

[36] *See* Hearing Tr. at 258 (Coelho) ("Two hundred tons, 800 tons, that small product, for sure, could be supplied by a distributor, which from the mill point of view, was probably a spot sale, and that distributor could have imported steel, so that would be a project. And so {} small projects, for sure, could be supplied through a distributor.").

smaller volume than subject imports from other countries, we do not find that this will meaningfully affect Brazilian producers' ability to compete for most sales in the market, along with subject imports from other countries.

In sum, while one may argue that the difference in quota levels between Brazil and South Korea may ultimately have a different impact on the domestic industry (and that is debatable), a difference in impact is not a different condition of competition.[37]

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

We generally concur with the Majority's analysis with respect to the lack of differences in the conditions of competition facing subject imports from the other countries and adopt that analysis herein, except as it pertains to Brazil.[38]

We also join the Majority's analysis with respect to evaluating the likelihood of continuation or recurrence of material injury by reason of subject imports from Austria, Belgium, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey, but we have also considered information regarding Brazil in the cumulated subject import and industry data, as noted in the Majority views. Based on this information, and for the reasons explained in the Majority views, we determine that revocation of the countervailing duty orders on CTL plate from China and South Korea and the antidumping duty orders on CTL plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

[37] The Court of International Trade has held that it is an abuse of discretion to rely on circular reasoning that conflates the Commission's cumulation and injury analyses. *See Neenah Foundry Co. v. United States*, 155 F. Supp. 2d 766, 771-72 (Ct. Int'l Trade 2001), *aff'd per curiam*, 112 Fed. Appx. 59 (Fed. Cir. 2004). The problem with such reasoning is that it undermines the very purpose of the cumulation provision, which is to address the potential "hammering effect" of individually small volumes of unfair imports from multiple subject countries. *See id.* (quoting H.R. Rep. No. 100-40 pt. 1, at 130 (1987)).

[38] *See* Commission Views at section III.D.3.b.

# Part I: Introduction

## Background

On December 1, 2021, the U.S. International Trade Commission ("Commission" or "USITC") gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended ("the Act"),[1] that it had instituted reviews to determine whether revocation of the countervailing duty orders on carbon and alloy steel cut-to-length plate ("CTL plate") from China and South Korea and the antidumping duty orders on CTL plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey would likely lead to the continuation or recurrence of material injury to a domestic industry.[2] [3] On March 7, 2022, the Commission determined that it would conduct full reviews pursuant to section 751(c)(5) of the Act.[4] Table I-1 presents information relating to the background and schedule of this proceeding.[5]

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

[2] 86 FR 68269, December 1, 2021. All interested parties were requested to respond to this notice by submitting the information requested by the Commission.

[3] In accordance with section 751(c) of the Act, the U.S. Department of Commerce ("Commerce") published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. 86 FR 68220, December 1, 2021.

[4] 87 FR 19121, April 1, 2022. The Commission found that the domestic interested party group responses and the respondent interested party group responses with respect to Austria, Brazil, France, Germany, Italy, Japan, and South Korea to its notice of institution (86 FR 68269, December 1, 2021) were adequate, and determined to conduct full reviews of the orders on imports from Austria, Brazil, France, Germany, Italy, Japan, and South Korea. The Commission also found that the respondent interested party group responses from Belgium, China, South Africa, Taiwan, and Turkey were inadequate but determined to conduct full reviews of the orders on CTL plate from those countries in order to promote administrative efficiency in light of its determinations to conduct full reviews of the orders with respect to Austria, Brazil, France, Germany, Italy, Japan, and South Korea.

[5] The Commission's notice of institution, notice to conduct full reviews, and scheduling notice are referenced in appendix A and may also be found at the Commission's web site (internet address *www.usitc.gov*). Commissioners' votes on whether to conduct expedited or full reviews may also be found at the web site. Appendix B presents the witnesses that appeared at the Commission's hearing.

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

| Effective date | Action |
|---|---|
| January 26, 2017 | Commerce's antidumping duty orders on CTL plate from Brazil, South Africa, and Turkey (82 FR 8911, February 1, 2017) |
| March 20, 2017 | Commerce's antidumping and countervailing duty orders on CTL plate from China (82 FR 14346 and 14349) |
| May 25, 2017 | Commerce's antidumping duty orders on CTL plate from Austria, Belgium, France, Germany, Italy, Japan, South Korea, and Taiwan (82 FR 24096); Commerce's countervailing duty order on CTL plate from South Korea (82 FR 24103) |
| December 1, 2021 | Commission's institution of five-year reviews (86 FR 68269) |
| December 1, 2021 | Commerce's initiation of five-year reviews (86 FR 68220) |
| March 7, 2022 | Commission's determinations to conduct full five-year reviews (87 FR 19121, April 1, 2022) |
| March 25, 2022 | Commerce's final results of expedited five-year reviews of the antidumping duty orders on CTL plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey (87 FR 17066) and the countervailing duty order on CTL pate from China (87 FR 17068) |
| April 1, 2022 | Commerce's final results of expedited five-year reviews of the countervailing duty order on CTL plate from South Korea (87 FR 19070) |
| July 8, 2022 | Commission's scheduling of the reviews (87 FR 43057, July 19, 2022) |
| November 15, 2022 | Commission's hearing |
| January 10, 2023 | Commission's vote |
| January 31, 2023 | Commission's determinations and views |

## The original investigations

The original investigations resulted from petitions filed on April 8, 2016, by ArcelorMittal USA LLC, Chicago, Illinois; Nucor Corporation, Charlotte, North Carolina; and SSAB Enterprises LLC, Lisle, Illinois, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized imports of CTL plate from China and Korea and less-than-fair-value ("LTFV") imports of CTL plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey.

### Brazil, South Africa, and Turkey

Following notification of final determinations by Commerce that imports of CTL plate from Brazil, South Africa, and Turkey were being sold at LTFV, the Commission determined on January 19, 2017, that a domestic industry was materially injured by reason of LTFV imports of CTL plate from Brazil, South Africa, and Turkey.[6] Commerce published the antidumping duty

[6] 82 FR 8541, January 26, 2017.

orders on subject imports of CTL plate from Brazil, South Africa, and Turkey on February 1, 2017.[7]

**China**

Following notification of final determinations by Commerce that imports of CTL plate from China were being sold at LTFV and subsidized by the Government of China, the Commission determined on March 13, 2017, that a domestic industry was materially injured by reason of subsidized and LTFV imports of CTL plate from China.[8] Commerce published the antidumping and countervailing duty orders on subject imports of CTL plate from China on March 20, 2017.[9]

**Austria, Belgium, France, Germany, Italy, Japan, Korea, and Taiwan**

Following notification of final determinations by Commerce that imports of CTL plate from Austria, Belgium, France, Germany, Italy, Japan, and Taiwan were being sold at LTFV and subsidized by the Government of Korea, the Commission determined on May 18, 2017, that a domestic industry was materially injured by reason of subsidized imports of CTL plate from South Korea and LTFV imports of CTL plate from Austria, Belgium, France, Germany, Italy, Japan, South Korea, and Taiwan.[10] Commerce published the countervailing duty order on imports of CTL plate from Korea and antidumping duty orders on imports of CTL plate from Austria, Belgium, France, Germany, Italy, Japan, South Korea, and Taiwan on May 25, 2017.[11]

# Previous and related investigations

## Antidumping and countervailing duty investigations

The Commission has conducted numerous antidumping and countervailing duty investigations regarding CTL plate or similar merchandise. There are currently 16 active antidumping duty orders, 5 active countervailing duty orders, and 2 suspension agreements on CTL plate, covering a total of 16 countries. Table I-2 presents information on previous and related title VII investigations.

[7] 82 FR 8911, February 1, 2017.
[8] 82 FR 14230, March 17, 2017.
[9] 82 FR 14346 and 14349, March 20, 2017.
[10] 82 FR 23592, May 23, 2017.
[11] 82 FR 24103, May 25, 2017.

**Table I-2**
**CTL plate: Previous and related Commission proceedings and status of orders**

| Date | Number(s) | Countr(ies) | Determination | Current status of order |
|---|---|---|---|---|
| 1978 | AA1921-179 | Japan | Affirmative | ITA revoked (1986) |
| 1979 | AA1921-197 | Taiwan | Affirmative | Affirmative first review (1999) Negative second review (2005) |
| 1980 | AA1921-203 | Poland | Negative | - |
| 1980 | 731-TA-18 | Belgium | Affirmative | Terminated (1980) |
| 1980 | 731-TA-19 | Germany (West) | Affirmative | Petition withdrawn (1980) |
| 1980 | 731-TA-20 | France | Affirmative | Petition withdrawn (1980) |
| 1980 | 731-TA-21 | Italy | Affirmative | Petition withdrawn (1980) |
| 1980 | 731-TA-22 | Luxembourg | Affirmative | Petition withdrawn (1980) |
| 1980 | 731-TA-23 | Netherlands | Affirmative | Petition withdrawn (1980) |
| 1981 | 731-TA-24 | United Kingdom | Affirmative | Petition withdrawn (1980) |
| 1981 | 701-TA-83 | Belgium | Affirmative | Incorporated into 701-TA-86 |
| 1982 | 701-TA-84 | Brazil | Affirmative | Incorporated into 701-TA-87 |
| 1982 | 731-TA-51 | Romania | Affirmative | Incorporated into 731-TA-58 |
| 1982 | 701-TA-86 | Belgium | Affirmative | Terminated (1982) |
| 1982 | 701-TA-87 | Brazil | Affirmative | Terminated (1985) |
| 1982 | 701-TA-88 | France | Negative | - |
| 1982 | 701-TA-89 | Italy | Negative | - |
| 1982 | 701-TA-90 | Luxembourg | Negative | - |
| 1982 | 701-TA-91 | Netherlands | Negative | - |
| 1982 | 701-TA-92 | United Kingdom | Affirmative | Terminated (1982) |
| 1982 | 701-TA-93 | Germany (West) | Affirmative | Terminated (1982) |
| 1982 | 701-TA-155 | Spain | Affirmative | ITA revoked (1985) |
| 1982 | 701-TA-170 | South Korea | Affirmative | ITA revoked (1985) |
| 1982 | 731-TA-53 | Belgium | Affirmative | Terminated (1982) |
| 1982 | 731-TA-54 | France | Negative | - |
| 1982 | 731-TA-55 | Italy | Negative | - |
| 1982 | 731-TA-56 | Luxembourg | Negative | - |
| 1982 | 731-TA-57 | Netherlands | Negative | - |
| 1982 | 731-TA-58 | Romania | Affirmative | Terminated (1985) |
| 1982 | 731-TA-59 | United Kingdom | Affirmative | Terminated (1982) |
| 1982 | 731-TA-60 | Germany (West) | Affirmative | Terminated (1982) |
| 1983 | 701-TA-204 | Brazil | Affirmative | ITA revoked (1985) |
| 1983 | 731-TA-123 | Brazil | Affirmative | ITA revoked (1985) |
| 1983 | 731-TA-146 | Belgium | Affirmative | Terminated (1984) |
| 1983 | 731-TA-147 | Germany (West) | Affirmative (on remand) | Terminated (1984) |
| 1983 | 731-TA-151 | South Korea | Affirmative | ITA revoked (1986) |

Table continued.

**Table I-2 Continued**
**CTL plate: Previous and related Commission proceedings and status of orders**

| Date | Number(s) | Countr(ies) | Determination | Current status of order |
|---|---|---|---|---|
| 1984 | 701-TA-225 | Sweden | Negative | - |
| 1984 | 701-TA-226 | Venezuela | Affirmative | Terminated (1985) |
| 1984 | 731-TA-169 | Finland | Affirmative | Petition withdrawn (1985) |
| 1984 | 731-TA-170 | South Africa | Affirmative | Petition withdrawn (1984) |
| 1984 | 731-TA-171 | Spain | Affirmative | Terminated (1985) |
| 1984 | 731-TA-213 | Czechoslovakia | Affirmative | Petition withdrawn (1985) |
| 1984 | 731-TA-214 | Germany (East) | Affirmative | Terminated (1985) |
| 1984 | 731-TA-215 | Hungary | Affirmative | Petition withdrawn (1985) |
| 1984 | 731-TA-216 | Poland | Affirmative | Terminated (1985) |
| 1984 | 731-TA-217 | Venezuela | Affirmative | Petition withdrawn (1985) |
| 1992 | 701-TA-319 | Belgium | Affirmative | Affirmative first review (2000) Negative second review (2007) |
| 1992 | 701-TA-320 | Brazil | Affirmative | Affirmative first review (2000) Negative second review (2007) |
| 1992 | 701-TA-321 | France | Negative | - |
| 1992 | 701-TA-322 | Germany | Affirmative | Affirmative first review (2000) ITA revoked (2004) |
| 1992 | 701-TA-323 | Italy | Negative | - |
| 1992 | 701-TA-324 | South Korea | Negative | - |
| 1992 | 701-TA-325 | Mexico | Affirmative | Affirmative first review (2000) Negative second review (2007) |
| 1992 | 701-TA-326 | Spain | Affirmative | Affirmative first review (2000) Negative second review (2007) |
| 1992 | 701-TA-327 | Sweden | Affirmative | Affirmative first review (2000) Negative second review (2007) |
| 1992 | 701-TA-328 | United Kingdom | Affirmative | Affirmative first review (2000) ITA revoked (2006) |
| 1992 | 731-TA-573 | Belgium | Affirmative | Affirmative first review (2000) Negative second review (2007) |

Table continued.

**Table I-2 Continued**
**CTL plate: Previous and related Commission proceedings and status of orders**

| Date | Number(s) | Countr(ies) | Determination | Current status of order |
|---|---|---|---|---|
| 1992 | 731-TA-574 | Brazil | Affirmative | Affirmative first review (2000) Negative second review (2007) |
| 1992 | 731-TA-575 | Canada | Affirmative | Negative first review (2000) |
| 1992 | 731-TA-576 | Finland | Affirmative | Affirmative first review (2000) Negative second review (2007) |
| 1992 | 731-TA-577 | France | Negative | - |
| 1992 | 731-TA-578 | Germany | Affirmative | Affirmative first review (2000) Negative second review (2007) |
| 1992 | 731-TA-579 | Italy | Negative | - |
| 1992 | 731-TA-580 | Japan | Negative | - |
| 1992 | 731-TA-581 | South Korea | Negative | - |
| 1992 | 731-TA-582 | Mexico | Affirmative | Affirmative first review (2000) Negative second review (2007) |
| 1992 | 731-TA-583 | Poland | Affirmative | Affirmative first review (2000) Negative second review (2007) |
| 1992 | 731-TA-584 | Romania | Affirmative | Affirmative first review (2000) Negative second review (2007) |
| 1992 | 731-TA-585 | Spain | Affirmative | Affirmative first review (2000) Negative second review (2007) |
| 1992 | 731-TA-586 | Sweden | Affirmative | Affirmative first review (2000) Negative second review (2007) |
| 1992 | 731-TA-587 | United Kingdom | Affirmative | Affirmative first review (2000) Negative second review (2007) |

Table continued.

**Table I-2 Continued**
**CTL plate: Previous and related Commission proceedings and status of orders**

| Date | Number(s) | Countr(ies) | Determination | Current status of order |
|---|---|---|---|---|
| 1996 | 731-TA-753 | China | Affirmative | Affirmative first review (2003) Affirmative second review (2009) Affirmative third review (2015) Affirmative fourth review (2021) |
| 1996 | 731-TA-754 | Russia | Affirmative | Affirmative first review (2003) Affirmative second review (2009) Affirmative third review (2015) Affirmative fourth review (2021) |
| 1996 | 731-TA-755 | South Africa | Affirmative | Negative first review (2003) |
| 1996 | 731-TA-756 | Ukraine | Affirmative | Affirmative first review (2003) Affirmative second review (2009) Affirmative third review (2015) Affirmative fourth review (2021) |
| 1999 | 731-TA-815 | Czech Republic | Negative | - |
| 1999 | 731-TA-816 | France | Affirmative | Negative first review (2005) |
| 1999 | 731-TA-817 | India | Affirmative | Affirmative first review (2005) Affirmative second review (2011) Affirmative third review (2018) |
| 1999 | 731-TA-818 | Indonesia | Affirmative | Affirmative first review (2005) Affirmative second review (2011) Affirmative third review (2018) |
| 1999 | 731-TA-819 | Italy | Affirmative | Affirmative first review (2005) Negative second review (2011) |

Table continued.

**Table I-2 Continued**
**CTL plate: Previous and related Commission proceedings and status of orders**

| Date | Number(s) | Countr(ies) | Determination | Current status of order |
|---|---|---|---|---|
| 1999 | 731-TA-820 | Japan | Affirmative | Affirmative first review (2005) Negative second review (2011) |
| 1999 | 731-TA-821 | South Korea | Affirmative | Affirmative first review (2005) Affirmative second review (2011) Affirmative third review (2018) |
| 1999 | 731-TA-822 | Macedonia | Negative | - |
| 1999 | 701-TA-388 | India | Affirmative | Affirmative first review (2005) Affirmative second review (2011) Affirmative third review (2018) |
| 1999 | 701-TA-389 | Indonesia | Affirmative | Affirmative first review (2005) Affirmative second review (2011) Affirmative third review (2018) |
| 1999 | 701-TA-391 | South Korea | Affirmative | Affirmative first review (2005) Affirmative second review (2011) Affirmative third review (2018) |
| 2016 | 701-TA-559 | Brazil | Negative | - |
| 2016 | 701-TA-560 | China | Affirmative | Ongoing first review |
| 2016 | 701-TA-561 | Korea | Affirmative | Ongoing first review |
| 2016 | 731-TA-1317 | Austria | Affirmative | Ongoing first review |
| 2016 | 731-TA-1318 | Belgium | Affirmative | Ongoing first review |
| 2016 | 731-TA-1319 | Brazil | Affirmative | Ongoing first review |
| 2016 | 731-TA-1320 | China | Affirmative | Ongoing first review |
| 2016 | 731-TA-1321 | France | Affirmative | Ongoing first review |
| 2016 | 731-TA-1322 | Germany | Affirmative | Ongoing first review |
| 2016 | 731-TA-1323 | Italy | Affirmative | Ongoing first review |
| 2016 | 731-TA-1324 | Japan | Affirmative | Ongoing first review |
| 2016 | 731-TA-1325 | South Korea | Affirmative | Ongoing first review |
| 2016 | 731-TA-1326 | South Africa | Affirmative | Ongoing first review |
| 2016 | 731-TA-1327 | Taiwan | Affirmative | Ongoing first review |
| 2016 | 731-TA-1328 | Turkey | Affirmative | Ongoing first review |

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

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

## Safeguard investigation

In 1984, the Commission determined that carbon and alloy steel (including CTL plate) was being imported into the United States in such increased quantities as to be a substantial cause of serious injury to the domestic industry producing such articles, and recommended quantitative restrictions of imports for a period of five years. President Ronald Reagan determined that import relief under section 201 of the Trade Act of 1974 was not in the national interest. At the President's direction, quantitative limitations under voluntary restraint agreements ("VRAs") for a five-year period ending September 30, 1989, were negotiated. In July 1989, the VRAs were extended for two and one-half years until March 31, 1992.

In 2001, the Commission determined that certain carbon and alloy steel, including CTL plate, was being imported into the United States in such increased quantities as to be a substantial cause of serious injury to the domestic industry producing such articles, and recommended additional duties on imports for a period of four years.[12] On March 5, 2002, President George W. Bush announced the implementation of steel safeguard measures. Import relief relating to CTL plate consisted of an additional tariff for a period of three years and one day (30 percent ad valorem on imports in the first year, 24 percent in the second year, and 18 percent in the third year).[13] Following receipt of the Commission's mid-term monitoring report in September 2003, and after seeking information from the U.S. Secretary of Commerce and U.S. Secretary of Labor, President Bush determined that the effectiveness of the action taken had been impaired by changed circumstances. Therefore, he terminated the U.S. measure with respect to increased tariffs on December 4, 2003.[14]

[12] 66 FR 67304, December 28, 2001.
[13] 67 FR 10553, March 7, 2002.
[14] 68 FR 68483, December 8, 2003.

## Summary data

Table I-3 presents a summary of data from the original investigations and the current full five-year reviews. The U.S. producers' market share increased overall from 82.1 in 2015 to 90.3 in 2021, while subject imports from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Korea, and Turkey all saw a decrease in market shares. The quantity of apparent consumption decreased by 35.3 percent between 2015 and 2021 while the value of apparent consumption increased by 14.1 percent. The share of subject import quantities and values decreased between 2015 and 2021 while the nonsubject market share increased between this period. Subject import quantities decreased between 2015 and 2021 while the quantities of nonsubject imports increased between this period.

Overall, U.S. producers' capacity, production, and the quantity of U.S. shipments were lower in 2021 than in 2015, but capacity utilization, value of U.S. producer shipments, and net sales were higher. Operating income increased from $22,538,000 in 2015 to $1,497,593,000. in 2021. The number of U.S. producers' production workers and hours worked decreased between 2015 and 2021, while productivity increased during this period.

**Table I-3**
**CTL plate: Comparative data from the original investigations and subsequent reviews to-date, by terminal years**

Quantity in short tons; Value in 1,000 dollars; Shares in percent

| Item | Measure | 2015 | 2021 |
|---|---|---|---|
| Apparent consumption | Quantity | 8,287,526 | 5,360,169 |
| U.S. producers market share | Share of quantity | 82.1 | 90.3 |
| Austria market share | Share of quantity | 0.2 | 0.0 |
| Belgium market share | Share of quantity | 0.3 | 0.0 |
| Brazil market share | Share of quantity | 0.6 | 0.0 |
| China market share | Share of quantity | 0.9 | 0.1 |
| France market share | Share of quantity | 2.6 | 0.0 |
| Germany market share | Share of quantity | 2.8 | 0.1 |
| Italy market share | Share of quantity | 0.7 | 0.1 |
| Japan market share | Share of quantity | 0.9 | 0.0 |
| South Africa market share | Share of quantity | 0.3 | --- |
| South Korea market share, subject | Share of quantity | *** | *** |
| Taiwan market share | Share of quantity | 0.4 | --- |
| Turkey market share | Share of quantity | 0.3 | 0.0 |
| Subject market share | Share of quantity | *** | *** |
| South Korea market share, nonsubject | Share of quantity | *** | *** |
| All other sources market share | Share of quantity | *** | *** |
| Nonsubject market share | Share of quantity | *** | *** |
| Import market share | Share of quantity | 17.9 | 9.7 |
| Apparent consumption | Value | 5,817,567 | 6,635,455 |
| U.S. producers market share | Share of value | 80.8 | 87.5 |
| Austria market share | Share of value | 0.3 | 0.0 |
| Belgium market share | Share of value | 0.4 | 0.1 |
| Brazil market share | Share of value | 0.5 | 0.0 |
| China market share | Share of value | 1.3 | 0.1 |
| France market share | Share of value | 2.9 | 0.0 |
| Germany market share | Share of value | *** | 0.2 |
| Italy market share | Share of value | 0.7 | 0.1 |
| Japan market share | Share of value | 1.0 | 0.0 |
| South Africa market share | Share of value | 0.2 | --- |
| South Korea market share, subject | Share of value | *** | *** |
| Taiwan market share | Share of value | 0.4 | --- |
| Turkey market share | Share of value | 0.2 | 0.0 |
| Subject market share | Share of value | *** | *** |
| South Korea market share, nonsubject | Share of value | *** | *** |
| All other sources market share | Share of value | *** | *** |
| Nonsubject market share | Share of value | *** | *** |
| Import market share | Share of value | 19.2 | 12.5 |

Table continued.

**Table I-3 Continued**
**CTL plate: Comparative data from the original investigations and subsequent reviews to-date, by terminal years**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton

| Item | Measure | 2015 | 2021 |
|---|---|---|---|
| Austria | Quantity | 13,305 | 1,078 |
| Austria | Value | 15,353 | 2,866 |
| Austria | Unit value | $1,154 | $2,657 |
| Belgium | Quantity | 21,023 | 2,036 |
| Belgium | Value | 20,921 | 4,543 |
| Belgium | Unit value | $995 | $2,231 |
| Brazil | Quantity | 46,183 | 25 |
| Brazil | Value | 28,386 | 306 |
| Brazil | Unit value | $615 | $12,482 |
| China | Quantity | 72,239 | 4,513 |
| China | Value | 74,601 | 4,767 |
| China | Unit value | $1,033 | $1,056 |
| France | Quantity | 217,558 | 1,595 |
| France | Value | 167,625 | 2,605 |
| France | Unit value | $770 | $1,633 |
| Germany | Quantity | 234,810 | 5,628 |
| Germany | Value | 194,609 | 10,323 |
| Germany | Unit value | $829 | $1,834 |
| Italy | Quantity | 59,455 | 6,149 |
| Italy | Value | 40,484 | 7,707 |
| Italy | Unit value | $681 | $1,253 |
| Japan | Quantity | 77,500 | 237 |
| Japan | Value | 57,964 | 1,099 |
| Japan | Unit value | $748 | $4,647 |
| South Africa | Quantity | 21,495 | --- |
| South Africa | Value | 10,626 | --- |
| South Africa | Unit value | $494 | --- |
| South Korea, subject | Quantity | *** | *** |
| South Korea, subject | Value | *** | *** |
| South Korea, subject | Unit value | *** | *** |
| Taiwan | Quantity | 35,482 | --- |
| Taiwan | Value | 22,986 | --- |
| Taiwan | Unit value | $648 | --- |
| Turkey | Quantity | 23,281 | 3 |
| Turkey | Value | 13,425 | 6 |
| Turkey | Unit value | $577 | $2,140 |
| Subject sources | Quantity | *** | *** |
| Subject sources | Value | *** | *** |
| Subject sources | Unit value | *** | *** |

Table continued.

**Table I-3 Continued**
**CTL plate: Comparative data from the original investigations and subsequent reviews to-date, by terminal years**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton

| Item | Measure | 2015 | 2021 |
|---|---|---|---|
| Nonsubject sources | Quantity | *** | *** |
| Nonsubject sources | Value | *** | *** |
| Nonsubject sources | Unit value | *** | *** |
| All import sources | Quantity | 1,479,800 | 521,094 |
| All import sources | Value | 1,114,132 | 832,227 |
| All import sources | Unit value | $753 | $1,597 |

Table continued.

**Table I-3 Continued**
**CTL plate: Comparative data from the original investigations and subsequent reviews to-date, by terminal years**

Quantity in short tons; Value in 1,000 dollars; Unit values in dollars per short ton; Ratios in percent

| Item | Measure | 2015 | 2021 |
|---|---|---|---|
| Capacity | Quantity | 12,487,100 | 8,291,000 |
| Production | Quantity | 7,528,917 | 5,505,910 |
| Capacity utilization | Ratio | 60.3 | 66.4 |
| Producer U.S. shipments | Quantity | 6,807,726 | 4,839,075 |
| Producer U.S. shipments | Value | 4,703,435 | 5,803,228 |
| Producer U.S. shipments | Unit value | $691 | $1,199 |
| Producer inventories | Quantity | 913,079 | 410,076 |
| Producer inventory ratio to total shipments | Ratio | 12.0 | *** |
| Production workers (number) | Noted in label | 4,591 | 2,846 |
| Hours worked (in 1,000 hours) | Noted in label | 9,687 | 6,324 |
| Wages paid (1,000 dollars) | Value | 333,810 | 283,710 |
| Hourly wages (dollars per hour) | Value | $34.46 | $44.86 |
| Productivity (short tons per 1,000 hours) | Noted in label | 777.2 | 870.6 |
| Net sales | Quantity | 6,559,704 | 5,544,765 |
| Net sales | Value | 4,669,052 | 6,619,801 |
| Net sales | Unit value | $712 | $1,194 |
| Cost of goods sold | Value | 4,448,239 | 4,851,399 |
| Gross profit or (loss) | Value | 220,813 | 1,768,402 |
| SG&A expense | Value | 198,275 | 270,809 |
| Operating income or (loss) | Value | 22,538 | 1,497,593 |
| Unit COGS | Unit value | $678 | $875 |
| Unit operating income | Unit value | $3 | $270 |
| COGS/ Sales | Ratio | 95.3 | 73.3 |
| Operating income or (loss)/ Sales | Ratio | 0.5 | 22.6 |

Table continued.

**Table I-3 Continued**
**CTL plate: Comparative data from the original investigations and subsequent reviews to-date, by terminal years**

Source: Investigation Nos. 701-TA-560-561 and 731-TA-1317-1328 (Final): Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey, Confidential Report, INV-OO-119, December 19, 2016 ("Original confidential report"), pp. VI-7-VI-12., and compiled from data submitted in response to Commission questionnaires and official U.S. import statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed September 29, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Data for 2015 are from the last year of the original investigations.

Table I-4 and figure I-1 present data on U.S. producers' U.S. shipments and U.S. importers' U.S. imports during the original investigations and these full reviews.

**Table I-4**
**CTL plate: U.S. producers' U.S. shipments and U.S. importers' U.S. imports from the original investigations and first reviews, by source and period**

Quantity in short tons; shares in percent

| Source | Measure | 2013 | 2014 | 2015 |
|---|---|---|---|---|
| U.S. producers | Quantity | 7,921,986 | 8,157,818 | 6,807,726 |
| Subject sources | Quantity | *** | *** | *** |
| Nonsubject sources | Quantity | *** | *** | *** |
| All import sources | Quantity | 897,417 | 1,773,391 | 1,479,800 |
| All sources | Quantity | 8,819,403 | 9,931,209 | 8,287,526 |
| U.S. producers | Share | 89.8 | 82.1 | 82.1 |
| Subject sources | Share | *** | *** | *** |
| Nonsubject sources | Share | *** | *** | *** |
| All import sources | Share | 10.2 | 17.9 | 17.9 |
| All sources | Share | 100.0 | 100.0 | 100.0 |

Table continued.

**Table I-4 Continued**
**CTL plate: U.S. producers' U.S. shipments and U.S. importers' U.S. imports from the original investigations and first reviews, by source and period**

Quantity in short tons; shares in percent

| Source | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| U.S. producers | Quantity | 4,900,101 | 5,078,561 | 5,612,723 |
| Subject sources | Quantity | *** | *** | *** |
| Nonsubject sources | Quantity | *** | *** | *** |
| All import sources | Quantity | 1,168,000 | 773,544 | 595,477 |
| All sources | Quantity | 6,068,101 | 5,852,105 | 6,208,200 |
| U.S. producers | Share | 80.8 | 86.8 | 90.4 |
| Subject sources | Share | *** | *** | *** |
| Nonsubject sources | Share | *** | *** | *** |
| All import sources | Share | 19.2 | 13.2 | 9.6 |
| All sources | Share | 100.0 | 100.0 | 100.0 |

Table continued.

**Table I-4 Continued**
**CTL plate: U.S. producers' U.S. shipments and U.S. importers' U.S. imports from the original investigations and first reviews, by source and period**

Quantity in short tons; shares in percent

| Source | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| U.S. producers | Quantity | 5,227,834 | 4,611,857 | 4,839,075 |
| Subject sources | Quantity | *** | *** | *** |
| Nonsubject sources | Quantity | *** | *** | *** |
| All import sources | Quantity | 532,575 | 311,238 | 521,094 |
| All sources | Quantity | 5,760,409 | 4,923,095 | 5,360,169 |
| U.S. producers | Share | 90.8 | 93.7 | 90.3 |
| Subject sources | Share | *** | *** | *** |
| Nonsubject sources | Share | *** | *** | *** |
| All import sources | Share | 9.2 | 6.3 | 9.7 |
| All sources | Share | 100.0 | 100.0 | 100.0 |

Source: Original confidential report, pp. IV-44-IV-48, and compiled from data submitted in response to Commission questionnaires and official U.S. import statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed September 29, 2022.

**Figure I-1**
**CTL plate: U.S. producers' U.S. shipments and U.S. importers' U.S. imports from the original investigations and first reviews, by source and period**

* * * * * * *

Source: Original confidential report, pp. IV-44-IV-48, and compiled from data submitted in response to Commission questionnaires and official U.S. import statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed September 29, 2022.

## Statutory criteria

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

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

> *(1) IN GENERAL.-- . . . the Commission shall determine whether revocation of an order, or termination of a suspended investigation, would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time. The Commission shall consider the likely*

*volume, price effect, and impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated. The Commission shall take into account--*

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

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

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

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

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

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

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

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

*(D) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.*

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

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

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

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

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

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

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

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

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

## Organization of report

Information obtained during the course of the reviews that relates to the statutory criteria is presented throughout this report. A summary of trade and financial data for CTL plate as collected in the reviews is presented in appendix C. U.S. industry data are based on the questionnaire responses of six U.S. producers of CTL plate that are believed to have accounted for the majority of domestic production of CTL plate in 2020.[15] U.S. import data and related information are based on Commerce's official import statistics, as adjusted from import data collected separately in questionnaire responses, and the questionnaire responses of 48 U.S. importers of CTL plate that are believed to have accounted for 92.7 percent of the total subject U.S. imports during 2021. Foreign industry data and related information are based on the questionnaire responses of 26 producers of CTL plate: four firms in Austria that accounted for *** CTL plate capacity in Austria[16]; three producers in Belgium that accounted for over *** percent of CTL plate production in Belgium[17]; one producer in Brazil that accounted for *** percent of CTL plate production in Brazil[18]; one producer in China that accounted for a minor amount of total production in China[19]; three producers in France that collectively accounted for *** of CTL plate production in France[20]; four producers in Germany that collectively accounted for *** percent of CTL plate production in Germany[21];

[15] The coverage estimate is based on a comparison of which firms responded in these reviews to the firms listed by domestic parties in their responses to the notices of institution in the adequacy phase of these reviews.

[16] Voestalpine's response to the notice of institution, January 3, 2022, pp. 13-14. Austrian responding producers reported they collectively accounted for *** percent of CTL plate production in Austria and *** percent of exports to the United States from Austria in their questionnaire responses.

[17] Belgian responding producers reported they collectively accounted for *** percent of CTL plate production in Belgium and *** percent of exports to the United States from Belgium in their questionnaire responses.

[18] According to USIMINAS, Gerdau SA (Brazil) ***. USIMINAS prehearing brief, p. 12. Hearing transcript, p. 207. Gerdau, which did not provide a questionnaire response, reported ***. ***. As indicated in Part I, ***.

[19] Based on information provided by the domestic interested parties in their responses to the Commission's notice of institution. Cleveland-Cliffs' response to the notice of institution, January 3, 2022, pp. 25-26; Nucor/SSAB's response to the notice of institution, January 3, 2022, pp. 22-24.

[20] French responding producers reported they collectively accounted for *** percent of CTL plate production in France in their questionnaire responses.

[21] German responding producers reported they collectively accounted for *** percent of CTL plate production in Germany and *** percent of exports to the United States from Germany in their questionnaire responses.

two producers in Italy that accounted for *** of CTL plate production in Italy[22]; five producers in Japan that accounted for *** percent of CTL plate production in Japan[23]; and three subject producers/exporters in South Korea that accounted for essentially all subject CTL plate production in South Korea. [24] The Commission received no responses to its questionnaire from CTL plate producers in South Africa, Taiwan, and Turkey. Responses by U.S. producers, importers, purchasers, and foreign producers of CTL plate to a series of questions concerning the significance of the existing antidumping and countervailing duty orders and the likely effects of revocation of such orders are presented in appendix D.

[22] Italian responding producers reported they collectively accounted for *** percent of CTL plate production in Italy and *** percent of exports to the United States from Italy in their questionnaire responses.

[23] Japanese responding producers reported they collectively accounted for *** percent of CTL plate production in Japan and *** percent of exports to the United States from Japan in their questionnaire responses.

[24] ***. Email from ***. For more information on mill differences see pp. I-55-57.

# Commerce's reviews[25]

## Administrative reviews[26]

Since the publication of the orders, Commerce conducted no administrative reviews of the antidumping orders on CTL plate from Brazil, China, Japan, South Africa, and Turkey. Accordingly, the estimated weighted-average dumping margins determined in the LTFV investigations continue to be the basis for assessing antidumping duties for entries of subject merchandise.[27]

### Austria

Commerce has completed one antidumping duty administrative review with regards to subject imports of CTL plate from Austria. The results of the administrative review are shown in table I-5.

**Table I-5**
**CTL plate: Administrative review of the antidumping duty order for Austria**

| Date results published | Period of review | Producer or exporter | Margin (percent) |
|---|---|---|---|
| 84 FR 68106 December 13, 2019 | November 14, 2016-April 30, 2018 | voestalpine Bohler Edelstahl GmbH & Co KG<br>voestalpine Bohler Bleche GmbH & Co KG<br>voestalpine High Performance Metals International GmbH<br>voestalpine Grobblech GmbH<br>voestalpine Steel & Service Center GmbH | 41.19 |

Source: Cited Federal Register notice.

[25] There have been no duty-absorption findings, changed-circumstances reviews, proceedings conducted pursuant to section 129 of the Uruguay Round Agreements Act (URAA) (section 129 proceedings), or circumvention inquiries concerning the antidumping duty orders on CTL plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey.

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

[27] Issues and Decision Memorandum for the Expedited Sunset Reviews of the Antidumping Duty Orders on Certain Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, the People's Republic of China, France, the Federal Republic of Germany, Italy, Japan, the Republic of Korea, South Africa, Taiwan, and the Republic of Turkey, March 18, 2022.

**Belgium**

Commerce has completed three antidumping duty administrative reviews with regard to subject imports of CTL plate from Belgium. The results of the administrative reviews are shown in table I-6.

**Table I-6**
**CTL plate: Administrative reviews of the antidumping duty order for Belgium**

| Date results published | Period of review | Producer or exporter | Margin (percent) |
|---|---|---|---|
| 85 FR 3028 January 17, 2020 | November 14, 2016-April 30, 2018 | Industeel Belgium S.A | 4.75 |
| 85 FR 3028 January 17, 2020 | November 14, 2016-April 30, 2018 | NLMK Clabecq S.A./NLMK Plate Sales S.A./NLMK Sales Europe S.A./NLMK Manage Steel Center S.A./NLMK La Louviere S.A | 16.14 |
| 85 FR 3028 January 17, 2020 | November 14, 2016-April 30, 2018 | Hengelhoef Concrete Joints NV | 13.53 |
| 85 FR 3028 January 17, 2020 | November 14, 2016-April 30, 2018 | Sarens NV | 13.53 |
| 85 FR 3028 January 17, 2020 | November 14, 2016-April 30, 2018 | Thyssenkrupp Materials Belgium N.V | 13.53 |
| 85 FR 3028 January 17, 2020 | November 14, 2016-April 30, 2018 | Universal Eisen und Stahl GmbH | 13.53 |
| 85 FR 3028 January 17, 2020 | November 14, 2016-April 30, 2018 | Valvan Baling Systems | 13.53 |
| 85 FR 3028 January 17, 2020 | November 14, 2016-April 30, 2018 | Voestalpine Belgium NV. | 13.53 |
| 86 FR 21274 April 22, 2021 | May 1, 2018-April 30, 2019 | Industeel Belgium S.A | 8.64 |
| 86 FR 21274 April 22, 2021 | May 1, 2018-April 30, 2019 | NLMK Clabecq S.A./NLMK Plate Sales S.A./NLMK Sales Europe S.A./NLMK Manage Steel Center S.A./NLMK La Louviere S.A | 12.29 |
| 86 FR 21274 April 22, 2021 | May 1, 2018-April 30, 2019 | Stahlo Stahl Service GmbH & Co. KG | 10.47 |
| 86 FR 21274 April 22, 2021 | May 1, 2018-April 30, 2019 | Tranter Service Centers | 10.47 |

Table continued.

**Table I-6 Continued**
**CTL plate: Administrative reviews of the antidumping duty order for Belgium**

| Date results published | Period of review | Producer or exporter | Margin (percent) |
|---|---|---|---|
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | Industeel Belgium S.A | 0.51 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | NLMK Clabecq S.A./NLMK Plate Sales S.A./NLMK Sales Europe S.A./NLMK Manage Steel Center S.A./NLMK La Louviere S.A | 5.76 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | C.A. Picard GmbH | 3.14 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | Doerrenberg Edelstahl GmbH | 3.14 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | Edgen Murray | 3.14 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | EEW Steel Trading LLC | 3.14 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | Fike Europe B.A | 3.14 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | Macsteel International | 3.14 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | NLMK Dansteel A.S | 3.14 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | NLMK Verona SpA | 3.14 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | NobelClad Europe GmbH & Co. KG | 3.14 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | RP Technik GmbH Profilsysteme | 3.14 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | Salzgitter Mannesmann International GmbH | 3.14 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | Stahlo Stahl Service GmbH & Co. KG | 3.14 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | Stemcor USA | 3.14 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | Thyssenkrupp Steel Europe | 3.14 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | TWF Treuhandgesellschaft Werbefilm mbH | 3.14 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | Tranter Service Centers | 3.14 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | Va´lcovny Trub Chomutov A.S | 3.14 |
| 87 FR 7116 February 8, 2022 | May 1, 2019-April 30, 2020 | voestalpine Grobblech GmbH | 3.14 |

Source: Cited Federal Register notices.

**France**

Commerce has completed one antidumping duty administrative review with regards to subject imports of CTL plate from France. The results of the administrative reviews are shown in table I-7.

**Table I-7**
**CTL plate: Administrative review of the antidumping duty order for France**

| Date results published | Period of review | Producer or exporter | Margin (percent) |
|---|---|---|---|
| 84 FR 64044<br>November 20, 2019 | November 14, 2016-<br>April 30, 2018 | Industeel France S.A.S | 4.83 |

Source: Cited Federal Register notice.

**Germany**

Commerce has completed three antidumping duty administrative reviews with regard to subject imports of CTL plate from Germany. The results of the administrative reviews are shown in table I-8.

**Table I-8**
**CTL plate: Administrative reviews of the antidumping duty order for Germany**

| Date results published | Period of review | Producer or exporter | Margin (percent) |
|---|---|---|---|
| 87 FR 29285<br>May 13, 2022 | May 1, 2020-April<br>30, 2021 | AG der Dillinger Hüttenwerke | 0.00 |
| 86 FR 70445<br>December 10, 2021 | May 1, 2019-April<br>30, 2020 | AG der Dillinger Hüttenwerke | 0.00 |
| 84 FR 32126<br>July 5, 2019 | November 14, 2016-<br>April 30, 2018 | Ilsenburger Grobblech GmbH, Salzgitter Mannesmann Grobblech GmbH, Salzgitter Flachstahl GmbH, and Salzgitter Mannesmann International GmbH | 174.03 |

Source: Cited Federal Register notices.

## Italy

Commerce has completed three antidumping duty administrative reviews with regard to subject imports of CTL plate from Italy. The results of the administrative reviews are shown in table I-9.

**Table I-9**
**CTL plate: Administrative reviews of the antidumping duty order for Italy**

| Date results published | Period of review | Producer or exporter | Margin (percent) |
|---|---|---|---|
| 85 FR 3026 January 17, 2020 | November 14, 2016-April 30, 2018 | NLMK Verona SpA | 1.44 |
| 85 FR 3026 January 17, 2020 | November 14, 2016-April 30, 2018 | Officine Tecnosider s.r.l | 1.63 |
| 85 FR 3026 January 17, 2020 | November 14, 2016-April 30, 2018 | Euroflex SpA | 1.57 |
| 85 FR 3026 January 17, 2020 | November 14, 2016-April 30, 2018 | Evraz Palini e Bertoli SpA | 1.57 |
| 85 FR 3026 January 17, 2020 | November 14, 2016-April 30, 2018 | Ilva SpA | 1.57 |
| 85 FR 3026 January 17, 2020 | November 14, 2016-April 30, 2018 | Metalcam SpA | 1.57 |
| 85 FR 3026 January 17, 2020 | November 14, 2016-April 30, 2018 | Modelleria di Modini Renato | 1.57 |
| 85 FR 3026 January 17, 2020 | November 14, 2016-April 30, 2018 | Ondulit Italiana SpA | 1.57 |
| 85 FR 3026 January 17, 2020 | November 14, 2016-April 30, 2018 | Padana Tubi e Profilati Acciaio SpA | 1.57 |
| 85 FR 3026 January 17, 2020 | November 14, 2016-April 30, 2018 | Riva Fire SpA | 1.57 |
| 86 FR 15645 March 24, 2021 | May 1, 2018-April 30, 2019 | NLMK Verona SpA | 1.39 |
| 86 FR 15645 March 24, 2021 | May 1, 2018-April 30, 2019 | Officine Tecnosider s.r.l | 1.23 |
| 86 FR 15645 March 24, 2021 | May 1, 2018-April 30, 2019 | O.ME.P SpA | 1.30 |
| 86 FR 15645 March 24, 2021 | May 1, 2018-April 30, 2019 | Ofar SpA | 1.30 |
| 86 FR 15645 March 24, 2021 | May 1, 2018-April 30, 2019 | Sesa SpA | 1.30 |
| 86 FR 15645 March 24, 2021 | May 1, 2018-April 30, 2019 | Tim-Cop Doo Temerin | 1.30 |
| 87 FR 6485 February 4, 2022 | May 1, 2019-April 30, 2020 | NLMK Verona SpA | 1.57 |
| 87 FR 6485 February 4, 2022 | May 1, 2019-April 30, 2020 | Officine Tecnosider s.r.l | 0.00 |
| 87 FR 6485 February 4, 2022 | May 1, 2019-April 30, 2020 | Non-Selected Companies | 1.57 |

Source: Cited Federal Register notices.

**South Korea**

Commerce has completed three countervailing duty administrative reviews and four antidumping duty administrative reviews with regard to subject imports of CTL plate from South Korea. The results of the administrative reviews are shown in tables I-10 and I-11.

**Table I-10**
**CTL plate: Administrative reviews of the countervailing duty order for South Korea**

| Date results published | Period of review | Producer or exporter | Margin (percent) |
|---|---|---|---|
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | POSCO | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | BDP International | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Blue Track Equipment | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Boxco | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Bukook Steel Co., Ltd | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Buma CE Co., Ltd | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Daelim Industrial Co., Ltd | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Daesam Industrial Co., Ltd | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Daesin Lighting Co., Ltd | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Daewoo International Corp | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Dong Yang Steel Pipe | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Dongkuk Industries Co., Ltd | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Dongkuk Steel Mill Co., Ltd | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Dongbu Steel Co., Ltd | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | EAE Automotive Equipment | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | EEW KHPC Co., Ltd | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Eplus Expo Inc | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | GS Global Corp | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Haem Co., Ltd | 0.50 |

Table continued.

**Table I-10 Continued**
**CTL plate: Administrative reviews of the countervailing duty order for South Korea**

| Date results published | Period of review | Producer or exporter | Margin (percent) |
|---|---|---|---|
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Han Young Industries | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Hyosung Corp | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Jinmyung Frictech Co., Ltd | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Korean Iron and Steel Co., Ltd | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Kyoungil Precision Co., Ltd | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Samsun C&T Corp | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | SK Netwoks Co., Ltd | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Steel N People Ltd | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Summit Industry | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Sungjin Co., Ltd | 0.50 |
| 85 FR 2710 January 16, 2020 | April 4, 2017-December 31, 2017 | Young Sun Steel | 0.50 |
| 86 FR 15184 March 22, 2021 | January 1, 2018-December 31, 2018 | POSCO | 0.49 (de minimis) |
| 86 FR 15184 March 22, 2021 | January 1, 2018-December 31, 2018 | Non-Selected Companies Under Review | 0.49 (de minimis) |
| 87 FR 6842 February 7, 2022 | January 1, 2019-December 31, 2019 | POSCO | 0.42 (de minimis) |
| 87 FR 6842 February 7, 2022 | January 1, 2019-December 31, 2019 | Non-selected companies under review | 0.42 (de minimis) |

Source: Cited Federal Register notices.

Note: In the first administrative review, Commerce determined the following companies to be cross-owned with POSCO: POSCO Chemtech, POSCO Nippon RHF Joint Venture Co., Ltd., POSCO Processing & Service, Pohang Scrap Recycling Distribution Center, and POSCO M-Tech.

Note: In the second administrative review, non-selected companies under review included: BDP International, Blue Track Equipment, Boxco, Bukook Steel Co., Ltd., Buma CE Co., Ltd., China Chengdu International Techno-Economic Cooperation Co., Ltd., Daehan I.M. Co., Ltd., Daelim Industrial Co., Ltd., Daesam Industrial Co., Ltd., Daesin Lighting Co., Ltd., Daewoo International Corp., Dong Yang Steel Pipe, Dongbu Steel Co., Ltd., Dongkuk Industries Co., Ltd., EAE Automotive Equipment, EEW KHPC Co., Ltd., Eplus Expo Inc., GS Global Corp., Haem Co., Ltd., Han Young Industries, Hyosung Corp., Jinmyung Frictech Co., Ltd., Kindus Inc., Korean Iron and Steel Co., Ltd., Kyoungil Precision Co., Ltd., Samsun C&T Corp., Shipping Imperial Co., Ltd., Sinchang Eng Co., Ltd., SK Networks Co., Ltd., SNP Ltd., Steel N People Ltd., Summit Industry, Sungjin Co., Ltd., and Young Sun Steel. Commerce found the following companies to be cross-owned with POSCO: Pohang Scrap Recycling Distribution Center Co., Ltd., POSCO Chemtech, POSCO Daewoo Corporation, POSCO M-Tech, POSCO Nippon Steel RHF Joint Venture Co., Ltd., and POSCO Terminal.

Note: In the third administrative review, non-selected companies under review included: BDP International, Blue Track Equipment, Boxco, Bukook Steel Co., Ltd., Buma CE Co., Ltd., China Chengdu International Techno-Economic Cooperation Co., Ltd., Daehan I.M. Co., Ltd., Daehan Tex Co., Ltd., Daelim Industrial Co., Ltd., Daesam Industrial Co., Ltd., Daesin Lighting Co., Ltd., Daewoo International Corp., Dong Yang Steel Pipe, Dongbu Steel Co., Ltd., Dongkuk Industries Co., Ltd., Dongkuk Steel Mill Co., Ltd., EAE Automotive Equipment, EEW KHPC Co., Ltd., Eplus Expo Inc., GS Global Corp., Haem Co., Ltd., Han Young Industries, Hyosung Corp., Jinmyung Frictech Co., Ltd., Khana Marine Ltd., Kindus Inc., Korean Iron and Steel Co., Ltd., Kyoungil Precision Co., Ltd., Menics, Qian'an Rentai Metal Products Co., Ltd., Samsun C&T Corp., Shinko, Shipping Imperial Co., Ltd., Sinchang Eng Co., Ltd., SK Networks Co., Ltd., SNP Ltd., Steel N People Ltd., Summit Industry, Sungjin Co., Ltd., and Young Sun Steel. Commerce found the following companies to be cross-owned with POSCO: Pohang Scrap Recycling Distribution Center Co. Ltd.; POSCO Chemical; POSCO M-Tech; POSCO Nippon Steel RHF Joint Venture Co., Ltd.; and POSCO Terminal.

**Table I-11**
**CTL plate: Administrative reviews of the antidumping duty order for South Korea**

| Date results published | Period of review | Producer or exporter | Margin (percent) |
|---|---|---|---|
| 84 FR 70951 December 26, 2019 | November 14, 2016-April 30, 2018 | POSCO single entity | 19.87 |
| 84 FR 70951 December 26, 2019 | November 14, 2016-April 30, 2018 | Buma Ce Co., Ltd | 19.87 |
| 84 FR 70951 December 26, 2019 | November 14, 2016-April 30, 2018 | Dong Yang Steel Pipe Co., Ltd | 19.87 |
| 84 FR 70951 December 26, 2019 | November 14, 2016-April 30, 2018 | Dongkuk Steel Mill Co., Ltd | 19.87 |
| 84 FR 70951 December 26, 2019 | November 14, 2016-April 30, 2018 | Expeditors Korea Ltd | 19.87 |
| 84 FR 70951 December 26, 2019 | November 14, 2016-April 30, 2018 | Haem Co., Ltd | 19.87 |
| 84 FR 70951 December 26, 2019 | November 14, 2016-April 30, 2018 | J.I. Sea & Air Express Co., Ltd | 19.87 |
| 84 FR 70951 December 26, 2019 | November 14, 2016-April 30, 2018 | Maxpeed Co., Ltd | 19.87 |
| 84 FR 70951 December 26, 2019 | November 14, 2016-April 30, 2018 | Ramses Logistics Co., Ltd | 19.87 |
| 84 FR 70951 December 26, 2019 | November 14, 2016-April 30, 2018 | Sumitomo Corp. Korea Ltd | 19.87 |
| 86 FR 15643 March 24, 2021 | May 1, 2018-April 30, 2019 | POSCO single entity | 0.00 |
| 87 FR 6483 February 4, 2022 | May 1, 2019-April 30, 2020 | POSCO single entity | 0.00 |
| 87 FR 61569 October 12, 2022 | May 1, 2020-April 30, 2021 | POSCO single entity | 2.59 |

Source: Cited Federal Register notices.

Note: In its first administrative review, Commerce determined that POSCO, POSCO Daewoo Corporation, POSCO Processing and Service Co., Ltd., Taechang Steel Co., Ltd., Winsteel Co., Ltd, Moonbae Steel Co., Ltd., Dae Dong Steel Co., Ltd, SPFC Co., Ltd., Steel Flower Co., Ltd., TC-TECH, Shinjin Esco Co., Ltd., POSCO Plantec., Ltd., POSCO Engineering and Construction Co., Ltd., Hi Steel Co., Ltd., Miju Steel, POSCO Eng., and Shilla Steel Co., Ltd. are affiliated and should be treated as a single entity (collectively, “POSCO single entity”).

Note: In its second administrative review, Commerce determined that POSCO, POSCO International Corporation (successor in interest to POSCO Daewoo Corporation), POSCO Processing & Service Co., Ltd., and certain distributors and service centers (Taechang Steel Co., Ltd., Winsteel Co., Ltd., Moonbae Steel Co., Ltd., Dae Dong Steel Co., Ltd., Shinjin Esco Co., Ltd., and Shilla Steel Co., Ltd.) are affiliated and should be treated as a single entity (collectively, “POSCO single entity”).

Note: In its third administrative review, Commerce determined that POSCO, POSCO International Corporation, POSCO SPS, and certain distributors and service centers (Taechang Steel Co., Ltd., Winsteel Co., Ltd., and Shinjin Esco Co., Ltd.) are affiliated and that these companies should be treated as a single entity (collectively, “POSCO single entity”).

Note: In its fourth administrative review, Commerce determined that POSCO, POSCO International Corporation, POSCO SPS, and certain distributors and service centers (i.e., Taechang Steel Co., Ltd. and Winsteel Co., Ltd.) are affiliated and that these companies should be treated as a single entity (collectively, “POSCO single entity”).

**Taiwan**

Commerce has completed one antidumping duty administrative review with regard to subject imports of CTL plate from Taiwan. The results of the administrative review are shown in table I-12.

**Table I-12**
**CTL plate: Administrative review of the antidumping duty order for Taiwan**

| Date results published | Period of review | Producer or exporter | Margin (percent) |
|---|---|---|---|
| 85 FR 69 January 2, 2020 | November 14, 2016-April 30, 2018 | Shang Chen Steel Co., Ltd. | 2.59 |
| 85 FR 69 January 2, 2020 | November 14, 2016-April 30, 2018 | Broad Hand Enterprise Co., Ltd. | 2.59 |
| 85 FR 69 January 2, 2020 | November 14, 2016-April 30, 2018 | C.H. Robinson Freight Services | 2.59 |
| 85 FR 69 January 2, 2020 | November 14, 2016-April 30, 2018 | Eci Taiwan Co., Ltd. | 2.59 |
| 85 FR 69 January 2, 2020 | November 14, 2016-April 30, 2018 | Locksure Inc. | 2.59 |
| 85 FR 69 January 2, 2020 | November 14, 2016-April 30, 2018 | Nan Hoang Traffic Instrument Co. | 2.59 |
| 85 FR 69 January 2, 2020 | November 14, 2016-April 30, 2018 | New Marine Consolidator Co., Ltd. | 2.59 |
| 85 FR 69 January 2, 2020 | November 14, 2016-April 30, 2018 | North America Mining Group Co., Ltd. | 2.59 |
| 85 FR 69 January 2, 2020 | November 14, 2016-April 30, 2018 | Oriental Power Logistics Co., Ltd. | 2.59 |
| 85 FR 69 January 2, 2020 | November 14, 2016-April 30, 2018 | Scanwell Logistics (Taiwan) | 2.59 |
| 85 FR 69 January 2, 2020 | November 14, 2016-April 30, 2018 | Shin Yang Steel Co., Ltd. | 2.59 |
| 85 FR 69 January 2, 2020 | November 14, 2016-April 30, 2018 | Shye Yao Steel Co., Ltd. | 2.59 |
| 85 FR 69 January 2, 2020 | November 14, 2016-April 30, 2018 | Speedmark Consolidation | 2.59 |
| 85 FR 69 January 2, 2020 | November 14, 2016-April 30, 2018 | Sumeeko Industries Co., Ltd. | 2.59 |
| 85 FR 69 January 2, 2020 | November 14, 2016-April 30, 2018 | Triple Merits Ltd. | 2.59 |
| 85 FR 69 January 2, 2020 | November 14, 2016-April 30, 2018 | UKI Enterprise Co., Ltd. | 2.59 |

Source: Cited Federal Register notice.

## Changed circumstances reviews

Commerce has conducted no changed circumstances reviews with respect to CTL plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey.

## Scope rulings

Commerce has conducted one scope ruling with respect to CTL plate from Italy. Cold-rolled steel strip in coils used to produce ‘‘doctor blades’’ are not covered by the scope of the antidumping duty order on CTL plate from Italy because they are neither hot-rolled nor forged, and they are in coil form.[28] Commerce has conducted one scope ruling with respect to CTL plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey. Certain preconfigured parts for mold bases used in plastic injection molding machines are not within the scope of the antidumping and countervailing duty orders on CTL plate because the totality of the further processing results in a downstream product that is not CTL plate and is thus not covered by the order.[29]

## Five-year reviews

Commerce has issued the final results of its expedited reviews with respect to all subject countries.[30] Table I-13 and table I-14 present the countervailable subsidy margins calculated by Commerce in its original investigations and first reviews of the countervailing duty orders concerning China and South Korea. Tables I-15 through I-26 present the dumping margins calculated by Commerce in its original investigations and first reviews of the antidumping duty orders concerning Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey.[31]

[28] 85 FR 2713, January 16, 2020.

[29] 84 FR 11743, March 28, 2019.

[30] 87 FR 17066, March 25, 2022; 87 FR 17068, March 25, 2022; 87 FR 19070, April 1, 2022.

[31] Commerce determined that revocation of the antidumping duty orders on CTL plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey would be likely to lead to continuation or recurrence of dumping and that the magnitude of the margin of dumping likely to prevail would be up to estimated weighted-average dumping margins determined as a result of the original LTFV investigations. Issues and Decision Memorandum, March 18, 2022.

**Table I-13**
**CTL plate: Commerce's original investigation and first five-year review countervailable subsidy margins for producers/exporters in China**

| Producer/exporter | Original margin (*percent*) | First five-year review margin (*percent*) |
|---|---|---|
| Jiangyin Xingcheng Special Steel Works Co. Ltd. | 251.00 | 251.00 |
| Hunan Valin Xiangtan Iron & Steel | 251.00 | 251.00 |
| Viewer Development Co., Ltd. | 251.00 | 251.00 |
| Jiangsu Tiangong Tools Company Limited, Tiangong Aihe Company Limited, Jiangsu Tiangong Group Company Limited, Jiangsu Tiangong Mould Steel R&D Center Company Limited | 251.00 | 24.04 |
| All others | 251.00 | 251.00 |

Source: 82 FR 14346, March 20, 2017; 87 FR 17068, March 25, 2022.

**Table I-14**
**CTL plate: Commerce's original investigation and first five-year review countervailable subsidy margins for producers/exporters in South Korea**

| Producer/exporter | Original margin (*percent*) | First five-year review margin (*percent*) |
|---|---|---|
| POSCO | 4.31 | 4.35 |
| All others | 4.31 | 4.35 |

Source: 82 FR 24103, May 25, 2017; 87 FR 19070, April 1, 2022.

Note: Following a final court decision, Commerce amended the final net countervailable subsidy rate on imports of CTL plate from South Korea to 3.72 percent, applicable November 18, 2019 (84 FR 64459, November 22, 2019).

**Table I-15**
**CTL plate: Commerce's original investigation and first five-year review dumping margins for producers/exporters in Austria**

| Producer/exporter | Original margin (*percent*) | First five-year review margin (*percent*) |
|---|---|---|
| Bohler Bleche GmbH & Co KG, Bohler Edelstahl GmbH & Co KG, Bohler International GmbH, voestalpine Grobblech GmbH, and voestalpine Steel Service Center GmbH. | 53.72 | See note |
| All Others | 53.72 | See note |

Source: 82 FR 24096, May 25, 2017; 87 FR 17066, March 25, 2022.

Note: Following final court decisions, Commerce amended the final antidumping duty margin on imports of CTL plate from Austria to 28.57 percent, applicable February 22, 2019 (84 FR 7344, March 4, 2019).

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on CTL plate from Austria would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 53.72 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin.

**Table I-16**
**CTL plate: Commerce's original investigation and first five-year review dumping margins for producers/exporters in Belgium**

| Producer/exporter | Original margin (*percent*) | First five-year review margin (*percent*) |
|---|---|---|
| Industeel Belgium S.A | 5.40 | See note |
| NLMK Clabecq S.A., NLMK Plate Sales S.A., NLMK Sales Europe S.A., NLMK Manage Steel Center S.A., and/or NLMK La Louviere S.A | 51.78 | See note |
| All Others | 5.40 | 5.40 |

Source: 82 FR 24096, May 25, 2017; 87 FR 17066, March 25, 2022.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on CTL plate from Belgium would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 51.78 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin.

**Table I-17**
**CTL plate: Commerce's original investigation and first five-year review dumping margins for producers/exporters in Brazil**

| Producer/exporter | Original margin (*percent*) | First five-year review margin (*percent*) |
|---|---|---|
| Companhia Siderurgica Nacional Usinas Siderurgicas de Minas Gerais SA | 74.52 | See note |
| All Others | 74.52 | See note |

Source: 82 FR 8911, February 1, 2017; 87 FR 17066, March 25, 2022.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on CTL plate from Brazil would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 74.52 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin

**Table I-18**
**CTL plate: Commerce's original investigation and first five-year review dumping margins for producers/exporters in China**

| Producer/exporter | Original margin (*percent*) | First five-year review margin (*percent*) |
|---|---|---|
| PRC-Wide Entity | 68.27 | See note |

Source: 82 FR 14349, March 20, 2017; 87 FR 17066, March 25, 2022.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on CTL plate from China would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 68.27 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin

**Table I-19**
**CTL plate: Commerce's original investigation and first five-year review dumping margins for producers/exporters in France**

| Producer/exporter | Original margin (*percent*) | First five-year review margin (*percent*) |
|---|---|---|
| Dillinger France S.A | 6.15 | See note |
| Industeel France S.A | 148.02 | See note |
| All Others | 6.15 | See note |

Source: 82 FR 24096, May 25, 2017; 87 FR 17066, March 25, 2022.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on CTL plate from France would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 148.02 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin

**Table I-20**
**CTL plate: Commerce's original investigation and first five-year review dumping margins for producers/exporters in Germany**

| Producer/exporter | Original margin (*percent*) | First five-year review margin (*percent*) |
|---|---|---|
| AG der Dillinger Hüttenwerke | 5.52 | See note |
| Ilsenburger Grobblech GmbH, Salzgitter Mannesmann Grobblech GmbH, Salzgitter Flachstahl GmbH, and Salzgitter Mannesmann International GmbH. | 22.90 | See note |
| All Others | 21.04 | See note |

Source: 82 FR 24096, May 25, 2017; 87 FR 17066, March 25, 2022.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on CTL plate from Germany would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 22.90 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin

**Table I-21**
**CTL plate: Commerce's original investigation and first five-year review dumping margins for producers/exporters in Italy**

| Producer/exporter | Original margin (*percent*) | First five-year review margin (*percent*) |
|---|---|---|
| NLMK Verona SpA | 22.19 | See note |
| Officine Tecnosider s.r.l | 6.08 | See note |
| Marcegaglia SpA | 22.19 | See note |
| All Others | 6.08 | See note |

Source: 82 FR 24096, May 25, 2017; 87 FR 17066, March 25, 2022.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on CTL plate from Italy would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 22.19 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin

**Table I-22**
**CTL plate: Commerce's original investigation and first five-year review dumping margins for producers/exporters in Japan**

| Producer/exporter | Original margin (*percent*) | First five-year review margin (*percent*) |
|---|---|---|
| Tokyo Steel Manufacturing Co., Ltd | 14.79 | See note |
| JFE Steel Corporation | 48.67 | See note |
| Shimabun Corporation | 48.67 | See note |
| All Others | 14.79 | See note |

Source: 82 FR 24096, May 25, 2017; 87 FR 17066, March 25, 2022.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on CTL plate from Japan would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 48.67 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin

**Table I-23**
**CTL plate: Commerce's original investigation and first five-year review dumping margins for producers/exporters in South Africa**

| Producer/exporter | Original margin (*percent*) | First five-year review margin (*percent*) |
|---|---|---|
| Evraz Highveld Steel and Vanadium Corp. | 94.14 | See note |
| All Others | 87.82 | See note |

Source: 81 FR 87545, December 5, 2016; 87 FR 17066, March 25, 2022.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on CTL plate from South Africa would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 94.14 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin

**Table I-24**
**CTL plate: Commerce's original investigation and first five-year review dumping margins for producers/exporters in South Korea**

| Producer/exporter | Original margin (*percent*) | First five-year review margin (*percent*) |
|---|---|---|
| POSCO | 7.10 | See note |
| All Others | 7.10 | See note |

Source: 82 FR 24096, May 25, 2017; 87 FR 17066, March 25, 2022.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on CTL plate from South Korea would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 7.39 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin

**Table I-25**
**CTL plate: Commerce's original investigation and first five-year review dumping margins for producers/exporters in Taiwan**

| Producer/exporter | Original margin (*percent*) | First five-year review margin (*percent*) |
|---|---|---|
| China Steel Corporation | 75.42 | See note |
| Shang Chen Steel Co., Ltd | 3.62 | See note |
| All Others | 39.52 | See note |

Source: 82 FR 24096, May 25, 2017; 87 FR 17066, March 25, 2022.

Note: Following final court decisions, Commerce amended the final antidumping duty margin on imports of CTL plate from Taiwan to 6.73 percent, applicable January 9, 2020 (85 FR 7535, February 10, 2020).

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on CTL plate from Taiwan would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 6.95 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin

**Table I-26**
**CTL plate: Commerce's original investigation and first five-year review dumping margins for producers/exporters in Turkey**

| Producer/exporter | Original margin (*percent*) | First five-year review margin (*percent*) |
|---|---|---|
| Ereg˘li Demir ve C¸elik Fabrikalari T.A.S¸. | 50.00 | See note |
| All Others | 42.02 | See note |

Source: 81 FR 87545, December 5, 2016; 87 FR 17066, March 25, 2022.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on CTL plate from Turkey would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 50.00 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin

# The subject merchandise

## Commerce's scope[32]

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

> *The products covered by these orders are certain carbon and alloy steel hot-rolled or forged flat plate products not in coils, whether or not painted, varnished, or coated with plastics or other non-metallic substances (cut-to-length plate). Subject merchandise includes plate that is produced by being cut-to-length from coils or from other discrete length plate and plate that is rolled or forged into a discrete length. The products covered include (1) Universal mill plates (i.e., flat-rolled products rolled on four faces or in a closed box pass, of a width exceeding 150 mm but not exceeding 1250 mm, and of a thickness of not less than 4 mm, which are not in coils and without patterns in relief), and (2) hot-rolled or forged*
>
> *flat steel products of a thickness of 4.75 mm or more and of a width which exceeds 150 mm and measures at least twice the thickness, and which are not in coils, whether or not with patterns in relief. The covered products described above may be rectangular, square, circular or other shapes and include products of either rectangular or non-rectangular cross-section where such non-rectangular cross-section is achieved subsequent to the rolling process, i.e., products which have been ''worked after rolling'', (e.g., products which have been beveled or rounded at the edges).*

[32] 87 FR 17066, March 25, 2022. Commerce Issues and Decision Memorandum for the Expedited Sunset Reviews of the Antidumping Duty Orders on Certain Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, the People's Republic of China, France, the Federal Republic of Germany, Italy, Japan, the Republic of Korea, South Africa, Taiwan, and the Republic of Turkey, March 18, 2022. The CTL items described in the scope of the antidumping and countervailing duty orders on CTL plate from the countries subject to these reviews is essentially the same for all countries, except for certain countries for which certain CTL plate items were already covered by an existing order at the time of the filing of the petitions (e.g., hot-rolled steel flat products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom (81 FR 67962, October 3, 2016); certain hot-rolled carbon steel flat products from China (66 FR 59561, November 29, 2001); and CTL plate from China (68 FR 60081, Oct. 21, 2003, as amended by 76 FR 50996 (August 17, 2011)). In addition, at the time of the filing of the petitions, there were existing 1999 antidumping and countervailing duty orders on certain cut-to-length carbon-quality steel plate products from Korea. The scope of the orders in these reviews cover only the subject cut-to-length plate not within the physical description of cut-to-length carbon quality steel plate in the earlier orders. In addition, the scope of the antidumping duty order on CTL plate from Korea that is the subject of these reviews covers CTL plate produced and/or exported by those companies that were excluded or revoked from the 1999 Korea antidumping duty order as of April 8, 2016 (i.e., Pohang Iron and Steel Company, also known as POSCO).

*For purposes of the width and thickness requirements referenced above, the following rules apply:*

*(1) Except where otherwise stated where the nominal and actual thickness or width measurements vary, a product from a given subject country is within the scope if application of either the nominal or actual*

*measurement would place it within the scope based on the definitions set forth above, and*

*(2) where the width and thickness vary for a specific product (e.g., the thickness of certain products with non-rectangular cross section, the width of certain products with non-rectangular shape, etc.), the measurement at its greatest width or thickness applies.*

*Steel products included in the scope of this order are products in which:*

*(1) Iron predominates, by weight, over each of the other contained elements; and (2) the carbon content is 2 percent or less by weight.*

*Subject merchandise includes cut-to-length plate that has been further processed in the subject country or a third country, including but not limited to pickling, oiling, levelling, annealing, tempering, temper rolling, skin passing, painting, varnishing, trimming, cutting, punching, beveling, and/or slitting, or any other processing that would not otherwise remove the merchandise from the scope of the order if performed in the country of manufacture of the cut-to-length plate.*

*All products that meet the written physical description, are within the scope of this order unless specifically excluded or covered by the scope of an existing order. The following products are outside of, and/ or specifically excluded from, the scope of this order:*

*(1) Products clad, plated, or coated with metal, whether or not painted, varnished or coated with plastic or other non-metallic substances;*

*(2) military grade armor plate certified to one of the following specifications or to a specification that references and incorporates one of the following specifications:*

- *MIL–A–12560,*
- *MIL–DTL–12560H,*
- *MIL–DTL–12560J,*

*• MIL–DTL–12560K,*

*• MIL–DTL–32332,*

*• MIL–A–46100D,*

*• MIL–DTL–46100–E,*

*• MIL–46177C,*

*• MIL–S–16216K Grade HY80,*

*• MIL–S–16216K Grade HY100,*

*• MIL–S–24645A HSLA–80;*

*• MIL–S–24645A HSLA–100,*

*• T9074–BD–GIB–010/0300 Grade HY80,*

*• T9074–BD–GIB–010/0300 Grade HY100,*

*• T9074–BD–GIB–010/0300 Grade HSLA80,*

*• T9074–BD–GIB–010/0300 Grade HSLA100, and*

*• T9074–BD–GIB–010/0300 Mod. Grade HSLA115,*

*except that any cut-to-length plate certified to one of the above specifications, or to a military grade armor specification that references and incorporates one of the above specifications, will not be excluded from the scope if it is also dual- or multiple-certified to any other non-armor specification that otherwise would fall within the scope of this order;*

*(3) stainless steel plate, containing 10.5 percent or more of chromium by weight and not more than 1.2 percent of carbon by weight;*

*(4) CTL plate meeting the requirements of ASTM A–829, Grade E 4340 that are over 305mm in actual thickness;*

*(5) Alloy forged and rolled CTL plate greater than or equal to 152.4 mm in actual thickness meeting each of the following requirements:*

*(a) Electric furnace melted, ladle refined & vacuum degassed and having a chemical composition (expressed in weight percentages):*

*• Carbon 0.23–0.28,*

*• Silicon 0.05–0.20,*

*• Manganese 1.20–1.60,*

*• Nickel not greater than 1.0,*

*• Sulfur not greater than 0.007,*

*• Phosphorus not greater than 0.020,*

*• Chromium 1.0–2.5,*

*• Molybdenum 0.35–0.80,*

*• Boron 0.002–0.004,*

*• Oxygen not greater than 20 ppm,*

*• Hydrogen not greater than 2 ppm, and*

*• Nitrogen not greater than 60 ppm;*

*(b) With a Brinell hardness measured in all parts of the product including mid thickness falling within one of the following ranges:*

*(i) 270–300 HBW,*

*(ii) 290–320 HBW, or*

*(iii) 320–350HBW;*

*(c) Having cleanliness in accordance with ASTM E45 method A (Thin and Heavy): A not exceeding 1.5, B not exceeding 1.0, C not exceeding 0.5, D not exceeding 1.5; and*

*(d) Conforming to ASTM A578–S9 ultrasonic testing requirements with acceptance criteria 2 mm flat bottom hole;*

*(6) Alloy forged and rolled steel CTL plate over 407 mm in actual thickness and meeting the following requirements:*

*(a) Made from Electric Arc Furnace melted, Ladle refined & vacuum degassed, alloy steel with the following chemical composition (expressed in weight percentages):*

*• Carbon 0.23–0.28,*

*• Silicon 0.05–0.15,*

*• Manganese 1.20–1.50,*

*• Nickel not greater than 0.4,*

*• Sulfur not greater than 0.010,*

*• Phosphorus not greater than 0.020,*

*• Chromium 1.20–1.50,*

*• Molybdenum 0.35–0.55,*

*• Boron 0.002–0.004,*

*• Oxygen not greater than 20 ppm,*

*• Hydrogen not greater than 2 ppm, and*

*• Nitrogen not greater than 60 ppm;*

*(b) Having cleanliness in accordance with ASTM E45 method A (Thin and Heavy): A not exceeding 1.5, B not exceeding 1.5, C not exceeding 1.0, D not exceeding 1.5;*

*(c) Having the following mechanical properties:*

*(i) With a Brinell hardness not more than 237 HBW measured in all parts of the product including mid thickness; and having a Yield Strength of 75ksi min and UTS 95ksi or more, Elongation of 18% or more and Reduction of area 35% or more; having charpy V at -75 degrees F in the longitudinal direction equal or greater than 15 ft. lbs (single value) and equal or greater than 20 ft. lbs (average of 3 specimens) and conforming to the requirements of NACE MR01–75; or*

*(ii) With a Brinell hardness not less than 240 HBW measured in all parts of the product including mid thickness; and having a Yield Strength of 90 ksi min and UTS 110 ksi or more, Elongation of 15% or more and Reduction of area 30% or more; having charpy V at -40 degrees F in the longitudinal direction equal or greater than 21 ft. lbs (single value) and equal or greater than 31 ft. lbs (average of 3 specimens);*

*(d) Conforming to ASTM A578–S9 ultrasonic testing requirements with acceptance criteria 3.2 mm flat bottom hole; and*

*(e) Conforming to magnetic particle inspection in accordance with AMS 2301;*

*(7) Alloy forged and rolled steel CTL plate over 407 mm in actual thickness and meeting the following requirements:*

*(a) Made from Electric Arc Furnace melted, ladle refined & vacuum degassed, alloy steel with the following chemical composition (expressed in weight percentages):*

- *Carbon 0.25–0.30,*
- *Silicon not greater than 0.25,*
- *Manganese not greater than 0.50,*
- *Nickel 3.0–3.5,*
- *Sulfur not greater than 0.010,*
- *Phosphorus not greater than 0.020,*
- *Chromium 1.0–1.5,*
- *Molybdenum 0.6–0.9,*
- *Vanadium 0.08 to 0.12*
- *Boron 0.002–0.004,*
- *Oxygen not greater than 20 ppm,*
- *Hydrogen not greater than 2 ppm, and*
- *Nitrogen not greater than 60 ppm.*

*(b) Having cleanliness in accordance with ASTM E45 method A (Thin and Heavy): A not exceeding 1.0(t) and 0.5(h), B not exceeding 1.5(t) and 1.0(h), C not exceeding 1.0(t) and 0.5(h), and D not exceeding 1.5(t) and 1.0(h);*

*(c) Having the following mechanical properties: A Brinell hardness not less than 350 HBW measured in all parts of the product including mid thickness; and having a Yield Strength of 145ksi or more and UTS 160ksi or more, Elongation of 15% or more and Reduction of area 35% or more; having charpy V at -40 degrees F in the transverse direction equal or*

*greater than 20 ft. lbs (single value) and equal or greater than 25 ft. lbs (average of 3 specimens);*

*(d) Conforming to ASTM A578–S9 ultrasonic testing requirements with acceptance criteria 3.2 mm flat bottom hole; and*

*(e) Conforming to magnetic particle inspection in accordance with AMS 2301.*

## Tariff treatment

CTL plate is classifiable in the Harmonized Tariff Schedule of the United States ("HTS") under subheadings 7208.40.30, 7208.51.00, 7208.52.00, 7211.13.00, 7211.14.00, 7225.40.11, 7225.40.30, 7226.20.00, and 7226.91.50 and reported for statistical purposes under statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000.[33] CTL plate originating in Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Korea, South Africa, Taiwan, and Turkey comes into the U.S. market at a column 1-general duty rate of "Free."[34] Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection ("CBP").

Effective March 23, 2018, CTL plate was included in the enumeration of iron and steel articles that became subject to the additional 25 percent ad valorem duty under Section 232 of

[33] Subject merchandise may also come into the U.S. market under statistical reporting numbers 7208.40.6060, 7208.53.0000, 7208.90.0000, 7210.70.3000, 7210.90.9000, 7211.19.1500, 7211.19.2000, 7211.19.4500, 7211.19.6000, 7211.19.7590, 7211.90.0000, 7212.40.1000, 7212.40.5000, 7212.50.0000, 7214.10.0000, 7214.30.0010, 7214.30.0080, 7214.91.0015, 7214.91.0060, 7214.91.0090, 7225.11.0000, 7225.19.0000, 7225.40.5110, 7225.40.5130, 7225.40.5160, 7225.40.7000, 7225.99.0010, 7225.99.0090, 7226.11.1000, 7226.11.9060, 7226.19.1000, 7214.91.0016, 7214.91.0020, 7226.91.0500, 7226.91.1530, 7226.91.1560, 7226.91.2530, 7226.91.2560, 7226.91.7000, 7226.91.8000, and 7226.99.0180. HTS statistical reporting numbers 7225.40.5110, 7225.40.5160, 7226.91.1560, and 7226.91.2560 cover tool/high speed steel CTL plate, 7226.91.0500 covers chipper knife steel CTL plate, and 7225.40.5130, 7226.91.1530, and 7226.91.2530 cover ball bearing steel CTL plate.

HTS statistical reporting numbers 7214.91.0016 and 7214.91.0020 were established, and HTS statistical reporting number 7214.91.0015 was discontinued, effective July 1, 2017. HTSUS (2017) Revision 1, USITC Publication 4706, July 2017, Change Record, p. 4.

[34] HTSUS (2022) Revision 12, USITC Publication 5394, November 2022, pp. 72-14 – 72-19, 72-21, 72-40 – 72-42, 72-47.

the Trade Expansion Act of 1962, as amended.[35] [36] The President also issued subsequent Proclamations to exempt or adjust these duties for selected U.S. trade partners:

- Presidential Proclamation 9711, March 22, 2018 (83 FR 13361, March 28, 2018) exempted iron and steel articles originating in Argentina, Australia, Brazil, Canada, the European Union ("EU") member countries (including the United Kingdom), South Korea, and Mexico, effective March 23, 2018.
- Presidential Proclamation 9740, April 30, 2018 (83 FR 20683, May 7, 2018) continued the duty exemptions for Argentina, Australia, Brazil, but within annual absolute quotas on iron and steel articles originating in South Korea, effective June 1, 2018; and did not continue the duty exemptions on iron and steel articles originating in Canada, Mexico, and the EU member countries (including the United Kingdom), effective June 1, 2018.
- Presidential Proclamation 9759, May 31, 2018 (83 FR 25857, June 5, 2018) continued the duty exemptions but within annual absolute quotas on iron and steel articles originating in Argentina, Brazil, and South Korea, effective June 1, 2018.
- Presidential Proclamation 9772, August 10, 2018 (83 FR 40429, August 15, 2018) continued the duty exemptions on iron and steel articles originating in Australia; continued the duty exemptions within annual absolute quotas limits on iron and steel articles originating in Argentina, Brazil, and South Korea, effective June 1, 2018; but also doubled the duty rate to 50 percent ad valorem on such imported articles originating in Turkey, effective August 13, 2018.
- Presidential Proclamation 9886, May 16, 2019 (84 FR 23421, May 21, 2019) restored the original additional duty rate of 25 percent ad valorem on steel articles originating from Turkey, effective May 21, 2019.
- Presidential Proclamation 9894, May 19, 2019 (84 FR 23987, May 23, 2019) restored the duty exemptions on steel articles originating in Canada and Mexico, effective May 20, 2019.

[35] Section 232 of the Trade Expansion Act of 1962, as amended (19 U.S.C. §1862), authorizes the President, on advice of the Secretary of Commerce, to adjust the imports of an article and its derivatives that are being imported into the United States in such quantities or under such circumstances as to threaten to impair the national security. *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9705, March 8, 2018 (83 FR 11625, March 15, 2018). See also HTS heading 9903.80.01 and U.S. notes 16(a)–16(g) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. HTSUS (2022) Revision 12, USITC Publication 5394, November 2022, pp. 99-III-5 – 99-III-8, 99-III-266 – 99-III-267, 99-III-272 – 99-III-274, 99-III-280 – 99-III-281, 99-III-286.

[36] Appendix F presents U.S. imports subject to chapter 99 provisions.

- Presidential Proclamation 10328, December 27, 2021 (87 FR 11, January 3, 2022) provided duty exemptions within annual tariff rate quotas ("TRQs") on iron and steel articles originating in EU member countries, effective between January 1, 2022, and December 31, 2023.
- Presidential Proclamation 10356, March 31, 2022 (87 FR 19351, April 1, 2022) provided duty exemptions within annual TRQs on iron and steel articles originating in Japan, effective April 1, 2022.
- Presidential Proclamation 10403, May 27, 2022 (87 FR 33407, June 2, 2022) provided exemptions to section 232 duties on iron and steel articles originating in Ukraine, effective between June 1, 2022, and June 1, 2023.
- Presidential Proclamation 10406, May 31, 2022 (87 FR 33591, June 3, 2022) provided duty exemptions within annual TRQs on iron and steel articles originating in the United Kingdom, effective June 1, 2022.

At this time, U.S. imports of CTL plate originating in Australia, Canada, Mexico, and Ukraine are exempt from Section 232 steel duties or quotas. CTL plate originating in Argentina (none), Brazil (10,049 short tons), and South Korea (223,252 short tons)[37] is currently exempt from Section 232 duties within annual absolute quotas (quantities for 2022).[38] CTL plate

[37] The absolute quota applies to all South Korean CTL plate producers, including those not subject to these orders.

[38] Quota ID No. 9903.80.11: Plate in cut lengths. Other HTS subheadings for CTP plate of tool steel and high-speed steel are included with others in Quota ID No. 9903.80.56: Products of tool steel and other products. CBP, "Quota Bulletin No. QB 22-601 2022: First Quarter Absolute Quota for Steel Mill Articles of Argentina, Brazil and South Korea," May 22, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-601-2022-first-quarter-absolute-quota-steel-mill-articles-argentina-brazil-and-south for a full list of product groups as well as their specified quotas and HTS definitions. Quota ID numbers are used by CBP to track the pertinent imports and are cited in the Quota Bulletins. The ID numbers also match HTS subheadings that may be used for more than one country or purpose. Thus, Quota ID numbers included in this section should not be directly compared with the matching HTS subheadings.

Brazil's annual quota usage rates for HTS statistical reporting numbers containing CTL plate in 2021: Quota ID Nos. 9903.80.11: Plate in cut lengths (none of 9,116,198 kg filled) and 9903.80.56: Products of tool steel and other products (73.4 percent of 9,426,132 kg filled). South Korea's annual quota usage rates for HTS statistical reporting numbers containing CTL plate in 2021: Quota ID Nos. 9903.80.11: Plate in cut lengths (99.6 percent of 202,530,628 kg filled) and 9903.80.56: Products of tool steel and other products (100.0 percent of 849,004 kg filled). CBP, "QB 21-604 2021 Fourth Quarter Absolute Quota for Steel Mill Articles of Argentina, Brazil and South Korea," September 16, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-21-604-2021-fourth-quarter-absolute-quota-steel-mill-articles-argentina-brazil-and; CBP, "2021 Annual Usage By Quarter – Absolute Steel and Aluminum Report," April 7, 2022, https://www.cbp.gov/sites/default/files/assets/documents/2022-Apr/2021%20Steel%20Quarter%20Usage%20Report.pdf.

originating in the European Union ("EU") member countries Austria (5,828 short tons), Belgium (14,449 short tons), France (81,427 short tons), Germany (95,042 short tons), and Italy (24,769 short tons);[39] as well as in Japan (1,519 short tons)[40] and the United Kingdom (1,650 short tons)[41] is exempt from Section 232 duties within TRQs (quantities for 2022) but imports above the quotas are subject to the Section 232 duties. CTL plate originating in China, South Africa, Taiwan, and Turkey is subject to these additional 25 percent ad valorem duties.

CTL plate originating in China, classifiable under in-scope HTS subheadings 7208.40.30, 7208.40.60, 7208.51.00, 7208.52.00, 7208.53.00, 7208.90.00, 7210.70.30, 7210.90.90, 7211.13.00, 7211.14.00, 7211.19.15, 7211.19.20, 7211.19.45, 7211.19.60, 7211.19.75, 7211.90.00, 7212.40.10, 7212.40.50, 7212.50.00, 7214.30.00, 7214.91.00, 7225.11.00, 7225.19.00, 7225.40.30, 7225.40.51, 7225.40.70, 7225.99.00, 7226.11.90, 7226.19.10, 7226.19.90, 7226.20.00, 7226.91.05, 7226.91.15, 7226.91.25, 7226.91.50, 7226.91.70, 7226.91.80, and 7226.99.01, was included in the United States Trade Representative's ("Trade Representative's") fourth enumeration ("Tranche 4, List 1, Annex A") of products subject to an additional 7.5 percent ad valorem duty under Section 301 of the Trade Act of 1974, as amended, effective February 14, 2020 (85 FR 3741, January 22, 2020).[42]

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[39] Quota ID No. 9903.80.71: Plate in cut lengths. Other HTS subheadings for CTP plate of tool steel and high-speed steel are included with others in Quota ID No. 9903.81.17: Products of tool steel and other products. CBP, "Quota Bulletin No. QB 22-611 2022: First and Second Quarter Tariff Rate Quota TRQ Steel Mill Articles-European," April 29, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-611-2022-first-and-second-quarter-tariff-rate-quota-trq-steel-mill-articles-0; CBP, "EU Sec 232 Steel Tariff Rate Quota (TRQ) 2022 Q1 and Q2," April 29, 2022, https://www.cbp.gov/sites/default/files/assets/documents/2022-Jan/EU%20Steel%20TRQ%20Limit%20Table%202022_Q1_Q2R.pdf for a full list of product groups as well as their specified quotas and HTS definitions.

[40] Quota ID No. 9903.81.31: Plate in cut lengths. Other HTS subheadings for CTP plate of tool steel and high-speed steel are included with others in Quota ID No. 9903.81.76: Products of tool steel and other products. CBP "Quota Bulletin No. QB 22-622 2022: Tariff Rate Quota TRQ Steel Articles Japan," October 5, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-622-2022-tariff-rate-quota-trq-steel-articles-japan.

[41] Quota ID No. 9903.81.31: Plate in cut lengths. Other HTS subheadings for CTP plate of tool steel and high-speed steel are included with others in Quota ID No. 9903.81.76: Products of tool steel and other products. CBP "Quota Bulletin No. QB 22-622a 2022: Tariff Rate Quota TRQ Steel Articles United Kingdom," June 6, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-622a-2022.

[42] The Trade Representative imposed tariffs under section 301 of the Trade Act of 1974, as amended (19 U.S.C. §2411), after determining that certain acts, policies, and practices of China are unreasonable or discriminatory and burden or restrict U.S commerce. 82 FR 40213, August 24, 2017; 83 FR 14906, April 6, 2018. CTL plate was included in the Trade Representative's fourth enumeration ("Tranche 4, List 1, Annex A") of goods produced in China that are subject to additional Section 301 duties.

(*continued*...)

CTL plate originating in China, classifiable under in-scope HTS subheading 7214.10.00 was included in USTR's fourth enumeration ("Tranche 4, List 2, Annex C") of products subject to an additional 10 percent ad valorem Section 301 duty, effective December 15, 2019 (84 FR 43304, August 20, 2019), which were subsequently suspended while retaining the same effective date (84 FR 69447, December 18, 2019).[43]

Tables I-27 and I-28 summarize the current Section 232 steel duties, quotas, and limits for the subject trade partners and Section 301 duties for China, respectively.

The Tranche 4, List 1 duty rate was 10 percent, effective September 1, 2019 (84 FR 43304, August 20, 2019). However, the rate was raised to 15 percent ad valorem, with the same effective date of September 1, 2019 (84 FR 45821, August 30, 2019), and was more recently reduced to 7.5 percent ad valorem, effective February 14, 2020 (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. HTSUS (2022) Revision 12, USITC Publication 5394, November 2022, pp. 99-III-86 – 99-III-87, 99-III-96 – 99-III-97, 99-III-296, 99-III-298 – 99-III-301.

[43] Tranche 4, List 2 tariffs with a rate of 10 percent ad valorem duties, was effective December 15, 2019 (84 FR 43304, August 20, 2019). However, the duty was increased to 15 percent ad valorem with the same effective date (84 FR 45821, August 30, 2019), but was subsequently suspended while retaining the same effective date (84 FR 69447, December 18, 2019). See also HTS heading 9903.88.16 and U.S. notes 20(t) and 20(u) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. HTSUS (2022) Revision 12, USITC Publication 5394, November 2022, pp. 99-III-100 – 99-III-102, 99-III-104 – 99-III-105, 99-III-296.

**Table I-27**
**CTL plate: Section 232 steel tariff actions**

| Subject trade partner | Tariff or quota action | Additional considerations |
|---|---|---|
| Austria | Annual TRQs | The annual TRQ for imports of CTL plate imports originating in the Austria is 5,828 short tons. |
| Belgium | Annual TRQs | The annual TRQ for imports of CTL plate imports originating in the Belgium is 14,449 short tons. |
| Brazil | Annual absolute quotas | The annual absolute quota for CTL plate imports originating in Brazil is 10,049 short tons. |
| China | 25 percent ad valorem | China's ad valorem rate is 25 percent. |
| France | Annual TRQs | The annual TRQ for imports of CTL plate originating in the France is 81,427 short tons. |
| Germany | Annual TRQs | The annual TRQ for imports of CTL plate originating in the Germany is 95,042 short tons. |
| Italy | Annual TRQs | The annual TRQ for imports of CTL plate originating in the Italy is 24,769 short tons. |
| Japan | Annual TRQs | The annual TRQ for imports of CTL plate originating in Japan is 1,519 short tons. |
| South Africa | 25 percent ad valorem | South Africa's ad valorem rate is 25 percent. |
| South Korea | Annual absolute quotas | The annual absolute quota for imports of CTL plate originating in South Korea is 223,252 short tons. |
| Taiwan | 25 percent ad valorem | Taiwan's ad valorem rate is 25 percent. |
| Turkey | 25 percent ad valorem | Turkey's ad valorem rate was increased to 50 percent in August 2018, but subsequently reduced back to 25 percent in May 2019. |

Source: 87 FR 11, January 3, 2022; 83 FR 25857, June 5, 2018; 83 FR 11625, March 15, 2018; 87 FR 19351, April 1, 2022; 83 FR 20683, May 7, 2018; 83 FR 20683, May 7, 2018; 87 FR 19351, April 1, 2022; 83 FR 40429, August 15, 2018; 84 FR 23421, May 21, 2019; CBP, "Quota Bulletin No. QB 22-601 2022: First Quarter Absolute Quota for Steel Mill Articles of Argentina, Brazil and South Korea," May 22, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-601-2022-first-quarter-absolute-quota-steel-mill-articles-argentina-brazil-and-south; CBP, "Quota Bulletin No. QB 22-611 2022: First and Second Quarter Tariff Rate Quota TRQ Steel Mill Articles-European," April 29, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-611-2022-first-and-second-quarter-tariff-rate-quota-trq-steel-mill-articles-0; CBP, "EU Sec 232 Steel Tariff Rate Quota (TRQ) 2022 Q1 and Q2," April 29, 2022, https://www.cbp.gov/sites/default/files/assets/documents/2022-Jan/EU%20Steel%20TRQ%20Limit%20Table%202022_Q1_Q2R.pdf; CBP, "Quota Bulletin No. QB 22-622 2022: Tariff Rate Quota TRQ Steel Articles Japan," October 5, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-622-2022-tariff-rate-quota-trq-steel-articles-japan.

**Table I-28**
**CTL plate: Section 301 China tariff actions**

| Subject trade partner | Tariff or quota action | Additional considerations |
|---|---|---|
| China | 7.5 percent ad valorem | China's ad valorem rate, initially 10 percent in September 2019, was increased to 15 percent in September 2019; but, subsequently reduced to 7.5 percent in February 2020. |

Source: 84 FR 43304, August 20, 2019; 84 FR 45821, August 30, 2019; 85 FR 3741, January 22, 2020.

Under Section 232 of the Trade Expansion Act of 1962, as amended, the President authorized the Secretary of Commerce, in consultation with other appropriate federal agency heads, to provide relief from the additional duties for any steel articles determined "…not to be produced in the United States in a sufficient and reasonably available amount or of a satisfactory quality and is also authorized to provide such relief based upon specific national security considerations. Such relief shall be provided for any article only after a request for exclusion is made by a directly affected party located in the United States."[44] Commerce reviews all exclusion requests and any objections, rebuttals, and sur-rebuttals to the requests and determines whether the items are warranting an exclusion based on the above criteria.[45]

If an organization manufactures steel articles in the United States and seeks to object to an existing exclusion request, it has 30 days from the posting of an exclusion request to submit such an objection. Any individual or organization in the United States may file an objection to an exclusion request.[46]

If objections are submitted during the 30-day comment period, Commerce reviews each objection for conformance with the submission requirements. If the objection meets the requirements, it will be posted. Once an objection is posted, the Commerce will re-open the exclusion request for a rebuttal period of 7 calendar days.

On December 14, 2020, Commerce published an interim final rule (the "December 14 rule") that revised aspects of the process for requesting exclusions from the duties and quantitative limitations on imports of steel and aluminum articles provided in three previous Commerce interim final rules implementing the exclusion process authorized by the President under Section 232, as well as a May 26, 2020, notice of inquiry. The December 14 rule included adding 123 General Approved Exclusions (GAEs) to the regulations.[47] GAEs may be used by any

[44] 83 FR 45025, September 4, 2018.

[45] Commerce, "Section 232 National Security Investigation of Steel Imports Information on the Exclusion Process," December 2, 2022, https://www.bis.doc.gov/index.php/232-steel.

[46] For an objection filing to be considered, organizations must provide factual information on 1) the steel articles that they manufacture in the United States, 2) the production capabilities at steel manufacturing facilities that they operate in the United States, and 3) the availability and delivery time of the products that they manufacture relative to the specific steel article that is subject to an exclusion request. Commerce, "Section 232 National Security Investigation of Steel Imports Information on the Exclusion Process," December 2, 2022, https://www.bis.doc.gov/index.php/232-steel.

[47] GAEs address a long-standing request from public comments of exclusion requesters to create a more efficient process to approve certain exclusions for use by all importers where Commerce has determined that no objections will be received and where it is warranted to approve an exclusion for all importers to use. Determinations for what steel or aluminum articles warrant being included in a GAE were made by Commerce, in consultation with other Federal agencies. The public was not involved in

(*continued*...)

importer and are indefinite in length. CTL plate is not eligible for exclusions based on this rule, as it is reported or comes into the United States under HTS statistical reporting numbers that are not included among those of the GAEs.[48]

Exclusions are not generally applicable to all imports under each HTS or to imports from all countries. Therefore, each exclusion may not cover imports of subject merchandise and/or may only cover a portion of imports of subject merchandise. Each granted exclusion is specific to certain criteria listed below:[49]

1) **A granted exclusion is only applicant-specific** (i.e., can only be used by the applicant who must be a "directly affected individuals or organizations located in the United States" which is generally an importer of record but may also be an end-user);
2) **is supplier-specific**; or
3) **is product-specific** (not only must a single 10-digit HTS statistical reporting number, be listed, including its specific dimension, but a full description of the properties of the steel product it seeks to import, including chemical composition, dimensions, strength, toughness, ductility, magnetic permeability, surface finish, coatings, and other relevant data);
4) **is country(ies) of origin-specific** (can only cover imports from specific country(ies) listed in a request);
5) **is limited by the volume listed in the request** (an applicant must certify that the exclusion "amount requested in a given year is in line with what the organization expects to import based on its current business outlook"); and **is limited to one year** (applicants must re-apply to use the exclusion after a year).

An exclusion will be granted if the article is not produced in the United States: (1) in sufficient and reasonably available amount, (2) satisfactory quality, or (3) there is a specific national security consideration warranting an exclusion. Applicants must list one of these as a reason for the request and must certify that the reason for the request is correct and accurate to the best of their knowledge.

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requesting new or revised GAEs, but Commerce uses the information provided in exclusion requests to inform its review process for what additional GAE should be added or what revisions should be made to existing GAEs. 86 FR 70003, December 9, 2021.

[48] 86 FR 70003, December 9, 2021.

[49] Commerce, "Section 232 National Security Investigation of Steel Imports Information on the Exclusion Process," December 2, 2022, https://www.bis.doc.gov/index.php/232-steel; 83 FR 12106, March 19, 2018; Commerce, "Section 232 Frequently Asked Questions (FAQs)," v. 1.01, June 19, 2019, pp. 11–12, https://www.bis.doc.gov/index.php/documents/section-232-investigations/2409-section-232-faq/file.

Excluded steel articles, including CTL plate, do not count toward filling the TRQs for the EU member countries, effective January 1, 2022.[50] Conversely, these "quota exclusion entries" do count toward filling the absolute quotas for Argentina, Brazil, and South Korea, effective August 30, 2018;[51] and the TRQs for Japan, effective April 1, 2022;[52] and the TRQs for the United Kingdom, effective June 1, 2022;[53] Exclusion quantities are counted against the quarterly quota in place at the time of entry and count towards the annual quota. However, they are excluded from the tariff once the quarterly and annual quotas are filled. CBP tracks and reports exclusion quarterly or annual "exclusion quota overflow" quantities.[54]

[50] 87 FR 11, January 3, 2022; CBP, "Quota Bulletin No. QB 22-611 2022: First and Second Quarter Tariff Rate Quota TRQ Steel Mill Articles-European," April 29, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-611-2022-first-and-second-quarter-tariff-rate-quota-trq-steel-mill-articles-0

[51] 83 FR 45025, September 4, 2018.

[52] 87 FR 19351, April 1, 20228.

[53] 87 FR 33591, June 3, 2022.

[54] Exclusion quota overflow quantities are designated with the "ALXC" suffix in the CBC quota fill reports for Argentina, Brazil, and South Korea; and with the "STXC" suffix for the reports for Japan and Korea. CBP, "Quota Bulletin No. QB 22-601 2022: First Quarter Absolute Quota for Steel Mill Articles of Argentina, Brazil and South Korea," May 22, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-601-2022-first-quarter-absolute-quota-steel-mill-articles-argentina-brazil-and-south; CBP, "Quota Bulletin No. QB 22-622 2022," October 5, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-622-2022-tariff-rate-quota-trq-steel-articles-japan; CBP "Quota Bulletin No. QB 22-622a 2022: Tariff Rate Quota TRQ Steel Articles United Kingdom," June 6, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-622a-2022.

In 2021, South Korea's annual quota usage rates for HTS statistical reporting numbers containing CTL plate in 2021: Quota ID No. 9903.80.56: Products of tool steel and other products recorded 100.0 percent of the 849,004 kg absolute quota filled, along with exclusion quota overflow (ALXC) of 4,077,830 kg. CBP, "QB 21-604 2021 Fourth Quarter Absolute Quota for Steel Mill Articles of Argentina, Brazil and South Korea," September 16, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-21-604-2021-fourth-quarter-absolute-quota-steel-mill-articles-argentina-brazil-and; CBP, "2021 Annual Usage By Quarter – Absolute Steel and Aluminum Report," April 7, 2022, https://www.cbp.gov/sites/default/files/assets/documents/2022-Apr/2021%20Steel%20Quarter%20Usage%20Report.pdf.

# The product

## Description and applications[55]

CTL plate is a flat-rolled or press-forged carbon or alloy steel product that is 4.75 millimeters (0.1870 or $^{3}/_{16}$ inch) or more in thickness. Although there is no upper limit on the thickness of CTL plate within the product scope, the great majority of CTL plate produced in the United States is two inches or less in thickness. CTL plate is available in a variety of widths, thicknesses, and shapes, being incorporated into other products or further processed into products. The term "cut-to-length" refers to a flat plate product with a defined length.

Most CTL plate is used in load-bearing and structural applications, such as agricultural and construction equipment (e.g., cranes, bulldozers, scrapers, and other tracked or self-propelled machinery); bridges; machine parts (e.g., the body of the machine or its frame); electricity transmission towers and light poles; buildings (especially nonresidential); and heavy transportation equipment, such as railway rolling stock (especially tank cars) and ships. Production of tanks, sills, floors, offshore drilling rigs, pipes and tubes, petrochemical plant and machinery, utility applications (such as wind turbine towers), pressure vessels, and various other fabricated pieces also use plate.

The product scope also includes wide flat steel bars at least 150 mm (5.9 inches) in width. Wide flat bar is a hot-rolled product of various lengths and widths, usually starting at 3.175 mm (0.125 or $^{1}/_{8}$ inch) in thickness although only bar at least 4.75 millimeters (0.187 or $^{3}/_{16}$ inch) in thickness is within the product scope. It is often used in structural and transportation applications, such as for bridges and trailers.

[55] Unless otherwise noted, this information is based on Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey, Investigation Nos. 701-TA-560–561 and 731-TA-1317–1328 (Final), USITC Publication 4664, January 2017 ("Original publication"), pp. I-30 – I-31.

In addition, there are certain low-volume types of CTL plate with specific applications noted in table I-29.

**Table I-29**
**CTL plate: Selected types and applications**

| Item | Description | Typical applications |
|---|---|---|
| Tool steel plate | Alloy steels that typically have higher carbon levels than standard carbon-quality steels, as well as alloying elements which increase steel hardness but makes it more susceptible to cracking (i.e., more brittle). Tool steels are generally heat treated to reduce their brittleness, and to impart desired characteristics. These steels have one or more of the following qualities; increased hardness, wear-resistance, or resistance to softening at elevated temperature. | Cutting tools for machining or cutting metals and for metal-casting or forging dies. |
| High-speed steel plate (or "high-speed tool steels") | Alloy steel that resists softening and maintain a sharp cutting edge at high service temperatures. These steels contain relatively high levels of tungsten or molybdenum and are used for steady, high-load conditions rather than shock loads. | Cutting tools such as drills, milling tools, etc. |
| Mold steel plate | Alloy steel with primary alloying elements of chromium, nickel, aluminum, and molybdenum, depending upon the type of mold steel. | Plastic-molding and zinc die-casting dies. |
| X-70 plate | Carbon steel with low levels of titanium that may also contain low levels of niobium and vanadium. | Pipe suitable for conveying gas, water, and oil in the oil and natural-gas industries. |

Sources: Original publication, p. I-30; Alro Steel, "Tool Steel," accessed January 21, 2022. https://www.alro.com/divsteel/metals_comp.aspx?comp=TS&n=TOOL%20STEEL; All Metals & Forge Group, "Tool Steel," accessed January 21, 2022. https://steelforge.com/tool-steel-ferrous-materials/; Machining Cloud, "Introduction to Milling Tools and their Application," 2016. https://www.machiningcloud.com/wp-content/uploads/2016/05/MachiningCloud_MillingToolsAndTheirApplication.pdf

## Manufacturing processes[56]

Hot-rolled nonalloy and alloy steel products such as CTL plate typically progress through three stages of production: (1) melting and refining steel; (2) casting steel into semi-finished forms; and (3) hot processing semi-finished forms into hot-rolled, flat-rolled steel mill products.

### Melting stage

Steel is produced from either the integrated or nonintegrated process. In the integrated process, a blast furnace smelts iron ore with coke to produce molten iron. The molten iron is poured into a steelmaking furnace, generally a basic oxygen furnace, together with a small amount of ferrous scrap. Oxygen blown into the furnace converts the molten iron into steel. In the nonintegrated process, an electric-arc furnace ("EAF") melts ferrous scrap and primary iron products (such as pig iron or direct-reduced iron) to produce molten steel. Tool steel is typically produced by EAF furnaces.

Whether produced by either the integrated or nonintegrated process, molten steel is poured or "tapped" from the furnace into a ladle to be transported to casting. It is common for steelmakers to utilize a secondary steelmaking stage (a ladle metallurgy station) to further refine the product into extra-clean or low-carbon steels satisfying stringent surface or internal requirements or micro cleanliness quality and mechanical properties before casting. Steelmakers may adjust the chemical content by adding alloying elements, lowering the carbon content (decarburization), or adjusting the temperature of the molten steel for optimum casting. Thus, the melt stage establishes the essential physical properties of the steel.

Some plate mills, such as EVRAZ North America ("Evraz") Inc. and JSW Steel USA Inc., do not produce their own steel. Instead, they roll plate from purchased slabs.[57] The production process for these mills does not include the melting and casting stages but begins at the rolling stage described later in this section.

### Casting stage

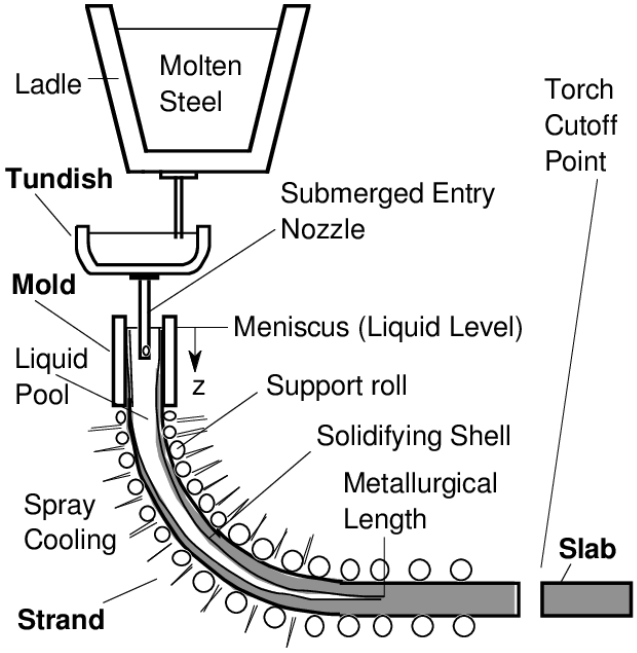
The subsequent casting stage immediately follows the melting stage, to cast the molten steel into a semi-finished form suitable for the rolling process. The molten steel is poured into a mold, which is then cooled and hardened into a solid form. The two principal methods are:

[56] Unless otherwise noted, this information is based on Original publication, pp. I-32 – I-38.

[57] Evraz, "Rolling Mill," http://www.evrazna.com/LocationsFacilities/OregonSteel/RollingMill/tabid/155/Default.asp; JSW Steel USA "Plate Division," https://www.jswsteel.us/baytown/about-us/#abt-plate-division, accessed January 21, 2022.

continuous slab casting[58] and ingot casting. Continuous slab casting (figure I-2) is the more common, preferred, and lower cost method to produce plates up to approximately four inches in thickness. Ingot casting (figure I-3) is used to produce thicker plates, because the continuous cast process cannot produce slabs of sufficient thickness. Ingot casting is also used for tool steel CTL plate production.

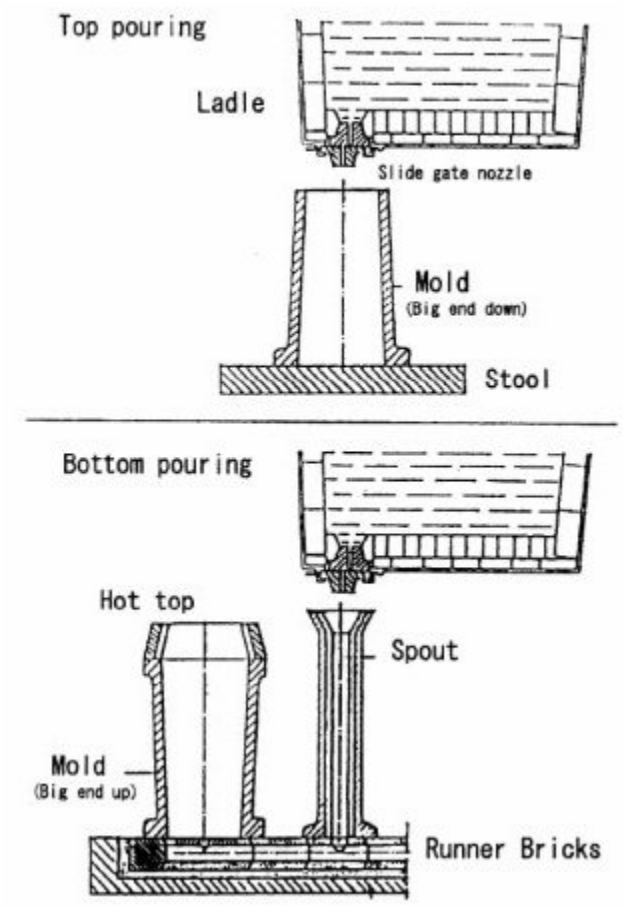
**Figure I-2**
**Continuous slab casting process**




Source: Thomas, Brian G., Figure 1: Schematic of steel continuous casting process, "Continuous Casting of Steel," *Modeling for Casting and Solidification Processing*, New York: Marcel Decker, 2001, p. 39, http://ccc.illinois.edu/PDF%20Files/Publications/01_Yu_Chap_15_final.pdf, retrieved October 7, 2022.

[58] Wide flat bar production uses billets as the form suitable for the rolling process. Billets can range from two to seven inches.

**Figure I-3**
**Top and bottom pouring ingot casting**



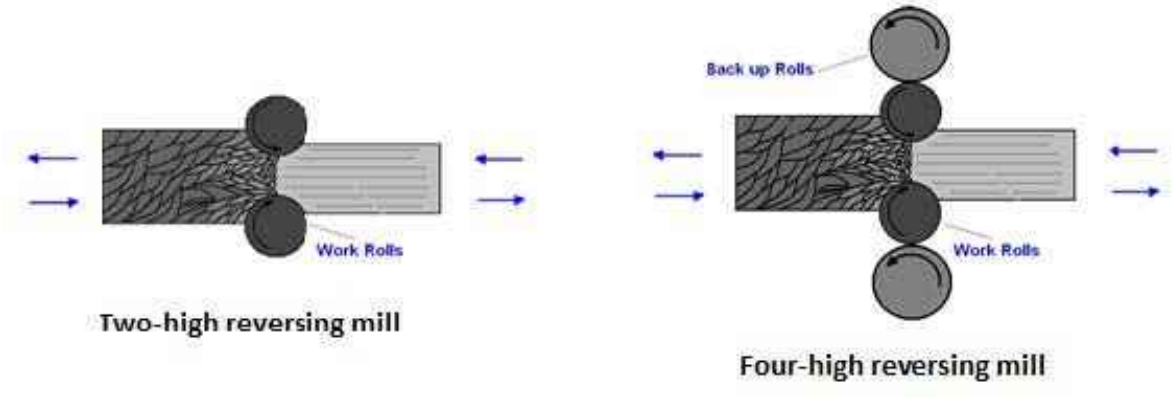

Source: Steel Data, "Non-Metallic Inclusions in Steel: Top pouring and bottom pouring for conventional ingot casting," http://www.steeldata.info/inclusions/demo/help/ingot.html, retrieved January 24, 2022.

**Hot-processing stage**

Most CTL plate is hot-rolled on a reversing plate mill (also called a "sheared plate mill") consisting of one or two reversing hot-rolling mill stands and associated equipment. If there are two stands, the first is the roughing mill and the second is the finishing mill. The roughing mill is equipped with special tables in front of and behind the mill to rotate the plate one-quarter turn between rolling passes for cross rolling to increase the width rather than the length of the plate as the thickness reduces. After reaching the desired finished width, the plate is again rotated one-quarter turn and rolled straightaway to the finished thickness. Reversing mills for plate production are typically either two or four parallel rolls high (figure I-4). The rolls in contact with the plate are work rolls. Thicker plate requires backup rolls parallel to the work rolls, to

provide rigidity to the work rolls, as shown on the four-high rolling mill. Reversing mills in the United States generally produce plate ranging from 0.187 to 20 inches (4.75 to 508 mm) in thickness and from 48 to 154 inches (1,219 to 3,912 mm) in width.

**Figure I-4**
**Two-high and four-high reversing mills**

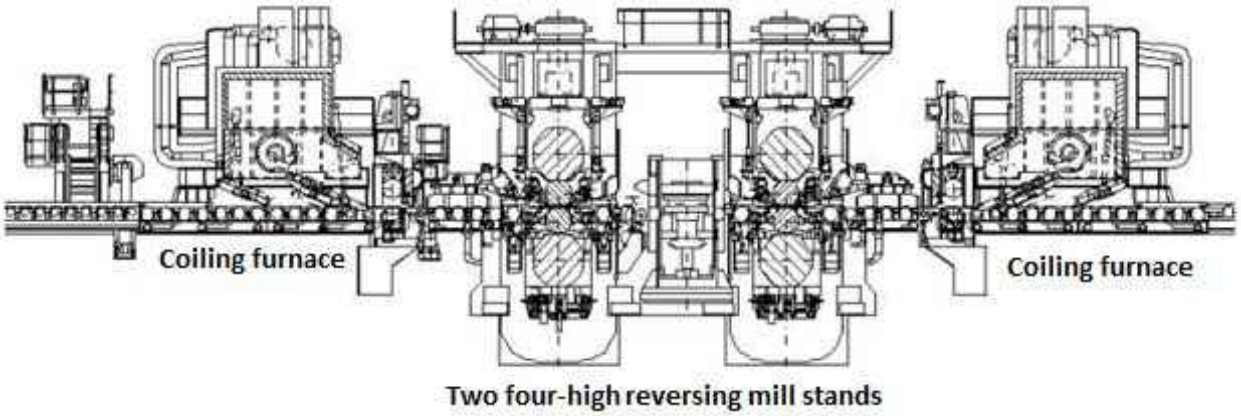



Source: *Mechanical Engineering*, "Types of Rolling Mills," http://engineeringhut.blogspot.com/2010/10/types-of-rolling-mills.html, retrieved January 24, 2022.

Some reversing plate mills (known as "Steckel mills") are equipped with coilers on each side of the finishing mill that operate inside small heating furnaces, keeping the steel hot and allowing the production of much longer or thinner plates (figure I-5).[59] If the coilers are not used, then the mill operates like a conventional reversing plate mill. Steckel mills are equipped with coilers at the end of the line to produce coiled plate as well as in-line shearing facilities. The hot-rolled coils produced by the Steckel mill can be moved to a separate line to be uncoiled, flattened, and cut to length as plate. Plate produced in a Steckel mill typically ranges from 0.187 to 0.750 inches (4.75 to 19.1 mm) in thickness and 48 to 96 inches (1,219 to 2,438 mm) in width, although some mills can produce even wider plate.

[59] China Advanced Steel Technologies and Engineering, "Steckel Mill Consulting," 2016. http://www.castellc.com/Steckel-Mill-Consulting.html, retrieved January 24, 2022.

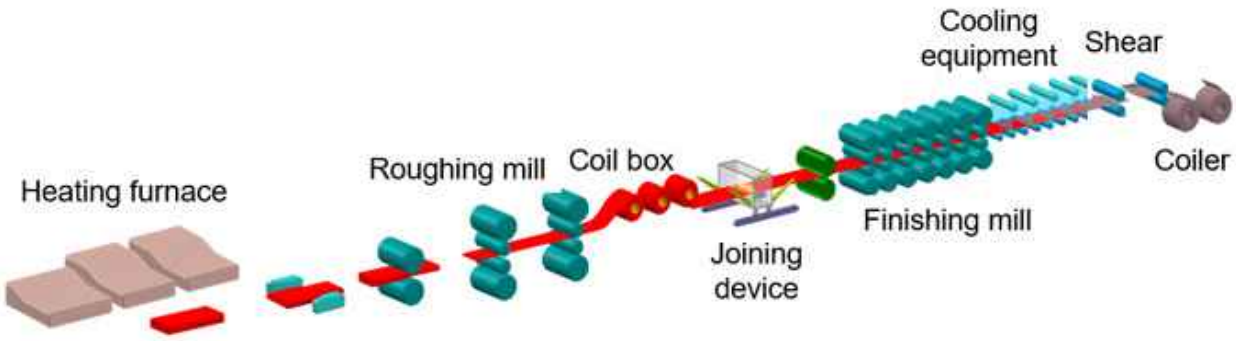
**Figure I-5**
**Steckel mill**




Source: China Advanced Steel Technologies and Engineering, "Steckel Mill Consulting," 2016, http://www.castellc.com/Steckel-Mill-Consulting.html, retrieved January 24, 2022.

In addition to reversing plate mills, a continuous hot-strip mill can roll plate (figure I-6). Such a mill has either a reversing rougher or a number (usually four or five) of non-reversing roughing mills followed by a finishing section consisting of a series of mill stands, usually six, spaced close together so that a plate is rolled continuously in a single pass in one direction. The finished plate is coiled, discharged from the mill, allowed to cool, then uncoiled, flattened, and cut to length on a separate processing line. Continuous hot-strip mills primarily produce hot-rolled sheet, although they may also produce plate up to one inch in thickness.

**Figure I-6**
**Continuous hot-strip mill**




Source: JFE Steel Corp., "JFE Steel Develops Hot-continuous Rolling Process for HITEN," May 6, 2021, https://www.jfe-steel.co.jp/en/release/2021/210506.html, retrieved January 24, 2022.

**Key differences in the various rolling methods**

Because of its capability to cross roll, a reversing mill is somewhat flexible with regard to the slab width used to produce a given plate width. Steckel mills and continuous hot-strip mills can only use slabs that are slightly wider than the desired width of the final plate. However, they have the advantage of being able to roll longer, heavier slabs than can be rolled on a reversing plate mill. Plate from a reversing mill is preferred for welded load-bearing and structural applications because of its generally thicker dimensions. End users concerned about "coil set memory" (e.g., users that cut parts from plate) may prefer plate from a reversing mill because the edges of plate cut from coils from hot-strip and Steckel mills may curl on heating.

Plate producers may have several types of mills at a single steel facility. In such facilities, the reversing plate mill is usually separated from the hot-strip mill and the Steckel mill and employs different production workers.

Wide flat bar is produced by rolling a billet through a series of bar mills which roll the material both horizontally and vertically, until the final dimensions are achieved.

Tool steel CTL plate is often press forged because its high strength and low ductility can make it difficult to roll, especially if the tool steel is of a grade that contains high levels of alloying elements. The tool steel can be press forged to its final shape or it can be press forged and then rolled to its final shape (the initial forging makes the steel easier to roll). Tool steel can also be rolled on a rolling mill without initially being press forged, especially if the steel is of a type with relatively low levels of alloying elements.

**Patterns in relief**

Most CTL plate is smooth on both sides, and by definition the product scope excludes plate with "patterns in relief" if produced on a universal mill.[60] "Patterns in relief," a non-skid pattern of raised figures at regular intervals on one surface of the plate, are typically found on floor plate. However, mills other than universal mills are able to produce floor plate with patterns in relief. A continuous hot-strip mill makes floor plate by placing an embossed roll in the final stand of the continuous mill, while a Steckel mill makes floor plate by holding the hot plate on one of the Steckel furnaces at the mill after completing all but the final rolling pass. Then one roll is exchanged for an embossed roll, and the final rolling pass is completed.

[60] A universal mill is a mill capable of simultaneously rolling between both horizontal and vertical rolls. Universal mill plate is defined in HTSUS Chapter 72 Additional U.S. Note 1(b) as follows: Flat-rolled products rolled on four faces or in a closed box pass, of a width exceeding 150 mm but not exceeding 1,250 mm and of thickness of not less than 4 mm, not in coils and without patterns in relief. HTSUS (2022) Revision 10, USITC Publication 5373, September 2022, pp. 72-5.

**Heat treatment**

After the CTL plate is rolled or pressed, it can be heat treated, by subjecting it to a series of temperature changes to increase its hardness, strength, or ductility, thereby allowing the plate to be suitable for additional applications.[61] The amount of time being held at the various temperatures and the rates of cooling can vary depending upon the desired characteristics for the plate. Some examples of heat treatments are normalizing, quenching, and quench and temper. Normalizing involves heating the steel to about 1,670 degrees Fahrenheit followed by slow cooling, such as exposure to air. This process increases the toughness of steel for applications requiring pressure-vessel quality. Quenching involves heating the steel to the required temperature, holding at that temperature for the necessary time to produce the desired steel qualities, and then immediate cooling of the steel. Quench and temper includes heating of the steel to the required temperature, rapid cooling, and reheating (commonly to 400–1,300 degrees) before cooling again, which makes the steel tougher and more ductile.[62]

**CTL plate manufacturing specifications**

CTL plate is produced to meet a variety of manufacturing standards. In the United States, common manufacturing standards are developed by the ASTM International. ASTM standards are voluntary and cover many different factors such as dimensions, chemistry, manufacturing process, testing procedures, etc. Customers and producers can agree to use a recognized manufacturing specification such as an ASTM specification "as is," a specification with certain adjustments, or their own proprietary specifications.

**Service centers**

Steel service centers traditionally serve as distributors of plate and typically do not operate their own plate mills. Some service centers also perform a wide range of value-added processing of many steel products, such as uncoiling, flattening, and cutting plate products to length or flame/plasma cutting plate into non-rectangular shapes. Service centers that process coiled plate into cut lengths or non-rectangular shapes may utilize coiled plate from domestic mills, foreign mills, or both.

[61] Standard commodity-grade CTL plate is not typically heat treated while alloy steel CTL plate is frequently heat treated.

[62] Heat treating information is sourced from Arcelor Mittal, Guidelines for Fabricating and Processing Plate Steel, April 2015.

## Domestic like product issues

In its original determinations, the Commission defined a single domestic like product consisting of all CTL plate coextensive with Commerce's scope and it defined the domestic industry as all U.S. producers of CTL plate, including steel service center processors.[63] In its notice of institution in these current five-year reviews, the Commission solicited comments from interested parties regarding the appropriate domestic like product and domestic industry.[64] No party requested that the Commission collect data concerning other possible domestic like products in their comments on the Commission's draft questionnaires. Domestic interested party Cleveland Cliffs and respondent interested party POSCO noted in their prehearing briefs the Commission should again define the domestic like product to consist of domestically produced CTL plate, as defined in the scope.[65]

## U.S. market participants

### U.S. producers

During the original investigations, 21 firms (i.e., nine mills and 12 processors) supplied the Commission with information on their U.S. operations with respect to CTL plate. These firms accounted for a substantial majority of U.S. production of CTL plate in 2015.[66] In these current proceedings, the Commission issued U.S. producers' questionnaires to 37 firms, 6 of which provided the Commission with information on their CTL plate operations. These firms (mills) are believed to have accounted for approximately 84 percent of U.S. production of CTL plate in 2021. Presented in table I-30 is a list of current domestic producers of CTL plate and each company's position on continuation of the orders, production locations(s), related and/or affiliated firms, and share of reported production of CTL plate in 2021.

[63] Original publication, pp. 13-21.

[64] 86 FR 68269, December 1, 2021.

[65] Cleveland Cliffs' prehearing brief, p. 11. POSCO's prehearing brief, p. 3.

[66] Original publication, p. III-1. The 21 U.S. producers that supplied the Commission with usable questionnaire information during the original investigations were: ***.

**Table I-30**
**CTL plate: U.S. producers, their position on the order(s), location of production, and share of reported production in 2021, by firm**

Share in percent

| Firm | Position on orders | Production location(s) | Share of production |
|---|---|---|---|
| A. Finkl & Sons | *** | Chicago, IL | *** |
| Cleveland-Cliffs | *** | Burns Harbor, IN<br>Coatesville, PA<br>Conshohocken, PA<br>Newton, NC<br>Steelton, PA | *** |
| EVRAZ | *** | Portland, OR | *** |
| Gerdau | *** | Cartersville, GA<br>Jackson, TN<br>Calvery City, KY | *** |
| Nucor | *** | Cofield, NC<br>Tuscaloosa, AL<br>Longview, TX | *** |
| SSAB Enterprises | *** | Axis, AL<br>Muscatine IA<br>Roseville MN<br>Houston TX | *** |
| All firms | Various | Various | 100.0 |

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

As indicated in table I-31, one U.S. producer (***) is related to a foreign producer of the subject merchandise. No responding U.S. producers are related to U.S. importers of the subject merchandise, directly import the subject merchandise, or purchase the subject merchandise from U.S. importers.

**Table I-31**
**CTL plate: U.S. producers' ownership, related and/or affiliated firms**

| Reporting firm | Relationship type and related firm | Details of relationship |
|---|---|---|
| *** | *** | *** |
| *** | *** | *** |
| *** | *** | *** |
| *** | *** | *** |
| *** | *** | *** |
| *** | *** | *** |
| *** | *** | *** |
| *** | *** | *** |
| *** | *** | *** |
| *** | *** | *** |
| *** | *** | *** |
| *** | *** | *** |
| *** | *** | *** |

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

## U.S. importers

In the original investigations, 93 U.S. importing firms supplied the Commission with usable information on their operations involving the importation of CTL plate, accounting for *** of U.S. imports of CTL plate from subject sources combined and approximately *** of nonsubject sources combined during 2015.[67]

In the current proceedings, the Commission issued U.S. importers' questionnaires to 299 firms believed to be importers of CTL plate, as well as to all U.S. producers of CTL plate. Usable questionnaire responses were received from 48 firms, representing 65.2 percent of total U.S. imports during 2021 and 92.7 percent of total subject imports during 2021. Table I-32 lists all responding U.S. importers of CTL plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey and other sources, their locations, and their shares of U.S. imports in 2021.

[67] Original confidential report, p. IV-1

**Table I-32**
**CTL plate: U.S. importers, their headquarters, and share of total imports within a given source in 2021, by firm**

Share in percent

| Firm | Headquarters | Subject sources | Nonsubject sources | All import sources |
|---|---|---|---|---|
| Ahmsa International | San Antonio, TX | *** | *** | *** |
| Algoma Steel | Wilmington, DE | *** | *** | *** |
| Berg Pipe | Panama City, FL | *** | *** | *** |
| Bestar | Atlanta, GA | *** | *** | *** |
| Bourgault | St. Brieux, SK | *** | *** | *** |
| Cotia | New York, NY | *** | *** | *** |
| CPW America | Houston, TX | *** | *** | *** |
| Dillinger America | Rochester Hills, MI | *** | *** | *** |
| Drill Rod & Tool | Franklin Park, IL | *** | *** | *** |
| Dura-Bond Pipe | Steelton, PA | *** | *** | *** |
| EDRO Specialty | Ellwood City, PA | *** | *** | *** |
| EVRAZ | Chicago, IL | *** | *** | *** |
| GHM America | Duluth, GA | *** | *** | *** |
| GS Global | Cerritos, CA | *** | *** | *** |
| Hitachi Metals America | Purchase, NY | *** | *** | *** |
| Hyundai (LA Office) | Torrance, CA | *** | *** | *** |
| Industeel Belgium | Charleroi, | *** | *** | *** |
| Industeel France | Saint-Denis, | *** | *** | *** |
| JFE Shoji America | Long Beach, CA | *** | *** | *** |
| Kanematsu | Schaumburg, IL | *** | *** | *** |
| Kiewit | Ingleside, TX | *** | *** | *** |
| Macsteel International | White Plains, NY | *** | *** | *** |
| Metal One America | Rosemont, IL | *** | *** | *** |
| Miller Fabrication | Brookville, PA | *** | *** | *** |
| MX Industrial | City Of Industry, CA | *** | *** | *** |
| NLMK North America Plate | Moon Township, PA | *** | *** | *** |
| NobelClad | Broomfield, CO | *** | *** | *** |
| Okaya (USA) | Arlington Heights, IL | *** | *** | *** |
| Olbert Metal | Mississauga, ON | *** | *** | *** |

Table continued.

**Table I-32 Continued**
**CTL plate: U.S. importers, their headquarters, and share of total imports within a given source in 2021, by firm**

Shares in percent

| Firm | Headquarters | Subject sources | Nonsubject sources | All import sources |
|---|---|---|---|---|
| Optima Steel | Pleasant Hill, CA | *** | *** | *** |
| Ovako North America | Charlotte, NC | *** | *** | *** |
| Polstar | Brampton, Ontario, Canada, | *** | *** | *** |
| POSCO America | Johns Creek, GA | *** | *** | *** |
| POSCO International America | Teaneck, NJ | *** | *** | *** |
| Precision Industries | Washington, PA | *** | *** | *** |
| Salzgitter Mannesmann International | Houston, TX | *** | *** | *** |
| Samsung | Ridgefield Park, NJ | *** | *** | *** |
| SSAB | Mobile, AL | *** | *** | *** |
| Stemcor USA | Fort Lauderdale, FL | *** | *** | *** |
| Sumitomo | New York, NY | *** | *** | *** |
| Swiss Steel | Carol Stream, IL | *** | *** | *** |
| Ternium USA | Houston, TX | *** | *** | *** |
| Toyota Tsusho America | Georgetown, KY | *** | *** | *** |
| Trinity Rail | Dallas, TX | *** | *** | *** |
| Universal Steel America | Houston, TX | *** | *** | *** |
| VDM USA Metals | Florham Park, NJ | *** | *** | *** |
| Voestalpine High Performance Metals | Elgin, IL | *** | *** | *** |
| Voestalpine USA | Houston, TX | *** | *** | *** |
| All firms | Various | *** | *** | *** |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

### U.S. purchasers

The Commission received 13 usable questionnaire responses from firms that bought CTL plate during January 2016 to June 2022.[68] Nine responding purchasers are distributors, 6 are end users, and one is an importer of record. In general, responding U.S. purchasers were located in all regions of the United States. The responding purchasers represented firms in a variety of domestic industries, including first stage processors, distributors, end users, fabricators, construction, heavy equipment OEM, injection mold makers, and steel service centers. Large purchasers of CTL plate include ***, *** and ***.

## Apparent U.S. consumption and market shares

### Quantity

Table I-33 and figure I-7 present data on apparent U.S. consumption and U.S. market shares by quantity for CTL plate. Apparent U.S. consumption decreased irregularly by 11.7 percent from 2016 to 2021 and was 13.6 percent lower in January-June 2022 compared to January-June 2021. The majority of the decrease occurred from 2018 to 2020, as the imposition of the section 232 tariffs took effect and the decrease in demand due to the COVID-19 pandemic.

The U.S. producers' market share, by quantity, increased from 80.8 percent to 90.3 percent between 2016 and 2021. The market shares of U.S. imports from each of the subject sources, except South Korea, were less than 0.2 percent in every year during 2017-21 and January-June 2022 and were less than 2.4 percent in 2016. The market share for subject imports from South Korea, the largest subject source in every period, ranged from *** percent to *** percent during 2016-21 and January-March 2022. During 2016-21 and January-March 2022, nonsubject imports' market share was higher than subject imports' market share in every year but 2016.

[68] Of the 13 responding purchasers, 12 purchased the domestic product, 6 purchased imports of the subject merchandise from South Korea, 3 purchased imports of the subject merchandise from Italy, and six purchased imports of CTL plate from other sources.

**Table I-33**
**CTL plate: Apparent U.S. consumption and market share based on quantity, by period and source**

Quantity in short tons

| Source | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| U.S. producers | Quantity | 4,900,101 | 5,078,561 | 5,612,723 |
| Austria | Quantity | 16,855 | 3,203 | 775 |
| Belgium | Quantity | 25,171 | 12,531 | 13,389 |
| Brazil | Quantity | 7,442 | 169 | 28 |
| China | Quantity | 37,312 | 1,755 | 788 |
| France | Quantity | 107,855 | 6,608 | 4,197 |
| Germany | Quantity | 147,626 | 10,981 | 4,683 |
| Italy | Quantity | 29,193 | 12,907 | 11,993 |
| Japan | Quantity | 34,261 | 13,809 | 1,652 |
| South Africa | Quantity | 93 | 3 | --- |
| South Korea, subject | Quantity | *** | *** | *** |
| Taiwan | Quantity | 12,076 | 937 | 1,815 |
| Turkey | Quantity | 35,590 | 630 | 121 |
| Subject sources | Quantity | *** | *** | *** |
| South Korea, nonsubject | Quantity | *** | *** | *** |
| All other sources | Quantity | *** | *** | *** |
| Nonsubject sources | Quantity | *** | *** | *** |
| All import sources | Quantity | 1,168,000 | 773,708 | 595,505 |
| All sources | Quantity | 6,068,101 | 5,852,269 | 6,208,228 |

Table continued.

**Table I-33 Continued**
**CTL plate: Apparent U.S. consumption and market share based on quantity, by period and source**

Quantity in short tons

| Source | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| U.S. producers | Quantity | 5,227,834 | 4,611,857 | 4,839,075 | 2,509,951 | 2,112,971 |
| Austria | Quantity | 240 | 820 | 1,078 | 313 | 684 |
| Belgium | Quantity | 7,658 | 6,943 | 2,036 | 1,362 | 1,368 |
| Brazil | Quantity | 15 | 34 | 25 | 12 | 42 |
| China | Quantity | 559 | 236 | 4,513 | 7 | 855 |
| France | Quantity | 4,042 | 1,375 | 1,595 | 892 | 269 |
| Germany | Quantity | 2,071 | 4,135 | 5,628 | 1,876 | 1,165 |
| Italy | Quantity | 4,575 | 5,048 | 6,149 | 2,650 | 1,503 |
| Japan | Quantity | 1,723 | 618 | 237 | 125 | 214 |
| South Africa | Quantity | --- | --- | --- | --- | --- |
| South Korea, subject | Quantity | *** | *** | *** | *** | *** |
| Taiwan | Quantity | 1,685 | 25 | --- | --- | --- |
| Turkey | Quantity | 67 | 63 | 3 | 3 | --- |
| Subject sources | Quantity | *** | *** | *** | *** | *** |
| South Korea, nonsubject | Quantity | *** | *** | *** | *** | *** |
| All other sources | Quantity | *** | *** | *** | *** | *** |
| Nonsubject sources | Quantity | *** | *** | *** | *** | *** |
| All import sources | Quantity | 532,590 | 311,238 | 521,094 | 242,450 | 266,468 |
| All sources | Quantity | 5,760,424 | 4,923,095 | 5,360,169 | 2,752,401 | 2,379,439 |

Table continued.

**Table I-33 Continued**
**CTL plate: Apparent U.S. consumption and market share based on quantity, by period and source**

Share of quantity in percent

| Source | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| U.S. producers | Share of quantity | 80.8 | 86.8 | 90.4 |
| Austria | Share of quantity | 0.3 | 0.1 | 0.0 |
| Belgium | Share of quantity | 0.4 | 0.2 | 0.2 |
| Brazil | Share of quantity | 0.1 | 0.0 | 0.0 |
| China | Share of quantity | 0.6 | 0.0 | 0.0 |
| France | Share of quantity | 1.8 | 0.1 | 0.1 |
| Germany | Share of quantity | 2.4 | 0.2 | 0.1 |
| Italy | Share of quantity | 0.5 | 0.2 | 0.2 |
| Japan | Share of quantity | 0.6 | 0.2 | 0.0 |
| South Africa | Share of quantity | 0.0 | 0.0 | --- |
| South Korea, subject | Share of quantity | *** | *** | *** |
| Taiwan | Share of quantity | 0.2 | 0.0 | 0.0 |
| Turkey | Share of quantity | 0.6 | 0.0 | 0.0 |
| Subject sources | Share of quantity | *** | *** | *** |
| South Korea, nonsubject | Share of quantity | *** | *** | *** |
| All other sources | Share of quantity | *** | *** | *** |
| Nonsubject sources | Share of quantity | *** | *** | *** |
| All import sources | Share of quantity | 19.2 | 13.2 | 9.6 |
| All sources | Share of quantity | 100.0 | 100.0 | 100.0 |

Table continued.

**Table I-33 Continued**
**CTL plate: Apparent U.S. consumption and market share based on quantity, by period and source**

Share of quantity in percent

| Source | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| U.S. producers | Share of quantity | 90.8 | 93.7 | 90.3 | 91.2 | 88.8 |
| Austria | Share of quantity | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Belgium | Share of quantity | 0.1 | 0.1 | 0.0 | 0.0 | 0.1 |
| Brazil | Share of quantity | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| China | Share of quantity | 0.0 | 0.0 | 0.1 | 0.0 | 0.0 |
| France | Share of quantity | 0.1 | 0.0 | 0.0 | 0.0 | 0.0 |
| Germany | Share of quantity | 0.0 | 0.1 | 0.1 | 0.1 | 0.0 |
| Italy | Share of quantity | 0.1 | 0.1 | 0.1 | 0.1 | 0.1 |
| Japan | Share of quantity | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| South Africa | Share of quantity | --- | --- | --- | --- | --- |
| South Korea, subject | Share of quantity | *** | *** | *** | *** | *** |
| Taiwan | Share of quantity | 0.0 | 0.0 | --- | --- | --- |
| Turkey | Share of quantity | 0.0 | 0.0 | 0.0 | 0.0 | --- |
| Subject sources | Share of quantity | *** | *** | *** | *** | *** |
| South Korea, nonsubject | Share of quantity | *** | *** | *** | *** | *** |
| All other sources | Share of quantity | *** | *** | *** | *** | *** |
| Nonsubject sources | Share of quantity | *** | *** | *** | *** | *** |
| All import sources | Share of quantity | 9.2 | 6.3 | 9.7 | 8.8 | 11.2 |
| All sources | Share of quantity | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed September 29, 2022, with adjustments based on data submitted in response to Commission questionnaires. Imports are based on the imports for consumption data series.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Figure I-7**
**CTL plate: Apparent U.S. consumption based on quantity, by period and source**

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed September 29, 2022, with adjustments based on data submitted in response to Commission questionnaires. Imports are based on the imports for consumption data series.

## Value

Table I-34 and figure I-8 present data on apparent U.S. consumption and U.S. market shares by value for CTL plate. The value of apparent U.S. consumption, in contrast to quantity, increased irregularly by 76.1 percent from 2016 to 2021 and was 57.5 percent higher in January-June 2022 compared to January-June 2021. While similarly to quantity of apparent U.S. consumption, the value of U.S. apparent consumption was at its lowest in 2020, but unlike quantity, value of U.S. apparent consumption increased to its highest level in 2021.

The U.S. producers' market share, by value, increased from 78.3 percent to 87.5 percent between 2016 and 2021. The market share of U.S. imports from subject sources decreased irregularly from *** percent to *** percent, or by *** percentage points. The market shares of U.S. imports from each of the subject sources, except South Korea, were less than 0.5 percent in every year during 2017-21 and January-June 2022. The market share for subject imports from South Korea, the largest subject source in every period, ranged from *** percent to *** percent during 2016-21 and January-March 2022. During 2016-21 and January-March 2022, nonsubject imports' market share was higher than subject imports' market share in every year but 2016.

**Table I-34**
**CTL plate: Apparent U.S. consumption and market share based on value, by period and source**

Value in 1,000 dollars

| Source | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| U.S. producers | Value | 2,952,042 | 3,627,608 | 4,950,712 |
| Austria | Value | 20,308 | 6,335 | 3,638 |
| Belgium | Value | 26,905 | 14,578 | 20,145 |
| Brazil | Value | 5,041 | 941 | 173 |
| China | Value | 36,527 | 3,203 | 658 |
| France | Value | 79,230 | 13,368 | 7,631 |
| Germany | Value | 137,203 | 20,395 | 9,518 |
| Italy | Value | 19,781 | 10,708 | 11,646 |
| Japan | Value | 25,634 | 11,746 | 4,641 |
| South Africa | Value | 39 | 2 | --- |
| South Korea, subject | Value | *** | *** | *** |
| Taiwan | Value | 6,021 | 602 | 1,421 |
| Turkey | Value | 14,796 | 563 | 85 |
| Subject sources | Value | *** | *** | *** |
| South Korea, nonsubject | Value | *** | *** | *** |
| All other sources | Value | *** | *** | *** |
| Nonsubject sources | Value | *** | *** | *** |
| All import sources | Value | 815,884 | 752,281 | 746,873 |
| All sources | Value | 3,767,926 | 4,379,889 | 5,697,585 |

Table continued.

**Table I-34 Continued**
**CTL plate: Apparent U.S. consumption and market share based on value, by period and source**

Value in 1,000 dollars

| Source | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| U.S. producers | Value | 4,572,815 | 3,098,144 | 5,803,228 | 2,404,928 | 3,706,561 |
| Austria | Value | 1,073 | 2,004 | 2,866 | 823 | 2,357 |
| Belgium | Value | 11,363 | 10,309 | 4,543 | 2,988 | 3,882 |
| Brazil | Value | 120 | 320 | 306 | 97 | 247 |
| China | Value | 444 | 277 | 4,767 | 49 | 686 |
| France | Value | 8,055 | 2,798 | 2,605 | 1,394 | 552 |
| Germany | Value | 6,925 | 8,207 | 10,323 | 3,225 | 3,811 |
| Italy | Value | 4,696 | 5,028 | 7,707 | 2,578 | 2,133 |
| Japan | Value | 4,817 | 3,391 | 1,099 | 577 | 977 |
| South Africa | Value | --- | --- | --- | --- | --- |
| South Korea, subject | Value | *** | *** | *** | *** | *** |
| Taiwan | Value | 1,523 | 18 | --- | --- | --- |
| Turkey | Value | 52 | 47 | 6 | 6 | --- |
| Subject sources | Value | *** | *** | *** | *** | *** |
| South Korea, nonsubject | Value | *** | *** | *** | *** | *** |
| All other sources | Value | *** | *** | *** | *** | *** |
| Nonsubject sources | Value | *** | *** | *** | *** | *** |
| All import sources | Value | 708,410 | 326,631 | 832,227 | 306,226 | 564,464 |
| All sources | Value | 5,281,225 | 3,424,775 | 6,635,455 | 2,711,154 | 4,271,025 |

Table continued.

**Table I-34 Continued**
**CTL plate: Apparent U.S. consumption and market share based on value, by period and source**

Share of value in percent

| Source | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| U.S. producers | Share of value | 78.3 | 82.8 | 86.9 |
| Austria | Share of value | 0.5 | 0.1 | 0.1 |
| Belgium | Share of value | 0.7 | 0.3 | 0.4 |
| Brazil | Share of value | 0.1 | 0.0 | 0.0 |
| China | Share of value | 1.0 | 0.1 | 0.0 |
| France | Share of value | 2.1 | 0.3 | 0.1 |
| Germany | Share of value | 3.6 | 0.5 | 0.2 |
| Italy | Share of value | 0.5 | 0.2 | 0.2 |
| Japan | Share of value | 0.7 | 0.3 | 0.1 |
| South Africa | Share of value | 0.0 | 0.0 | --- |
| South Korea, subject | Share of value | *** | *** | *** |
| Taiwan | Share of value | 0.2 | 0.0 | 0.0 |
| Turkey | Share of value | 0.4 | 0.0 | 0.0 |
| Subject sources | Share of value | *** | *** | *** |
| South Korea, nonsubject | Share of value | *** | *** | *** |
| All other sources | Share of value | *** | *** | *** |
| Nonsubject sources | Share of value | *** | *** | *** |
| All import sources | Share of value | 21.7 | 17.2 | 13.1 |
| All sources | Share of value | 100.0 | 100.0 | 100.0 |

Table continued.

**Table I-34 Continued**
**CTL plate: Apparent U.S. consumption and market share based on value, by period and source**

Share of value in percent

| Source | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| U.S. producers | Share of value | 86.6 | 90.5 | 87.5 | 88.7 | 86.8 |
| Austria | Share of value | 0.0 | 0.1 | 0.0 | 0.0 | 0.1 |
| Belgium | Share of value | 0.2 | 0.3 | 0.1 | 0.1 | 0.1 |
| Brazil | Share of value | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| China | Share of value | 0.0 | 0.0 | 0.1 | 0.0 | 0.0 |
| France | Share of value | 0.2 | 0.1 | 0.0 | 0.1 | 0.0 |
| Germany | Share of value | 0.1 | 0.2 | 0.2 | 0.1 | 0.1 |
| Italy | Share of value | 0.1 | 0.1 | 0.1 | 0.1 | 0.0 |
| Japan | Share of value | 0.1 | 0.1 | 0.0 | 0.0 | 0.0 |
| South Africa | Share of value | --- | --- | --- | --- | --- |
| South Korea, subject | Share of value | *** | *** | *** | *** | *** |
| Taiwan | Share of value | 0.0 | 0.0 | --- | --- | --- |
| Turkey | Share of value | 0.0 | 0.0 | 0.0 | 0.0 | --- |
| Subject sources | Share of value | *** | *** | *** | *** | *** |
| South Korea, nonsubject | Share of value | *** | *** | *** | *** | *** |
| All other sources | Share of value | *** | *** | *** | *** | *** |
| Nonsubject sources | Share of value | *** | *** | *** | *** | *** |
| All import sources | Share of value | 13.4 | 9.5 | 12.5 | 11.3 | 13.2 |
| All sources | Share of value | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed September 29, 2022, with adjustments based on data submitted in response to Commission questionnaires. Imports are based on the imports for consumption data series. Import values are based on landed, (normal) duty-paid value.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Figure I-8**
**CTL plate: Apparent U.S. consumption based on value, by period and source**

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed September 29, 2022, with adjustments based on data submitted in response to Commission questionnaires. Imports are based on the imports for consumption data series. Imports value are the landed duty paid value.

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

## U.S. market characteristics

Commodity-grade CTL plate is used in a variety of applications, such as the manufacture of storage tanks, heavy machinery and machinery parts, ships and barges, agriculture and construction equipment, and general load-bearing structures.[1] Non-commodity grades of CTL plate have superior strength and performance characteristics as compared with commodity grades and typically are produced to exhibit specific properties, such as improved malleability, hardness or abrasion resistance, impact resistance or toughness, higher strength, and ease in machining and welding. Non-commodity grades of CTL plate are used to manufacture railroad cars, line pipes, mobile equipment, highway and railway bridges, wind tower and transmission poles, pressure vessels, military armor, hand tools, die sets, and machinery components.

Apparent U.S. consumption of CTL plate fluctuated from January 2016 to June 2022. Overall, apparent U.S. consumption in 2021 was 11.7 percent lower than in 2016.

## Impact of sections 232 and 301 measures

U.S. producers, importers, and purchasers were asked to report the impact of sections 232 measures and 301 tariffs on overall demand, supply, prices, or raw material costs (tables II-1 and II-2).[2] With respect to the section 232 measures, most firms reported either an increase or no change in the domestic supply of CTL plate, supply of imports decreased, prices increased, and overall demand and raw material costs had mixed responses. With respect to the section 301 tariffs, most firms reported either an increase or no change in the domestic supply of CTL plate, supply of imports from China decreased or had no change, imports from other sources increased or had no change, prices increased or did not change, and overall demand and raw material costs had mixed responses. Eight of the 42 importers reported seeking section 232 exclusions and *** reported seeking section 301 exclusions.

[1] Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey, Investigation Nos. 701-TA-560–561 and 731-TA-1317–1328 (Final), USITC Publication 4664, January 2017 ("Original publication"), p. II-1.

[2] See Part I "Tariff treatment" for a discussion on the sections 301 and 232 measures applied to subject sources.

**Table II-1**
**CTL plate: U.S. producers', importers', and purchasers' perceptions regarding impact of section 232 measures**

Count in number of firms reporting

| Sources of purchases | Firm type | Increase | No change | Decrease | Fluctuate |
|---|---|---|---|---|---|
| Domestic supply in market | U.S. producers | 4 | 0 | 0 | 2 |
| Domestic supply in market | Importers | 14 | 8 | 0 | 2 |
| Domestic supply in market | Purchasers | 4 | 6 | 1 | 2 |
| Import supply in market | U.S. producers | 0 | 1 | 3 | 2 |
| Import supply in market | Importers | 2 | 2 | 24 | 0 |
| Import supply in market | Purchasers | 0 | 1 | 9 | 3 |
| Prices of CTL plate | U.S. producers | 3 | 0 | 0 | 2 |
| Prices of CTL plate | Importers | 23 | 2 | 0 | 2 |
| Prices of CTL plate | Purchasers | 10 | 1 | 0 | 2 |
| Overall demand in market | U.S. producers | 0 | 3 | 0 | 2 |
| Overall demand in market | Importers | 6 | 10 | 3 | 5 |
| Overall demand in market | Purchasers | 2 | 3 | 1 | 7 |
| Raw material costs of CTL plate | U.S. producers | 1 | 2 | 0 | 2 |
| Raw material costs of CTL plate | Importers | 9 | 5 | 0 | 7 |
| Raw material costs of CTL plate | Purchasers | 3 | 4 | 0 | 6 |

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

**Table II-2**
**CTL plate: U.S. producers', importers', and purchasers' perceptions regarding impact of section 301 tariffs on Chinese origin products**

Count in number of firms reporting

| Sources of purchases | Firm type | Increase | No change | Decrease | Fluctuate |
|---|---|---|---|---|---|
| Domestic supply in market | U.S. producers | 2 | 1 | 0 | 0 |
| Domestic supply in market | Importers | 4 | 3 | 1 | 0 |
| Domestic supply in market | Purchasers | 2 | 2 | 0 | 1 |
| China supply in market | U.S. producers | 0 | 1 | 2 | 0 |
| China supply in market | Importers | 0 | 2 | 7 | 0 |
| China supply in market | Purchasers | 0 | 2 | 2 | 1 |
| Other than China supply in market | U.S. producers | 1 | 2 | 0 | 0 |
| Other than China supply in market | Importers | 3 | 4 | 1 | 1 |
| Other than China supply in market | Purchasers | 0 | 4 | 0 | 1 |
| Prices of CTL plate | U.S. producers | 1 | 1 | 0 | 1 |
| Prices of CTL plate | Importers | 5 | 2 | 0 | 1 |
| Prices of CTL plate | Purchasers | 2 | 2 | 0 | 1 |
| Overall demand in market | U.S. producers | 0 | 2 | 0 | 1 |
| Overall demand in market | Importers | 4 | 5 | 0 | 0 |
| Overall demand in market | Purchasers | 1 | 3 | 0 | 1 |
| Raw material costs of CTL plate | U.S. producers | 0 | 2 | 0 | 1 |
| Raw material costs of CTL plate | Importers | 3 | 3 | 0 | 3 |
| Raw material costs of CTL plate | Purchasers | 1 | 2 | 0 | 2 |

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

## Channels of distribution

As shown in table II-3, roughly three-fifths of U.S. producers' sales were to distributors during the review period, with the remainder sold to construction and other end users. End users were the largest channel of subject import shipments in 2016 and 2017, but most subject imports were sold to distributors starting in 2018. In 2021, the distributor channel comprised most shipments of subject imports from Belgium, Italy, Japan, and South Korea, and other end users was the main channel for subject imports from Austria, Brazil, China, France, Germany, and Turkey. Most nonsubject imports were sold to distributors throughout the review period.

**Table II-3**
**CTL plate: Share of U.S. producers' and importers' U.S. shipments within each source, by channel of distribution and period**

Shares in percent

| Source | Channel | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Distributors | 58.8 | 61.1 | 59.3 |
| United States | Construction end users | 14.1 | 13.7 | 13.1 |
| United States | Other end users | 27.1 | 25.2 | 27.6 |
| Austria | Distributors | *** | *** | *** |
| Austria | Construction end users | *** | *** | *** |
| Austria | Other end users | *** | *** | *** |
| Belgium | Distributors | *** | *** | *** |
| Belgium | Construction end users | *** | *** | *** |
| Belgium | Other end users | *** | *** | *** |
| Brazil | Distributors | *** | *** | *** |
| Brazil | Construction end users | *** | *** | *** |
| Brazil | Other end users | *** | *** | *** |
| China | Distributors | *** | *** | *** |
| China | Construction end users | *** | *** | *** |
| China | Other end users | *** | *** | *** |
| France | Distributors | *** | *** | *** |
| France | Construction end users | *** | *** | *** |
| France | Other end users | *** | *** | *** |
| Germany | Distributors | *** | *** | *** |
| Germany | Construction end users | *** | *** | *** |
| Germany | Other end users | *** | *** | *** |
| Italy | Distributors | *** | *** | *** |
| Italy | Construction end users | *** | *** | *** |
| Italy | Other end users | *** | *** | *** |
| Japan | Distributors | *** | *** | *** |
| Japan | Construction end users | *** | *** | *** |
| Japan | Other end users | *** | *** | *** |

Table continued.

**Table II-3 Continued**
**CTL plate: Share of U.S. producers' and importers' U.S. shipments within each source, by channel of distribution and period**

Shares in percent

| Source | Channel | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| United States | Distributors | 54.7 | 59.8 | 60.1 | 58.5 | 59.7 |
| United States | Construction end users | 15.7 | 15.3 | 15.0 | 14.3 | 17.2 |
| United States | Other end users | 29.6 | 24.9 | 24.9 | 27.1 | 23.1 |
| Austria | Distributors | *** | *** | *** | *** | *** |
| Austria | Construction end users | *** | *** | *** | *** | *** |
| Austria | Other end users | *** | *** | *** | *** | *** |
| Belgium | Distributors | *** | *** | *** | *** | *** |
| Belgium | Construction end users | *** | *** | *** | *** | *** |
| Belgium | Other end users | *** | *** | *** | *** | *** |
| Brazil | Distributors | *** | *** | *** | *** | *** |
| Brazil | Construction end users | *** | *** | *** | *** | *** |
| Brazil | Other end users | *** | *** | *** | *** | *** |
| China | Distributors | *** | *** | *** | *** | *** |
| China | Construction end users | *** | *** | *** | *** | *** |
| China | Other end users | *** | *** | *** | *** | *** |
| France | Distributors | *** | *** | *** | *** | *** |
| France | Construction end users | *** | *** | *** | *** | *** |
| France | Other end users | *** | *** | *** | *** | *** |
| Germany | Distributors | *** | *** | *** | *** | *** |
| Germany | Construction end users | *** | *** | *** | *** | *** |
| Germany | Other end users | *** | *** | *** | *** | *** |
| Italy | Distributors | *** | *** | *** | *** | *** |
| Italy | Construction end users | *** | *** | *** | *** | *** |
| Italy | Other end users | *** | *** | *** | *** | *** |
| Japan | Distributors | *** | *** | *** | *** | *** |
| Japan | Construction end users | *** | *** | *** | *** | *** |
| Japan | Other end users | *** | *** | *** | *** | *** |

Table continued.

**Table II-3 Continued**
**CTL plate: Share of U.S. producers' and importers' U.S. shipments within each source, by channel of distribution and period**

Shares in percent

| Source | Channel | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| South Africa | Distributors | *** | *** | *** |
| South Africa | Construction end users | *** | *** | *** |
| South Africa | Other end users | *** | *** | *** |
| South Korea, subject | Distributors | *** | *** | *** |
| South Korea, subject | Construction end users | *** | *** | *** |
| South Korea, subject | Other end users | *** | *** | *** |
| Taiwan | Distributors | *** | *** | *** |
| Taiwan | Construction end users | *** | *** | *** |
| Taiwan | Other end users | *** | *** | *** |
| Turkey | Distributors | *** | *** | *** |
| Turkey | Construction end users | *** | *** | *** |
| Turkey | Other end users | *** | *** | *** |
| Subject | Distributors | *** | *** | *** |
| Subject | Construction end users | *** | *** | *** |
| Subject | Other end users | *** | *** | *** |
| Nonsubject | Distributors | *** | *** | *** |
| Nonsubject | Construction end users | *** | *** | *** |
| Nonsubject | Other end users | *** | *** | *** |
| All imports | Distributors | *** | *** | *** |
| All imports | Construction end users | *** | *** | *** |
| All imports | Other end users | *** | *** | *** |

Table continued.

**Table II-3 Continued**
**CTL plate: Share of U.S. producers' and importers' U.S. shipments within each source, by channel of distribution and period**

Shares in percent

| Source | Channel | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| South Africa | Distributors | *** | *** | *** | *** | *** |
| South Africa | Construction end users | *** | *** | *** | *** | *** |
| South Africa | Other end users | *** | *** | *** | *** | *** |
| South Korea, subject | Distributors | *** | *** | *** | *** | *** |
| South Korea, subject | Construction end users | *** | *** | *** | *** | *** |
| South Korea, subject | Other end users | *** | *** | *** | *** | *** |
| Taiwan | Distributors | *** | *** | *** | *** | *** |
| Taiwan | Construction end users | *** | *** | *** | *** | *** |
| Taiwan | Other end users | *** | *** | *** | *** | *** |
| Turkey | Distributors | *** | *** | *** | *** | *** |
| Turkey | Construction end users | *** | *** | *** | *** | *** |
| Turkey | Other end users | *** | *** | *** | *** | *** |
| Subject | Distributors | *** | *** | *** | *** | *** |
| Subject | Construction end users | *** | *** | *** | *** | *** |
| Subject | Other end users | *** | *** | *** | *** | *** |
| Nonsubject | Distributors | *** | *** | *** | *** | *** |
| Nonsubject | Construction end users | *** | *** | *** | *** | *** |
| Nonsubject | Other end users | *** | *** | *** | *** | *** |
| All imports | Distributors | *** | *** | *** | *** | *** |
| All imports | Construction end users | *** | *** | *** | *** | *** |
| All imports | Other end users | *** | *** | *** | *** | *** |

Source: Compiled from data submitted in response to Commission questionnaires

# Geographic distribution

U.S. producers reported selling CTL plate to all regions in the contiguous United States (table II-4). Subject imports were also reportedly sold to all contiguous U.S. regions, although individual importers' responses were more varied. More importers reported serving the Midwest, Northeast, Southeast, and Central Southwest regions than other regions. The Pacific Coast region was most frequently served by imports from Austria, Belgium, France, Germany, and South Korea.

For U.S. producers, *** percent of sales were within 100 miles of their production facility, *** percent were between 101 and 1,000 miles, and *** percent were over 1,000 miles. Importers sold *** percent within 100 miles of their U.S. point of shipment, *** percent between 101 and 1,000 miles, and *** percent over 1,000 miles.

**Table II-4**
**CTL plate: Count of U.S. producers' and U.S. importers' geographic markets**

Number of firms reporting

| Region | U.S. producers | Austria | Belgium | Brazil | China | France | Germany |
|---|---|---|---|---|---|---|---|
| Northeast | 5 | 3 | 4 | 2 | 1 | 2 | 8 |
| Midwest | 6 | 3 | 4 | 1 | 3 | 3 | 8 |
| Southeast | 5 | 4 | 4 | 1 | 2 | 2 | 5 |
| Central Southwest | 6 | 4 | 4 | 1 | 2 | 3 | 7 |
| Mountains | 5 | 3 | 2 | 1 | 1 | 2 | 5 |
| Pacific Coast | 6 | 4 | 4 | 1 | 1 | 3 | 5 |
| Other | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| All regions (except Other) | 4 | 2 | 2 | 1 | 1 | 1 | 3 |
| Reporting firms | 6 | 5 | 4 | 2 | 3 | 3 | 9 |

Table continued.

**Table II-4 Continued**
**CTL plate: Count of U.S. producers' and U.S. importers' geographic markets**

Number of firms reporting

| Region | Italy | Japan | South Africa | South Korea, subject | Taiwan | Turkey | Subject sources |
|---|---|---|---|---|---|---|---|
| Northeast | 1 | 1 | 0 | 3 | 0 | 0 | 17 |
| Midwest | 3 | 5 | 0 | 3 | 1 | 2 | 20 |
| Southeast | 3 | 2 | 0 | 4 | 1 | 2 | 16 |
| Central Southwest | 3 | 2 | 0 | 6 | 1 | 2 | 19 |
| Mountains | 1 | 2 | 0 | 1 | 0 | 0 | 10 |
| Pacific Coast | 0 | 3 | 0 | 4 | 0 | 0 | 18 |
| Other | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| All regions (except Other) | 0 | 0 | 0 | 1 | 0 | 0 | 5 |
| Reporting firms | 3 | 8 | 0 | 7 | 1 | 2 | 31 |

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

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

# Supply and demand considerations

## U.S. supply

Table II-5 provides a summary of the supply factors regarding CTL plate from U.S. producers and from subject countries.[3]

**Table II-5**
**CTL plate: Supply factors that affect the ability to increase shipments to the U.S. market, by country**

Quantity in short tons; ratio and share in percent

| Factor | Measure | United States | Austria | Belgium | Brazil | China |
|---|---|---|---|---|---|---|
| Capacity 2016 | Quantity | 8,251,000 | *** | *** | *** | *** |
| Capacity 2021 | Quantity | 8,291,000 | *** | *** | *** | *** |
| Capacity utilization 2016 | Ratio | 68.7 | *** | *** | *** | *** |
| Capacity utilization 2021 | Ratio | 66.4 | *** | *** | *** | *** |
| Ending inventories 2016 | Ratio | *** | *** | *** | *** | *** |
| Ending inventories 2021 | Ratio | *** | *** | *** | *** | *** |
| Home market 2021 | Ratio | *** | *** | *** | *** | *** |
| Non-US export markets 2021 | Ratio | *** | *** | *** | *** | *** |
| Ability to shift production | Count | *** | *** | *** | *** | *** |

Table continued.

[3] The Commission did not receive responses to the Foreign Producers' Questionnaire from South Africa, Taiwan, and Turkey.

**Table II-5 Continued**
**CTL plate: Supply factors that affect the ability to increase shipments to the U.S. market, by country**

Quantity in short tons; ratio and share in percent

| Factor | Measure | France | Germany | Italy | Japan | South Africa |
|---|---|---|---|---|---|---|
| Capacity 2016 | Quantity | *** | *** | *** | *** | *** |
| Capacity 2021 | Quantity | *** | *** | *** | *** | *** |
| Capacity utilization 2016 | Ratio | *** | *** | *** | *** | *** |
| Capacity utilization 2021 | Ratio | *** | *** | *** | *** | *** |
| Ending inventories 2016 | Ratio | *** | *** | *** | *** | *** |
| Ending inventories 2021 | Ratio | *** | *** | *** | *** | *** |
| Home market 2021 | Ratio | *** | *** | *** | *** | *** |
| Non-US export markets 2021 | Ratio | *** | *** | *** | *** | *** |
| Ability to shift production | Count | *** | *** | *** | *** | *** |

Table continued.

**Table II-5 Continued**
**CTL plate: Supply factors that affect the ability to increase shipments to the U.S. market, by country**

Quantity in short tons; ratio and share in percent

| Factor | Measure | South Korea, subject | Taiwan | Turkey | Subject suppliers |
|---|---|---|---|---|---|
| Capacity 2016 | Quantity | *** | *** | *** | *** |
| Capacity 2021 | Quantity | *** | *** | *** | *** |
| Capacity utilization 2016 | Ratio | *** | *** | *** | *** |
| Capacity utilization 2021 | Ratio | *** | *** | *** | *** |
| Ending inventories 2016 | Ratio | *** | *** | *** | *** |
| Ending inventories 2021 | Ratio | *** | *** | *** | *** |
| Home market 2021 | Ratio | *** | *** | *** | *** |
| Non-US export markets 2021 | Ratio | *** | *** | *** | *** |
| Ability to shift production | Count | *** | *** | *** | *** |

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

Note: Responding U.S. producers accounted for more than 75 percent of U.S. production of CTL plate in 2021. Responding foreign producer/exporter firms accounted for more than 25 percent but less than 50 percent of U.S. imports of CTL plate from all subject sources during 2021. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Part I, “Summary Data, Data Sources, and Organization of Report.”

**Domestic production**

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

U.S. producers' capacity increased slightly during 2016-21, and their total production declined over this period, resulting in a decline in capacity utilization to 66.4 percent in 2021. U.S. producers reported primarily exporting to Canada and Mexico. Other products that producers reportedly can produce on the same equipment as CTL plate include discrete plate, hot-rolled coils, slab, merchant bar, and rebar. Factors affecting U.S. producers' ability to shift production include specific customer orders or other situation requiring selective production. U.S. producer *** reported that it does not switch between products for any reason other than customer orders; *** reported that a switch in production would only occur if its production facilities were running at full capacity and selective production was required but noted that it is committed to the CTL plate market for the long run. Similarly, *** reported that CTL plate *** product is central to its volume and not easily replaced. *** reported that it would switch if there were more profitable products but noted that typically its facilities operate at the optimum product mix and would not be able to easily switch. Lastly, *** also reported being able to shift production to other products but noted that there are significant costs in terms of personnel requirements and changeover time.

**Subject imports from subject countries**

Based on available information, the producers of CTL plate from subject sources have the ability to respond to changes in demand with at least moderate-to-large changes in the quantity of shipments of quantity of CTL plate to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of some unused capacity and the ability to shift a considerable quantity of shipments from alternate markets. Factors mitigating responsiveness of supply include decreasing capacity, limited available inventories, and a somewhat limited ability to shift production to or from alternate products.

Table II-5 provides a summary of supply of CTL plate from subject countries. The Commission did not receive questionnaire responses from foreign producers in South Africa, Taiwan, or Turkey. Production capacity decreased in Belgium, Brazil, France, Germany, and Japan, while production capacity increased slightly for Austria and Italy and remained constant

in China and South Korea during 2016-21. Capacity utilization decreased significantly for Austria and slightly decreased for Germany, Japan, and South Korea, and increased slightly for Belgium, Brazil, and Italy. Chinese capacity utilization increased by *** percent and French capacity utilization decreased by *** percent. Some countries have maintained higher inventory-to-shipment ratios than others: Belgium and China, and France had inventory-to-shipment ratios that were greater than *** percent in 2021. These ratios increased between 2016-21 for seven of the nine subject countries with responding foreign producers. In 2021, foreign producers' home market shipments accounted for more than *** percent of shipments for Brazil, China, Germany, Japan, and South Korea while exports to third country markets accounted for more than *** percent of foreign producers' shipments in Austria, Belgium, France, and Italy.

Fourteen of 24 responding foreign producers reported being able to produce other products on the same equipment as CTL plate including titanium plate, stainless steel and nickel-based alloys and all grades of square and round bars, pressure vessels, mounded bullets, metallic structures, other high performance alloy plates, tool steels, high speed steels, ingots, and H beams. Factors affecting foreign producers' ability to shift production include the complexity of production flow and dimensions of the products, client demand, order book priority, coil material availability, and the profitability of products.

**Imports from nonsubject sources**

Nonsubject imports accounted for *** percent of total U.S. imports in 2021. The largest source of nonsubject imports by far was Canada, which accounted for over 80 percent of nonsubject imports during the period of review.

**Supply constraints**

Five of six U.S. producers and most importers (25 of 41) reported that they had not experienced supply constraints since January 1, 2016. However, 16 importers and 9 of 13 purchasers reported supply constraints, but most did not indicate the country source. Importers reported supply constraint issues include higher demand, shipping constraints, availability of specialized products, and constraints related to the section 232 measures and the antidumping and countervailing duty orders. Importer *** reports that there has been an increase in trade restrictions against importing countries, and importer *** reports that it has experienced a variety of constraints on supplying its customers as a result of the AD orders and imposition of section 232 duties on plates from the European Union. Importer *** reported that shipping constraints have limited supply of CTL plates resulting in production delays. Importer *** also reported that lead times

have been extended for CTL plate and delivery delays from suppliers have created inventory shortages on occasions.

Purchasers that reported that they had been declined orders cited allocations, controlled-order entry, limited capacity of certain mills due to outages and COVID-related labor shortages, and tightness of supply. Purchaser *** reported supply constraints at times with product from South Korea because of quotas on steel from South Korea.

**New suppliers**

Most purchasers (10 of 14) reported that no new suppliers had entered the U.S. market since January 1, 2016, and 9 of 14 purchasers reported that they did not expect new suppliers in the future. Several purchasers reported that Nucor's Brandenburg, Kentucky facility is expected to enter into production in late 2022 or 2023. Purchaser *** reported that Cleveland Cliffs bought ArcelorMittal's plate assets and that American Heavy Plate was also a new CTL plate supplier. Purchaser *** reported that Macedonia is a new country source supplier.

## U.S. demand

Based on available information, the overall demand for CTL plate is likely to experience small-to-moderate changes in response to changes in price, depending on the end-use market for the CTL plate. The main contributing factors are a wide variety of cost shares for CTL plate among end-use products and the existence of substitute products for CTL plate only in particular end uses.

**End uses and cost share**

U.S. demand for CTL plate depends on the demand for U.S.-produced downstream products. CTL plate is used for construction, infrastructure, heavy industrial production, line pipe, shipbuilding, barges, tanks, railcars and rail transportation, tractors, wind towers, electricity transmission poles, oil and gas structures, industrial equipment, pipe and tube, and rail transportation.[4] According to the ***, the construction and contractor market is the largest market into which CTL plate is shipped directly from U.S.

[4] Original publication, pp. II-12-II-13.

producers to end users (tables II-6 and II-7).[5] These data indicate that the share of shipments to this market has increased over the past three full years.

**Table II-6**
**CTL plate: Shipments by U.S. producers of CTL plate by market 2019-2021**

Quantity in short tons

| End Market | 2019 | 2020 | 2021 |
|---|---|---|---|
| Construction and contractors products | *** | *** | *** |
| Rail transportation | *** | *** | *** |
| Steel for converting and processing (primarily used for pipes and tubes) | *** | *** | *** |
| Automotive | *** | *** | *** |
| Machinery, industrial equipment, and tools | *** | *** | *** |
| Shipbuilding and marine equipment | *** | *** | *** |
| Oil and gas industry-drilling and transportation, shortage tanks, and process vessels | *** | *** | *** |
| Agricultural and electrical equipment | *** | *** | *** |

Source: ***.

**Table II-7**
**CTL plate: Shares of shipments by U.S. producers of CTL plate by market 2019-2021**

Shares in percent

| End Market | 2019 | 2020 | 2021 |
|---|---|---|---|
| Construction and contractors products | *** | *** | *** |
| Rail transportation | *** | *** | *** |
| Steel for converting and processing (primarily used for pipes and tubes) | *** | *** | *** |
| Automotive | *** | *** | *** |
| Machinery, industrial equipment, and tools | *** | *** | *** |
| Shipbuilding and marine equipment | *** | *** | *** |
| Oil and gas industry-drilling and transportation, shortage tanks, and process vessels | *** | *** | *** |
| Agricultural and electrical equipment | *** | *** | *** |

Source: ***.

[5] In 2015, the construction and contractor market were the largest market (*** percent), followed by rail transportation (*** percent), and steel for converting and processing (*** percent). Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey, Investigation Nos. 701-TA-560–561 and 731-TA-1317–1328 (Final), USITC Publication 4664, January 2017 ("Original confidential publication"), p. II-14, table II-4.

The majority of responding U.S. producers (5 of 6), importers (38 of 41), and purchasers (10 of 12) reported no changes in end uses. U.S. producer *** reported that wind turbines may become more important to the CTL plate market in the future.

The cost share of CTL plate in end-use products can vary considerably depending on the end use. Based on information reported in the final investigations, CTL plate reportedly accounts for a majority of the cost in some downstream products, such as pressure vessels (95-100 percent), processed plate (84 percent) wind towers (40-80 percent), and large diameter line pipe (70-80 percent).[6] CTL plate accounts for a smaller portion of the costs of some other downstream products, such as automotive (23 percent), aerospace (12 percent), cranes (10 percent), oil rigs (10 percent), power plant equipment (5 percent), and mining equipment (5 percent).[7] Some firms reported large cost share ranges for the same end use, such as tooling (10-100 percent), shipbuilding (6 to 85 percent), construction and construction equipment (8-100 percent), and railroad applications (20-90 percent).[8]

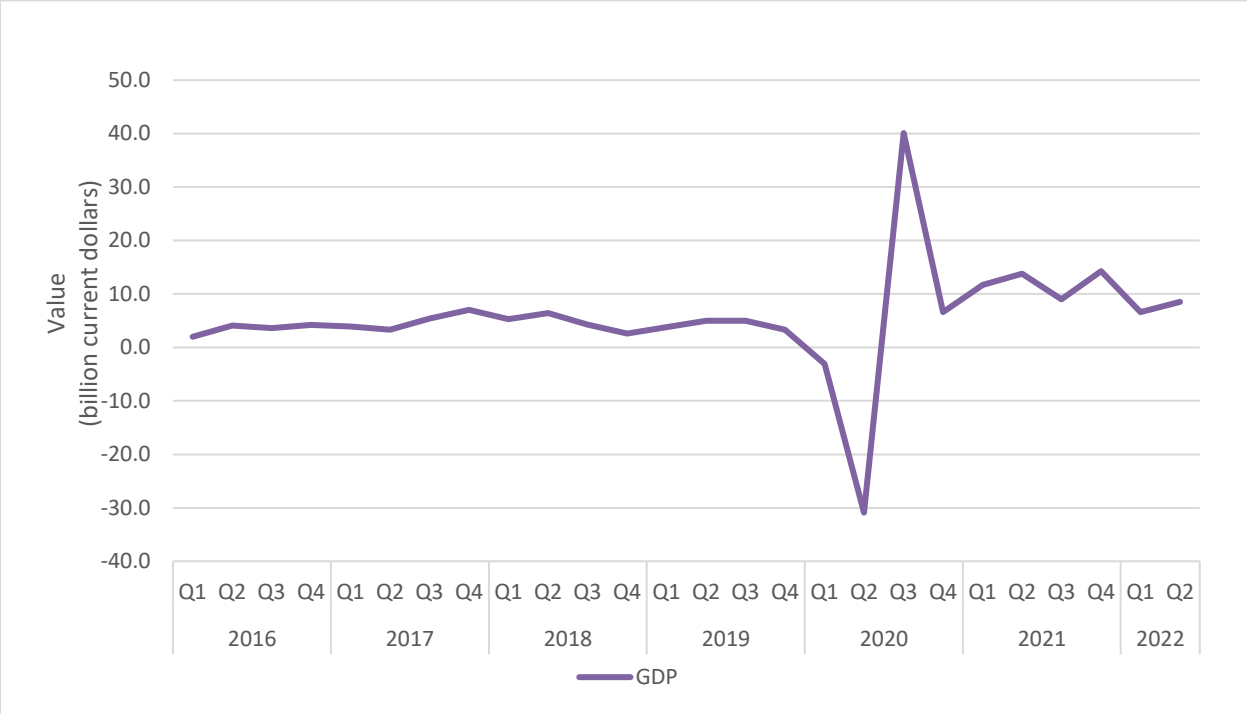
**Business cycles**

The majority of U.S. producers (5 of 6) and importers (27 of 42), and almost half of responding purchasers (5 of 13) indicated that the market was subject to business cycles or distinct conditions of competition. Specifically, U.S. producer *** reported that demand for CTL plate fluctuates in accordance with the global economy. It also reported that political factors influence the production of CTL plate and that the COVID-19 pandemic caused temporary supply and demand imbalances. Importers reported that business cycles in construction or aerospace build schedules resulted in business cycles in the CTL plate industry. Purchaser *** reported strong linkages between general economic conditions and the demand for CTL plate. Purchaser *** reported that fluctuations in the price of raw materials required to manufacture CTL plate was a distinct condition of competition.

Some U.S. producers and importers noted that overall demand fluctuated with the economy since CTL plate is used in a wide variety of sectors. While GDP increased in nearly all quarters from January 2016 to June 2022, except the first and second quarters of 2020, it has increased by varying amounts (figure II-1 and table II-8).

[6] Original confidential publication, p. II-14.
[7] Original confidential publication, pp. II-14-15.
[8] Original confidential publication, p. II-15.

**Figure II-1**
**GDP: Percent changes from the previous quarter, first quarter 2015 to second quarter 2022**




Source: Source: Gross Domestic Product, Changes in GDP dating back to 1930, Bureau of Economic Analysis, https://www.bea.gov/resources, Retrieved Oct 11, 2022.

**Table II-8**
**GDP: Changes from the previous quarter**

GDP changes in percent from the previous quarter

| Period | Percent change |
|---|---|
| 2016 Q1 | 2.0 |
| 2016 Q2 | 4.1 |
| 2016 Q3 | 3.6 |
| 2016 Q4 | 4.2 |
| 2017 Q1 | 3.9 |
| 2017 Q2 | 3.3 |
| 2017 Q3 | 5.4 |
| 2017 Q4 | 7.0 |
| 2018 Q1 | 5.3 |
| 2018 Q2 | 6.4 |
| 2018 Q3 | 4.3 |
| 2018 Q4 | 2.6 |
| 2019 Q1 | 3.8 |
| 2019 Q2 | 5.0 |
| 2019 Q3 | 5.0 |
| 2019 Q4 | 3.3 |
| 2020 Q1 | (3.1) |
| 2020 Q2 | (30.9) |
| 2020 Q3 | 40.1 |
| 2020 Q4 | 6.6 |
| 2021 Q1 | 11.7 |
| 2021 Q2 | 13.8 |
| 2021 Q3 | 9.0 |
| 2021 Q4 | 14.3 |
| 2022 Q1 | 6.6 |
| 2022 Q2 | 8.5 |

Source: Gross Domestic Product, Changes in GDP dating back to 1930, Bureau of Economic Analysis, https://www.bea.gov/resources, retrieved Oct 11, 2022.

**Demand trends**

As shown in table II-9, the majority of U.S. producers and a plurality of importers reported that U.S. demand for CTL plate fluctuated since January 1, 2016 while a plurality of purchasers reported that U.S. demand for CTL plate increased. Foreign producers' responses were mixed with respect to U.S. demand for CTL plate.

**Table II-9**
**CTL plate: Count of firms' responses regarding overall domestic and foreign demand since January 1, 2016, by firm type**

Number of firms reporting

| Market | Firm type | Increase | No change | Decrease | Fluctuate |
|---|---|---|---|---|---|
| U.S. demand | U.S. producers | 0 | 1 | 1 | 4 |
| U.S. demand | Importers | 8 | 8 | 2 | 18 |
| U.S. demand | Purchasers | 6 | 3 | 1 | 3 |
| U.S. demand | Foreign producers | 5 | 6 | 5 | 8 |
| Foreign demand | U.S. producers | 1 | 1 | 0 | 2 |
| Foreign demand | Importers | 5 | 6 | 0 | 12 |
| Foreign demand | Purchasers | 1 | 2 | 0 | 1 |
| Demand in subject home market | Foreign producers | 5 | 6 | 3 | 11 |
| Demand in other export markets | Foreign producers | 13 | 3 | 1 | 8 |
| Demand for end use products | Purchasers | 2 | 1 | 1 | 5 |

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

As shown in table II-10, half of responding U.S. producers expect U.S. demand to fluctuate. A plurality of importers, the majority of responding purchasers, and the majority of foreign producers expect U.S. demand for CTL plate will increase. Most foreign producers anticipate increased demand in other export markets. Foreign producers reported mixed answers with respect to their home markets, but only two anticipated decreased demand in their home markets.

**Table II-10**
**CTL plate: Count of firms' responses regarding anticipated overall domestic and foreign demand, by firm type**

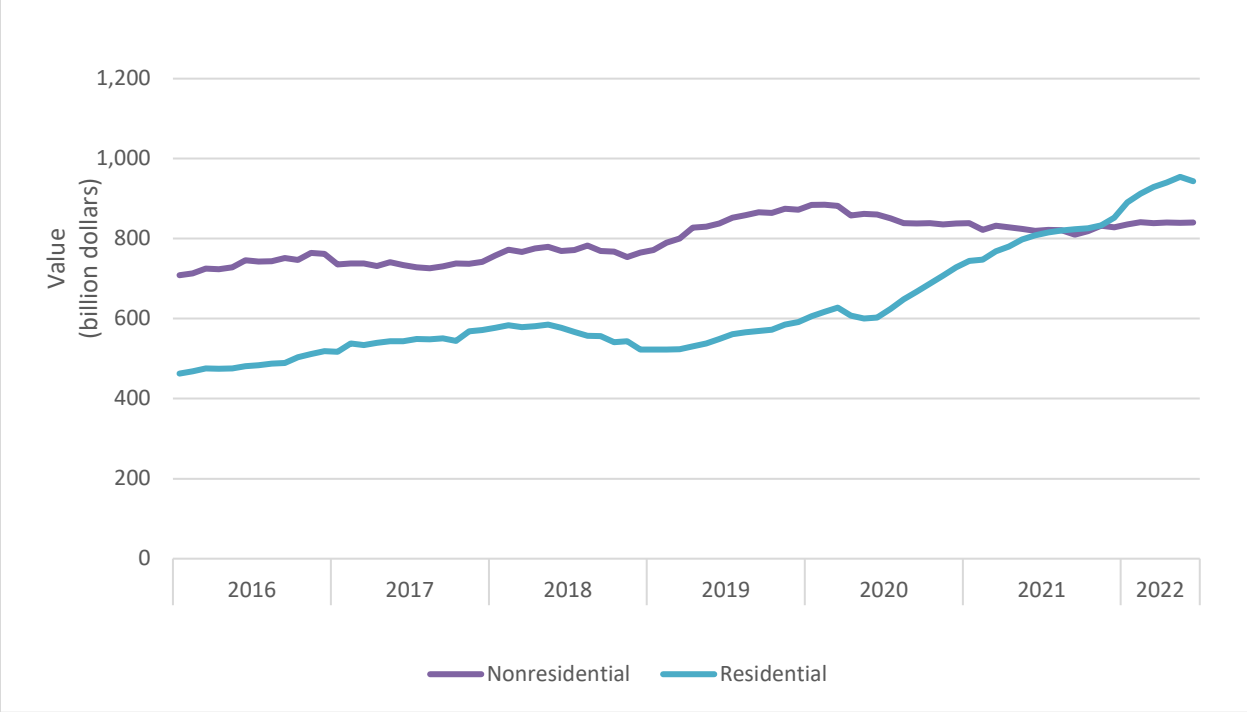
Number of firms reporting

| Market | Firm type | Increase | No change | Decrease | Fluctuate |
|---|---|---|---|---|---|
| U.S. demand | U.S. producers | 1 | 2 | 0 | 3 |
| U.S. demand | Importers | 14 | 8 | 3 | 11 |
| U.S. demand | Purchasers | 7 | 2 | 2 | 2 |
| U.S. demand | Foreign producers | 14 | 6 | 0 | 4 |
| Foreign demand | U.S. producers | 1 | 1 | 1 | 1 |
| Foreign demand | Importers | 8 | 7 | 1 | 8 |
| Foreign demand | Purchasers | 2 | 2 | 0 | 0 |
| Demand in subject home market | Foreign producers | 8 | 9 | 2 | 6 |
| Demand in other export markets | Foreign producers | 15 | 3 | 1 | 6 |

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

As discussed above, two common applications for CTL plate are construction and energy development and transmission. The value of seasonally adjusted residential and non-residential construction spending generally increased from January 2016 to June 2022 (figure II-2 and table II-11). The total value of annualized U.S. construction spending increased from $1,171 billion in January 2016 to $1,784 billion in June 2022.

**Figure II-2**
**Construction spending: Values of U.S. Residential and non-residential construction spending, seasonally adjusted at annual rates, by month, January 2016 to June 2022**




Source: Federal Reserve Economic Data, https://fed.stlousisfed.org; Retrieved September 30, 2022.

**Table II-11**
**Construction spending: Values of U.S. Residential and non-residential construction spending, seasonally adjusted at annual rates, by month, January 2016 to June 2022**

Values in millions of U.S. dollars

| Year | Month | Nonresidential | Residential |
|---|---|---|---|
| 2016 | January | 708,623 | 462,729 |
| 2016 | February | 713,068 | 468,615 |
| 2016 | March | 724,770 | 475,857 |
| 2016 | April | 723,711 | 474,859 |
| 2016 | May | 728,024 | 475,471 |
| 2016 | June | 745,679 | 481,016 |
| 2016 | July | 742,438 | 483,448 |
| 2016 | August | 743,813 | 487,803 |
| 2016 | September | 751,630 | 489,278 |
| 2016 | October | 746,782 | 503,588 |
| 2016 | November | 764,566 | 511,331 |
| 2016 | December | 761,694 | 518,926 |
| 2017 | January | 735,851 | 517,415 |
| 2017 | February | 738,124 | 538,210 |
| 2017 | March | 737,951 | 533,989 |
| 2017 | April | 731,456 | 539,763 |
| 2017 | May | 741,214 | 543,896 |
| 2017 | June | 733,860 | 543,889 |
| 2017 | July | 728,196 | 548,874 |
| 2017 | August | 726,169 | 548,690 |
| 2017 | September | 730,381 | 551,001 |
| 2017 | October | 737,981 | 544,317 |
| 2017 | November | 737,203 | 568,426 |
| 2017 | December | 742,258 | 571,214 |

Table continued.

**Table II-11 Continued**
**Construction spending: Values of U.S. Residential and non-residential construction spending, seasonally adjusted at annual rates, by month, January 2016 to June 2022**

Values in millions of U.S. dollars

| Year | Month | Nonresidential | Residential |
|---|---|---|---|
| 2018 | January | 757,859 | 577,316 |
| 2018 | February | 772,362 | 583,280 |
| 2018 | March | 766,577 | 578,684 |
| 2018 | April | 775,683 | 581,271 |
| 2018 | May | 779,461 | 585,431 |
| 2018 | June | 769,489 | 576,776 |
| 2018 | July | 771,262 | 567,115 |
| 2018 | August | 782,725 | 556,811 |
| 2018 | September | 769,181 | 556,403 |
| 2018 | October | 767,190 | 541,318 |
| 2018 | November | 753,602 | 543,360 |
| 2018 | December | 764,781 | 523,119 |
| 2019 | January | 771,568 | 522,830 |
| 2019 | February | 789,974 | 522,444 |
| 2019 | March | 799,988 | 523,776 |
| 2019 | April | 827,586 | 530,488 |
| 2019 | May | 829,698 | 538,194 |
| 2019 | June | 837,803 | 549,077 |
| 2019 | July | 852,036 | 560,959 |
| 2019 | August | 858,892 | 566,061 |
| 2019 | September | 865,556 | 569,395 |
| 2019 | October | 864,303 | 572,486 |
| 2019 | November | 874,437 | 585,352 |
| 2019 | December | 872,324 | 591,208 |

Table continued.

**Table II-11 Continued**
**Construction spending: Values of U.S. Residential and non-residential construction spending, seasonally adjusted at annual rates, by month, January 2016 to June 2022**

Values in millions of U.S. dollars

| Year | Month | Nonresidential | Residential |
|---|---|---|---|
| 2020 | January | 884,156 | 605,832 |
| 2020 | February | 884,837 | 617,004 |
| 2020 | March | 881,676 | 627,211 |
| 2020 | April | 858,261 | 607,913 |
| 2020 | May | 861,608 | 600,302 |
| 2020 | June | 860,164 | 603,019 |
| 2020 | July | 850,707 | 624,276 |
| 2020 | August | 838,817 | 648,039 |
| 2020 | September | 837,584 | 667,490 |
| 2020 | October | 838,538 | 687,334 |
| 2020 | November | 835,169 | 707,819 |
| 2020 | December | 837,688 | 728,680 |
| 2021 | January | 838,758 | 744,622 |
| 2021 | February | 821,971 | 747,851 |
| 2021 | March | 832,446 | 768,074 |
| 2021 | April | 828,374 | 780,114 |
| 2021 | May | 824,214 | 797,728 |
| 2021 | June | 819,324 | 808,662 |
| 2021 | July | 821,846 | 815,483 |
| 2021 | August | 821,003 | 820,597 |
| 2021 | September | 809,705 | 823,155 |
| 2021 | October | 818,428 | 825,903 |
| 2021 | November | 832,195 | 832,997 |
| 2021 | December | 828,737 | 852,307 |
| 2022 | January | 835,822 | 890,763 |
| 2022 | February | 841,077 | 912,047 |
| 2022 | March | 839,145 | 929,023 |
| 2022 | April | 840,292 | 940,598 |
| 2022 | May | 839,303 | 954,475 |
| 2022 | June | 840,687 | 943,612 |

Source: Federal Reserve Economic Data, https://fed.stlousisfed.org; Retrieved September 30, 2022.

**Substitute products**

Substitutes for CTL plate are limited. All responding U.S. producers and the majority of importers and purchasers reported that there had been no changes to the substitutes for CTL plate since 2016 and do not anticipate future changes. U.S. producer *** reported that there had been a small amount of substitution of CTL plate with heavier hot-rolled steel. Importer *** reported that discrete plate has been used as a substitute for CTL steel plate. Importers *** reported that wear resistant products with high formability and weldability might be a future substitute for the yellow goods[9] industry, high alloy nickel plate can serve as a substitute for CTL plate for in pressure vessels, and thermomechanically rolled plate in 100mm or more thickness can be used to substitute CTL plate in offshore wind towers and monopiles.

## Substitutability issues

This section assesses the degree to which U.S.-produced CTL plate and imports of CTL plate from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of CTL plate from domestic and imported sources based on those factors. Based on available data, staff believes that there is a at least a moderate to high degree of substitutability[10] between domestically produced CTL plate and CTL plate imported from subject sources in the merchant market.[11] Factors contributing to this level of substitutability include similar quality, availability, little preference for particular country of origin or producers, similarities between domestically produced CTL plate and CTL plate imported from subject countries across multiple purchase factors, interchangeability between domestic and subject sources, and limited significant factors other than price. Factors that may

[9] Yellow goods are strong, wear resistant steels used for construction and earth-moving equipment, quarrying equipment, and fork-lift trucks. This term can also be used to encompass agricultural equipment, such as tractors.

[10] The degree of substitution between domestic and imported CTL plate depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced CTL plate to the CTL plate imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as relative prices (discounts/rebates), quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

[11] In the original investigations, domestically produced CTL Plate and product imported from subject sources was estimated to have a moderate to high degree of substitutability. Original publication, p. II-25.

reduce this level of substitutability include customer requirements, different lead times, and delivery times from domestic and subject sources.

## Factors affecting purchasing decisions[12]

### Purchaser decisions based on source

As shown in table II-12, most purchasers and their customers usually or sometimes make purchasing decisions based on the producer. Purchaser *** reported that it always makes decisions based on the producer, explaining that it maintains an approved suppliers list and selects suppliers based on compliance on specific project requirements on a case-by-case basis. A plurality of purchasers reported that they and their customers sometimes make purchasing decisions based on the country of origin.

**Table II-12**
**CTL plate: Count of purchasers' responses regarding frequency of purchasing decisions based on producer and country of origin**

| Firm making decision | Decision based on | Always | Usually | Sometimes | Never |
|---|---|---|---|---|---|
| Purchaser | Producer | 3 | 5 | 5 | 1 |
| Customer | Producer | 0 | 4 | 7 | 2 |
| Purchaser | Country | 2 | 3 | 6 | 2 |
| Customer | Country | 0 | 2 | 8 | 2 |

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

### Importance of purchasing domestic product

Eleven of 13 purchasers reported that most or all of their purchases did not require purchasing U.S.-produced product. Six reported that domestic product was required by law (for 1 to 15 percent of their purchases), eight reported it was required by their customers (for 1 to 100 percent of their purchases), and two reported other preferences for domestic product (transaction preference and customer preference).

### Most important purchase factors

The most often cited top three factors firms consider in their purchasing decisions for CTL plate were price (13 firms), quality (9 firms), and availability (5 firms), as shown in table II-

[12] Twelve purchasers indicated they had marketing/pricing knowledge of domestic product, 2 of Austrian product, 2 of Belgian product, 4 of Brazilian product, 2 of Chinese product, 4 of French product, 3 of German product, 3 of Italian product, 4 of Japanese product, 2 of South African product, 11 of South Korean product, 3 of Taiwanese product, 3 of Turkish product, and 4 of product from nonsubject countries.

13. Availability was the most frequently cited first-most important factor (cited by 5 firms), followed by price (4 firms); price was the most frequently reported second-most important factor (5 firms), followed by quality (3 firms); and price was the most frequently reported third-most important factor followed by quality.

**Table II-13**
**CTL plate: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor**

| Factor | First | Second | Third | Total |
|---|---|---|---|---|
| Price / Cost | 5 | 5 | 4 | 14 |
| Quality | 3 | 3 | 4 | 10 |
| Availability / Supply | 5 | 0 | 0 | 5 |
| Delivery performance | 0 | 2 | 2 | 4 |
| All other factors | 1 | 4 | 4 | 9 |

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

Note: Other factors include technical requirements, lead time, delivery performance, range of suppliers, strategic relationship, and total landed cost.

Most purchasers (8 of 14) reported that they sometimes purchase the lowest-priced product.

**Importance of specified purchase factors**

Purchasers were asked to rate the importance of 16 factors in their purchasing decisions (table II-14). The factors rated as very important by more than half of responding purchasers were availability, delivery time, price, and product consistency (13 purchasers each); quality meets industry standards (12), reliability of supply (11), availability of grades/products needed (10), delivery terms (9), and payment terms (7).

**Table II-14**
**CTL plate: Count of purchasers' responses regarding importance of purchase factors, by factor**

Number of firms reporting

| Factor | Very important | Somewhat important | Not important |
|---|---|---|---|
| Availability | 13 | 2 | 0 |
| Availability of grades/products needed | 10 | 4 | 0 |
| Delivery terms | 9 | 4 | 1 |
| Delivery time | 13 | 1 | 0 |
| Discounts offered | 5 | 6 | 3 |
| Minimum quantity requirements | 2 | 9 | 2 |
| Packaging | 1 | 8 | 5 |
| Payment terms | 7 | 5 | 2 |
| Price | 13 | 0 | 0 |
| Product consistency | 13 | 1 | 0 |
| Product range | 6 | 6 | 2 |
| Quality meets industry standards | 12 | 2 | 0 |
| Quality exceeds industry standards | 4 | 10 | 0 |
| Reliability of supply | 11 | 3 | 0 |
| Technical support/service | 3 | 10 | 1 |
| U.S. transportation costs | 6 | 7 | 1 |

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

### Lead times

CTL plate is primarily produced-to-order. U.S. producers reported that 94.4 percent of their commercial shipments were produced-to-order, with lead times averaging 31 days. The remaining 5.6 percent of their commercial shipments came from inventories, with lead times averaging 11 days. For importers, 85.9 percent of their commercial shipments were produced-to-order times with lead times averaging 120 days. When selling out of U.S. inventory (the remaining 14.1 percent), the average lead time is 21 days.

### Supplier certification

Seven of 14 responding purchasers require their suppliers to become certified or qualified to sell CTL plate to their firm. Purchasers reported that the time to qualify a new supplier ranged from 5 to 160 days, with most purchasers reporting an average of 60 days. Two purchasers reported that a domestic or foreign supplier had failed in its attempt to qualify product or had lost its approval status since 2016. Purchaser *** reported that domestic producer JSW Steel lost certification in 2019 due to quality issues, and was recertified in 2021, and *** stated that NLMK DanSteel (Denmark) failed to qualify as a supplier for grade X70, due to inconsistent mechanical properties.

### Minimum quality specifications

As can be seen from table II-15, most responding purchasers reported that domestically produced product "always" or "usually" met minimum quality specifications. All responding purchasers with knowledge of CTL plate from subject sources in South Korea reported that these sources "always" or "usually" met minimum quality specifications. Although most purchasers generally did not know if CTL plate from other subject countries met minimum quality requirements, those that did generally reported that the products always or usually met minimum quality specifications except for the sole purchaser responding with respect to China and one of three responding with respect to Turkey.

**Table II-15**
**CTL plate: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source**

Number of firms reporting

| Source of purchases | Always | Usually | Sometimes | Rarely or never | Don't Know |
|---|---|---|---|---|---|
| United States | 5 | 8 | 0 | 0 | 1 |
| Austria | 0 | 1 | 0 | 0 | 13 |
| Belgium | 0 | 1 | 0 | 0 | 13 |
| Brazil | 1 | 1 | 0 | 0 | 12 |
| China | 0 | 0 | 1 | 0 | 13 |
| France | 2 | 1 | 0 | 0 | 11 |
| Germany | 1 | 1 | 0 | 0 | 12 |
| Italy | 2 | 1 | 0 | 0 | 11 |
| Japan | 2 | 3 | 0 | 0 | 9 |
| South Africa | 0 | 0 | 0 | 0 | 14 |
| South Korea, subject | 4 | 5 | 0 | 0 | 5 |
| Taiwan | 1 | 2 | 0 | 0 | 10 |
| Turkey | 1 | 1 | 1 | 0 | 11 |
| All other sources | 0 | 1 | 0 | 0 | 6 |

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

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

### Changes in purchasing patterns

Purchasers were asked about changes in their purchasing patterns from different sources since 2016 (table II-16); reasons reported for changes in sourcing included market conditions, the antidumping orders, and competitiveness of offers. Eleven of 14s responding purchasers reported that they had changed suppliers since January 1, 2016. Specifically, firms

dropped or reduced purchases from USIMINAS, SSAB, Nucor, Mittal, and EVRAZ. Reasons cited were the antidumping orders, price, performance, or strategic realignments. Firms added or increased purchases from Hyundai Steel, Steel Dynamics, and JSW Steel to increase capacity, competition among suppliers, or broaden supply options. Firms also reported changes because of customer negotiations, plant purchases, plant closures, or rotating purchasers.

**Table II-16**
**CTL plate: Count of purchasers' responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries**

Number of firms reporting

| Source of purchases | Decreased | Increased | Constant | Fluctuated | Did not purchase |
|---|---|---|---|---|---|
| United States | 0 | 2 | 7 | 4 | 1 |
| Austria | 1 | 0 | 0 | 0 | 12 |
| Belgium | 1 | 0 | 0 | 0 | 12 |
| Brazil | 1 | 0 | 0 | 0 | 11 |
| China | 1 | 0 | 0 | 0 | 12 |
| France | 1 | 0 | 0 | 0 | 12 |
| Germany | 1 | 0 | 0 | 0 | 12 |
| Italy | 1 | 0 | 1 | 0 | 11 |
| Japan | 1 | 0 | 0 | 0 | 12 |
| South Africa | 0 | 0 | 0 | 0 | 12 |
| South Korea, subject | 5 | 1 | 0 | 3 | 4 |
| Taiwan | 1 | 0 | 0 | 0 | 11 |
| Turkey | 2 | 0 | 0 | 0 | 11 |
| All other sources | 0 | 0 | 3 | 2 | 9 |
| Sources unknown | 1 | 0 | 0 | 0 | 9 |

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

## Purchase factor comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a number of questions comparing CTL plate produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 16 factors (table II-17) for which they were asked to rate the importance.

In comparisons with product from subject sources, a majority of purchasers rated domestic product as comparable with product from each subject source on most factors. Domestic product was ranked as superior in comparisons with subject sources regarding availability, reliability of supply, and U.S. transportation cost. Domestic product was rated inferior concerning price (in comparison to all subject sources except Austria, Belgium, and

Brazil), delivery time (in comparison to China, Italy, Japan, South Korea, and Taiwan), and delivery terms (in comparison to Austria, Belgium, Brazil).

Most purchasers reported that U.S. and nonsubject CTL plate were comparable on most factors except availability, delivery time, reliability of supply, and U.S. transportation cost (for which domestic CTL plate was ranked superior), and delivery terms, minimum quantity requirements, and payment terms (for which an equal number of purchasers ranked domestic CTL plate as superior or comparable). Domestic product was ranked inferior to nonsubject CTL plate on price.

**Table II-17**
**CTL plate: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

| Factor | Country pair | Superior | Comparable | Inferior |
|---|---|---|---|---|
| Availability | U.S. vs Austria | 1 | 0 | 0 |
| Availability of grades/products needed | U.S. vs Austria | 0 | 1 | 0 |
| Delivery terms | U.S. vs Austria | 0 | 0 | 1 |
| Delivery time | U.S. vs Austria | 1 | 0 | 0 |
| Discounts offered | U.S. vs Austria | 1 | 0 | 0 |
| Minimum quantity requirements | U.S. vs Austria | 0 | 1 | 0 |
| Packaging | U.S. vs Austria | 0 | 1 | 0 |
| Payment terms | U.S. vs Austria | 0 | 1 | 0 |
| Price | U.S. vs Austria | 0 | 1 | 0 |
| Product consistency | U.S. vs Austria | 0 | 1 | 0 |
| Product range | U.S. vs Austria | 0 | 1 | 0 |
| Quality meets industry standards | U.S. vs Austria | 0 | 1 | 0 |
| Quality exceeds industry standards | U.S. vs Austria | 0 | 1 | 0 |
| Reliability of supply | U.S. vs Austria | 1 | 0 | 0 |
| Technical support/service | U.S. vs Austria | 0 | 1 | 0 |
| U.S. transportation costs | U.S. vs Austria | 1 | 0 | 0 |

Table continued.

**Table II-17 Continued**
**CTL plate: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

| Factor | Country pair | Superior | Comparable | Inferior |
|---|---|---|---|---|
| Availability | U.S. vs Belgium | 1 | 0 | 0 |
| Availability of grades/products needed | U.S. vs Belgium | 0 | 1 | 0 |
| Delivery terms | U.S. vs Belgium | 0 | 0 | 1 |
| Delivery time | U.S. vs Belgium | 1 | 0 | 0 |
| Discounts offered | U.S. vs Belgium | 1 | 0 | 0 |
| Minimum quantity requirements | U.S. vs Belgium | 0 | 1 | 0 |
| Packaging | U.S. vs Belgium | 0 | 1 | 0 |
| Payment terms | U.S. vs Belgium | 0 | 1 | 0 |
| Price | U.S. vs Belgium | 0 | 1 | 0 |
| Product consistency | U.S. vs Belgium | 0 | 1 | 0 |
| Product range | U.S. vs Belgium | 0 | 1 | 0 |
| Quality meets industry standards | U.S. vs Belgium | 0 | 1 | 0 |
| Quality exceeds industry standards | U.S. vs Belgium | 0 | 1 | 0 |
| Reliability of supply | U.S. vs Belgium | 1 | 0 | 0 |
| Technical support/service | U.S. vs Belgium | 0 | 1 | 0 |
| U.S. transportation costs | U.S. vs Belgium | 1 | 0 | 0 |

Table continued.

**Table II-17 Continued**
**CTL plate: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

| Factor | Country pair | Superior | Comparable | Inferior |
|---|---|---|---|---|
| Availability | U.S. vs Brazil | 2 | 0 | 0 |
| Availability of grades/products needed | U.S. vs Brazil | 0 | 2 | 0 |
| Delivery terms | U.S. vs Brazil | 1 | 0 | 1 |
| Delivery time | U.S. vs Brazil | 2 | 0 | 0 |
| Discounts offered | U.S. vs Brazil | 1 | 1 | 0 |
| Minimum quantity requirements | U.S. vs Brazil | 0 | 2 | 0 |
| Packaging | U.S. vs Brazil | 0 | 2 | 0 |
| Payment terms | U.S. vs Brazil | 1 | 1 | 0 |
| Price | U.S. vs Brazil | 0 | 2 | 0 |
| Product consistency | U.S. vs Brazil | 0 | 1 | 0 |
| Product range | U.S. vs Brazil | 0 | 1 | 0 |
| Quality meets industry standards | U.S. vs Brazil | 0 | 1 | 0 |
| Quality exceeds industry standards | U.S. vs Brazil | 0 | 1 | 0 |
| Reliability of supply | U.S. vs Brazil | 1 | 0 | 0 |
| Technical support/service | U.S. vs Brazil | 0 | 1 | 0 |
| U.S. transportation costs | U.S. vs Brazil | 2 | 0 | 0 |

Table continued.

**Table II-17 Continued**
**CTL plate: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

| Factor | Country pair | Superior | Comparable | Inferior |
|---|---|---|---|---|
| Availability | U.S. vs China | 2 | 1 | 0 |
| Availability of grades/products needed | U.S. vs China | 1 | 2 | 0 |
| Delivery terms | U.S. vs China | 1 | 1 | 1 |
| Delivery time | U.S. vs China | 2 | 0 | 1 |
| Discounts offered | U.S. vs China | 0 | 2 | 1 |
| Minimum quantity requirements | U.S. vs China | 1 | 2 | 0 |
| Packaging | U.S. vs China | 0 | 2 | 1 |
| Payment terms | U.S. vs China | 1 | 1 | 1 |
| Price | U.S. vs China | 0 | 1 | 2 |
| Product consistency | U.S. vs China | 1 | 1 | 0 |
| Product range | U.S. vs China | 1 | 1 | 0 |
| Quality meets industry standards | U.S. vs China | 1 | 1 | 0 |
| Quality exceeds industry standards | U.S. vs China | 1 | 1 | 0 |
| Reliability of supply | U.S. vs China | 1 | 0 | 1 |
| Technical support/service | U.S. vs China | 0 | 1 | 1 |
| U.S. transportation costs | U.S. vs China | 2 | 1 | 0 |

Table continued.

**Table II-17 Continued**
**CTL plate: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

| Factor | Country pair | Superior | Comparable | Inferior |
|---|---|---|---|---|
| Availability | U.S. vs France | 1 | 2 | 0 |
| Availability of grades/products needed | U.S. vs France | 2 | 0 | 1 |
| Delivery terms | U.S. vs France | 0 | 3 | 0 |
| Delivery time | U.S. vs France | 2 | 1 | 0 |
| Discounts offered | U.S. vs France | 0 | 3 | 0 |
| Minimum quantity requirements | U.S. vs France | 1 | 1 | 1 |
| Packaging | U.S. vs France | 0 | 3 | 0 |
| Payment terms | U.S. vs France | 0 | 3 | 0 |
| Price | U.S. vs France | 0 | 2 | 1 |
| Product consistency | U.S. vs France | 0 | 2 | 1 |
| Product range | U.S. vs France | 1 | 1 | 1 |
| Quality meets industry standards | U.S. vs France | 0 | 3 | 0 |
| Quality exceeds industry standards | U.S. vs France | 0 | 2 | 1 |
| Reliability of supply | U.S. vs France | 1 | 1 | 1 |
| Technical support/service | U.S. vs France | 0 | 1 | 2 |
| U.S. transportation costs | U.S. vs France | 1 | 0 | 2 |

Table continued.

**Table II-17 Continued**
**CTL plate: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

| Factor | Country pair | Superior | Comparable | Inferior |
|---|---|---|---|---|
| Availability | U.S. vs Germany | 2 | 1 | 0 |
| Availability of grades/products needed | U.S. vs Germany | 1 | 2 | 0 |
| Delivery terms | U.S. vs Germany | 1 | 2 | 0 |
| Delivery time | U.S. vs Germany | 3 | 0 | 0 |
| Discounts offered | U.S. vs Germany | 0 | 3 | 0 |
| Minimum quantity requirements | U.S. vs Germany | 1 | 2 | 0 |
| Packaging | U.S. vs Germany | 0 | 3 | 0 |
| Payment terms | U.S. vs Germany | 1 | 2 | 0 |
| Price | U.S. vs Germany | 0 | 2 | 1 |
| Product consistency | U.S. vs Germany | 0 | 1 | 1 |
| Product range | U.S. vs Germany | 0 | 1 | 1 |
| Quality meets industry standards | U.S. vs Germany | 0 | 2 | 0 |
| Quality exceeds industry standards | U.S. vs Germany | 0 | 1 | 1 |
| Reliability of supply | U.S. vs Germany | 1 | 1 | 0 |
| Technical support/service | U.S. vs Germany | 0 | 1 | 1 |
| U.S. transportation costs | U.S. vs Germany | 2 | 0 | 1 |

Table continued.

**Table II-17 Continued**
**CTL plate: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

| Factor | Country pair | Superior | Comparable | Inferior |
|---|---|---|---|---|
| Availability | U.S. vs Italy | 1 | 1 | 1 |
| Availability of grades/products needed | U.S. vs Italy | 1 | 1 | 1 |
| Delivery terms | U.S. vs Italy | 0 | 2 | 1 |
| Delivery time | U.S. vs Italy | 1 | 1 | 1 |
| Discounts offered | U.S. vs Italy | 0 | 2 | 0 |
| Minimum quantity requirements | U.S. vs Italy | 1 | 1 | 1 |
| Packaging | U.S. vs Italy | 0 | 2 | 1 |
| Payment terms | U.S. vs Italy | 0 | 3 | 0 |
| Price | U.S. vs Italy | 0 | 2 | 1 |
| Product consistency | U.S. vs Italy | 1 | 1 | 1 |
| Product range | U.S. vs Italy | 1 | 1 | 1 |
| Quality meets industry standards | U.S. vs Italy | 0 | 2 | 1 |
| Quality exceeds industry standards | U.S. vs Italy | 0 | 2 | 1 |
| Reliability of supply | U.S. vs Italy | 1 | 1 | 1 |
| Technical support/service | U.S. vs Italy | 0 | 2 | 1 |
| U.S. transportation costs | U.S. vs Italy | 2 | 1 | 0 |

Table continued.

**Table II-17 Continued**
**CTL plate: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

| Factor | Country pair | Superior | Comparable | Inferior |
|---|---|---|---|---|
| Availability | U.S. vs Japan | 2 | 2 | 0 |
| Availability of grades/products needed | U.S. vs Japan | 1 | 3 | 0 |
| Delivery terms | U.S. vs Japan | 1 | 3 | 0 |
| Delivery time | U.S. vs Japan | 2 | 1 | 1 |
| Discounts offered | U.S. vs Japan | 0 | 3 | 0 |
| Minimum quantity requirements | U.S. vs Japan | 1 | 3 | 0 |
| Packaging | U.S. vs Japan | 0 | 4 | 0 |
| Payment terms | U.S. vs Japan | 0 | 4 | 0 |
| Price | U.S. vs Japan | 0 | 2 | 2 |
| Product consistency | U.S. vs Japan | 0 | 3 | 1 |
| Product range | U.S. vs Japan | 0 | 3 | 1 |
| Quality meets industry standards | U.S. vs Japan | 0 | 4 | 0 |
| Quality exceeds industry standards | U.S. vs Japan | 1 | 3 | 0 |
| Reliability of supply | U.S. vs Japan | 2 | 2 | 0 |
| Technical support/service | U.S. vs Japan | 2 | 2 | 0 |
| U.S. transportation costs | U.S. vs Japan | 2 | 1 | 1 |

Table continued.

**Table II-17 Continued**
**CTL plate: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

| Factor | Country pair | Superior | Comparable | Inferior |
|---|---|---|---|---|
| Availability | U.S. vs South Africa | 1 | 0 | 0 |
| Availability of grades/products needed | U.S. vs South Africa | 1 | 0 | 0 |
| Delivery terms | U.S. vs South Africa | 0 | 1 | 0 |
| Delivery time | U.S. vs South Africa | 1 | 0 | 0 |
| Discounts offered | U.S. vs South Africa | 0 | 1 | 0 |
| Minimum quantity requirements | U.S. vs South Africa | 1 | 0 | 0 |
| Packaging | U.S. vs South Africa | 0 | 1 | 0 |
| Payment terms | U.S. vs South Africa | 0 | 1 | 0 |
| Price | U.S. vs South Africa | 0 | 0 | 1 |
| Product consistency | U.S. vs South Africa | 1 | 0 | 0 |
| Product range | U.S. vs South Africa | 1 | 0 | 0 |
| Quality meets industry standards | U.S. vs South Africa | 0 | 1 | 0 |
| Quality exceeds industry standards | U.S. vs South Africa | 0 | 1 | 0 |
| Reliability of supply | U.S. vs South Africa | 1 | 0 | 0 |
| Technical support/service | U.S. vs South Africa | 0 | 1 | 0 |
| U.S. transportation costs | U.S. vs South Africa | 1 | 0 | 0 |

Table continued.

**Table II-17 Continued**
**CTL plate: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

| Factor | Country pair | Superior | Comparable | Inferior |
|---|---|---|---|---|
| Availability | U.S. vs South Korea, subject | 4 | 4 | 1 |
| Availability of grades/products needed | U.S. vs South Korea, subject | 2 | 7 | 0 |
| Delivery terms | U.S. vs South Korea, subject | 3 | 6 | 0 |
| Delivery time | U.S. vs South Korea, subject | 6 | 2 | 1 |
| Discounts offered | U.S. vs South Korea, subject | 0 | 7 | 0 |
| Minimum quantity requirements | U.S. vs South Korea, subject | 3 | 4 | 0 |
| Packaging | U.S. vs South Korea, subject | 0 | 8 | 0 |
| Payment terms | U.S. vs South Korea, subject | 3 | 6 | 0 |
| Price | U.S. vs South Korea, subject | 1 | 5 | 2 |
| Product consistency | U.S. vs South Korea, subject | 0 | 6 | 1 |
| Product range | U.S. vs South Korea, subject | 1 | 6 | 1 |
| Quality meets industry standards | U.S. vs South Korea, subject | 0 | 8 | 0 |
| Quality exceeds industry standards | U.S. vs South Korea, subject | 0 | 7 | 1 |
| Reliability of supply | U.S. vs South Korea, subject | 2 | 4 | 2 |
| Technical support/service | U.S. vs South Korea, subject | 2 | 5 | 0 |
| U.S. transportation costs | U.S. vs South Korea, subject | 4 | 5 | 0 |

Table continued.

**Table II-17 Continued**
**CTL plate: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

| Factor | Country pair | Superior | Comparable | Inferior |
|---|---|---|---|---|
| Availability | U.S. vs Taiwan | 1 | 2 | 0 |
| Availability of grades/products needed | U.S. vs Taiwan | 2 | 1 | 0 |
| Delivery terms | U.S. vs Taiwan | 0 | 3 | 0 |
| Delivery time | U.S. vs Taiwan | 1 | 1 | 1 |
| Discounts offered | U.S. vs Taiwan | 0 | 2 | 0 |
| Minimum quantity requirements | U.S. vs Taiwan | 1 | 2 | 0 |
| Packaging | U.S. vs Taiwan | 0 | 3 | 0 |
| Payment terms | U.S. vs Taiwan | 0 | 3 | 0 |
| Price | U.S. vs Taiwan | 0 | 1 | 2 |
| Product consistency | U.S. vs Taiwan | 0 | 2 | 1 |
| Product range | U.S. vs Taiwan | 1 | 1 | 1 |
| Quality meets industry standards | U.S. vs Taiwan | 0 | 3 | 0 |
| Quality exceeds industry standards | U.S. vs Taiwan | 1 | 2 | 0 |
| Reliability of supply | U.S. vs Taiwan | 2 | 1 | 0 |
| Technical support/service | U.S. vs Taiwan | 1 | 2 | 0 |
| U.S. transportation costs | U.S. vs Taiwan | 1 | 1 | 0 |

Table continued.

**Table II-17 Continued**
**CTL plate: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

| Factor | Country pair | Superior | Comparable | Inferior |
|---|---|---|---|---|
| Availability | U.S. vs Turkey | 1 | 1 | 0 |
| Availability of grades/products needed | U.S. vs Turkey | 1 | 1 | 0 |
| Delivery terms | U.S. vs Turkey | 0 | 2 | 0 |
| Delivery time | U.S. vs Turkey | 1 | 1 | 0 |
| Discounts offered | U.S. vs Turkey | 0 | 1 | 0 |
| Minimum quantity requirements | U.S. vs Turkey | 1 | 1 | 0 |
| Packaging | U.S. vs Turkey | 0 | 2 | 0 |
| Payment terms | U.S. vs Turkey | 0 | 2 | 0 |
| Price | U.S. vs Turkey | 0 | 1 | 1 |
| Product consistency | U.S. vs Turkey | 0 | 2 | 0 |
| Product range | U.S. vs Turkey | 0 | 2 | 0 |
| Quality meets industry standards | U.S. vs Turkey | 0 | 2 | 0 |
| Quality exceeds industry standards | U.S. vs Turkey | 0 | 2 | 0 |
| Reliability of supply | U.S. vs Turkey | 1 | 1 | 0 |
| Technical support/service | U.S. vs Turkey | 0 | 2 | 0 |
| U.S. transportation costs | U.S. vs Turkey | 1 | 1 | 0 |

Table continued.

**Table II-17 Continued**
**CTL plate: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

| Factor | Country pair | Superior | Comparable | Inferior |
|---|---|---|---|---|
| Availability | U.S. vs Nonsubject sources | 2 | 0 | 0 |
| Availability of grades/products needed | U.S. vs Nonsubject sources | 0 | 2 | 0 |
| Delivery terms | U.S. vs Nonsubject sources | 1 | 1 | 0 |
| Delivery time | U.S. vs Nonsubject sources | 2 | 0 | 0 |
| Discounts offered | U.S. vs Nonsubject sources | 0 | 2 | 0 |
| Minimum quantity requirements | U.S. vs Nonsubject sources | 1 | 1 | 0 |
| Packaging | U.S. vs Nonsubject sources | 0 | 2 | 0 |
| Payment terms | U.S. vs Nonsubject sources | 1 | 1 | 0 |
| Price | U.S. vs Nonsubject sources | 0 | 1 | 1 |
| Product consistency | U.S. vs Nonsubject sources | 0 | 1 | 0 |
| Product range | U.S. vs Nonsubject sources | 0 | 1 | 0 |
| Quality meets industry standards | U.S. vs Nonsubject sources | 0 | 1 | 0 |
| Quality exceeds industry standards | U.S. vs Nonsubject sources | 0 | 1 | 0 |
| Reliability of supply | U.S. vs Nonsubject sources | 1 | 0 | 0 |
| Technical support/service | U.S. vs Nonsubject sources | 0 | 1 | 0 |
| U.S. transportation costs | U.S. vs Nonsubject sources | 2 | 0 | 0 |

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

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

## Comparison of U.S.-produced and imported CTL plate

In order to determine whether U.S.-produced CTL plate can generally be used in the same applications as imports from subject sources, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables II-18 to II-20, almost all responding U.S. producers reported that product from domestic and subject sources were always interchangeable. Most subject sources were reported to be frequently interchangeable with U.S. product by a majority or plurality of importers each with more importers reporting that each subject source was always or frequently interchangeable with U.S. product than reported “sometimes” or “never” interchangeable. Purchasers generally reported that CTL plate from subject sources was frequently or sometimes interchangeable with U.S. product, with a majority reporting “sometimes” for Belgium, France, Germany, Italy, Japan, Taiwan and Turkey. Most responding purchasers reported that CTL plate from subject sources in South Korea was frequently interchangeable with U.S. product.

Importer *** and ***, which indicated domestic and Japanese CTL plate were frequently interchangeable, reported that customer requirements limit interchangeability. Importer *** reported that U.S. products are only sometimes interchangeable with CTL plate from France and Germany because of the special quality of French and German products, stating thermomechanical rolling that permits the production of steel having the finest possible grain but maintaining very low alloy contents. Importer *** reported that products from Belgium and Italy are sometimes interchangeable due to requirements of customers and grades and specification for designated applications and are not interchangeable with U.S. products due to non-availability of wide floor plates from domestic suppliers. Importer and purchaser *** reported that factors limiting interchangeability between domestically produced CTL plate and imports of CTL plate from Germany, France, Korea, Japan, and nonsubject sources include producing steel suitable for API grades, meeting company and customer specifications, and limited production capability guarantees in aspects such as width, gauge, grade and chemistry or physical properties—especially regarding grade X70. *** added that it is often the case that although domestic product can deliver the quality standard requirements of API 5L grade X70, domestic producers have difficulty complying with customers' requirements that are project specific.

**Table II-18**
**CTL plate: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|---|---|---|---|---|
| United States vs. Austria | 4 | 1 | 0 | 0 |
| United States vs. Belgium | 4 | 1 | 0 | 0 |
| United States vs. Brazil | 4 | 1 | 0 | 0 |
| United States vs. China | 4 | 1 | 0 | 0 |
| United States vs. France | 4 | 1 | 0 | 0 |
| United States vs. Germany | 4 | 1 | 0 | 0 |
| United States vs. Italy | 4 | 1 | 0 | 0 |
| United States vs. Japan | 4 | 1 | 0 | 0 |
| United States vs. South Africa | 4 | 1 | 0 | 0 |
| United States vs. South Korea, Subject | 4 | 1 | 0 | 0 |
| United States vs. Taiwan | 4 | 1 | 0 | 0 |
| United States vs. Turkey | 4 | 1 | 0 | 0 |
| Austria vs. Belgium | 4 | 0 | 0 | 0 |
| Austria vs. Brazil | 4 | 0 | 0 | 0 |
| Austria vs. China | 4 | 0 | 0 | 0 |
| Austria vs. France | 4 | 0 | 0 | 0 |
| Austria vs. Germany | 4 | 0 | 0 | 0 |
| Austria vs. Italy | 4 | 0 | 0 | 0 |
| Austria vs. Japan | 4 | 0 | 0 | 0 |
| Austria vs. South Africa | 4 | 0 | 0 | 0 |
| Austria vs. South Korea, Subject | 4 | 0 | 0 | 0 |
| Austria vs. Taiwan | 4 | 0 | 0 | 0 |
| Austria vs. Turkey | 4 | 0 | 0 | 0 |
| Belgium vs. Brazil | 4 | 0 | 0 | 0 |
| Belgium vs. China | 4 | 0 | 0 | 0 |
| Belgium vs. France | 4 | 0 | 0 | 0 |
| Belgium vs. Germany | 4 | 0 | 0 | 0 |
| Belgium vs. Italy | 4 | 0 | 0 | 0 |
| Belgium vs. Japan | 4 | 0 | 0 | 0 |
| Belgium vs. South Africa | 4 | 0 | 0 | 0 |
| Belgium vs. South Korea, Subject | 4 | 0 | 0 | 0 |
| Belgium vs. Taiwan | 4 | 0 | 0 | 0 |
| Belgium vs. Turkey | 4 | 0 | 0 | 0 |

Table continued.

**Table II-18 Continued**
**CTL plate: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|---|---|---|---|---|
| Brazil vs. China | 4 | 0 | 0 | 0 |
| Brazil vs. France | 4 | 0 | 0 | 0 |
| Brazil vs. Germany | 4 | 0 | 0 | 0 |
| Brazil vs. Italy | 4 | 0 | 0 | 0 |
| Brazil vs. Japan | 4 | 0 | 0 | 0 |
| Brazil vs. South Africa | 4 | 0 | 0 | 0 |
| Brazil vs. South Korea, Subject | 4 | 0 | 0 | 0 |
| Brazil vs. Taiwan | 4 | 0 | 0 | 0 |
| Brazil vs. Turkey | 4 | 0 | 0 | 0 |
| China vs. France | 4 | 0 | 0 | 0 |
| China vs. Germany | 4 | 0 | 0 | 0 |
| China vs. Italy | 4 | 0 | 0 | 0 |
| China vs. Japan | 4 | 0 | 0 | 0 |
| China vs. South Africa | 4 | 0 | 0 | 0 |
| China vs. South Korea, Subject | 4 | 0 | 0 | 0 |
| China vs. Taiwan | 4 | 0 | 0 | 0 |
| China vs. Turkey | 4 | 0 | 0 | 0 |
| France vs. Germany | 4 | 0 | 0 | 0 |
| France vs. Italy | 4 | 0 | 0 | 0 |
| France vs. Japan | 4 | 0 | 0 | 0 |
| France vs. South Africa | 4 | 0 | 0 | 0 |
| France vs. South Korea, Subject | 4 | 0 | 0 | 0 |
| France vs. Taiwan | 4 | 0 | 0 | 0 |
| France vs. Turkey | 4 | 0 | 0 | 0 |
| Germany vs. Italy | 4 | 0 | 0 | 0 |
| Germany vs. Japan | 4 | 0 | 0 | 0 |
| Germany vs. South Africa | 4 | 0 | 0 | 0 |
| Germany vs. South Korea, Subject | 4 | 0 | 0 | 0 |
| Germany vs. Taiwan | 4 | 0 | 0 | 0 |
| Germany vs. Turkey | 4 | 0 | 0 | 0 |
| Italy vs. Japan | 4 | 0 | 0 | 0 |
| Italy vs. South Africa | 4 | 0 | 0 | 0 |
| Italy vs. South Korea, Subject | 4 | 0 | 0 | 0 |
| Italy vs. Taiwan | 4 | 0 | 0 | 0 |
| Italy vs. Turkey | 4 | 0 | 0 | 0 |

Table continued.

**Table II-18 Continued**
**CTL plate: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|---|---|---|---|---|
| Japan vs. South Africa | 4 | 0 | 0 | 0 |
| Japan vs. South Korea, Subject | 4 | 0 | 0 | 0 |
| Japan vs. Taiwan | 4 | 0 | 0 | 0 |
| Japan vs. Turkey | 4 | 0 | 0 | 0 |
| South Africa vs. South Korea, Subject | 4 | 0 | 0 | 0 |
| South Africa vs. Taiwan | 4 | 0 | 0 | 0 |
| South Africa vs. Turkey | 4 | 0 | 0 | 0 |
| South Korea vs. Taiwan | 4 | 0 | 0 | 0 |
| South Korea vs. Turkey | 4 | 0 | 0 | 0 |
| Taiwan vs. Turkey | 4 | 0 | 0 | 0 |
| United States vs. Other | 4 | 1 | 0 | 0 |
| Austria vs. Other | 4 | 0 | 0 | 0 |
| Belgium vs. Other | 4 | 0 | 0 | 0 |
| Brazil vs. Other | 4 | 0 | 0 | 0 |
| China vs. Other | 4 | 0 | 0 | 0 |
| France vs. Other | 4 | 0 | 0 | 0 |
| Germany vs. Other | 4 | 0 | 0 | 0 |
| Italy vs. Other | 4 | 0 | 0 | 0 |
| Japan vs. Other | 4 | 0 | 0 | 0 |
| South Africa vs. Other | 4 | 0 | 0 | 0 |
| South Korea, Subject vs. Other | 4 | 0 | 0 | 0 |
| Taiwan vs. Other | 4 | 0 | 0 | 0 |
| Turkey vs. Other | 4 | 0 | 0 | 0 |

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

**Table II-19**
**CTL plate: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|---|---|---|---|---|
| United States vs. Austria | 3 | 6 | 3 | 1 |
| United States vs. Belgium | 2 | 6 | 2 | 0 |
| United States vs. Brazil | 2 | 5 | 3 | 0 |
| United States vs. China | 3 | 3 | 3 | 1 |
| United States vs. France | 2 | 7 | 3 | 0 |
| United States vs. Germany | 5 | 7 | 6 | 0 |
| United States vs. Italy | 2 | 6 | 1 | 0 |
| United States vs. Japan | 2 | 7 | 7 | 0 |
| United States vs. South Africa | 2 | 3 | 3 | 0 |
| United States vs. South Korea, Subject | 2 | 8 | 2 | 0 |
| United States vs. Taiwan | 2 | 3 | 3 | 0 |
| United States vs. Turkey | 2 | 4 | 3 | 0 |
| Austria vs. Belgium | 2 | 5 | 1 | 1 |
| Austria vs. Brazil | 2 | 4 | 4 | 0 |
| Austria vs. China | 3 | 3 | 3 | 1 |
| Austria vs. France | 2 | 6 | 1 | 1 |
| Austria vs. Germany | 3 | 7 | 1 | 0 |
| Austria vs. Italy | 2 | 7 | 0 | 1 |
| Austria vs. Japan | 2 | 6 | 1 | 0 |
| Austria vs. South Africa | 2 | 3 | 3 | 1 |
| Austria vs. South Korea, Subject | 2 | 6 | 0 | 1 |
| Austria vs. Taiwan | 2 | 3 | 3 | 1 |
| Austria vs. Turkey | 2 | 3 | 3 | 1 |
| Belgium vs. Brazil | 2 | 3 | 4 | 0 |
| Belgium vs. China | 2 | 3 | 4 | 1 |
| Belgium vs. France | 2 | 6 | 2 | 0 |
| Belgium vs. Germany | 2 | 6 | 2 | 0 |
| Belgium vs. Italy | 2 | 6 | 0 | 1 |
| Belgium vs. Japan | 2 | 6 | 1 | 0 |
| Belgium vs. South Africa | 2 | 3 | 3 | 0 |
| Belgium vs. South Korea, Subject | 2 | 6 | 1 | 0 |
| Belgium vs. Taiwan | 2 | 3 | 3 | 0 |
| Belgium vs. Turkey | 2 | 3 | 3 | 0 |

Table continued.

**Table II-19 Continued**
**CTL plate: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|---|---|---|---|---|
| Brazil vs. China | 2 | 5 | 1 | 0 |
| Brazil vs. France | 2 | 4 | 2 | 0 |
| Brazil vs. Germany | 2 | 4 | 3 | 0 |
| Brazil vs. Italy | 2 | 4 | 2 | 0 |
| Brazil vs. Japan | 2 | 5 | 1 | 0 |
| Brazil vs. South Africa | 2 | 5 | 1 | 0 |
| Brazil vs. South Korea, Subject | 2 | 6 | 0 | 0 |
| Brazil vs. Taiwan | 2 | 5 | 1 | 0 |
| Brazil vs. Turkey | 2 | 5 | 1 | 0 |
| China vs. France | 2 | 3 | 3 | 0 |
| China vs. Germany | 3 | 3 | 3 | 0 |
| China vs. Italy | 2 | 3 | 3 | 0 |
| China vs. Japan | 2 | 3 | 3 | 0 |
| China vs. South Africa | 2 | 5 | 1 | 0 |
| China vs. South Korea, Subject | 2 | 5 | 1 | 0 |
| China vs. Taiwan | 2 | 5 | 1 | 0 |
| China vs. Turkey | 2 | 5 | 1 | 0 |
| France vs. Germany | 2 | 7 | 2 | 0 |
| France vs. Italy | 2 | 7 | 0 | 0 |
| France vs. Japan | 2 | 7 | 1 | 0 |
| France vs. South Africa | 2 | 3 | 3 | 0 |
| France vs. South Korea, Subject | 2 | 7 | 1 | 0 |
| France vs. Taiwan | 2 | 3 | 3 | 0 |
| France vs. Turkey | 2 | 4 | 3 | 0 |
| Germany vs. Italy | 2 | 7 | 0 | 0 |
| Germany vs. Japan | 2 | 7 | 1 | 0 |
| Germany vs. South Africa | 2 | 3 | 3 | 0 |
| Germany vs. South Korea, Subject | 2 | 7 | 1 | 0 |
| Germany vs. Taiwan | 2 | 3 | 3 | 0 |
| Germany vs. Turkey | 2 | 4 | 3 | 0 |
| Italy vs. Japan | 2 | 6 | 1 | 0 |
| Italy vs. South Africa | 2 | 3 | 3 | 0 |
| Italy vs. South Korea, Subject | 2 | 6 | 1 | 0 |
| Italy vs. Taiwan | 2 | 3 | 3 | 0 |
| Italy vs. Turkey | 2 | 3 | 3 | 0 |

Table continued.

**Table II-19 Continued**
**CTL plate: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|---|---|---|---|---|
| Japan vs. South Africa | 2 | 3 | 3 | 0 |
| Japan vs. South Korea, Subject | 2 | 5 | 3 | 0 |
| Japan vs. Taiwan | 2 | 5 | 1 | 0 |
| Japan vs. Turkey | 2 | 4 | 3 | 0 |
| South Africa vs. South Korea, Subject | 2 | 5 | 1 | 0 |
| South Africa vs. Taiwan | 2 | 5 | 1 | 0 |
| South Africa vs. Turkey | 2 | 5 | 1 | 0 |
| South Korea vs. Taiwan | 2 | 5 | 1 | 0 |
| South Korea vs. Turkey | 2 | 6 | 1 | 0 |
| Taiwan vs. Turkey | 2 | 5 | 1 | 0 |
| United States vs. Other | 4 | 7 | 6 | 0 |
| Austria vs. Other | 2 | 4 | 4 | 0 |
| Belgium vs. Other | 2 | 5 | 3 | 0 |
| Brazil vs. Other | 2 | 6 | 1 | 0 |
| China vs. Other | 2 | 6 | 1 | 0 |
| France vs. Other | 2 | 5 | 4 | 0 |
| Germany vs. Other | 3 | 5 | 4 | 0 |
| Italy vs. Other | 2 | 4 | 3 | 0 |
| Japan vs. Other | 2 | 5 | 4 | 0 |
| South Africa vs. Other | 2 | 6 | 1 | 0 |
| South Korea, Subject vs. Other | 2 | 7 | 2 | 0 |
| Taiwan vs. Other | 2 | 6 | 1 | 0 |
| Turkey vs. Other | 3 | 6 | 1 | 0 |

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

**Table II-20**
**CTL plate: Count of purchasers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|---|---|---|---|---|
| United States vs. Austria | 0 | 1 | 1 | 0 |
| United States vs. Belgium | 0 | 0 | 2 | 0 |
| United States vs. Brazil | 0 | 2 | 2 | 0 |
| United States vs. China | 0 | 1 | 1 | 0 |
| United States vs. France | 0 | 1 | 4 | 0 |
| United States vs. Germany | 0 | 2 | 3 | 0 |
| United States vs. Italy | 0 | 1 | 2 | 0 |
| United States vs. Japan | 0 | 2 | 3 | 0 |
| United States vs. South Africa | 0 | 1 | 1 | 0 |
| United States vs. South Korea, Subject | 1 | 6 | 2 | 0 |
| United States vs. Taiwan | 0 | 1 | 2 | 0 |
| United States vs. Turkey | 0 | 1 | 2 | 0 |
| Austria vs. Belgium | 0 | 0 | 1 | 0 |
| Austria vs. Brazil | 0 | 0 | 1 | 0 |
| Austria vs. China | 0 | 0 | 0 | 0 |
| Austria vs. France | 0 | 0 | 1 | 0 |
| Austria vs. Germany | 0 | 0 | 1 | 0 |
| Austria vs. Italy | 0 | 0 | 1 | 0 |
| Austria vs. Japan | 0 | 0 | 1 | 0 |
| Austria vs. South Africa | 0 | 0 | 1 | 0 |
| Austria vs. South Korea, Subject | 0 | 0 | 1 | 0 |
| Austria vs. Taiwan | 0 | 0 | 1 | 0 |
| Austria vs. Turkey | 0 | 0 | 1 | 0 |
| Belgium vs. Brazil | 0 | 0 | 1 | 0 |
| Belgium vs. China | 0 | 0 | 0 | 0 |
| Belgium vs. France | 0 | 0 | 1 | 0 |
| Belgium vs. Germany | 0 | 0 | 1 | 0 |
| Belgium vs. Italy | 0 | 0 | 1 | 0 |
| Belgium vs. Japan | 0 | 0 | 1 | 0 |
| Belgium vs. South Africa | 0 | 0 | 1 | 0 |
| Belgium vs. South Korea, Subject | 0 | 0 | 1 | 0 |
| Belgium vs. Taiwan | 0 | 0 | 1 | 0 |
| Belgium vs. Turkey | 0 | 0 | 1 | 0 |

Table continued.

**Table II-20 Continued**
**CTL plate: Count of purchasers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|---|---|---|---|---|
| Brazil vs. China | 0 | 0 | 0 | 0 |
| Brazil vs. France | 0 | 0 | 1 | 0 |
| Brazil vs. Germany | 0 | 0 | 1 | 0 |
| Brazil vs. Italy | 0 | 0 | 1 | 0 |
| Brazil vs. Japan | 0 | 0 | 1 | 0 |
| Brazil vs. South Africa | 0 | 0 | 1 | 0 |
| Brazil vs. South Korea, Subject | 0 | 0 | 1 | 0 |
| Brazil vs. Taiwan | 0 | 0 | 1 | 0 |
| Brazil vs. Turkey | 0 | 0 | 1 | 0 |
| China vs. France | 0 | 0 | 1 | 0 |
| China vs. Germany | 0 | 0 | 1 | 0 |
| China vs. Italy | 0 | 0 | 1 | 0 |
| China vs. Japan | 0 | 0 | 1 | 0 |
| China vs. South Africa | 0 | 0 | 1 | 0 |
| China vs. South Korea, Subject | 0 | 0 | 1 | 0 |
| China vs. Taiwan | 0 | 0 | 1 | 0 |
| China vs. Turkey | 0 | 0 | 1 | 0 |
| France vs. Germany | 0 | 1 | 1 | 0 |
| France vs. Italy | 0 | 0 | 2 | 0 |
| France vs. Japan | 0 | 1 | 1 | 0 |
| France vs. South Africa | 0 | 0 | 1 | 0 |
| France vs. South Korea, Subject | 0 | 1 | 1 | 0 |
| France vs. Taiwan | 0 | 0 | 1 | 0 |
| France vs. Turkey | 0 | 0 | 1 | 0 |
| Germany vs. Italy | 0 | 0 | 2 | 0 |
| Germany vs. Japan | 0 | 1 | 1 | 0 |
| Germany vs. South Africa | 0 | 0 | 1 | 0 |
| Germany vs. South Korea, Subject | 0 | 1 | 1 | 0 |
| Germany vs. Taiwan | 0 | 0 | 1 | 0 |
| Germany vs. Turkey | 0 | 0 | 1 | 0 |
| Italy vs. Japan | 0 | 0 | 1 | 0 |
| Italy vs. South Africa | 0 | 0 | 1 | 0 |
| Italy vs. South Korea, Subject | 0 | 0 | 1 | 0 |
| Italy vs. Taiwan | 0 | 0 | 1 | 0 |
| Italy vs. Turkey | 0 | 0 | 1 | 0 |

Table continued.

**Table II-20 Continued**
**CTL plate: Count of purchasers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|---|---|---|---|---|
| Japan vs. South Africa | 0 | 0 | 1 | 0 |
| Japan vs. South Korea, Subject | 0 | 1 | 1 | 0 |
| Japan vs. Taiwan | 0 | 0 | 1 | 0 |
| Japan vs. Turkey | 0 | 0 | 1 | 0 |
| South Africa vs. South Korea, Subject | 0 | 0 | 1 | 0 |
| South Africa vs. Taiwan | 0 | 0 | 1 | 0 |
| South Africa vs. Turkey | 0 | 0 | 1 | 0 |
| South Korea, Subject vs. Taiwan | 0 | 0 | 1 | 0 |
| South Korea, Subject vs. Turkey | 0 | 0 | 1 | 0 |
| Taiwan vs. Turkey | 0 | 0 | 1 | 0 |
| United States vs. Other | 0 | 1 | 0 | 0 |
| Austria vs. Other | 0 | 0 | 0 | 0 |
| Belgium vs. Other | 0 | 0 | 0 | 0 |
| Brazil vs. Other | 0 | 0 | 0 | 0 |
| China vs. Other | 0 | 0 | 0 | 0 |
| France vs. Other | 0 | 0 | 0 | 0 |
| Germany vs. Other | 0 | 0 | 0 | 0 |
| Italy vs. Other | 0 | 0 | 0 | 0 |
| Japan vs. Other | 0 | 0 | 0 | 0 |
| South Africa vs. Other | 0 | 0 | 0 | 0 |
| South Korea, Subject vs. Other | 0 | 0 | 0 | 0 |
| Taiwan vs. Other | 0 | 0 | 0 | 0 |
| Turkey vs. Other | 0 | 0 | 0 | 0 |

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

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of CTL plate from the United States, subject, or nonsubject countries. As seen in tables II-21 to II-23, firms' responses were varied. Most U.S. producers reported that non-price factors were never or sometimes important when comparing domestic CTL plate with product from subject sources. Most importers reported that non-price factors were always or sometimes important, and most purchasers reported that they are frequently or sometimes important. Purchaser *** report that CTL steel plate required to produce certain sizes and grades of large diameter steel pipes are not available

from U.S. suppliers, and purchaser *** adds that lead times, quality differences, and availability are factors to consider other than price.

**Table II-21**
**CTL plate: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair**

Number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|---|---|---|---|---|
| United States vs. Austria | 0 | 0 | 2 | 3 |
| United States vs. Belgium | 0 | 0 | 2 | 3 |
| United States vs. Brazil | 0 | 0 | 2 | 3 |
| United States vs. China | 0 | 1 | 1 | 3 |
| United States vs. France | 0 | 0 | 2 | 3 |
| United States vs. Germany | 0 | 0 | 2 | 3 |
| United States vs. Italy | 0 | 0 | 2 | 3 |
| United States vs. Japan | 0 | 0 | 2 | 3 |
| United States vs. South Africa | 0 | 1 | 1 | 3 |
| United States vs. South Korea, subject | 0 | 0 | 2 | 3 |
| United States vs. Taiwan | 0 | 0 | 1 | 3 |
| United States vs. Turkey | 0 | 0 | 1 | 3 |
| Austria vs. Belgium | 0 | 0 | 1 | 3 |
| Austria vs. Brazil | 0 | 0 | 1 | 3 |
| Austria vs. China | 0 | 0 | 1 | 3 |
| Austria vs. France | 0 | 0 | 1 | 3 |
| Austria vs. Germany | 0 | 0 | 1 | 3 |
| Austria vs. Italy | 0 | 0 | 1 | 3 |
| Austria vs. Japan | 0 | 0 | 1 | 3 |
| Austria vs. South Africa | 0 | 0 | 1 | 3 |
| Austria vs. South Korea, subject | 0 | 0 | 1 | 3 |
| Austria vs. Taiwan | 0 | 0 | 1 | 3 |
| Austria vs. Turkey | 0 | 0 | 1 | 3 |
| Belgium vs. Brazil | 0 | 0 | 1 | 3 |
| Belgium vs. China | 0 | 0 | 1 | 3 |
| Belgium vs. France | 0 | 0 | 1 | 3 |
| Belgium vs. Germany | 0 | 0 | 1 | 3 |
| Belgium vs. Italy | 0 | 0 | 1 | 3 |
| Belgium vs. Japan | 0 | 0 | 1 | 3 |
| Belgium vs. South Africa | 0 | 0 | 1 | 3 |
| Belgium vs. South Korea, subject | 0 | 0 | 1 | 3 |
| Belgium vs. Taiwan | 0 | 0 | 1 | 3 |
| Belgium vs. Turkey | 0 | 0 | 1 | 3 |

Table continued.

**Table II-21 Continued**
**CTL plate: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair**

Number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|---|---|---|---|---|
| Brazil vs. China | 0 | 0 | 1 | 3 |
| Brazil vs. France | 0 | 0 | 1 | 3 |
| Brazil vs. Germany | 0 | 0 | 1 | 3 |
| Brazil vs. Italy | 0 | 0 | 1 | 3 |
| Brazil vs. Japan | 0 | 0 | 1 | 3 |
| Brazil vs. South Africa | 0 | 0 | 1 | 3 |
| Brazil vs. South Korea, subject | 0 | 0 | 1 | 3 |
| Brazil vs. Taiwan | 0 | 0 | 1 | 3 |
| Brazil vs. Turkey | 0 | 0 | 1 | 3 |
| China vs. France | 0 | 0 | 1 | 3 |
| China vs. Germany | 0 | 0 | 1 | 3 |
| China vs. Italy | 0 | 0 | 1 | 3 |
| China vs. Japan | 0 | 0 | 1 | 3 |
| China vs. South Africa | 0 | 0 | 1 | 3 |
| China vs. South Korea, subject | 0 | 0 | 1 | 3 |
| China vs. Taiwan | 0 | 0 | 1 | 3 |
| China vs. Turkey | 0 | 0 | 1 | 3 |
| France vs. Germany | 0 | 0 | 1 | 3 |
| France vs. Italy | 0 | 0 | 1 | 3 |
| France vs. Japan | 0 | 0 | 1 | 3 |
| France vs. South Africa | 0 | 0 | 1 | 3 |
| France vs. South Korea, subject | 0 | 0 | 1 | 3 |
| France vs. Taiwan | 0 | 0 | 1 | 3 |
| France vs. Turkey | 0 | 0 | 1 | 3 |
| Germany vs. Italy | 0 | 0 | 1 | 3 |
| Germany vs. Japan | 0 | 0 | 1 | 3 |
| Germany vs. South Africa | 0 | 0 | 1 | 3 |
| Germany vs. South Korea, subject | 0 | 0 | 1 | 3 |
| Germany vs. Taiwan | 0 | 0 | 1 | 3 |
| Germany vs. Turkey | 0 | 0 | 1 | 3 |
| Italy vs. Japan | 0 | 0 | 1 | 3 |
| Italy vs. South Africa | 0 | 0 | 1 | 3 |
| Italy vs. South Korea, subject | 0 | 0 | 1 | 3 |
| Italy vs. Taiwan | 0 | 0 | 1 | 3 |
| Italy vs. Turkey | 0 | 0 | 1 | 3 |

Table continued.

**Table II-21 Continued**
**CTL plate: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair**

Number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|---|---|---|---|---|
| Japan vs. South Africa | 0 | 0 | 1 | 3 |
| Japan vs. South Korea, subject | 0 | 0 | 1 | 3 |
| Japan vs. Taiwan | 0 | 0 | 1 | 3 |
| Japan vs. Turkey | 0 | 0 | 1 | 3 |
| South Africa vs. South Korea, subject | 0 | 0 | 1 | 3 |
| South Africa vs. Taiwan | 0 | 0 | 1 | 3 |
| South Africa vs. Turkey | 0 | 0 | 1 | 3 |
| South Korea, subject vs. Taiwan | 0 | 0 | 1 | 3 |
| South Korea, subject vs. Turkey | 0 | 0 | 1 | 3 |
| Taiwan vs. Turkey | 0 | 0 | 1 | 3 |
| United States vs. Other | 0 | 0 | 1 | 4 |
| Austria vs. Other | 0 | 0 | 1 | 3 |
| Belgium vs. Other | 0 | 0 | 1 | 3 |
| Brazil vs. Other | 0 | 0 | 1 | 3 |
| China vs. Other | 0 | 0 | 1 | 3 |
| France vs. Other | 0 | 0 | 1 | 3 |
| Germany vs. Other | 0 | 0 | 1 | 3 |
| Italy vs. Other | 0 | 0 | 1 | 3 |
| Japan vs. Other | 0 | 0 | 1 | 3 |
| South Africa vs. Other | 0 | 0 | 1 | 3 |
| South Korea, subject vs. Other | 0 | 0 | 1 | 3 |
| Taiwan vs. Other | 0 | 0 | 1 | 3 |
| Turkey vs. Other | 0 | 0 | 1 | 3 |

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

**Table II-22**
**CTL plate: Count of importers reporting the significance of differences between product produced in the United States and in other countries, by country pair**

Number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|---|---|---|---|---|
| United States vs. Austria | 5 | 4 | 4 | 1 |
| United States vs. Belgium | 3 | 3 | 4 | 1 |
| United States vs. Brazil | 3 | 2 | 5 | 1 |
| United States vs. China | 3 | 1 | 6 | 1 |
| United States vs. France | 4 | 2 | 4 | 1 |
| United States vs. Germany | 6 | 4 | 5 | 2 |
| United States vs. Italy | 4 | 2 | 3 | 1 |
| United States vs. Japan | 6 | 1 | 7 | 1 |
| United States vs. South Africa | 3 | 1 | 4 | 1 |
| United States vs. South Korea, subject | 5 | 2 | 5 | 1 |
| United States vs. Taiwan | 3 | 1 | 4 | 1 |
| United States vs. Turkey | 3 | 1 | 4 | 1 |
| Austria vs. Belgium | 3 | 3 | 4 | 1 |
| Austria vs. Brazil | 2 | 4 | 3 | 1 |
| Austria vs. China | 3 | 3 | 3 | 1 |
| Austria vs. France | 3 | 2 | 4 | 1 |
| Austria vs. Germany | 2 | 3 | 5 | 1 |
| Austria vs. Italy | 3 | 2 | 3 | 1 |
| Austria vs. Japan | 4 | 1 | 3 | 1 |
| Austria vs. South Africa | 3 | 3 | 2 | 1 |
| Austria vs. South Korea, subject | 3 | 2 | 3 | 1 |
| Austria vs. Taiwan | 3 | 3 | 2 | 1 |
| Austria vs. Turkey | 3 | 3 | 2 | 1 |
| Belgium vs. Brazil | 2 | 3 | 3 | 1 |
| Belgium vs. China | 2 | 3 | 2 | 1 |
| Belgium vs. France | 2 | 2 | 4 | 1 |
| Belgium vs. Germany | 2 | 2 | 5 | 1 |
| Belgium vs. Italy | 2 | 2 | 3 | 1 |
| Belgium vs. Japan | 4 | 0 | 4 | 1 |
| Belgium vs. South Africa | 2 | 3 | 2 | 1 |
| Belgium vs. South Korea, subject | 2 | 2 | 3 | 1 |
| Belgium vs. Taiwan | 2 | 3 | 2 | 1 |
| Belgium vs. Turkey | 2 | 3 | 2 | 1 |

Table continued.

**Table II-22 Continued**
**CTL plate: Count of importers reporting the significance of differences between product produced in the United States and in other countries, by country pair**

Number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|---|---|---|---|---|
| Brazil vs. China | 2 | 1 | 4 | 1 |
| Brazil vs. France | 2 | 3 | 2 | 1 |
| Brazil vs. Germany | 2 | 3 | 3 | 1 |
| Brazil vs. Italy | 2 | 3 | 2 | 1 |
| Brazil vs. Japan | 4 | 1 | 2 | 1 |
| Brazil vs. South Africa | 2 | 1 | 4 | 1 |
| Brazil vs. South Korea, subject | 2 | 1 | 4 | 1 |
| Brazil vs. Taiwan | 2 | 1 | 4 | 1 |
| Brazil vs. Turkey | 2 | 1 | 4 | 1 |
| China vs. France | 4 | 1 | 2 | 1 |
| China vs. Germany | 4 | 1 | 3 | 1 |
| China vs. Italy | 4 | 1 | 2 | 1 |
| China vs. Japan | 4 | 1 | 2 | 1 |
| China vs. South Africa | 2 | 1 | 4 | 1 |
| China vs. South Korea, subject | 2 | 1 | 4 | 1 |
| China vs. Taiwan | 2 | 1 | 4 | 1 |
| China vs. Turkey | 2 | 2 | 3 | 1 |
| France vs. Germany | 2 | 2 | 4 | 1 |
| France vs. Italy | 2 | 2 | 3 | 1 |
| France vs. Japan | 4 | 0 | 3 | 1 |
| France vs. South Africa | 2 | 3 | 2 | 1 |
| France vs. South Korea, subject | 2 | 2 | 3 | 1 |
| France vs. Taiwan | 2 | 3 | 2 | 1 |
| France vs. Turkey | 2 | 3 | 2 | 1 |
| Germany vs. Italy | 2 | 2 | 3 | 1 |
| Germany vs. Japan | 4 | 0 | 3 | 1 |
| Germany vs. South Africa | 2 | 3 | 2 | 1 |
| Germany vs. South Korea, subject | 2 | 2 | 3 | 1 |
| Germany vs. Taiwan | 2 | 3 | 2 | 1 |
| Germany vs. Turkey | 2 | 3 | 2 | 1 |
| Italy vs. Japan | 4 | 0 | 3 | 1 |
| Italy vs. South Africa | 2 | 3 | 2 | 1 |
| Italy vs. South Korea, subject | 2 | 2 | 3 | 1 |
| Italy vs. Taiwan | 2 | 3 | 2 | 1 |
| Italy vs. Turkey | 2 | 3 | 2 | 1 |

Table continued.

**Table II-22 Continued**
**CTL plate: Count of importers reporting the significance of differences between product produced in the United States and in other countries, by country pair**

Number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|---|---|---|---|---|
| Japan vs. South Africa | 4 | 1 | 2 | 1 |
| Japan vs. South Korea, subject | 4 | 0 | 3 | 1 |
| Japan vs. Taiwan | 4 | 1 | 2 | 1 |
| Japan vs. Turkey | 4 | 1 | 2 | 1 |
| South Africa vs. South Korea, subject | 2 | 1 | 4 | 1 |
| South Africa vs. Taiwan | 2 | 1 | 4 | 1 |
| South Africa vs. Turkey | 2 | 1 | 4 | 1 |
| South Korea, subject vs. Taiwan | 2 | 1 | 4 | 1 |
| South Korea, subject vs. Turkey | 2 | 1 | 4 | 1 |
| Taiwan vs. Turkey | 2 | 1 | 4 | 1 |
| United States vs. Other | 3 | 3 | 7 | 1 |
| Austria vs. Other | 2 | 3 | 2 | 1 |
| Belgium vs. Other | 2 | 3 | 2 | 1 |
| Brazil vs. Other | 2 | 0 | 4 | 1 |
| China vs. Other | 2 | 0 | 4 | 1 |
| France vs. Other | 2 | 2 | 2 | 1 |
| Germany vs. Other | 2 | 2 | 3 | 1 |
| Italy vs. Other | 2 | 2 | 2 | 1 |
| Japan vs. Other | 4 | 0 | 2 | 1 |
| South Africa vs. Other | 2 | 0 | 4 | 1 |
| South Korea, subject vs. Other | 2 | 0 | 4 | 1 |
| Taiwan vs. Other | 2 | 0 | 4 | 1 |
| Turkey vs. Other | 2 | 0 | 4 | 1 |

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

**Table II-23**
**CTL plate: Count of purchasers reporting the significance of differences between product produced in the United States and in other countries, by country pair**

Number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|---|---|---|---|---|
| United States vs. Austria | 0 | 1 | 0 | 1 |
| United States vs. Belgium | 0 | 1 | 0 | 1 |
| United States vs. Brazil | 1 | 1 | 1 | 1 |
| United States vs. China | 0 | 1 | 1 | 0 |
| United States vs. France | 0 | 1 | 3 | 1 |
| United States vs. Germany | 1 | 1 | 2 | 1 |
| United States vs. Italy | 0 | 1 | 1 | 1 |
| United States vs. Japan | 0 | 2 | 2 | 1 |
| United States vs. South Africa | 0 | 1 | 1 | 0 |
| United States vs. South Korea, subject | 1 | 3 | 3 | 2 |
| United States vs. Taiwan | 0 | 1 | 1 | 1 |
| United States vs. Turkey | 0 | 1 | 1 | 1 |
| Austria vs. Belgium | 0 | 1 | 0 | 0 |
| Austria vs. Brazil | 0 | 1 | 0 | 0 |
| Austria vs. China | 0 | 0 | 0 | 0 |
| Austria vs. France | 0 | 1 | 0 | 0 |
| Austria vs. Germany | 0 | 1 | 0 | 0 |
| Austria vs. Italy | 0 | 1 | 0 | 0 |
| Austria vs. Japan | 0 | 1 | 0 | 0 |
| Austria vs. South Africa | 0 | 1 | 0 | 0 |
| Austria vs. South Korea, subject | 0 | 1 | 0 | 0 |
| Austria vs. Taiwan | 0 | 1 | 0 | 0 |
| Austria vs. Turkey | 0 | 1 | 0 | 1 |
| Belgium vs. Brazil | 0 | 1 | 0 | 0 |
| Belgium vs. China | 0 | 0 | 0 | 0 |
| Belgium vs. France | 0 | 1 | 0 | 0 |
| Belgium vs. Germany | 0 | 1 | 0 | 0 |
| Belgium vs. Italy | 0 | 1 | 0 | 0 |
| Belgium vs. Japan | 0 | 1 | 0 | 0 |
| Belgium vs. South Africa | 0 | 1 | 0 | 0 |
| Belgium vs. South Korea, subject | 0 | 1 | 0 | 0 |
| Belgium vs. Taiwan | 0 | 1 | 0 | 0 |
| Belgium vs. Turkey | 0 | 1 | 0 | 0 |

Table continued.

**Table II-23 Continued**
**CTL plate: Count of purchasers reporting the significance of differences between product produced in the United States and in other countries, by country pair**

Number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|---|---|---|---|---|
| Brazil vs. China | 0 | 0 | 0 | 0 |
| Brazil vs. France | 0 | 1 | 0 | 0 |
| Brazil vs. Germany | 0 | 1 | 0 | 0 |
| Brazil vs. Italy | 0 | 1 | 0 | 0 |
| Brazil vs. Japan | 0 | 1 | 0 | 0 |
| Brazil vs. South Africa | 0 | 1 | 0 | 0 |
| Brazil vs. South Korea, subject | 0 | 1 | 0 | 0 |
| Brazil vs. Taiwan | 0 | 1 | 0 | 0 |
| Brazil vs. Turkey | 0 | 1 | 0 | 0 |
| China vs. France | 0 | 1 | 0 | 0 |
| China vs. Germany | 0 | 1 | 0 | 0 |
| China vs. Italy | 0 | 1 | 0 | 0 |
| China vs. Japan | 0 | 1 | 0 | 0 |
| China vs. South Africa | 0 | 1 | 0 | 0 |
| China vs. South Korea, subject | 0 | 1 | 0 | 0 |
| China vs. Taiwan | 0 | 1 | 0 | 0 |
| China vs. Turkey | 0 | 1 | 0 | 0 |
| France vs. Germany | 0 | 2 | 0 | 0 |
| France vs. Italy | 0 | 1 | 0 | 0 |
| France vs. Japan | 0 | 2 | 0 | 0 |
| France vs. South Africa | 0 | 1 | 0 | 0 |
| France vs. South Korea, subject | 0 | 2 | 0 | 0 |
| France vs. Taiwan | 0 | 1 | 0 | 0 |
| France vs. Turkey | 0 | 1 | 0 | 0 |
| Germany vs. Italy | 0 | 1 | 0 | 0 |
| Germany vs. Japan | 0 | 2 | 0 | 0 |
| Germany vs. South Africa | 0 | 1 | 0 | 0 |
| Germany vs. South Korea, subject | 0 | 2 | 0 | 0 |
| Germany vs. Taiwan | 0 | 1 | 0 | 0 |
| Germany vs. Turkey | 0 | 1 | 0 | 0 |
| Italy vs. Japan | 0 | 1 | 0 | 0 |
| Italy vs. South Africa | 0 | 1 | 0 | 0 |
| Italy vs. South Korea, subject | 0 | 1 | 0 | 0 |
| Italy vs. Taiwan | 0 | 1 | 0 | 0 |
| Italy vs. Turkey | 0 | 1 | 0 | 0 |

Table continued.

**Table II-23 Continued**
**CTL plate: Count of purchasers reporting the significance of differences between product produced in the United States and in other countries, by country pair**

Number of firms reporting

| Country pair | Always | Frequently | Sometimes | Never |
|---|---|---|---|---|
| Japan vs. South Africa | 0 | 1 | 0 | 0 |
| Japan vs. South Korea, subject | 0 | 2 | 0 | 0 |
| Japan vs. Taiwan | 0 | 1 | 0 | 0 |
| Japan vs. Turkey | 0 | 1 | 0 | 0 |
| South Africa vs. South Korea | 0 | 1 | 0 | 0 |
| South Africa vs. Taiwan | 0 | 1 | 0 | 0 |
| South Africa vs. Turkey | 0 | 1 | 0 | 0 |
| South Korea, subject vs. Taiwan | 0 | 1 | 0 | 0 |
| South Korea, subject vs. Turkey, subject | 0 | 1 | 0 | 0 |
| Taiwan vs. Turkey | 0 | 1 | 0 | 0 |
| United States vs. Other | 1 | 0 | 0 | 0 |
| Austria vs. Other | 0 | 0 | 0 | 0 |
| Belgium vs. Other | 0 | 0 | 0 | 0 |
| Brazil vs. Other | 0 | 0 | 0 | 0 |
| China vs. Other | 0 | 0 | 0 | 0 |
| France vs. Other | 0 | 0 | 0 | 0 |
| Germany vs. Other | 0 | 0 | 0 | 0 |
| Italy vs. Other | 0 | 0 | 0 | 0 |
| Japan vs. Other | 0 | 0 | 0 | 0 |
| South Africa vs. Other | 0 | 0 | 0 | 0 |
| South Korea, subject vs. Other | 0 | 0 | 0 | 0 |
| Taiwan vs. Other | 0 | 0 | 0 | 0 |
| Turkey vs. Other | 0 | 0 | 0 | 0 |

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

# Elasticity estimates

This section discusses elasticity estimates. No parties provided comments on these estimates in their prehearing or posthearing briefs.

## U.S. supply elasticity

The domestic supply elasticity for CTL plate measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of CTL plate. The elasticity of domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products,

the existence of inventories, and the availability of alternate markets for U.S.-produced CTL plate. Analysis of these factors earlier indicates that the U.S. industry is likely to be able to increase or decrease shipments to the U.S. market in a moderate-to-large manner based on unused capacity and production flexibilities; an estimate in the range of 2.5 to 5 is suggested.

## U.S. demand elasticity

The U.S. demand elasticity for CTL plate measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of CTL plate. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the CTL plate in the production of any downstream products. Based on the available information, the aggregate demand for CTL plate is likely to be moderately inelastic, with values ranging between -0.25 and -0.75.

## Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.[13] Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced CTL plate and imported CTL plate is likely to be in the range of 3 to 5. Domestic and subject country CTL plate are of similar quality, price is important in purchasing decisions, and there are no significant domestic content requirements. There are also similarities between domestically produced CTL plate and product imported from subject countries across most purchase factors. Many responding firms reported that product from domestic and subject sources appear to be highly interchangeable, and factors other than price are somewhat limited in significance. Some factors reducing the degree of substitutability include customer requirements and different lead times, between domestic and subject sources.

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

# Part III: Condition of the U.S. industry

## Overview

The information in this section of the report was compiled from responses to the Commission's questionnaires. Six firms, which accounted for the majority of U.S. production of CTL plate during 2020, supplied information on their operations in these reviews and other proceedings on CTL plate.[1]

Since the Commission's original investigations, several developments have occurred in the CTL plate industry (table III-1).[2] In addition to the company specific events listed in table III-1, two additional events have impacted the industry generally. First, as noted in Part I, the March 2018 imposition of Section 232 duties on U.S. steel imports included CTL plate.[3] Second, the September 2019 imposition of Section 301 duties on imports from China also included CTL plate.[4]

**Table III-1**
**CTL plate: Important industry events since January 2016**

| Item | Firm | Event |
|---|---|---|
| Plant shutdown | ArcelorMittal | September 2017— ArcelorMittal announced that it would consolidate plate operations by idling its rolling mill in Conshohocken, Pennsylvania. |
| Expansion | Kloeckner Metals | December 2017— Kloeckner Metals Corp., completed the expansion of its steel and aluminum processing facility in Greenville, South Carolina. |
| Acquisition | Metal One | December 2017— Metal One Corp. acquired Cargill Metals Supply Chain's U.S. metals business, including a steel plate processing facility in Windsor, Colorado. |
| Expansion | JSW Steel | March 2018— JSW Steel USA announced that it would be investing $500 million into the expansion of its pipe and plate mill in Baytown, Texas. |
| Expansion | SSAB | October 2018— SSAB announced investments to increase the annual production capacity at its Mobile, Alabama mill from 300,000 metric tons (330,693 short tons) to 400,000 metric tons (440,935 short tons). |

Table continued.

[1] Staff's assessment is based on a comparison of which firms responded in these reviews to the firms listed by domestic parties in their responses to the notices of institution in the adequacy phase of these reviews.

[2] Metal One is a U.S. importer of CTL plate. Regarding its acquisition agreement with Cargill, Metal One stated ***. ***.

[3] 83 FR 11625, March 15, 2018. See also Part I, tariff treatment.

[4] 84 FR 43304, August 20, 2019. See also Part 1, tariff treatment.

**Table III-1 Continued**
**CTL plate: Recent developments in the U.S. industry, since January 2016**

| Item | Firm | Event |
|---|---|---|
| Plant construction | Nucor | October 2020— Nucor began construction of a $1.7-billion plate mill in Brandenburg, Kentucky with annual production capacity of 1.2 million short tons. This project is anticipated to be completed in the first quarter of 2022. |
| Plant opening | Olympic Steel | June 2020— Olympic Steel Inc. announced the opening of a new flat-rolled fabricating facility in Buford, Georgia. |
| Acquisition | Cleveland-Cliffs | December 2020— Cleveland-Cliffs acquired ArcelorMittal USA and its subsidiaries, with the exception of the AM/NS Calvert (a joint-venture with Nippon Steel ("NS") Corp.) steel processing facility in Calvert, Alabama, that shipped steel plate only in coiled form. |
| Expansion | JSW Steel | November 2021— JSW Steel commenced the phase II upgrades to its plate mill in Baytown, Texas. Installing a four-high finishing mill, pre-leveler, accelerated cooling system/direct quench, cooling beds, and new roll shop is anticipated for completion by 2023. These upgrades are part of the $260 million investments to improve the mill's product quality, productivity, yields, and overall cost-effectiveness. |
| Expansion | Nucor | November 2021— Nucor announced the addition of a blast and prime line (to remove mill scale from steel surfaces) with an annual production capacity of 120,000 short tons per year, at its new $1.7-billion plate mill in Brandenburg, Kentucky. This facility will be capable of providing the broadest scope of CTL plate products consumed in the U.S. market, including both X-70 plate and tool steel compositions. |
| Mill certification | Nucor | September 2022— Nucor announced the public registration to attain the U.S. Green Building Council's LEED v4 Building and Design environmental sustainability certification for its new plate mill in Brandenburg, Kentucky. |
| Plant completion | Nucor | December 2022 (Estimated) — Construction of Nucor's new $1.7 billion plate mill in Brandenburg, Kentucky is anticipated to commence operations during the latter part of fourth quarter 2022. The plate mill will be able to produce nearly every type of CTL plate products consumed in the U.S. market, including both X-70 plate and tool steels. |

Sources: Heinze, Justin, "Arcelor Mittal Plant Closes in Conshohocken, Hundreds Laid Off: Union," September 26, 2017, https://patch.com/pennsylvania/norristown/arcelor-mittal-plant-shuts-down-conshohocken-200-plus-jobs-lost; Retrofit, "Kloeckner Metals Corp. Opens Expanded Greenville Plant," October 23, 2017, https://www.kloecknermetals.com/news/kloeckner-metals-corp-opens-expanded-greenville-plant/; Cargill, "Metal One Corporation to Acquire Cargill's U.S. Metals Business," December 29, 2017, https://www.cargill.com/2017/metal-one-to-acquire-cargills-us-metals-business; Cargill, "Cargill to Build its Eighth U.S. Steel Processing in Windsor, Colorado," January 4, 2014, https://www.cargill.com/news/releases/2014/NA3083008.jsp; Fox 26 Houston, "Steel Mill Expansion Expected to Bring 500 New Jobs to Baytown," March 26, 2018, https://www.fox26houston.com/news/steel-mill-expansion-expected-to-bring-500-new-jobs-to-baytown; SSAB, "SSAB to Invest in Increased Q&T Steel Production Capacity," October 26, 2018, https://www.ssab.es/noticias/2018/10/ssab-to-invest-in-increased-qt-steel-production-capacity; Kentucky Cabinet for Economic Development, "Nucor Breaks Ground on 400-Job Steel Mill in Brandenburg," October 23, 2020, https://ced.ky.gov/Newsroom/NewsPage/20201023_nucor; Association for Iron and Steel Technology, "It's Official: Arcelor Mittal USA Mills Now Belong to Cleveland Cliffs," December 9, 2021; Cleveland-Cliffs, "Cleveland-Cliffs Completes Acquisition of Ferrous Processing and Trading Company," November 18, 2021, https://d1io3yog0oux5.cloudfront.net/_e368c2a78f32cc983372cb2dc2dfe84f/clevelandcliffs/news/2021-11-18_Cleveland_Cliffs_Completes_Acquisition_of_Ferrous__538.pdf; USITC staff email correspondence with ***, ArcelorMittal North America LLC, October 28, 2022; Staff Writer, "JSW Steel USA Begins Phase II Upgrade of Plate Mill Facility at Baytown, Texas," Construction Week Online, November 1, 2021,

https://www.constructionweekonline.in/projects-tenders/20386-jsw-steel-usa-begins-phase-ii-upgrade-of-plate-mill-facility-at-baytown-texas; "New Nucor Steel Plate Mill Pursuing LEED v4 Certification," PR Newswire, September 20, 2022, https://www.prnewswire.com/news-releases/new-nucor-steel-plate-mill-pursuing-leed-v4-certification-301628753.html; ArcelorMittal North America, "AM/NS Calvert," ©2022, https://northamerica.arcelormittal.com/our-operations/am-ns-calvert#, retrieved October 20, 2022; ArcelorMittal North America, "Hot Strip Mill (HSM)," ©2022, https://northamerica.arcelormittal.com/our-operations/am-ns-calvert/am-ns-calvert-what-we-do/am-ns-calvert-hsm, retrieved October 20, 2022; Coyne, Justine "Nucor to Add Blast, Prime Line at Kentucky Steel Plate Mill," November 18, 2018, https://www.spglobal.com/platts/en/market-insights/latest-news/metals/111821-nucor-to-add-blast-prime-line-at-kentucky-steel-plate-mill#:~:text=Nucor%20will%20add%20a%20blast,18; Cafiero Giusti, Autumn, and James Leggate, "US Steel, Nucor Build Major Mills Amid Steelmakers' Modernization," Engineering News Record, January 14, 2022, https://www.enr.com/articles/53439-us-steel-nucor-build-major-mills-amid-steelmakers-modernization; Dukes, Seth, "Steel on Track: Nucor to be Operational by End of Year," Elizabethtown, KY: News Enterprise, September 9, 2022, https://www.thenewsenterprise.com/news/local/steel-on-track-nucor-to-be-operational-by-end-of-year/article_bcf9e795-fbef-5e84-be50-473f30cd02bb.html; Nucor Corp., Hearing transcript (revised), p. 46 (Behr), p.93 (Whiteman).

## Changes experienced by the industry

Producers in the United States were asked to report any other change in the character of their operations or organization relating to the production of CTL plate since 2016. Four of the six domestic producers (which provided responses in these reviews) indicated that they had experienced such changes; their responses are presented in table III-2.

**Table III-2**
**CTL plate: U.S. producers' reported changes in operations since January 1, 2016 by type of change and firm**

| Type of change | Firm name and narrative on changes in operations |
|---|---|
| Plant openings | *** |
| Plant closings | *** |
| Acquisitions | *** |
| Prolonged shutdowns or curtailments | *** |
| Prolonged shutdowns or curtailments | *** |

| Type of change | Firm name and narrative on changes in operations |
|---|---|
| Revised labor agreements | *** |
| Revised labor agreements | *** |
| Other | *** |

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

## Anticipated changes in operations

The Commission asked domestic producers to report anticipated changes in the character of their operations relating to the production of CTL plate. Their responses appear in table III-3.

**Table III-3**
**CTL plate: U.S. producers' anticipated changes in operations**

| Firm | Anticipate changes | Narrative on anticipated changes in operations |
|---|---|---|
| A. Finkl & Sons | *** | *** |
| Cleveland-Cliffs | *** | *** |
| EVRAZ | *** | *** |
| Gerdau | *** | *** |
| Nucor | *** | *** |
| SSAB Enterprises | *** | *** |

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

# U.S. production, capacity, and capacity utilization

Table III-4 presents U.S. producers' production, capacity, and capacity utilization. Five out of six firms reported that their average production capacity stayed the same between 2016 and 2021. *** saw fluctuations throughout the period and clarified that *** U.S. producers' production fluctuated between 2016 and 2021, with all but two firms increasing production in 2017 and 2018, while all but one firm had lower production in

2019 and all did so 2020, followed by an increase in production in 2021 for all but two firms. Overall, all but two firms had lower production in 2021 than in 2016. All six firms had decreases in production in 2020 and four out of six producers, including two of the three largest firms, reported that COVID-19 had an impact on production, particularly in 2020. U.S. producers' capacity utilization followed similar trends to production, increasing in 2017 and 2018, declining in 2019 and 2020, and then increasing in 2021, ending 2.3 percentage points lower in 2021 than in 2016. *** had the highest capacity utilization for all years except 2019 and 2020. ***. *** had the highest share of production among U.S. producers, while *** had the lowest share of production.

**Table III-4**
**CTL plate: Firm-by-firm capacity, by period**

**Capacity**

Quantity in short tons

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 8,251,000 | 8,291,000 | 8,311,000 |

Table continued.

**Table III-4 Continued**
**CTL plate: Firm-by-firm capacity, by period**

**Capacity**

Quantity in short tons

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 8,306,000 | 8,291,000 | 8,291,000 | 4,195,500 | 4,195,500 |

Table continued.

**Table III-4 Continued**
**CTL plate: Firm-by-firm production, by period**

**Production**

Quantity in short tons

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 5,669,500 | 5,875,780 | 6,232,395 |

Table continued.

**Table III-4 Continued**
**CTL plate: Firm-by-firm production, by period**

**Production**

Quantity in short tons

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 5,810,323 | 5,363,795 | 5,505,910 | 2,870,170 | 2,458,504 |

Table continued.

**Table III-4 Continued**
**CTL plate: Firm-by-firm capacity utilization, by period**

**Capacity utilization**

Ratio in percent

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 68.7 | 70.9 | 75.0 |

Table continued.

**Table III-4 Continued**
**CTL plate: Firm-by-firm capacity utilization, by period**

## Capacity utilization

Ratio in percent

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 70.0 | 64.7 | 66.4 | 68.4 | 58.6 |

Table continued.

**Table III-4 Continued**
**CTL plate: Firm-by-firm share of production, by period**

## Share of production

Share in percent

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 100.0 | 100.0 | 100.0 |

Table continued.

**Table III-4 Continued**
**CTL plate: Firm-by-firm share of production, by period**

## Share of production

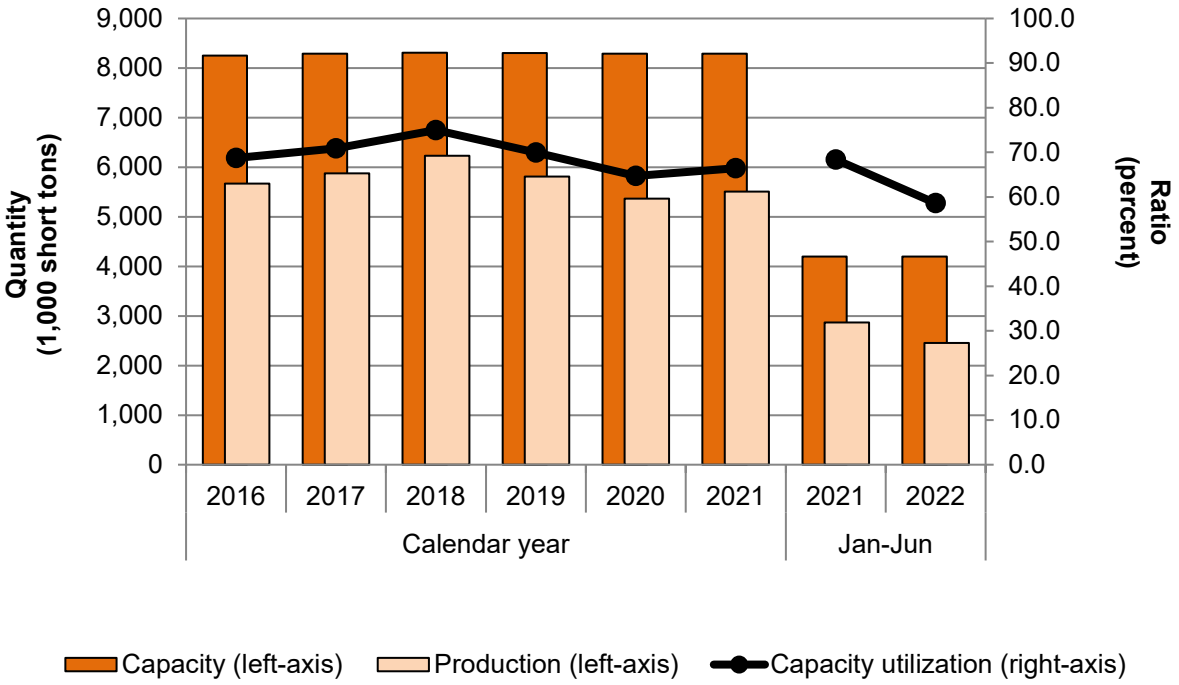
Share in percent

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

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

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

**Figure III-1**
**CTL plate: U.S. producers' production, capacity, and capacity utilization, by period**




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

Tables III-5 and III-6 present data on U.S. producers' ability or capacity and actual production, respectively, of specific types of products and steel thickness. While at least one producer reported that ability to produce each of the specified product types (although not in all thicknesses), none actually produced high-speed steel plate, heat-resisting steel plate, or A553, Type 1, 9 percent nickel in 2021.

**Table III-5**
**CTL plate: Count of U.S. producers' ability or capacity by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Product type | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | 5 | 5 | 3 | 5 |
| CrMo pressure vessel plate | 4 | 4 | 2 | 4 |
| Ni pressure vessel plate | 1 | 1 | 1 | 1 |
| Other pressure vessel plate | 4 | 4 | 3 | 4 |
| Tool steel plate | 3 | 3 | 4 | 4 |
| Mold steel plate | 3 | 3 | 3 | 4 |
| AR400-AR600 wear resistant/abrasion resistant plate | 4 | 4 | 1 | 4 |
| Other wear resistant/abrasion resistant plate | 4 | 4 | 2 | 4 |
| Oil-drilling platform plate | 3 | 3 | 2 | 3 |
| Offshore wind energy plate | 4 | 4 | 2 | 4 |
| Shipbuilding plate | 4 | 4 | 3 | 4 |
| X-70 (or higher) plate width < 120 inches | 4 | 2 | 0 | 4 |
| X-70 (or higher) plate width ≥ 120 inches | 2 | 1 | 0 | 2 |
| Other plate for line pipe | 4 | 2 | 0 | 4 |
| Sour service plate | 4 | 3 | 2 | 4 |
| High-speed steel plate | 1 | 0 | 0 | 1 |
| Heat-resisting steel plate | 1 | 1 | 0 | 1 |
| UHSS or AHSS plate | 3 | 2 | 1 | 3 |
| HSLA plate | 4 | 4 | 3 | 4 |
| Forged alloy steel plate | 0 | 0 | 1 | 1 |
| A553, Type 1, 9% nickel | 1 | 1 | 0 | 1 |
| API2W grade 50 or 60 | 1 | 1 | 0 | 1 |
| SA387 grade 11 or 22 | 2 | 2 | 2 | 2 |
| SA516 grade 70/65, HIC tested | 2 | 2 | 1 | 2 |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | 2 | 2 | 1 | 2 |
| Any product type | 5 | 5 | 4 | 6 |

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

**Table III-6**
**CTL plate: Count of U.S. producers' actual production by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Product type | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | 5 | 5 | 3 | 5 |
| CrMo pressure vessel plate | 1 | 2 | 1 | 2 |
| Ni pressure vessel plate | 1 | 1 | 1 | 1 |
| Other pressure vessel plate | 4 | 4 | 2 | 4 |
| Tool steel plate | 2 | 3 | 3 | 4 |
| Mold steel plate | 2 | 2 | 3 | 3 |
| AR400-AR600 wear resistant/abrasion resistant plate | 4 | 4 | 1 | 4 |
| Other wear resistant/abrasion resistant plate | 4 | 4 | 2 | 4 |
| Oil-drilling platform plate | 1 | 2 | 2 | 2 |
| Offshore wind energy plate | 1 | 2 | 2 | 2 |
| Shipbuilding plate | 4 | 4 | 2 | 4 |
| X-70 (or higher) plate width < 120 inches | 3 | 2 | 0 | 3 |
| X-70 (or higher) plate width ≥ 120 inches | 1 | 1 | 0 | 1 |
| Other plate for line pipe | 3 | 2 | 0 | 3 |
| Sour service plate | 1 | 1 | 1 | 1 |
| High-speed steel plate | 0 | 0 | 0 | 0 |
| Heat-resisting steel plate | 0 | 0 | 0 | 0 |
| UHSS or AHSS plate | 3 | 2 | 1 | 3 |
| HSLA plate | 4 | 4 | 3 | 4 |
| Forged alloy steel plate | 0 | 0 | 1 | 1 |
| A553, Type 1, 9% nickel | 0 | 0 | 0 | 0 |
| API2W grade 50 or 60 | 1 | 1 | 0 | 1 |
| SA387 grade 11 or 22 | 2 | 2 | 1 | 2 |
| SA516 grade 70/65, HIC tested | 1 | 1 | 0 | 1 |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | 2 | 2 | 0 | 2 |
| Any product type | 5 | 5 | 4 | 6 |

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

## Alternative products

As shown in table III-7, 76.0 percent of the product produced from mill operations during 2021 by U.S. producers was CTL plate. Table III-8 shows that *** percent of the product produced from purchased coil during 2021 by U.S. producers (namely ***) was CTL plate. Five out of six firms reported producing out-of-scope merchandise using the same equipment as subject production.[5]

**Table III-7**
**CTL plate: U.S. producers' overall capacity and production on the same equipment as subject production from mill operations, by period**

Quantities in short tons; shares and ratios in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Overall mill capacity | Quantity | 10,090,000 | 9,830,000 | 9,850,000 |
| CTL plate mill production | Quantity | 5,417,105 | 5,610,756 | 5,946,728 |
| Other mill production | Quantity | 1,576,189 | 1,692,318 | 1,814,864 |
| Total mill production | Quantity | 6,993,294 | 7,303,074 | 7,761,592 |
| Overall mill capacity utilization | Ratio | 69.3 | 74.3 | 78.8 |
| CTL plate mill production | Share | 77.5 | 76.8 | 76.6 |
| Other mill production | Share | 22.5 | 23.2 | 23.4 |
| Total mill production | Share | 100.0 | 100.0 | 100.0 |

Table continued.

[5] These included hot rolled coil, plate in coil merchant bar products and rebar, discrete plate, hot-rolled plate in coils, slab, and equipment there are able to produce a wide variety of chemistries, sizes, and cross sections.

**Table III-7 Continued**
**CTL plate: U.S. producers' overall capacity and production on the same equipment as subject production from mill operations, by period**

Quantities in short tons; shares and ratios in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Overall mill capacity | Quantity | 9,845,000 | 9,830,000 | 9,830,000 | 4,965,000 | 4,965,000 |
| CTL plate mill production | Quantity | 5,551,583 | 5,115,249 | 5,311,406 | 2,779,756 | 2,359,018 |
| Other mill production | Quantity | 1,521,352 | 1,549,504 | 1,679,461 | 878,482 | 733,074 |
| Total mill production | Quantity | 7,072,935 | 6,664,753 | 6,990,867 | 3,658,238 | 3,092,092 |
| Overall mill capacity utilization | Ratio | 71.8 | 67.8 | 71.1 | 73.7 | 62.3 |
| CTL plate mill production | Share | 78.5 | 76.8 | 76.0 | 76.0 | 76.3 |
| Other mill production | Share | 21.5 | 23.2 | 24.0 | 24.0 | 23.7 |
| Total mill production | Share | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

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

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

**Table III-8**
**CTL plate: U.S. producers' overall capacity and cutting production on the same equipment as subject production from purchased coil, by period**

Quantities in short tons; shares and ratios in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Overall coil slitting capacity | Quantity | *** | *** | *** |
| CTL plate production from purchased coil | Quantity | *** | *** | *** |
| Other production from purchased coil | Quantity | *** | *** | *** |
| Total production from purchased coil | Quantity | *** | *** | *** |
| Overall coil slitting capacity utilization | Ratio | *** | *** | *** |
| CTL plate production from purchased coil | Share | *** | *** | *** |
| Other production from purchased coil | Share | *** | *** | *** |
| Total production from purchased coil | Share | 100.0 | 100.0 | 100.0 |

Table continued.

**Table III-8 Continued**
**CTL plate: U.S. producers' overall capacity and cutting production on the same equipment as subject production from purchased coil, by period**

Quantities in short tons; shares and ratios in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Overall coil slitting capacity | Quantity | *** | *** | *** | *** | *** |
| CTL plate production from purchased coil | Quantity | *** | *** | *** | *** | *** |
| Other production from purchased coil | Quantity | *** | *** | *** | *** | *** |
| Total production from purchased coil | Quantity | *** | *** | *** | *** | *** |
| Overall coil slitting capacity utilization | Ratio | *** | *** | *** | *** | *** |
| CTL plate production from purchased coil | Share | *** | *** | *** | *** | *** |
| Other production from purchased coil | Share | *** | *** | *** | *** | *** |
| Total production from purchased coil | Share | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

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

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

## Constraints on capacity

Two of the six responding U.S. producers reported constraints in the manufacturing process. ***

## U.S. producers' U.S. shipments and exports

Table III-9 presents U.S. producers' U.S. shipments, export shipments, and total shipments. U.S. shipments consistently accounted for more than *** percent of total shipments by quantity.[6] Internal consumption's share of U.S. shipments by quantity ranged between *** percent and *** percent during 2016-21 and January-June 2022, while transfers to related firms' share of U.S. shipments ranged between *** and *** percent during the same time period.[7]

U.S. shipments decreased irregularly by 1.2 percent during 2016-21 and were 15.8 percent lower during January-June 2022 compared to January-June 2021. U.S. shipments initially increased by 14.5 percent during 2016-18 before declining by 7.4 percent during 2019-21. U.S. shipments for all firms but *** decreased overall between 2016 and 2021, with all firms but *** decreased U.S. shipments in 2019 and all firms had lower U.S. shipments in 2020, while they increased for all firms but *** in 2020.

**Table III-9**
**CTL plate: U.S. producers' shipments, by location of shipment and by period**

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

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| U.S. shipments | Quantity | 4,900,101 | 5,078,561 | 5,612,723 |
| Export shipments | Quantity | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** |
| U.S. shipments | Value | 2,952,042 | 3,627,608 | 4,950,712 |
| Export shipments | Value | *** | *** | *** |
| Total shipments | Value | *** | *** | *** |
| U.S. shipments | Unit value | 602 | 714 | 882 |
| Export shipments | Unit value | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** |
| U.S. shipments | Share of quantity | *** | *** | *** |
| Export shipments | Share of quantity | *** | *** | *** |
| Total shipments | Share of quantity | 100.0 | 100.0 | 100.0 |
| U.S. shipments | Share of value | *** | *** | *** |
| Export shipments | Share of value | *** | *** | *** |
| Total shipments | Share of value | 100.0 | 100.0 | 100.0 |

Table continued.

[6] All six firms had export shipments, with principal markets including ***.
[7] *** reported internal consumption and *** and *** reported transfers.

**Table III-9 Continued**
**CTL plate: U.S. producers' shipments, by location of shipment and by period**

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

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| U.S. shipments | Quantity | 5,227,834 | 4,611,857 | 4,839,075 | 2,509,951 | 2,112,971 |
| Export shipments | Quantity | *** | *** | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** | *** | *** |
| U.S. shipments | Value | 4,572,815 | 3,098,144 | 5,803,228 | 2,404,928 | 3,706,561 |
| Export shipments | Value | *** | *** | *** | *** | *** |
| Total shipments | Value | *** | *** | *** | *** | *** |
| U.S. shipments | Unit value | 875 | 672 | 1,199 | 958 | 1,754 |
| Export shipments | Unit value | *** | *** | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** | *** | *** |
| U.S. shipments | Share of quantity | *** | *** | *** | *** | *** |
| Export shipments | Share of quantity | *** | *** | *** | *** | *** |
| Total shipments | Share of quantity | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |
| U.S. shipments | Share of value | *** | *** | *** | *** | *** |
| Export shipments | Share of value | *** | *** | *** | *** | *** |
| Total shipments | Share of value | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

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

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

## U.S. producers' inventories

Table III-10 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments. U.S. producers' inventories increased in each year during 2016-20 and then declined in 2021.[8] There was a 12.6 percent decrease in inventories between January-June 2021 and January-June 2022. Ratio of inventory to U.S. production, U.S. shipments, and total shipments increased between 2016 and 2021, reaching their highest in 2020.

**Table III-10**
**CTL plate: U.S. producers' inventories, by period**

Quantity in short tons; inventory ratios in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| End-of-period inventory | Quantity | 239,992 | 240,676 | 279,440 |
| Inventory to U.S. production | Ratio | 4.2 | 4.1 | 4.5 |
| Inventory to U.S. shipments | Ratio | 4.9 | 4.7 | 5.0 |
| Inventory to total shipments | Ratio | *** | *** | *** |

Table continued.

**Table III-10 Continued**
**CTL plate: U.S. producers' inventories, by period**

Quantity in short tons; inventory ratios in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| End-of-period inventory | Quantity | 326,776 | 448,931 | 410,076 | 461,299 | 403,038 |
| Inventory to U.S. production | Ratio | 5.6 | 8.4 | 7.4 | 8.0 | 8.2 |
| Inventory to U.S. shipments | Ratio | 6.3 | 9.7 | 8.5 | 9.2 | 9.5 |
| Inventory to total shipments | Ratio | *** | *** | *** | *** | *** |

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

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

[8] The vast majority of the increase in inventories were due to ***, accounting for over *** percent of U.S. producer's inventories in 2020 and 2021.

## U.S. producers' imports from subject sources

No responding U.S. producer reported imports of CTL plate from subject sources during 2016-2021 and both interim periods.

## U.S. producers' purchases of imports from subject sources

No responding U.S. producer reported purchases of CTL plate during 2016-2021 and both interim periods.

## U.S. employment, wages, and productivity

Table III-11 shows U.S. producers' employment-related data. The number of PRWs reported by U.S. producers combined decreased during 2016-21, but were slightly higher during January-June 2022 compared to January-June 2021. Hourly wages increased steadily by 15.6 percent during 2016-21, and were higher during January-June 2022 compared to January-June 2021. Productivity, which increased irregularly during 2016-21, was the highest in 2018 at 891.2 short tons per 1,000 hours before falling to its lowest in 2019.

**Table III-11**
**CTL plate: U.S. producers' employment related data, by period**

| Item | 2016 | 2017 | 2018 |
|---|---|---|---|
| Production and related workers (PRWs) (number) | 3,160 | 3,102 | 3,093 |
| Total hours worked (1,000 hours) | 6,569 | 6,862 | 6,993 |
| Hours worked per PRW (hours) | 2,079 | 2,212 | 2,261 |
| Wages paid ($1,000) | 254,913 | 271,613 | 290,020 |
| Hourly wages (dollars per hour) | $38.81 | $39.58 | $41.47 |
| Productivity (short tons per 1,000 hours) | 863.1 | 856.3 | 891.2 |
| Unit labor costs (dollars per short ton) | $44.96 | $46.23 | $46.53 |

Table continued.

**Table III-11 Continued**
**CTL plate: U.S. producers' employment related data, by period**

| Item | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| Production and related workers (PRWs) (number) | 3,153 | 2,880 | 2,846 | 2,625 | 2,716 |
| Total hours worked (1,000 hours) | 6,863 | 6,171 | 6,324 | 3,136 | 3,350 |
| Hours worked per PRW (hours) | 2,177 | 2,143 | 2,222 | 1,195 | 1,233 |
| Wages paid ($1,000) | 290,673 | 265,795 | 283,710 | 134,982 | 149,057 |
| Hourly wages (dollars per hour) | $42.35 | $43.07 | $44.86 | $43.04 | $44.49 |
| Productivity (short tons per 1,000 hours) | 846.6 | 869.2 | 870.6 | 915.2 | 733.9 |
| Unit labor costs (dollars per short ton) | $50.03 | $49.55 | $51.53 | $47.03 | $60.63 |

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

# Financial experience of U.S. producers

## Background[9]

The financial results of six U.S. producers of CTL plate are presented in this section of the report.[10] [11] All of the firms reported their financial data on a calendar-year basis. Four of the firms provided their financial data on the basis of IFRS, while the remaining two firms provided their financial data on the basis of GAAP.

Net sales of CTL plate were primarily comprised of commercial sales, but also included a small amount of internal consumption and transfers to related firms. Combined, these shipments accounted for *** percent of the total net sales volume of CTL plate in 2021 and are not shown separately in this section.[12]

Figure III-2 presents each responding firm's share of the total reported net sales quantity in 2021. In the original investigations (with a period of investigation of January 1, 2013 — September 30, 2016) *** U.S. mills and *** processors reported usable financial results, compared with *** U.S. mills that provided financial results in these reviews.[13] While there was a change in ownership of ***, the overall composition of the industry has not changed significantly since the final phase of the original investigations. The industry was, and still is, somewhat concentrated among a few firms. In the final phase of the original investigations, the largest U.S. producers (***)

[9] The following abbreviations are used in the tables and/or text of this section: international financial reporting standards ("IFRS"), generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative ("SG&A") expenses, average unit values ("AUVs"), research and development ("R&D"), and return on assets ("ROA").

[10] ***. *** U.S. producers' questionnaire response, section III-14. ***.

[11] ArcelorMittal USA, the ***, was purchased by Cleveland-Cliffs in 2020. Cleveland Cliffs webpage, https://www.clevelandcliffs.com/news/news-releases/detail/8/cleveland-cliffs-inc-completes-acquisition-of, retrieved October 21, 2022. ***.

[12] Internal consumption and transfers to related firms combined accounted for between *** of total net sales quantity during the period examined.

[13] Original confidential report, p. VI-1.

accounted for *** percent of the industry's reported net sales volume in 2015.[14] In the current reviews, the *** three firms (***) accounted for *** percent of the total reported net sales volume in 2021.

**Figure III-2**
**CTL plate: Share of net sales quantity in 2021, by firm**

* * * * * * *

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

[14] Calculated from original confidential report, table VI-3.

## Operations on CTL plate

Table III-12 presents aggregated data on U.S. producers' operations in relation to CTL plate, while table III-13 presents corresponding changes in AUVs. Table III-14 presents selected company-specific financial data.

**Table III-12**
**CTL plate: Results of operations of U.S. producers, by item and period**

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

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Total net sales | Quantity | 5,705,869 | 5,845,592 | 6,193,630 |
| Total net sales | Value | 3,362,805 | 4,079,731 | 5,425,430 |
| COGS: Raw materials | Value | 1,715,573 | 2,268,824 | 2,886,512 |
| COGS: Direct labor | Value | 315,209 | 326,364 | 361,256 |
| COGS: Other factory | Value | 1,199,020 | 1,359,692 | 1,490,571 |
| COGS: Total | Value | 3,229,802 | 3,954,880 | 4,738,339 |
| Gross profit or (loss) | Value | 133,003 | 124,851 | 687,091 |
| SG&A expenses | Value | 244,468 | 222,239 | 300,309 |
| Operating income or (loss) | Value | (111,465) | (97,388) | 386,782 |
| Other expenses or (income), net | Value | *** | *** | *** |
| Net income or (loss) | Value | *** | *** | *** |
| Depreciation/amortization | Value | 175,823 | 184,161 | 218,482 |
| Cash flow | Value | *** | *** | *** |
| COGS: Raw materials | Ratio to NS | 51.0 | 55.6 | 53.2 |
| COGS: Direct labor | Ratio to NS | 9.4 | 8.0 | 6.7 |
| COGS: Other factory | Ratio to NS | 35.7 | 33.3 | 27.5 |
| COGS: Total | Ratio to NS | 96.0 | 96.9 | 87.3 |
| Gross profit | Ratio to NS | 4.0 | 3.1 | 12.7 |
| SG&A expense | Ratio to NS | 7.3 | 5.4 | 5.5 |
| Operating income or (loss) | Ratio to NS | (3.3) | (2.4) | 7.1 |
| Net income or (loss) | Ratio to NS | *** | *** | *** |

Table continued.

**Table III-12 Continued**
**CTL plate: Results of operations of U.S. producers, by item and period**

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

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Total net sales | Quantity | 5,762,985 | 5,241,641 | 5,544,765 | 2,859,584 | 2,465,085 |
| Total net sales | Value | 5,010,781 | 3,523,786 | 6,619,801 | 2,731,877 | 4,301,403 |
| COGS: Raw materials | Value | 2,513,806 | 1,972,810 | 3,173,011 | 1,459,522 | 1,713,930 |
| COGS: Direct labor | Value | 361,938 | 338,272 | 394,805 | 184,490 | 204,883 |
| COGS: Other factory | Value | 1,517,878 | 1,169,979 | 1,283,583 | 583,620 | 678,330 |
| COGS: Total | Value | 4,393,622 | 3,481,061 | 4,851,399 | 2,227,632 | 2,597,143 |
| Gross profit or (loss) | Value | 617,159 | 42,725 | 1,768,402 | 504,245 | 1,704,260 |
| SG&A expenses | Value | 294,666 | 226,357 | 270,809 | 122,415 | 141,176 |
| Operating income or (loss) | Value | 322,493 | (183,632) | 1,497,593 | 381,830 | 1,563,084 |
| Other expenses or (income), net | Value | *** | *** | *** | *** | *** |
| Net income or (loss) | Value | *** | *** | *** | *** | *** |
| Depreciation/amortization | Value | 215,899 | 136,056 | 128,061 | 60,070 | 64,814 |
| Cash flow | Value | *** | *** | *** | *** | *** |
| COGS: Raw materials | Ratio to NS | 50.2 | 56.0 | 47.9 | 53.4 | 39.8 |
| COGS: Direct labor | Ratio to NS | 7.2 | 9.6 | 6.0 | 6.8 | 4.8 |
| COGS: Other factory | Ratio to NS | 30.3 | 33.2 | 19.4 | 21.4 | 15.8 |
| COGS: Total | Ratio to NS | 87.7 | 98.8 | 73.3 | 81.5 | 60.4 |
| Gross profit | Ratio to NS | 12.3 | 1.2 | 26.7 | 18.5 | 39.6 |
| SG&A expense | Ratio to NS | 5.9 | 6.4 | 4.1 | 4.5 | 3.3 |
| Operating income or (loss) | Ratio to NS | 6.4 | (5.2) | 22.6 | 14.0 | 36.3 |
| Net income or (loss) | Ratio to NS | *** | *** | *** | *** | *** |

Table continued.

**Table III-12 Continued**
**CTL plate: Results of operations of U.S. producers, by item and period**

Shares in percent; unit values in dollars per short ton; count in number of firms reporting

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| COGS: Raw materials | Share | 53.1 | 57.4 | 60.9 |
| COGS: Direct labor | Share | 9.8 | 8.3 | 7.6 |
| COGS: Other factory | Share | 37.1 | 34.4 | 31.5 |
| COGS: Total | Share | 100.0 | 100.0 | 100.0 |
| Total net sales | Unit value | 589 | 698 | 876 |
| COGS: Raw materials | Unit value | 301 | 388 | 466 |
| COGS: Direct labor | Unit value | 55 | 56 | 58 |
| COGS: Other factory | Unit value | 210 | 233 | 241 |
| COGS: Total | Unit value | 566 | 677 | 765 |
| Gross profit or (loss) | Unit value | 23 | 21 | 111 |
| SG&A expenses | Unit value | 43 | 38 | 48 |
| Operating income or (loss) | Unit value | (20) | (17) | 62 |
| Net income or (loss) | Unit value | *** | *** | *** |
| Operating losses | Count | *** | *** | *** |
| Net losses | Count | *** | *** | *** |
| Data | Count | *** | *** | *** |

Table continued.

**Table III-12 Continued**
**CTL plate: Results of operations of U.S. producers, by item and period**

Shares in percent; unit values in dollars per short ton; count in number of firms reporting

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| COGS: Raw materials | Share | 57.2 | 56.7 | 65.4 | 65.5 | 66.0 |
| COGS: Direct labor | Share | 8.2 | 9.7 | 8.1 | 8.3 | 7.9 |
| COGS: Other factory | Share | 34.5 | 33.6 | 26.5 | 26.2 | 26.1 |
| COGS: Total | Share | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |
| Total net sales | Unit value | 869 | 672 | 1,194 | 955 | 1,745 |
| COGS: Raw materials | Unit value | 436 | 376 | 572 | 510 | 695 |
| COGS: Direct labor | Unit value | 63 | 65 | 71 | 65 | 83 |
| COGS: Other factory | Unit value | 263 | 223 | 231 | 204 | 275 |
| COGS: Total | Unit value | 762 | 664 | 875 | 779 | 1,054 |
| Gross profit or (loss) | Unit value | 107 | 8 | 319 | 176 | 691 |
| SG&A expenses | Unit value | 51 | 43 | 49 | 43 | 57 |
| Operating income or (loss) | Unit value | 56 | (35) | 270 | 134 | 634 |
| Net income or (loss) | Unit value | *** | *** | *** | *** | *** |
| Operating losses | Count | *** | *** | *** | *** | *** |
| Net losses | Count | *** | *** | *** | *** | *** |
| Data | Count | *** | *** | *** | *** | *** |

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

Note: Shares represent the share of total COGS. Ratios shown as “0.0” and unit values shown as “0” represent non-zero values that are less than 0.05 percent and less than $0.50, respectively.

Note: As previously discussed, ***. *** U.S. producers’ questionnaire response, section III-14. ***.

**Table III-13**
**CTL plate: Changes in AUVs between comparison periods**

Changes in percent

| Item | 2016-21 | 2016-17 | 2017-18 | 2018-19 | 2019-20 | 2020-21 | Jan-Jun 2021-22 |
|---|---|---|---|---|---|---|---|
| Total net sales | ▲102.6 | ▲18.4 | ▲25.5 | ▼(0.7) | ▼(22.7) | ▲77.6 | ▲82.7 |
| COGS: Raw materials | ▲90.3 | ▲29.1 | ▲20.1 | ▼(6.4) | ▼(13.7) | ▲52.0 | ▲36.2 |
| COGS: Direct labor | ▲28.9 | ▲1.1 | ▲4.5 | ▲7.7 | ▲2.8 | ▲10.3 | ▲28.8 |
| COGS: Other factory | ▲10.2 | ▲10.7 | ▲3.5 | ▲9.4 | ▼(15.3) | ▲3.7 | ▲34.8 |
| COGS: Total | ▲54.6 | ▲19.5 | ▲13.1 | ▼(0.3) | ▼(12.9) | ▲31.7 | ▲35.2 |

Table continued.

**Table III-13 Continued**
**CTL plate: Changes in AUVs between comparison periods**

Changes in dollars per short ton

| Item | 2016-21 | 2016-17 | 2017-18 | 2018-19 | 2019-20 | 2020-21 | Jan-Jun 2021-22 |
|---|---|---|---|---|---|---|---|
| Total net sales | ▲605 | ▲109 | ▲178 | ▼(6) | ▼(197) | ▲522 | ▲790 |
| COGS: Raw materials | ▲272 | ▲87 | ▲78 | ▼(30) | ▼(60) | ▲196 | ▲185 |
| COGS: Direct labor | ▲16 | ▲1 | ▲2 | ▲4 | ▲2 | ▲7 | ▲19 |
| COGS: Other factory | ▲21 | ▲22 | ▲8 | ▲23 | ▼(40) | ▲8 | ▲71 |
| COGS: Total | ▲309 | ▲111 | ▲88 | ▼(3) | ▼(98) | ▲211 | ▲275 |
| Gross profit or (loss) | ▲296 | ▼(2) | ▲90 | ▼(4) | ▼(99) | ▲311 | ▲515 |
| SG&A expense | ▲6 | ▼(5) | ▲10 | ▲3 | ▼(8) | ▲6 | ▲14 |
| Operating income or (loss) | ▲290 | ▲3 | ▲79 | ▼(6) | ▼(91) | ▲305 | ▲501 |
| Net income or (loss) | *** | *** | *** | *** | *** | *** | *** |

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

**Table III-14**
**CTL plate: Firm-by-firm total net sales quantity, by period**

**Net sales quantity**

Quantity in short tons

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 5,705,869 | 5,845,592 | 6,193,630 |

Table continued.

**Table III-14**
**CTL plate: Firm-by-firm total net sales quantity, by period**

**Net sales quantity**

Quantity in short tons

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 5,762,985 | 5,241,641 | 5,544,765 | 2,859,584 | 2,465,085 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm total net sales value, by period**

**Net sales value**

Value in 1,000 dollars

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 3,362,805 | 4,079,731 | 5,425,430 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm total net sales value, by period**

**Net sales value**

Value in 1,000 dollars

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 5,010,781 | 3,523,786 | 6,619,801 | 2,731,877 | 4,301,403 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm cost of goods sold ("COGS"), by period**

**COGS**

Value in 1,000 dollars

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 3,229,802 | 3,954,880 | 4,738,339 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm cost of goods sold ("COGS"), by period**

**COGS**

Value in 1,000 dollars

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 4,393,622 | 3,481,061 | 4,851,399 | 2,227,632 | 2,597,143 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm gross profit or (loss), by period**

**Gross profit or (loss)**

Value in 1,000 dollars

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 133,003 | 124,851 | 687,091 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm gross profit or (loss), by period**

**Gross profit or (loss)**

Value in 1,000 dollars

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 617,159 | 42,725 | 1,768,402 | 504,245 | 1,704,260 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm selling, general, and administrative ("SG&A") expenses, by period**

**SG&A expenses**

Value in 1,000 dollars

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 244,468 | 222,239 | 300,309 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm selling, general, and administrative ("SG&A") expenses, by period**

**SG&A expenses**

Value in 1,000 dollars

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 294,666 | 226,357 | 270,809 | 122,415 | 141,176 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm operating income or (loss), by period**

**Operating income or (loss)**

Value in 1,000 dollars

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | (111,465) | (97,388) | 386,782 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm operating income or (loss), by period**

**Operating income or (loss)**

Value in 1,000 dollars

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 322,493 | (183,632) | 1,497,593 | 381,830 | 1,563,084 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm net income or (loss), by period**

**Net income or (loss)**

Value in 1,000 dollars

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm net income or (loss), by period**

**Net income or (loss)**

Value in 1,000 dollars

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | *** | *** | *** | *** | *** |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm ratio of COGS to net sales value, by period**

**COGS to net sales ratio**

Ratios in percent

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 96.0 | 96.9 | 87.3 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm ratio of COGS to net sales value, by period**

**COGS to net sales ratio**

Ratios in percent

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 87.7 | 98.8 | 73.3 | 81.5 | 60.4 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm ratio of gross profit or (loss) to net sales value, by period**

**Gross profit or (loss) to net sales ratio**

Ratios in percent

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 4.0 | 3.1 | 12.7 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm ratio of gross profit or (loss) to net sales value, by period**

**Gross profit or (loss) to net sales ratio**

Ratios in percent

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 12.3 | 1.2 | 26.7 | 18.5 | 39.6 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm ratio of SG&A expenses to net sales value, by period**

**SG&A expenses to net sales ratio**

Ratios in percent

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 7.3 | 5.4 | 5.5 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm ratio of SG&A expenses to net sales value, by period**

**SG&A expenses to net sales ratio**

Ratios in percent

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 5.9 | 6.4 | 4.1 | 4.5 | 3.3 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm ratio of operating income or (loss) to net sales value, by period**

**Operating income or (loss) to net sales ratio**

Ratios in percent

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | (3.3) | (2.4) | 7.1 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm ratio of operating income or (loss) to net sales value, by period**

**Operating income or (loss) to net sales ratio**

Ratios in percent

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 6.4 | (5.2) | 22.6 | 14.0 | 36.3 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm ratio of net income or (loss) to net sales value, by period**

**Net income or (loss) to net sales ratio**

Ratios in percent

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm ratio of net income or (loss) to net sales value, by period**

**Net income or (loss) to net sales ratio**

Ratios in percent

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | *** | *** | *** | *** | *** |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm unit net sales value, by period**

**Unit net sales value**

Unit values in dollars per short ton

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 589 | 698 | 876 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm unit net sales value, by period**

**Unit net sales value**

Unit values in dollars per short ton

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 869 | 672 | 1,194 | 955 | 1,745 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm unit raw material costs, by period**

**Unit raw material**

Unit values in dollars per short ton

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 301 | 388 | 466 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm unit raw material costs, by period**

**Unit raw material**

Unit values in dollars per short ton

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 436 | 376 | 572 | 510 | 695 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm unit direct labor cost, by period**

**Unit direct labor**

Unit values in dollars per short ton

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 55 | 56 | 58 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm unit direct labor cost, by period**

**Unit direct labor**

Unit values in dollars per short ton

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 63 | 65 | 71 | 65 | 83 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm unit other factory costs, by period**

**Unit other factory costs**

Unit values in dollars per short ton

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 210 | 233 | 241 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm unit other factory costs, by period**

**Unit other factory costs**

Unit values in dollars per short ton

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 263 | 223 | 231 | 204 | 275 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm unit COGS, by period**

**Unit COGS**

Unit values in dollars per short ton

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 566 | 677 | 765 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm unit COGS, by period**

**Unit COGS**

Unit values in dollars per short ton

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 762 | 664 | 875 | 779 | 1,054 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm unit gross profit or (loss), by period**

**Unit gross profit or (loss)**

Unit values in dollars per short ton

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 23 | 21 | 111 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm unit gross profit or (loss), by period**

**Unit gross profit or (loss)**

Unit values in dollars per short ton

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 107 | 8 | 319 | 176 | 691 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm unit SG&A expenses, by period**

**Unit SG&A expenses**

Unit values in dollars per short ton

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | 43 | 38 | 48 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm unit SG&A expenses, by period**

**Unit SG&A expenses**

Unit values in dollars per short ton

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 51 | 43 | 49 | 43 | 57 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm unit operating income or (loss), by period**

**Unit operating income or (loss)**

Unit values in dollars per short ton

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | (20) | (17) | 62 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm unit operating income or (loss), by period**

**Unit operating income or (loss)**

Unit values in dollars per short ton

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | 56 | (35) | 270 | 134 | 634 |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm unit net income or (loss), by period**

**Unit net income or (loss)**

Unit values in dollars per short ton

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

**Table III-14 Continued**
**CTL plate: Firm-by-firm unit net income or (loss), by period**

**Unit net income or (loss)**

Unit values in dollars per short ton

| Firm | 2016 | 2017 | 2018 | Jan-Jun 2019 | Jan-Jun 2020 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | *** | *** | *** | *** | *** |

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

Note: As previously discussed, ***. *** U.S. producers' questionnaire response, section III-14. ***.

## Net sales

As shown in table III-12, the CTL plate net sales quantity increased from 5.7 million short tons in 2016 to a period high of 6.2 million short tons in 2018, decreased to 5.2 million short tons in 2020, and increased to 5.5 million short tons in 2021 (for an overall decrease of 2.8 percent from 2016 to 2021). Net sales quantity was lower in interim 2022 (2.5 million short tons) than in interim 2021 (2.9 million short tons). On a company-specific basis, the year-to-year directional trends varied, however four of six firms reported their highest net sales quantity in 2018, and five of six firms reported their lowest annual-period net sales quantity in 2020. The majority of the firms (five of six) reported a lower net sales quantity in interim 2022 than in interim 2021.

Total net sales value increased from $3.4 billion in 2016 to $5.4 billion in 2018, decreased to a period low of $3.5 billion in 2020, and increased noticeably to a period high of $6.6 billion in 2021 (for an overall increase of 96.9 percent from 2016 to 2021). It was higher in interim 2022 ($4.3 billion) than in interim 2021 ($2.7 billion). On a company-specific basis, the year-to-year net sales value directional trends varied, however four of six firms reported their highest net sales values in 2021, and four of six firms reported their lowest annual-period net sales value in 2020. The majority of the firms (five of six) reported a higher net sales value in interim 2022 than in interim 2021.

The net sales AUV fluctuated year-to-year from 2016 to 2021, but when comparing 2021 to 2016, it more than doubled, from $589 per short ton in 2016 to $1,194 per short ton in 2021. It was also noticeably higher in interim 2022 ($1,745 per short ton), than in interim 2021 ($955 per short ton). On a company-specific basis, the directional trends of the net sales AUVs were mostly uniform. All companies reported an increase in their net sales AUVs from 2016 to 2018, an overall decrease in their net sales AUVs from 2018 to 2020, and an increase in their net sales AUVs in 2021.[15] Similarly, all firms reported higher net sales AUVs in interim 2022 than in interim 2021.[16]

[15] For two firms the 2018-20 decrease was irregular (i.e., their net sales AUV increased from 2018 to 2019 before decreasing in 2020 to levels below 2019).

[16] The net sales AUVs reported by ***. A. Finkl & Sons is a producer of tool steel which has a higher per-short ton sales value than other types of CTL plate. Original publication, pp. 16-17. In response to questions from staff, the company indicated that ***. Email from ***.

## Cost of goods sold and gross profit or loss

Raw material costs were the largest component of COGS in each full- and partial-year period, accounting for between 53.1 percent (2016) and 66.0 percent (January-June 2022) percent of total COGS. On a per-short ton basis, raw material costs increased from 2016 to 2018, decreased from 2018 to 2020, increased in 2021, and were higher in interim 2022 than in interim 2021. As seen in table III-14, on a company-specific basis, the year-to-year directional trends in raw material AUVs were mostly uniform. All of the firms with data reported for the entire period experienced their lowest per-short ton raw material cost in 2016 and their highest per-short ton cost in January-June 2022.

Table III-15 presents raw materials, by type. Steel or iron scrap, which is used in EAF furnace production of CTL plate, was reported by ***. Steel slabs were reported as raw material inputs by ***. ***. ***. Other material inputs were reported by ***. All *** companies reported *** within this category. ***.[17]

[17] Several U.S. producers reported purchasing inputs from related firms. ***. U.S. producers' questionnaire responses, sections III-7-8.

**Table III-15**
**CTL plate: Raw material costs in the last full year of the period**

Value in 1,000 dollars; share of value in percent

| Item | Value | Share of value |
|---|---|---|
| Steel or iron scrap | *** | *** |
| Steel slabs | *** | *** |
| Coal | *** | *** |
| Steel coil / sheet (produced domestically) | *** | *** |
| Steel coil / sheet (produced in other countries) | *** | *** |
| Other material input costs | *** | *** |
| All raw materials | 3,173,011 | 100.0 |

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

Note: Since not all of these raw material inputs are used by all producers in their production of CTL plate, unit values are not meaningful and are, therefore, not shown.

The second largest component of COGS, other factory costs, accounted for between 26.1 percent and 37.1 percent of total COGS during the period examined. On a per-short ton basis, other factory costs increased from 2016 to 2019, decreased in 2020, and increased in 2021 (it increased overall from 2016-21); they were higher in interim 2022 than in interim 2021.[18] [19]

[18] ***. *** U.S. producers' questionnaire, section III-10; email from ***.

***. Ibid.

[19] The decrease in other factory costs on a per-short ton basis between 2019 and 2020 was experienced by the majority of firms (***). Other than ***.

Lastly, direct labor, the smallest component of COGS, accounted for between 7.6 percent and 9.8 percent of total COGS during the period examined. On a per-short ton basis, direct labor increased each year from 2016 to 2021, and was higher in interim 2022 than in interim 2021.[20]

Total COGS increased irregularly from 2016 to 2021, and was higher in interim 2022 than in interim 2021. As a ratio to net sales, COGS fluctuated year-to-year, but decreased overall from 96.0 percent in 2016 to 73.3 percent in 2021, and was lower in interim 2022 (60.4 percent) than during the same period in 2021 (81.5 percent). As seen in table III-12, gross profit increased irregularly from $133.0 million in 2016 to $1.8 billion in 2021 and was higher in interim 2022 (at $1.7 billion) than in interim 2021 (at $504.2 million). Of the six U.S. producers, ***.[21]

## SG&A expenses and operating income or loss

The U.S. producers' SG&A expenses fluctuated during the period for which data were collected, but increased overall between 2016 and 2021 (from $244.5 million to $270.8 million), and were higher in interim 2022 ($141.2 million) than in interim 2021 ($122.4 million). As a ratio to net sales, SG&A expenses decreased irregularly from 7.3 percent in 2016 to 4.1 percent in 2021, and were lower in interim 2022 (at 3.3 percent) than in interim 2021 (at 4.5 percent).

The industry recorded an operating loss in 2016 of $111.5 million which improved to an income of $386.8 million in 2018, worsened to a loss of $183.6 million in 2020 (the period low), and improved noticeably to an income of $1.5 billion in 2021. The industry's operating income was $381.8 million in interim 2021 and $1.6 billion in interim 2022.

Of the five firms that had reportable data in 2016 and 2017, three reported an increase in operating income from 2016-17, whereas all five reported an increase from 2017-18. Of the six companies with reportable data for the remainder of the period, five reported a decrease in operating income from 2018-19 and from 2019-20, all firms reported an increase from 2020-21, and all firms had higher operating income in interim 2022 than in interim 2021.

[20] ***. Email from ***.
[21] ***.

## All other expenses and net income or loss

Classified below the operating income level are interest expense, other expense, and other income, which are often allocated to the product line from high levels in the corporation. In table III-12 these amounts are aggregated, and only a combined amount is shown. ***. Interest expense, which ***, fluctuated from 2016 to 2021, but increased overall, and was higher in interim 2022 than in interim 2021.

The industry's net income improved irregularly from *** in 2016 to *** in 2021; it was higher in interim 2022 (at $***) than in interim 2021 (at $***). The industry's directional trends for net income were similar to its operating income directional trends, that is, net income improved from 2016 to 2018, worsened from 2018 to 2020, improved *** in 2021, and was *** higher in interim 2022 than in interim 2021.

The Commission requested U.S. producers to describe the effects of the COVID-19 pandemic on their CTL plate financial performance, if any. Four of the companies reported that their CTL plate financial performance was affected by the pandemic, and their narrative responses are presented in table III-16.

**Table III-16**
**CTL plate: U.S. producers' narrative responses relating to COVID-19 pandemic effects on CTL plate financial performance, by firm**

| Firm | Narrative on capital expenditures |
|---|---|
| *** | *** |
| *** | *** |
| *** | *** |
| *** | *** |

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

## Variance analysis

A variance analysis for the operations of U.S. producers of CTL plate is presented in table III-17.[22] The information for this variance analysis is derived from table III-12. The analysis shows that the $1.6 billion increase in operating income between 2016 and 2021 was primarily due to a favorable price variance despite an unfavorable cost variance (i.e., the industry's net sales AUVs increased more than the industry's per-unit COGS and per-unit SG&A expense). Similarly, the analysis shows that the $1.2 billion improvement in operating income in interim 2022 compared to interim 2021 was primarily due to a favorable price variance despite an unfavorable cost variance.

[22] The Commission's variance analysis is calculated in three parts: Sales variance, cost of sales variance (COGS variance), and SG&A expense variance. Each part consists of a price variance (in the case of the sales variance) or a cost or expense variance (in the case of the COGS and SG&A expense variance), and a volume variance. The sales or cost/expense variance is calculated as the change in unit price or per-unit cost/expense times the new volume, while the volume variance is calculated as the change in volume times the old unit price or per-unit cost/expense. Summarized at the bottom of the table, the price variance is from sales; the cost/expense variance is the sum of those items from COGS and SG&A variances, respectively, and the volume variance is the sum of the volume components of the net sales, COGS, and SG&A expense variances. The overall volume component of the variance analysis is generally small.

**Table III-17**
**CTL plate: Variance analysis on the operations of U.S. producers between comparison periods**

Value in 1,000 dollars

| Item | 2016-21 | 2016-17 | 2017-18 | 2018-19 | 2019-20 | 2020-21 | Jan-Jun 2021-22 |
|---|---|---|---|---|---|---|---|
| NS price variance | 3,351,944 | 634,579 | 1,102,798 | (37,417) | (1,033,699) | 2,892,235 | 1,946,407 |
| NS volume variance | (94,948) | 82,347 | 242,901 | (377,232) | (453,296) | 203,780 | (376,881) |
| NS total variance | 3,256,996 | 716,926 | 1,345,699 | (414,649) | (1,486,995) | 3,096,015 | 1,569,526 |
| COGS cost variance | (1,712,790) | (645,988) | (547,991) | 15,259 | 515,095 | (1,169,028) | (676,828) |
| COGS volume variance | 91,193 | (79,090) | (235,468) | 329,458 | 397,466 | (201,310) | 307,317 |
| COGS total variance | (1,621,597) | (725,078) | (783,459) | 344,717 | 912,561 | (1,370,338) | (369,511) |
| Gross profit variance | 1,635,399 | (8,152) | 562,240 | (69,932) | (574,434) | 1,725,677 | 1,200,015 |
| SG&A cost variance | (33,244) | 28,215 | (64,838) | (15,238) | 41,652 | (31,362) | (35,649) |
| SG&A volume variance | 6,903 | (5,986) | (13,232) | 20,881 | 26,657 | (13,090) | 16,888 |
| SG&A total variance | (26,341) | 22,229 | (78,070) | 5,643 | 68,309 | (44,452) | (18,761) |
| Operating income price variance | 3,351,944 | 634,579 | 1,102,798 | (37,417) | (1,033,699) | 2,892,235 | 1,946,407 |
| Operating income cost variance | (1,746,033) | (617,772) | (612,829) | 21 | 556,748 | (1,200,390) | (712,477) |
| Operating income volume variance | 3,147 | (2,730) | (5,798) | (26,893) | (29,174) | (10,619) | (52,676) |
| Operating income total variance | 1,609,058 | 14,077 | 484,170 | (64,289) | (506,125) | 1,681,225 | 1,181,254 |

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

## Capital expenditures and research and development expenses

Table III-18 presents capital expenditures, by firm, and table III-19 presents the firms' narrative explanations of the nature, focus, and significance of their capital expenditures. Total capital expenditures fluctuated during the period examined, but increased overall between 2016 and 2021 and were higher in interim 2022 than in interim 2021. ***.

**Table III-18**
**CTL plate: U.S. producers' capital expenditures, by firm and period**

Value in 1,000 dollars

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

**Table III-18 Continued**
**CTL plate: U.S. producers' capital expenditures, by firm and period**

Value in 1,000 dollars

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | *** | *** | *** | *** | *** |

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

**Table III-19**
**CTL plate: Narrative descriptions of U.S. producers' capital expenditures, by firm**

| Firm | Narrative on capital expenditures |
|---|---|
| A. Finkl & Sons | *** |
| Cleveland-Cliffs | *** |
| EVRAZ | *** |
| Gerdau | *** |
| Nucor | *** |
| SSAB | *** |

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

Table III-20 presents R&D expenses, by firm, and table III-21 presents the firms' narrative explanations of the nature, focus, and significance of their R&D expenses. Total R&D expenses increased from 2016 to 2018, and then decreased through 2021. They were *** higher in January-June 2022 than they were in January-June 2021.

**Table III-20**
**CTL plate: U.S. producers' R&D expenses, by firm and period**

Value in 1,000 dollars

| Firm | 2016 | 2017 | 2018 |
|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** |
| EVRAZ | *** | *** | *** |
| Gerdau | *** | *** | *** |
| Nucor | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** |
| All firms | *** | *** | *** |

Table continued.

**Table III-20 Continued**
**CTL plate: U.S. producers' R&D expenses, by firm and period**

Value in 1,000 dollars

| Firm | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** |
| All firms | *** | *** | *** | *** | *** |

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

**Table III-21**
**CTL plate: Narrative descriptions of U.S. producers R&D expenses, by firm**

| Firm | Narrative on R&D expenses |
|---|---|
| A. Finkl & Sons | *** |
| Cleveland-Cliffs | *** |
| EVRAZ | *** |
| Gerdau | *** |
| Nucor | *** |
| SSAB Enterprises | *** |

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

## Assets and return on assets

Table III-22 presents data on the U.S. producers' total net assets, while table III-23 presents their operating ROA.[23] Table III-24 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time.

As shown in table III-22, total net assets fluctuated year-to-year from 2016 to 2021, but increased overall, with all firms that had reportable data throughout the period reporting higher total net assets in 2021 than in 2016. *** accounted for the majority of reported net assets in each year examined. The company reported that the main asset categories included in its total assets were ***. The industry's operating ROA also fluctuated from year-to-year, but was noticeably higher in 2021, reflecting the large increase in the industry's operating income that year.

**Table III-22**
**CTL plate: U.S. producers' total net assets, by firm and period**

Value in 1,000 dollars

| Firm | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 |
|---|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** | *** |
| All firms | *** | *** | *** | *** | *** | *** |

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

[23] The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

**Table III-23**
**CTL plate: U.S. producers' operating ROA, by firm and period**

Ratio in percent

| Firm | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 |
|---|---|---|---|---|---|---|
| A. Finkl & Sons | *** | *** | *** | *** | *** | *** |
| Cleveland-Cliffs | *** | *** | *** | *** | *** | *** |
| EVRAZ | *** | *** | *** | *** | *** | *** |
| Gerdau | *** | *** | *** | *** | *** | *** |
| Nucor | *** | *** | *** | *** | *** | *** |
| SSAB Enterprises | *** | *** | *** | *** | *** | *** |
| All firms | *** | *** | *** | *** | *** | *** |

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

**Table III-24**
**CTL plate: Narrative descriptions of U.S. producers' total net assets, by firm**

| Firm | Narrative on assets |
|---|---|
| A. Finkl & Sons | *** |
| Cleveland-Cliffs | *** |
| EVRAZ | *** |
| Gerdau | *** |
| Nucor | *** |
| SSAB Enterprises | *** |

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

# Part IV: U.S. imports and the foreign industries

## U.S. imports

### Overview

The Commission issued questionnaires to 299 potential importers of CTL plate during January 2016-June 2022.[1] Forty-eight firms provided usable data and information in response to the importer questionnaires, while 67 firms indicated that they had not imported product during the period for which data were collected. Based on adjusted official Commerce statistics for imports of CTL plate, importers' questionnaire data accounted for 65.1 percent of total U.S. imports during 2021 and 92.7 percent of total subject imports during 2021.[2] The import data reported by firms responding to the Commission's questionnaire accounted for the following shares of U.S. imports from individual subject countries (as a share of adjusted official import statistics, by quantity) during 2021:

- Austria: ***
- Belgium: ***
- Brazil: ***
- China: ***
- France: ***
- Germany: ***
- Italy: ***
- Japan: ***
- South Africa: ***
- South Korea, subject: ***
- Taiwan: ***
- Turkey: ***

[1] The Commission issued importer questionnaires to firms that based on a review of data from third-party sources, may have accounted for more than one percent of imports classified under the primary HTS statistical reporting numbers for CTL plate: 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000.

[2] The coverage estimates presented for imports in this section of the report are based on questionnaire data reported for U.S. imports of CTL plate compared with official U.S. import statistics of the U. S. Department of Commerce for the following primary HTS statistical reporting numbers for CTL plate: 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, with adjustments based on data submitted in response to Commission questionnaires.

In light of less-than-complete coverage of data from certain subject countries in the Commission's questionnaires, import data in this report, unless otherwise noted, are based on official Commerce statistics for CTL plate, as adjusted using data collected separately in questionnaire responses to (1) include in-scope CTL plate imported under secondary HTS statistical reporting numbers,[3] (2) exclude out-of-scope CTL plate imported under primary HTS statistical reporting numbers,[4] and (3) re-categorize nonsubject imports from South Korea as imports from nonsubject sources.[5]

## Imports from subject and nonsubject countries

Table IV-1 and figure IV-1 present information on U.S. imports of CTL plate from subject and nonsubject sources over the period examined.

[3] Import data on in-scope CTL plate entering the United States under secondary HTS statistical reporting numbers were collected separately in importer questionnaire responses. These reported import data (from ***) accounted for less than *** percent of total reported U.S. imports in each of the annual periods from 2016 to 2021 and interim periods 2021 and 2022.

[4] Data concerning certain forms of CTL plate that were specifically excluded from the scope (and which are accounted for in the primary HTS numbers used in the compilation of the report) were collected separately in importer questionnaire responses. These reported import data on excluded forms (only from ***) accounted for less than *** percent of total reported U.S. imports in each of the annual periods from 2016 to 2021 and interim periods 2021 and 2022.

[5] At the time of the filing of the petitions, there were existing antidumping and countervailing duty orders on certain cut-to-length carbon-quality steel plate products from South Korea. (See 64 FR 73196, December 29, 1999, as amended, 65 FR 6585, February 10, 2000, and 64 FR 73176, December 29, 1999, as amended, 65 FR 6587, February 10, 2000) ("1999 South Korea Orders"). The antidumping and countervailing duty orders concerning South Korea that are the subject of these current first five-year reviews include subject merchandise produced and/or exported by South Korean companies that were excluded or revoked from the 1999 South Korea Orders as of April 8, 2016. The only revoked or excluded company from the 1999 South Korea Orders is Pohang Iron and Steel Company, also known as POSCO. Therefore, consistent with the treatment in the original investigations, the data concerning subject imports from South Korea presented throughout this report include all U.S. imports of CTL plate produced by POSCO and POSCO affiliates and exclude imports from South Korea that are produced/exported by non-POSCO entities, unless such imports were not subject to the existing antidumping and countervailing duty orders (i.e., alloy steel plate).

**Table IV-1**
**CTL plate: U.S. imports by source and period**

Quantity in short tons

| Source | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Austria | Quantity | 16,855 | 3,203 | 775 |
| Belgium | Quantity | 25,171 | 12,531 | 13,389 |
| Brazil | Quantity | 7,442 | 169 | 28 |
| China | Quantity | 37,312 | 1,755 | 788 |
| France | Quantity | 107,855 | 6,608 | 4,197 |
| Germany | Quantity | 147,626 | 10,981 | 4,683 |
| Italy | Quantity | 29,193 | 12,907 | 11,993 |
| Japan | Quantity | 34,261 | 13,809 | 1,652 |
| South Africa | Quantity | 93 | 3 | --- |
| South Korea, subject | Quantity | *** | *** | *** |
| Taiwan | Quantity | 12,076 | 937 | 1,815 |
| Turkey | Quantity | 35,590 | 630 | 121 |
| Subject sources | Quantity | *** | *** | *** |
| South Korea, nonsubject | Quantity | *** | *** | *** |
| All other sources | Quantity | *** | *** | *** |
| Nonsubject sources | Quantity | *** | *** | *** |
| All import sources | Quantity | 1,168,000 | 773,708 | 595,505 |

Table continued.

**Table IV-1 Continued**
**CTL plate: U.S. imports by source and period**

Quantity in short tons

| Source | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Austria | Quantity | 240 | 820 | 1,078 | 313 | 684 |
| Belgium | Quantity | 7,658 | 6,943 | 2,036 | 1,362 | 1,368 |
| Brazil | Quantity | 15 | 34 | 25 | 12 | 42 |
| China | Quantity | 559 | 236 | 4,513 | 7 | 855 |
| France | Quantity | 4,042 | 1,375 | 1,595 | 892 | 269 |
| Germany | Quantity | 2,071 | 4,135 | 5,628 | 1,876 | 1,165 |
| Italy | Quantity | 4,575 | 5,048 | 6,149 | 2,650 | 1,503 |
| Japan | Quantity | 1,723 | 618 | 237 | 125 | 214 |
| South Africa | Quantity | --- | --- | --- | --- | --- |
| South Korea, subject | Quantity | *** | *** | *** | *** | *** |
| Taiwan | Quantity | 1,685 | 25 | --- | --- | --- |
| Turkey | Quantity | 67 | 63 | 3 | 3 | --- |
| Subject sources | Quantity | *** | *** | *** | *** | *** |
| South Korea, nonsubject | Quantity | *** | *** | *** | *** | *** |
| All other sources | Quantity | *** | *** | *** | *** | *** |
| Nonsubject sources | Quantity | *** | *** | *** | *** | *** |
| All import sources | Quantity | 532,590 | 311,238 | 521,094 | 242,450 | 266,468 |

Table continued.

**Table IV-1 Continued**
**CTL plate: U.S. imports by source and period**

Value in 1,000 dollars

| Source | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Austria | Value | 20,308 | 6,335 | 3,638 |
| Belgium | Value | 26,905 | 14,578 | 20,145 |
| Brazil | Value | 5,041 | 941 | 173 |
| China | Value | 36,527 | 3,203 | 658 |
| France | Value | 79,230 | 13,368 | 7,631 |
| Germany | Value | 137,203 | 20,395 | 9,518 |
| Italy | Value | 19,781 | 10,708 | 11,646 |
| Japan | Value | 25,634 | 11,746 | 4,641 |
| South Africa | Value | 39 | 2 | --- |
| South Korea, subject | Value | *** | *** | *** |
| Taiwan | Value | 6,021 | 602 | 1,421 |
| Turkey | Value | 14,796 | 563 | 85 |
| Subject sources | Value | *** | *** | *** |
| South Korea, nonsubject | Value | *** | *** | *** |
| All other sources | Value | *** | *** | *** |
| Nonsubject sources | Value | *** | *** | *** |
| All import sources | Value | 815,884 | 752,281 | 746,873 |

Table continued.

**Table IV-1 Continued**
**CTL plate: U.S. imports by source and period**

Value in 1,000 dollars

| Source | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Austria | Value | 1,073 | 2,004 | 2,866 | 823 | 2,357 |
| Belgium | Value | 11,363 | 10,309 | 4,543 | 2,988 | 3,882 |
| Brazil | Value | 120 | 320 | 306 | 97 | 247 |
| China | Value | 444 | 277 | 4,767 | 49 | 686 |
| France | Value | 8,055 | 2,798 | 2,605 | 1,394 | 552 |
| Germany | Value | 6,925 | 8,207 | 10,323 | 3,225 | 3,811 |
| Italy | Value | 4,696 | 5,028 | 7,707 | 2,578 | 2,133 |
| Japan | Value | 4,817 | 3,391 | 1,099 | 577 | 977 |
| South Africa | Value | --- | --- | --- | --- | --- |
| South Korea, subject | Value | *** | *** | *** | *** | *** |
| Taiwan | Value | 1,523 | 18 | --- | --- | --- |
| Turkey | Value | 52 | 47 | 6 | 6 | --- |
| Subject sources | Value | *** | *** | *** | *** | *** |
| South Korea, nonsubject | Value | *** | *** | *** | *** | *** |
| All other sources | Value | *** | *** | *** | *** | *** |
| Nonsubject sources | Value | *** | *** | *** | *** | *** |
| All import sources | Value | 708,410 | 326,631 | 832,227 | 306,226 | 564,464 |

Table continued.

**Table IV-1 Continued**
**CTL plate: U.S. imports by source and period**

Unit value in dollars per short ton

| Source | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Austria | Unit value | 1,205 | 1,978 | 4,693 |
| Belgium | Unit value | 1,069 | 1,163 | 1,505 |
| Brazil | Unit value | 677 | 5,566 | 6,179 |
| China | Unit value | 979 | 1,825 | 835 |
| France | Unit value | 735 | 2,023 | 1,818 |
| Germany | Unit value | 929 | 1,857 | 2,033 |
| Italy | Unit value | 678 | 830 | 971 |
| Japan | Unit value | 748 | 851 | 2,809 |
| South Africa | Unit value | 414 | 695 | --- |
| South Korea, subject | Unit value | *** | *** | *** |
| Taiwan | Unit value | 499 | 643 | 783 |
| Turkey | Unit value | 416 | 894 | 700 |
| Subject sources | Unit value | *** | *** | *** |
| South Korea, nonsubject | Unit value | *** | *** | *** |
| All other sources | Unit value | *** | *** | *** |
| Nonsubject sources | Unit value | *** | *** | *** |
| All import sources | Unit value | 699 | 973 | 1,254 |

Table continued.

**Table IV-1 Continued**
**CTL plate: U.S. imports by source and period**

Unit value in dollars per short ton

| Source | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Austria | Unit value | 4,462 | 2,445 | 2,657 | 2,630 | 3,447 |
| Belgium | Unit value | 1,484 | 1,485 | 2,231 | 2,194 | 2,838 |
| Brazil | Unit value | 8,000 | 9,412 | 12,482 | 8,083 | 5,891 |
| China | Unit value | 795 | 1,174 | 1,056 | 7,349 | 802 |
| France | Unit value | 1,993 | 2,034 | 1,633 | 1,562 | 2,051 |
| Germany | Unit value | 3,343 | 1,985 | 1,834 | 1,719 | 3,271 |
| Italy | Unit value | 1,026 | 996 | 1,253 | 973 | 1,419 |
| Japan | Unit value | 2,797 | 5,490 | 4,647 | 4,605 | 4,573 |
| South Africa | Unit value | --- | --- | --- | --- | --- |
| South Korea, subject | Unit value | *** | *** | *** | *** | *** |
| Taiwan | Unit value | 904 | 725 | --- | --- | --- |
| Turkey | Unit value | 776 | 753 | 2,140 | 2,140 | --- |
| Subject sources | Unit value | *** | *** | *** | *** | *** |
| South Korea, nonsubject | Unit value | *** | *** | *** | *** | *** |
| All other sources | Unit value | *** | *** | *** | *** | *** |
| Nonsubject sources | Unit value | *** | *** | *** | *** | *** |
| All import sources | Unit value | 1,330 | 1,049 | 1,597 | 1,263 | 2,118 |

Table continued.

**Table IV-1 Continued**
**CTL plate: U.S. imports by source and period**

Shares in percent

| Source | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Austria | Share of quantity | 1.4 | 0.4 | 0.1 |
| Belgium | Share of quantity | 2.2 | 1.6 | 2.2 |
| Brazil | Share of quantity | 0.6 | 0.0 | 0.0 |
| China | Share of quantity | 3.2 | 0.2 | 0.1 |
| France | Share of quantity | 9.2 | 0.9 | 0.7 |
| Germany | Share of quantity | 12.6 | 1.4 | 0.8 |
| Italy | Share of quantity | 2.5 | 1.7 | 2.0 |
| Japan | Share of quantity | 2.9 | 1.8 | 0.3 |
| South Africa | Share of quantity | 0.0 | 0.0 | --- |
| South Korea, subject | Share of quantity | *** | *** | *** |
| Taiwan | Share of quantity | 1.0 | 0.1 | 0.3 |
| Turkey | Share of quantity | 3.0 | 0.1 | 0.0 |
| Subject sources | Share of quantity | *** | *** | *** |
| South Korea, nonsubject | Share of quantity | *** | *** | *** |
| All other sources | Share of quantity | *** | *** | *** |
| Nonsubject sources | Share of quantity | *** | *** | *** |
| All import sources | Share of quantity | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-1 Continued**
**CTL plate: U.S. imports by source and period**

Shares in percent

| Source | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Austria | Share of quantity | 0.0 | 0.3 | 0.2 | 0.1 | 0.3 |
| Belgium | Share of quantity | 1.4 | 2.2 | 0.4 | 0.6 | 0.5 |
| Brazil | Share of quantity | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| China | Share of quantity | 0.1 | 0.1 | 0.9 | 0.0 | 0.3 |
| France | Share of quantity | 0.8 | 0.4 | 0.3 | 0.4 | 0.1 |
| Germany | Share of quantity | 0.4 | 1.3 | 1.1 | 0.8 | 0.4 |
| Italy | Share of quantity | 0.9 | 1.6 | 1.2 | 1.1 | 0.6 |
| Japan | Share of quantity | 0.3 | 0.2 | 0.0 | 0.1 | 0.1 |
| South Africa | Share of quantity | --- | --- | --- | --- | --- |
| South Korea, subject | Share of quantity | *** | *** | *** | *** | *** |
| Taiwan | Share of quantity | 0.3 | 0.0 | --- | --- | --- |
| Turkey | Share of quantity | 0.0 | 0.0 | 0.0 | 0.0 | --- |
| Subject sources | Share of quantity | *** | *** | *** | *** | *** |
| South Korea, nonsubject | Share of quantity | *** | *** | *** | *** | *** |
| All other sources | Share of quantity | *** | *** | *** | *** | *** |
| Nonsubject sources | Share of quantity | *** | *** | *** | *** | *** |
| All import sources | Share of quantity | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-1 Continued**
**CTL plate: U.S. imports by source and period**

Shares in percent

| Source | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Austria | Share of value | 2.5 | 0.8 | 0.5 |
| Belgium | Share of value | 3.3 | 1.9 | 2.7 |
| Brazil | Share of value | 0.6 | 0.1 | 0.0 |
| China | Share of value | 4.5 | 0.4 | 0.1 |
| France | Share of value | 9.7 | 1.8 | 1.0 |
| Germany | Share of value | 16.8 | 2.7 | 1.3 |
| Italy | Share of value | 2.4 | 1.4 | 1.6 |
| Japan | Share of value | 3.1 | 1.6 | 0.6 |
| South Africa | Share of value | 0.0 | 0.0 | --- |
| South Korea, subject | Share of value | *** | *** | *** |
| Taiwan | Share of value | 0.7 | 0.1 | 0.2 |
| Turkey | Share of value | 1.8 | 0.1 | 0.0 |
| Subject sources | Share of value | *** | *** | *** |
| South Korea, nonsubject | Share of value | *** | *** | *** |
| All other sources | Share of value | *** | *** | *** |
| Nonsubject sources | Share of value | *** | *** | *** |
| All import sources | Share of value | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-1 Continued**
**CTL plate: U.S. imports by source and period**

Shares in percent

| Source | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Austria | Share of value | 0.2 | 0.6 | 0.3 | 0.3 | 0.4 |
| Belgium | Share of value | 1.6 | 3.2 | 0.5 | 1.0 | 0.7 |
| Brazil | Share of value | 0.0 | 0.1 | 0.0 | 0.0 | 0.0 |
| China | Share of value | 0.1 | 0.1 | 0.6 | 0.0 | 0.1 |
| France | Share of value | 1.1 | 0.9 | 0.3 | 0.5 | 0.1 |
| Germany | Share of value | 1.0 | 2.5 | 1.2 | 1.1 | 0.7 |
| Italy | Share of value | 0.7 | 1.5 | 0.9 | 0.8 | 0.4 |
| Japan | Share of value | 0.7 | 1.0 | 0.1 | 0.2 | 0.2 |
| South Africa | Share of value | --- | --- | --- | --- | --- |
| South Korea, subject | Share of value | *** | *** | *** | *** | *** |
| Taiwan | Share of value | 0.2 | 0.0 | --- | --- | --- |
| Turkey | Share of value | 0.0 | 0.0 | 0.0 | 0.0 | --- |
| Subject sources | Share of value | *** | *** | *** | *** | *** |
| South Korea, nonsubject | Share of value | *** | *** | *** | *** | *** |
| All other sources | Share of value | *** | *** | *** | *** | *** |
| Nonsubject sources | Share of value | *** | *** | *** | *** | *** |
| All import sources | Share of value | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-1 Continued**
**CTL plate: U.S. imports by source and period**

Ratios in percent and represent the ratio to U.S. production

| Source | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Austria | Ratio | 0.3 | 0.1 | 0.0 |
| Belgium | Ratio | 0.4 | 0.2 | 0.2 |
| Brazil | Ratio | 0.1 | 0.0 | 0.0 |
| China | Ratio | 0.7 | 0.0 | 0.0 |
| France | Ratio | 1.9 | 0.1 | 0.1 |
| Germany | Ratio | 2.6 | 0.2 | 0.1 |
| Italy | Ratio | 0.5 | 0.2 | 0.2 |
| Japan | Ratio | 0.6 | 0.2 | 0.0 |
| South Africa | Ratio | 0.0 | 0.0 | --- |
| South Korea, subject | Ratio | *** | *** | *** |
| Taiwan | Ratio | 0.2 | 0.0 | 0.0 |
| Turkey | Ratio | 0.6 | 0.0 | 0.0 |
| Subject sources | Ratio | *** | *** | *** |
| South Korea, nonsubject | Ratio | *** | *** | *** |
| All other sources | Ratio | *** | *** | *** |
| Nonsubject sources | Ratio | *** | *** | *** |
| All import sources | Ratio | 20.6 | 13.2 | 9.6 |

Table continued.

**Table IV-1 Continued**
**CTL plate: U.S. imports by source and period**

Ratios in percent and represent the ratio to U.S. production

| Source | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Austria | Ratio | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Belgium | Ratio | 0.1 | 0.1 | 0.0 | 0.0 | 0.1 |
| Brazil | Ratio | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| China | Ratio | 0.0 | 0.0 | 0.1 | 0.0 | 0.0 |
| France | Ratio | 0.1 | 0.0 | 0.0 | 0.0 | 0.0 |
| Germany | Ratio | 0.0 | 0.1 | 0.1 | 0.1 | 0.0 |
| Italy | Ratio | 0.1 | 0.1 | 0.1 | 0.1 | 0.1 |
| Japan | Ratio | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| South Africa | Ratio | --- | --- | --- | --- | --- |
| South Korea, subject | Ratio | *** | *** | *** | *** | *** |
| Taiwan | Ratio | 0.0 | 0.0 | --- | --- | --- |
| Turkey | Ratio | 0.0 | 0.0 | 0.0 | 0.0 | --- |
| Subject sources | Ratio | *** | *** | *** | *** | *** |
| South Korea, nonsubject | Ratio | *** | *** | *** | *** | *** |
| All other sources | Ratio | *** | *** | *** | *** | *** |
| Nonsubject sources | Ratio | *** | *** | *** | *** | *** |
| All import sources | Ratio | 9.2 | 5.8 | 9.5 | 8.4 | 10.8 |

Table continued.

**Table IV-1 Continued**
**CTL plate: U.S. imports by source and period**

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed September 29, 2022, with adjustments based on data submitted in response to Commission questionnaires. Imports are based on the imports for consumption data series. Imports value are the landed duty paid value.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Figure IV-1**
**CTL plate: U.S. import quantities and average unit values, by source and period**

* * * * * * *

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed September 29, 2022, with adjustments based on data submitted in response to Commission questionnaires. Imports are based on the imports for consumption data series. Imports value are the landed duty paid value.

Imports of CTL plate decreased from 2016 to 2020, but increased in 2021 to a level almost equal to 2019. Imports were higher during the first half of 2022 compared with the first half of 2021. Similar trends were exhibited by the quantity of subject imports, declining overall from *** short tons in 2016 to *** short tons in 2020, but increasing to *** short tons in 2021. Subject imports were higher at *** short tons in the first half of 2022 compared with *** short tons in the first half of 2021. By quantity, subject imports accounted for a declining share of total imports during 2016-21, falling from *** percent of total imports in 2016 to *** percent in 2020, before increasing to *** percent in 2021. Subject imports accounted for *** percent of total imports in the first half of 2022 compared with *** percent in the first half of 2021. The average unit values of subject imports increased from $*** per short ton in 2016 to $*** per short ton 2021 and were $*** per short ton during the first half of 2022 compared with $*** per short ton during the first half of 2021.

Although declining in absolute terms, subject imports from South Korea accounted for the largest share of all subject imports in each period examined, increasing overall as a share of subject imports from *** percent in 2016 to *** percent in 2021. Subject imports from South Korea accounted for *** percent of total subject imports in the first half of 2022 compared with *** percent in the first half of 2021. The second and third largest subject sources, which varied depending on the period examined, were Italy and Germany in 2021, accounting for *** and *** percent of subject imports, respectively. U.S. imports from other subject countries, however, had an increasingly diminished presence in the United States after 2016. Subject imports from Brazil and South Africa declined following the imposition of the orders to 169 short tons and 3 short tons respectively in 2017. No imports from South Africa were reported for the remainder of the period of review while imports from Brazil ranged between 15 and 34 short tons during 2018-21 and were 42 short tons during the first half of 2022. Imports from Taiwan declined to zero in 2021 and imports from Turkey declined to zero in the first half of 2022.

Imports from nonsubject sources, of which Canada was the largest, fluctuated on an absolute basis, but were *** percent lower in 2021 than in 2016 and were *** percent higher in the first half of 2022 compared with the first half of 2021. Imports from nonsubject sources as a share of total U.S. imports increased overall from *** percent in 2016 to *** percent in 2021. Nonsubject imports accounted for *** percent of total subject imports in the first half of 2022 compared with *** percent in the first half of 2021. The average unit values of nonsubject imports increased from $*** per short ton in 2016 to $*** per short ton 2021 and were $*** per short ton during the first half of 2022 compared with $*** per short ton during the first half of 2021. During 2021, Canada was the largest nonsubject

source of CTL plate imports, accounting for *** percent of total imports from nonsubject sources, followed by nonsubject South Korea at *** percent, Sweden at *** percent, Finland at *** percent, Ukraine at *** percent, and Mexico at *** percent.

The ratio of subject import volume to U.S. production declined from a high of *** percent in 2016 and fluctuated between *** percent and *** percent in the remaining periods.

## Cumulation considerations

In assessing whether U.S. imports from the subject countries are likely to compete with each other and with the domestic like product, the Commission has generally considered four factors: (1) fungibility, (2) presence of sales or offers to sell in the same geographical markets, (3) common or similar channels of distribution, and (4) simultaneous presence in the market. Information regarding channels of distribution, market areas, and interchangeability appear in Part II. Additional information concerning fungibility, geographical markets, and simultaneous presence in the market is presented below.

### Fungibility

Table IV-2 and figure IV-2 present data on U.S. producers' and U.S. importers' U.S. shipments of CTL plate by steel type in 2021. U.S. producers' reported shipments of all steel types, with carbon plate as rolled accounting for most (*** percent) of their total U.S. shipments. The majority (*** percent) of the responding U.S. importers' U.S. shipments of subject imports, most of which were subject South Korean imports, as well as the majority (*** percent) of the responding U.S. importers' U.S. shipments of nonsubject imports were also carbon plate as rolled. On the other hand, most (if not all) of U.S. importers' U.S. shipments of subject imports from Germany and Japan were alloy plate as rolled, all U.S. importers' U.S. shipments of subject imports from China were heat treated carbon plate, all U.S. importers' U.S. shipments of subject imports from Brazil were heat treated alloy plate, and most U.S. importers' U.S. shipments of subject imports from Italy were heat treated alloy plate. U.S. importers' U.S. shipments of subject imports from Belgium were roughly split between heat treated carbon plate and heat treated alloy plate. Overall, U.S. producers accounted for more than *** of U.S. shipments of each type of CTL plate steel in 2021.

**Table IV-2**
**CTL plate: Quantity of U.S. producers' and U.S. importers' U.S. shipments, by steel type, 2021**

Quantity in short tons

| Source | Carbon plate as rolled | Carbon plate heat treated | All carbon plate | Alloy plate as rolled | Alloy plate heat treated | All alloy plate | All steel types |
|---|---|---|---|---|---|---|---|
| U.S. producers | *** | *** | *** | *** | *** | *** | *** |
| Austria | *** | *** | *** | *** | *** | *** | *** |
| Belgium | *** | *** | *** | *** | *** | *** | *** |
| Brazil | *** | *** | *** | *** | *** | *** | *** |
| China | *** | *** | *** | *** | *** | *** | *** |
| France | *** | *** | *** | *** | *** | *** | *** |
| Germany | *** | *** | *** | *** | *** | *** | *** |
| Italy | *** | *** | *** | *** | *** | *** | *** |
| Japan | *** | *** | *** | *** | *** | *** | *** |
| South Africa | *** | *** | *** | *** | *** | *** | *** |
| South Korea | *** | *** | *** | *** | *** | *** | *** |
| Taiwan | *** | *** | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** | *** | *** |
| Subject sources | *** | *** | *** | *** | *** | *** | *** |
| Nonsubject sources | *** | *** | *** | *** | *** | *** | *** |
| All import sources | *** | *** | *** | *** | *** | *** | *** |
| All sources | *** | *** | *** | *** | *** | *** | *** |

Table continued.

**Table IV-2 Continued**
**CTL plate: Share of U.S. producers' and U.S. importers' U.S. shipments within source, by steel type, 2021**

Share across in percent

| Source | Carbon plate as rolled | Carbon plate heat treated | All carbon plate | Alloy plate as rolled | Alloy plate heat treated | All alloy plate | All steel types |
|---|---|---|---|---|---|---|---|
| U.S. producers | *** | *** | *** | *** | *** | *** | *** |
| Austria | *** | *** | *** | *** | *** | *** | *** |
| Belgium | *** | *** | *** | *** | *** | *** | *** |
| Brazil | *** | *** | *** | *** | *** | *** | *** |
| China | *** | *** | *** | *** | *** | *** | *** |
| France | *** | *** | *** | *** | *** | *** | *** |
| Germany | *** | *** | *** | *** | *** | *** | *** |
| Italy | *** | *** | *** | *** | *** | *** | *** |
| Japan | *** | *** | *** | *** | *** | *** | *** |
| South Africa | *** | *** | *** | *** | *** | *** | *** |
| South Korea | *** | *** | *** | *** | *** | *** | *** |
| Taiwan | *** | *** | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** | *** | *** |
| Subject sources | *** | *** | *** | *** | *** | *** | *** |
| Nonsubject sources | *** | *** | *** | *** | *** | *** | *** |
| All import sources | *** | *** | *** | *** | *** | *** | *** |
| All sources | *** | *** | *** | *** | *** | *** | *** |

Table continued.

**Table IV-2 Continued**
**CTL plate: Share of U.S. producers' and U.S. importers' U.S. shipments within steel type, by source, 2021**

Share down in percent

| Source | Carbon plate as rolled | Carbon plate heat treated | All carbon plate | Alloy plate as rolled | Alloy plate heat treated | All alloy plate | All steel types |
|---|---|---|---|---|---|---|---|
| U.S. producers | *** | *** | *** | *** | *** | *** | *** |
| Austria | *** | *** | *** | *** | *** | *** | *** |
| Belgium | *** | *** | *** | *** | *** | *** | *** |
| Brazil | *** | *** | *** | *** | *** | *** | *** |
| China | *** | *** | *** | *** | *** | *** | *** |
| France | *** | *** | *** | *** | *** | *** | *** |
| Germany | *** | *** | *** | *** | *** | *** | *** |
| Italy | *** | *** | *** | *** | *** | *** | *** |
| Japan | *** | *** | *** | *** | *** | *** | *** |
| South Africa | *** | *** | *** | *** | *** | *** | *** |
| South Korea | *** | *** | *** | *** | *** | *** | *** |
| Taiwan | *** | *** | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** | *** | *** |
| Subject sources | *** | *** | *** | *** | *** | *** | *** |
| Nonsubject sources | *** | *** | *** | *** | *** | *** | *** |
| All import sources | *** | *** | *** | *** | *** | *** | *** |
| All sources | *** | *** | *** | *** | *** | *** | *** |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Figure IV-2**
**CTL plate: U.S. producers' and U.S. importers' U.S. shipments, by source and steel type, 2021**

* * * * * * *

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

Table IV-3 and figure IV-3 present data on U.S. producers' and U.S. importers' U.S. shipments of CTL plate by thickness in 2021. U.S. producers' reported shipments of all categories of steel thicknesses, with smaller thicknesses (<1") accounting for the majority (*** percent) of their total U.S. shipments and the medium category of thicknesses (≥1" but <4") accounting for most of their remaining U.S. shipments. The majority (*** percent) of the responding U.S. importers' U.S. shipments of subject imports, most of which were subject South Korean imports, as well as the majority (*** percent) of the responding U.S. importers' U.S. shipments of nonsubject imports were also the smaller category of thicknesses (<1"). On the other hand, most (if not all) of U.S. importers' U.S. shipments of subject imports from China and Japan were the medium category of thicknesses (≥1" but <4"), and most of U.S. importers' U.S. shipments of subject imports from Brazil and Italy fell into the thickest category of CTL plate (≥4"). Overall, U.S. producers accounted for more than four-fifths of U.S. shipments of each category of CTL plate thicknesses in 2021.

**Table IV-3**
**CTL plate: Quantity of U.S. producers' and U.S. importers' U.S. shipments, by plate thickness, 2021**

Quantity in short tons

| Source | <1" | ≥1" but <4" | ≥4" | All plate thicknesses |
|---|---|---|---|---|
| U.S. producers | *** | *** | *** | *** |
| Austria | *** | *** | *** | *** |
| Belgium | *** | *** | *** | *** |
| Brazil | *** | *** | *** | *** |
| China | *** | *** | *** | *** |
| France | *** | *** | *** | *** |
| Germany | *** | *** | *** | *** |
| Italy | *** | *** | *** | *** |
| Japan | *** | *** | *** | *** |
| South Africa | *** | *** | *** | *** |
| South Korea | *** | *** | *** | *** |
| Taiwan | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** |
| Subject sources | *** | *** | *** | *** |
| Nonsubject sources | *** | *** | *** | *** |
| All import sources | *** | *** | *** | *** |
| All sources | *** | *** | *** | *** |

Table continued.

**Table IV-3 Continued**
**CTL plate: Share of U.S. producers' and U.S. importers' U.S. shipments within source, by plate thickness, 2021**

Share across in percent

| Source | <1" | ≥1" but <4" | ≥4" | All plate thicknesses |
|---|---|---|---|---|
| U.S. producers | *** | *** | *** | *** |
| Austria | *** | *** | *** | *** |
| Belgium | *** | *** | *** | *** |
| Brazil | *** | *** | *** | *** |
| China | *** | *** | *** | *** |
| France | *** | *** | *** | *** |
| Germany | *** | *** | *** | *** |
| Italy | *** | *** | *** | *** |
| Japan | *** | *** | *** | *** |
| South Africa | *** | *** | *** | *** |
| South Korea | *** | *** | *** | *** |
| Taiwan | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** |
| Subject sources | *** | *** | *** | *** |
| Nonsubject sources | *** | *** | *** | *** |
| All import sources | *** | *** | *** | *** |
| All sources | *** | *** | *** | *** |

Table continued.

**Table IV-3 Continued**
**CTL plate: Share of U.S. producers' and U.S. importers' U.S. shipments within plate thickness, by source, 2021**

Share down in percent

| Source | <1" | ≥1" but <4" | ≥4" | All plate thicknesses |
|---|---|---|---|---|
| U.S. producers | *** | *** | *** | *** |
| Austria | *** | *** | *** | *** |
| Belgium | *** | *** | *** | *** |
| Brazil | *** | *** | *** | *** |
| China | *** | *** | *** | *** |
| France | *** | *** | *** | *** |
| Germany | *** | *** | *** | *** |
| Italy | *** | *** | *** | *** |
| Japan | *** | *** | *** | *** |
| South Africa | *** | *** | *** | *** |
| South Korea | *** | *** | *** | *** |
| Taiwan | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** |
| Subject sources | *** | *** | *** | *** |
| Nonsubject sources | *** | *** | *** | *** |
| All import sources | *** | *** | *** | *** |
| All sources | *** | *** | *** | *** |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Figure IV-3**
**CTL plate: U.S. producers' and U.S. importers' U.S. shipments, by source and plate thickness, 2021**

* * * * * * *

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

## Geographical markets

Table IV-4 presents data on U.S. imports of CTL plate by border of entry in 2021. According to official U.S. import statistics, the majority of U.S. imports from subject countries, most of which were from South Korea, entered into the United States through ports located in the South, whereas the majority of U.S. imports from nonsubject countries, the largest of which was from Canada, entered into the United States through ports located in the North. Notably, most (if not all) U.S. imports from Belgium, Brazil, and China entered the United States through ports located in the East and a majority of U.S. imports from Austria, Germany, South Korea, and Turkey entered the United States through ports located in the South. U.S. imports from France were split mostly between entrance into United States through ports located in the North and South; U.S. imports from Italy were split mostly between entrance into United States through ports located in the East and South; and U.S. imports from Japan were split mostly between entrance into United States through ports located in the West and East.

**Table IV-4**
**CTL plate: U.S. imports in 2021, by source and border of entry**

Quantity in short tons

| Source | East | North | South | West | All borders |
|---|---|---|---|---|---|
| Austria | 74 | 292 | 685 | 23 | 1,074 |
| Belgium | 1,640 | 64 | --- | 332 | 2,036 |
| Brazil | 1 | --- | --- | --- | 1 |
| China | 3,826 | 18 | 670 | --- | 4,513 |
| France | 81 | 805 | 706 | 2 | 1,595 |
| Germany | 1,099 | 508 | 3,494 | --- | 5,101 |
| Italy | 2,793 | 436 | 3,218 | --- | 6,447 |
| Japan | 85 | 51 | --- | 100 | 237 |
| South Africa | --- | --- | --- | --- | --- |
| South Korea | 5,914 | --- | 160,329 | 53,424 | 219,667 |
| Taiwan | --- | --- | --- | --- | --- |
| Turkey | --- | --- | 3 | --- | 3 |
| Subject sources | 15,512 | 2,175 | 169,106 | 53,882 | 240,674 |
| Nonsubject sources | 61,351 | 205,641 | 8,611 | 3,873 | 279,476 |
| All import sources | 76,863 | 207,816 | 177,716 | 57,755 | 520,149 |

Table continued.

**Table IV-4 Continued**
**CTL plate: U.S. imports in 2021, by source and border of entry**

Share across in percent

| Source | East | North | South | West | All borders |
|---|---|---|---|---|---|
| Austria | 6.9 | 27.2 | 63.8 | 2.1 | 100.0 |
| Belgium | 80.5 | 3.1 | --- | 16.3 | 100.0 |
| Brazil | 100.0 | --- | --- | --- | 100.0 |
| China | 84.8 | 0.4 | 14.8 | --- | 100.0 |
| France | 5.1 | 50.5 | 44.3 | 0.1 | 100.0 |
| Germany | 21.5 | 10.0 | 68.5 | --- | 100.0 |
| Italy | 43.3 | 6.8 | 49.9 | --- | 100.0 |
| Japan | 35.8 | 21.7 | --- | 42.4 | 100.0 |
| South Africa | --- | --- | --- | --- | --- |
| South Korea | 2.7 | --- | 73.0 | 24.3 | 100.0 |
| Taiwan | --- | --- | --- | --- | --- |
| Turkey | --- | --- | 100.0 | --- | 100.0 |
| Subject sources | 6.4 | 0.9 | 70.3 | 22.4 | 100.0 |
| Nonsubject sources | 22.0 | 73.6 | 3.1 | 1.4 | 100.0 |
| All import sources | 14.8 | 40.0 | 34.2 | 11.1 | 100.0 |

Table continued.

**Table IV-4 Continued**
**CTL plate: U.S. imports in 2021, by source and border of entry**

Share down in percent

| Source | East | North | South | West | All borders |
|---|---|---|---|---|---|
| Austria | 0.1 | 0.1 | 0.4 | 0.0 | 0.2 |
| Belgium | 2.1 | 0.0 | --- | 0.6 | 0.4 |
| Brazil | 0.0 | --- | --- | --- | 0.0 |
| China | 5.0 | 0.0 | 0.4 | --- | 0.9 |
| France | 0.1 | 0.4 | 0.4 | 0.0 | 0.3 |
| Germany | 1.4 | 0.2 | 2.0 | --- | 1.0 |
| Italy | 3.6 | 0.2 | 1.8 | --- | 1.2 |
| Japan | 0.1 | 0.0 | --- | 0.2 | 0.0 |
| South Africa | --- | --- | --- | --- | --- |
| South Korea | 7.7 | --- | 90.2 | 92.5 | 42.2 |
| Taiwan | --- | --- | --- | --- | --- |
| Turkey | --- | --- | 0.0 | --- | 0.0 |
| Subject sources | 20.2 | 1.0 | 95.2 | 93.3 | 46.3 |
| Nonsubject sources | 79.8 | 99.0 | 4.8 | 6.7 | 53.7 |
| All import sources | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed September 29, 2022. Imports are based on the imports for consumption data series.

Note: The data presented for South Korea include not only subject imports of CTL plate that are subject to these reviews but also include nonsubject imports of CTL plate that are subject to the earlier 1999 South Korea Orders. Therefore, the data presented for South Korea are overstated and the data presented for nonsubject sources are understated. See table IV-1 for adjusted import totals for subject South Korea and nonsubject South Korea for comparison of over/understatement. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

## Presence in the market

Table IV-5 and figures IV-4 and IV-5 present monthly data for subject and nonsubject imports during January 2016-June 2022. U.S. imports from Belgium, Germany, and South Korea were present in every month during January 2016-June 2022 and U.S. imports from Austria and Japan were present in every month, except September 2019 and November 2020, respectively. U.S. imports from France, Italy, and China were present in a majority of the 78 months during January 2016-June 2022 (71 months for France, 66 months for Italy, and 63 months for China), whereas U.S. imports from Taiwan were present in one-half of the months and U.S. imports from Turkey were present in 27 of the 78 months. U.S. imports from Brazil were present in four months in 2016, one month in 2017, and one month in 2021 and 2022, while U.S. imports from South Africa were present in only January 2016 and November 2017. Overall, imports from subject and nonsubject sources were present in every month during January 2016-June 2022.

**Table IV-5**
**CTL plate: U.S. imports, by source and month**

Quantity in short tons

| Year | Month | Austria | Belgium | Brazil | China | France |
|---|---|---|---|---|---|---|
| 2016 | January | 516 | 931 | --- | 23,079 | 1,495 |
| 2016 | February | 1,514 | 1,090 | --- | 2,087 | 508 |
| 2016 | March | 679 | 704 | --- | 725 | 44,188 |
| 2016 | April | 500 | 1,972 | 4,398 | 1,223 | 1,081 |
| 2016 | May | 1,119 | 1,860 | 1,926 | 870 | 628 |
| 2016 | June | 3,064 | 4,561 | 558 | 871 | 16,486 |
| 2016 | July | 2,367 | 1,167 | --- | 441 | 40,789 |
| 2016 | August | 1,397 | 1,358 | 11 | 3,277 | 428 |
| 2016 | September | 3,305 | 3,627 | --- | 4,400 | 690 |
| 2016 | October | 1,028 | 2,477 | --- | 104 | 318 |
| 2016 | November | 133 | 424 | --- | 72 | 595 |
| 2016 | December | 144 | 5,000 | --- | 164 | 649 |
| 2017 | January | 28 | 2,217 | --- | 328 | 742 |
| 2017 | February | 760 | 1,397 | --- | 54 | 848 |
| 2017 | March | 221 | 3,183 | --- | 28 | 577 |
| 2017 | April | 534 | 1,198 | --- | 8 | 316 |
| 2017 | May | 291 | 213 | --- | 60 | 1,822 |
| 2017 | June | 133 | 479 | --- | --- | 526 |
| 2017 | July | 57 | 421 | --- | --- | --- |
| 2017 | August | 71 | 711 | 5 | 6 | 561 |
| 2017 | September | 182 | 1,071 | --- | --- | 241 |
| 2017 | October | 437 | 450 | --- | 1,264 | 355 |
| 2017 | November | 32 | 437 | --- | 6 | 3 |
| 2017 | December | 432 | 756 | --- | --- | 618 |

Table continued.

**Table IV-5 Continued**
**CTL plate: U.S. imports, by source and month**

Quantity in short tons

| Year | Month | Germany | Italy | Japan | South Africa | South Korea |
|---|---|---|---|---|---|---|
| 2016 | January | 31,646 | 271 | 2,618 | 93 | 7,426 |
| 2016 | February | 12,239 | 3,766 | 549 | --- | 45,266 |
| 2016 | March | 2,185 | 565 | 11,422 | --- | 32,992 |
| 2016 | April | 3,023 | 1,060 | 3,103 | --- | 63,967 |
| 2016 | May | 31,023 | 1,748 | 5,797 | --- | 41,824 |
| 2016 | June | 8,260 | 862 | 1,811 | --- | 39,547 |
| 2016 | July | 5,128 | 10,380 | 4,704 | --- | 40,257 |
| 2016 | August | 29,093 | 1,980 | 1,433 | --- | 31,424 |
| 2016 | September | 19,974 | 8,276 | 2,011 | --- | 28,464 |
| 2016 | October | 952 | 55 | 766 | --- | 27,713 |
| 2016 | November | 791 | 229 | 42 | --- | 28,067 |
| 2016 | December | 245 | 3 | 4 | --- | 14,108 |
| 2017 | January | 312 | 126 | 33 | --- | 22,928 |
| 2017 | February | 1,632 | 157 | 10 | --- | 21,959 |
| 2017 | March | 419 | 1,429 | 733 | --- | 22,236 |
| 2017 | April | 2,943 | --- | 46 | --- | 11,096 |
| 2017 | May | 627 | 343 | 2,482 | --- | 17,435 |
| 2017 | June | 198 | 1,992 | 1,148 | --- | 28,253 |
| 2017 | July | 223 | 4,322 | 1,292 | --- | 19,144 |
| 2017 | August | 543 | 263 | 7,795 | --- | 24,349 |
| 2017 | September | 346 | 2,544 | 201 | --- | 15,342 |
| 2017 | October | 1,017 | --- | 23 | --- | 18,421 |
| 2017 | November | 212 | 1,663 | 4 | 3 | 19,106 |
| 2017 | December | 181 | 138 | 42 | --- | 5,659 |

Table continued.

**Table IV-5 Continued**
**CTL plate: U.S. imports, by source and month**

Quantity in short tons

| Year | Month | Taiwan | Turkey | Subject sources | Nonsubject sources | All import sources |
|---|---|---|---|---|---|---|
| 2016 | January | 1,525 | 490 | 70,090 | 25,539 | 95,628 |
| 2016 | February | 346 | 5,705 | 73,070 | 30,220 | 103,290 |
| 2016 | March | 771 | --- | 94,230 | 28,599 | 122,830 |
| 2016 | April | 1,947 | 11,546 | 93,820 | 23,311 | 117,131 |
| 2016 | May | 602 | 3,893 | 91,291 | 22,723 | 114,014 |
| 2016 | June | 918 | 2,743 | 79,681 | 20,427 | 100,108 |
| 2016 | July | 1,336 | 472 | 107,041 | 19,187 | 126,228 |
| 2016 | August | 1,196 | 10,698 | 82,296 | 25,022 | 107,318 |
| 2016 | September | 1,941 | 28 | 72,717 | 21,972 | 94,689 |
| 2016 | October | 1,248 | --- | 34,661 | 38,892 | 73,553 |
| 2016 | November | 246 | --- | 30,598 | 34,405 | 65,003 |
| 2016 | December | --- | 16 | 20,333 | 21,159 | 41,491 |
| 2017 | January | 5 | 20 | 26,739 | 30,711 | 57,450 |
| 2017 | February | 5 | 98 | 26,922 | 18,394 | 45,317 |
| 2017 | March | 5 | 208 | 29,039 | 27,707 | 56,746 |
| 2017 | April | 4 | --- | 16,145 | 32,752 | 48,898 |
| 2017 | May | 6 | 65 | 23,345 | 52,866 | 76,211 |
| 2017 | June | 57 | 37 | 32,822 | 43,275 | 76,097 |
| 2017 | July | 14 | 4 | 25,477 | 71,301 | 96,778 |
| 2017 | August | 271 | --- | 34,575 | 37,660 | 72,234 |
| 2017 | September | 271 | --- | 20,197 | 38,691 | 58,887 |
| 2017 | October | 300 | 9 | 22,275 | 51,711 | 73,987 |
| 2017 | November | --- | --- | 21,466 | 39,338 | 60,804 |
| 2017 | December | --- | 188 | 8,013 | 38,105 | 46,118 |

Table continued.

**Table IV-5 Continued**
**CTL plate: U.S. imports, by source and month**

Quantity in short tons

| Year | Month | Austria | Belgium | Brazil | China | France |
|---|---|---|---|---|---|---|
| 2018 | January | 49 | 652 | --- | 51 | 391 |
| 2018 | February | 51 | 1,969 | --- | 29 | --- |
| 2018 | March | 30 | 1,733 | --- | 84 | 1,351 |
| 2018 | April | 63 | 503 | --- | 62 | 490 |
| 2018 | May | 23 | 1,395 | --- | 34 | 920 |
| 2018 | June | 68 | 1,263 | --- | 341 | 149 |
| 2018 | July | 82 | 697 | --- | 11 | 495 |
| 2018 | August | 37 | 423 | --- | 57 | 31 |
| 2018 | September | 21 | 1,450 | --- | 26 | --- |
| 2018 | October | 85 | 1,214 | --- | 58 | 5 |
| 2018 | November | 11 | 359 | --- | 32 | 268 |
| 2018 | December | 246 | 1,733 | --- | 3 | 98 |
| 2019 | January | 81 | 619 | --- | 25 | 40 |
| 2019 | February | 16 | 370 | --- | 304 | 424 |
| 2019 | March | 24 | 272 | --- | 57 | 491 |
| 2019 | April | 6 | 247 | --- | 5 | 444 |
| 2019 | May | 6 | 583 | --- | 6 | 234 |
| 2019 | June | 3 | 941 | --- | 51 | 541 |
| 2019 | July | 22 | 1,617 | --- | --- | 696 |
| 2019 | August | 14 | 1,644 | --- | 30 | 517 |
| 2019 | September | --- | 233 | --- | 11 | 569 |
| 2019 | October | 3 | 144 | --- | 1 | 12 |
| 2019 | November | 18 | 621 | --- | --- | 64 |
| 2019 | December | 46 | 368 | --- | 69 | 9 |

Table continued.

**Table IV-5 Continued**
**CTL plate: U.S. imports, by source and month**

Quantity in short tons

| Year | Month | Germany | Italy | Japan | South Africa | South Korea |
|---|---|---|---|---|---|---|
| 2018 | January | 1,997 | 1,082 | 77 | --- | 12,589 |
| 2018 | February | 198 | --- | 41 | --- | 20,275 |
| 2018 | March | 183 | 439 | 113 | --- | 14,359 |
| 2018 | April | 319 | 2,298 | 21 | --- | 22,264 |
| 2018 | May | 483 | 1,641 | 1,138 | --- | 1,535 |
| 2018 | June | 127 | 1,030 | 24 | --- | 3,084 |
| 2018 | July | 61 | 3,333 | 51 | --- | 11,023 |
| 2018 | August | 68 | 294 | 15 | --- | 27,083 |
| 2018 | September | 143 | 196 | 39 | --- | 29,388 |
| 2018 | October | 177 | 549 | 36 | --- | 36,054 |
| 2018 | November | 84 | 213 | 82 | --- | 30,752 |
| 2018 | December | 298 | 917 | 15 | --- | 35 |
| 2019 | January | 36 | 829 | 24 | --- | 41,924 |
| 2019 | February | 65 | --- | 1,093 | --- | 18,775 |
| 2019 | March | 131 | 638 | 14 | --- | 4,953 |
| 2019 | April | 374 | 1,177 | 156 | --- | 36,291 |
| 2019 | May | 22 | 608 | 13 | --- | 21,590 |
| 2019 | June | 254 | 209 | 53 | --- | 4,176 |
| 2019 | July | 83 | 493 | 15 | --- | 27,293 |
| 2019 | August | 142 | 302 | 69 | --- | 10,312 |
| 2019 | September | 142 | 887 | 139 | --- | 10,903 |
| 2019 | October | 235 | 131 | 5 | --- | 1,560 |
| 2019 | November | 33 | 22 | 90 | --- | 20,848 |
| 2019 | December | 40 | --- | 52 | --- | 17,192 |

Table continued.

**Table IV-5 Continued**
**CTL plate: U.S. imports, by source and month**

Quantity in short tons

| Year | Month | Taiwan | Turkey | Subject sources | Nonsubject sources | All import sources |
|---|---|---|---|---|---|---|
| 2018 | January | 372 | 71 | 17,330 | 30,717 | 48,047 |
| 2018 | February | --- | 22 | 22,585 | 29,557 | 52,142 |
| 2018 | March | 66 | --- | 18,357 | 36,701 | 55,059 |
| 2018 | April | --- | --- | 26,021 | 36,777 | 62,798 |
| 2018 | May | 272 | 3 | 7,444 | 59,831 | 67,275 |
| 2018 | June | 394 | 21 | 6,501 | 24,364 | 30,865 |
| 2018 | July | 440 | --- | 16,193 | 23,212 | 39,405 |
| 2018 | August | 105 | --- | 28,112 | 18,120 | 46,232 |
| 2018 | September | --- | 3 | 31,267 | 16,338 | 47,605 |
| 2018 | October | 134 | --- | 38,310 | 18,521 | 56,831 |
| 2018 | November | --- | --- | 31,802 | 27,992 | 59,794 |
| 2018 | December | 33 | --- | 3,378 | 23,475 | 26,853 |
| 2019 | January | 89 | --- | 43,669 | 25,404 | 69,073 |
| 2019 | February | 272 | --- | 21,320 | 33,517 | 54,837 |
| 2019 | March | 351 | --- | 6,930 | 34,221 | 41,152 |
| 2019 | April | 244 | --- | 38,945 | 24,695 | 63,640 |
| 2019 | May | 106 | --- | 23,167 | 24,362 | 47,529 |
| 2019 | June | 115 | --- | 6,342 | 29,177 | 35,519 |
| 2019 | July | 212 | --- | 30,431 | 25,668 | 56,099 |
| 2019 | August | --- | --- | 13,030 | 21,824 | 34,854 |
| 2019 | September | 196 | --- | 13,079 | 20,837 | 33,916 |
| 2019 | October | --- | 67 | 2,157 | 20,377 | 22,534 |
| 2019 | November | 100 | --- | 21,796 | 14,724 | 36,521 |
| 2019 | December | --- | --- | 17,776 | 18,662 | 36,437 |

Table continued.

**Table IV-5 Continued**
**CTL plate: U.S. imports, by source and month**

Quantity in short tons

| Year | Month | Austria | Belgium | Brazil | China | France |
|---|---|---|---|---|---|---|
| 2020 | January | 142 | 530 | --- | 28 | 73 |
| 2020 | February | 40 | 208 | --- | 1 | 63 |
| 2020 | March | 5 | 2,031 | --- | 1 | 214 |
| 2020 | April | 23 | 2,669 | --- | --- | 1 |
| 2020 | May | 34 | 53 | --- | 84 | --- |
| 2020 | June | 220 | 332 | --- | 55 | 1 |
| 2020 | July | 11 | 390 | --- | 3 | 410 |
| 2020 | August | 1 | 102 | --- | 4 | 159 |
| 2020 | September | 14 | 54 | --- | 56 | 301 |
| 2020 | October | 219 | 230 | --- | --- | 19 |
| 2020 | November | 18 | 129 | --- | --- | 2 |
| 2020 | December | 87 | 217 | --- | 4 | 133 |
| 2021 | January | 10 | 261 | --- | --- | 3 |
| 2021 | February | 21 | 228 | --- | --- | 149 |
| 2021 | March | 22 | 215 | --- | --- | 63 |
| 2021 | April | 212 | 362 | --- | 0 | 97 |
| 2021 | May | 22 | 157 | --- | 2 | 568 |
| 2021 | June | 23 | 139 | --- | 4 | 12 |
| 2021 | July | 72 | 374 | --- | 13 | 356 |
| 2021 | August | 95 | 88 | --- | 518 | 335 |
| 2021 | September | 26 | 23 | 1 | 670 | --- |
| 2021 | October | 2 | 54 | --- | 3,306 | --- |
| 2021 | November | 557 | 91 | --- | --- | 2 |
| 2021 | December | 14 | 43 | --- | --- | 10 |
| 2022 | January | 145 | 6 | --- | 551 | 64 |
| 2022 | February | 53 | 332 | --- | 112 | 52 |
| 2022 | March | 94 | 565 | --- | 13 | 133 |
| 2022 | April | 139 | 173 | --- | 33 | --- |
| 2022 | May | 77 | 247 | 19 | 1 | 1 |
| 2022 | June | 171 | 46 | --- | 145 | 20 |

Table continued.

**Table IV-5 Continued**
**CTL plate: U.S. imports, by source and month**

Quantity in short tons

| Year | Month | Germany | Italy | Japan | South Africa | South Korea |
|---|---|---|---|---|---|---|
| 2020 | January | 481 | 1,530 | 66 | --- | 7,987 |
| 2020 | February | 70 | --- | 2 | --- | 7,125 |
| 2020 | March | 159 | 161 | 136 | --- | 10,562 |
| 2020 | April | 441 | 118 | 101 | --- | 9,141 |
| 2020 | May | 237 | 1,377 | 66 | --- | 13,858 |
| 2020 | June | 286 | 714 | 23 | --- | 8,716 |
| 2020 | July | 106 | --- | 24 | --- | 49 |
| 2020 | August | 246 | 1 | 34 | --- | 4,720 |
| 2020 | September | 74 | 726 | 63 | --- | 4,404 |
| 2020 | October | 964 | 989 | 37 | --- | 1,158 |
| 2020 | November | 517 | 165 | --- | --- | 74 |
| 2020 | December | 114 | --- | 64 | --- | 2,902 |
| 2021 | January | 83 | 186 | 1 | --- | 1,952 |
| 2021 | February | 188 | 1,578 | 39 | --- | 8,571 |
| 2021 | March | 60 | 0 | 6 | --- | 22,004 |
| 2021 | April | 191 | 476 | 66 | --- | 34,198 |
| 2021 | May | 1,035 | 50 | 9 | --- | 9,218 |
| 2021 | June | 67 | 402 | 5 | --- | 22,215 |
| 2021 | July | 137 | 0 | 50 | --- | 24,495 |
| 2021 | August | 147 | 748 | 16 | --- | 11,866 |
| 2021 | September | 330 | 8 | 5 | --- | 28,090 |
| 2021 | October | 212 | 643 | 21 | --- | 16,144 |
| 2021 | November | 111 | 1,752 | 8 | --- | 24,752 |
| 2021 | December | 2,540 | 604 | 11 | --- | 16,162 |
| 2022 | January | 88 | 302 | 42 | --- | 14,519 |
| 2022 | February | 182 | 239 | 1 | --- | 18,838 |
| 2022 | March | 156 | --- | 46 | --- | 19,458 |
| 2022 | April | 144 | 960 | 26 | --- | 16,472 |
| 2022 | May | 85 | --- | 47 | --- | 12,901 |
| 2022 | June | 280 | 2 | 51 | --- | 22,414 |

Table continued.

**Table IV-5 Continued**
**CTL plate: U.S. imports, by source and month**

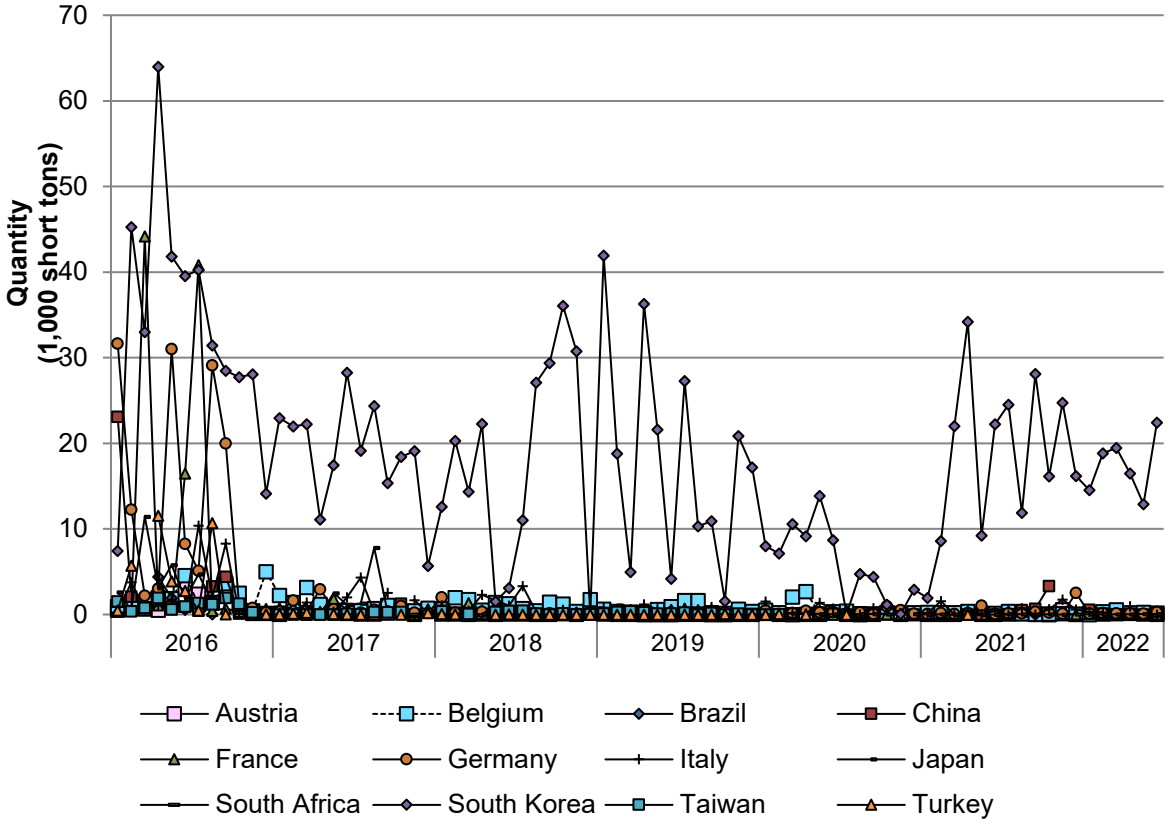
Quantity in short tons

| Year | Month | Taiwan | Turkey | Subject sources | Nonsubject sources | All import sources |
|---|---|---|---|---|---|---|
| 2020 | January | --- | --- | 10,836 | 16,058 | 26,894 |
| 2020 | February | 25 | 50 | 7,584 | 16,727 | 24,311 |
| 2020 | March | --- | --- | 13,269 | 17,659 | 30,928 |
| 2020 | April | --- | 4 | 12,496 | 18,295 | 30,791 |
| 2020 | May | --- | --- | 15,709 | 20,738 | 36,446 |
| 2020 | June | --- | --- | 10,346 | 15,603 | 25,949 |
| 2020 | July | --- | 8 | 1,001 | 19,424 | 20,425 |
| 2020 | August | --- | --- | 5,268 | 19,865 | 25,133 |
| 2020 | September | --- | --- | 5,692 | 16,435 | 22,126 |
| 2020 | October | --- | --- | 3,615 | 19,829 | 23,444 |
| 2020 | November | --- | --- | 906 | 22,138 | 23,044 |
| 2020 | December | --- | --- | 3,521 | 17,971 | 21,493 |
| 2021 | January | --- | --- | 2,496 | 21,068 | 23,564 |
| 2021 | February | --- | --- | 10,774 | 24,846 | 35,620 |
| 2021 | March | --- | --- | 22,371 | 23,639 | 46,011 |
| 2021 | April | --- | 3 | 35,603 | 24,451 | 60,054 |
| 2021 | May | --- | --- | 11,061 | 23,272 | 34,333 |
| 2021 | June | --- | --- | 22,867 | 19,398 | 42,265 |
| 2021 | July | --- | --- | 25,497 | 23,760 | 49,257 |
| 2021 | August | --- | --- | 13,812 | 20,145 | 33,957 |
| 2021 | September | --- | --- | 29,152 | 22,915 | 52,067 |
| 2021 | October | --- | --- | 20,382 | 28,726 | 49,108 |
| 2021 | November | --- | --- | 27,273 | 21,124 | 48,397 |
| 2021 | December | --- | --- | 19,385 | 26,131 | 45,516 |
| 2022 | January | --- | --- | 15,716 | 29,890 | 45,607 |
| 2022 | February | --- | --- | 19,809 | 20,226 | 40,035 |
| 2022 | March | --- | --- | 20,465 | 24,207 | 44,672 |
| 2022 | April | --- | --- | 17,949 | 36,047 | 53,995 |
| 2022 | May | --- | --- | 13,379 | 24,753 | 38,132 |
| 2022 | June | --- | --- | 23,129 | 20,177 | 43,306 |

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed September 29, 2022. Imports are based on the imports for consumption data series.

Note: The data presented for South Korea include not only subject imports of CTL plate that are subject to these reviews but also include nonsubject imports of CTL plate that are subject to the earlier 1999 South Korea Orders. Therefore, the data presented for South Korea are overstated and the data presented for nonsubject sources are understated. See table IV-1 for adjusted import totals for subject South Korea and nonsubject South Korea for comparison of over/understatement. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

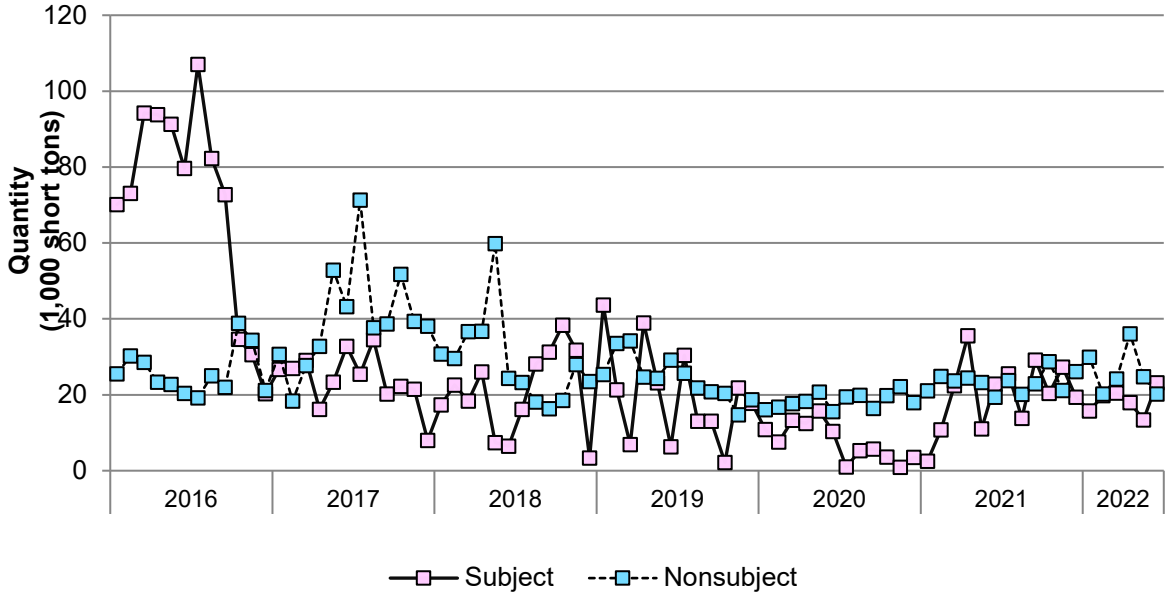
**Figure IV-4**
**CTL plate: U.S. imports from individual subject sources, by month, January 2016 through June 2022**




Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed September 29, 2022. Imports are based on the imports for consumption data series.

Note: The data presented for South Korea include not only subject imports of CTL plate that are subject to these reviews but also include nonsubject imports of CTL plate that are subject to the earlier 1999 South Korea Orders. Therefore, the data presented for South Korea are overstated.

**Figure IV-5**
**CTL plate: U.S. imports from aggregated subject sources and nonsubject sources, by month, January 2016 through June 2022**




Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed September 29, 2022. Imports are based on the imports for consumption data series.

Note: The data presented for South Korea include not only subject imports of CTL plate that are subject to these reviews but also include nonsubject imports of CTL plate that are subject to the earlier 1999 South Korea Orders. Therefore, the data presented for subject sources (including South Korea) are overstated and the data presented for nonsubject sources are understated.

## U.S. inventories of imported merchandise

Table IV-6 presents data for end-of-period inventories of U.S. imports of CTL plate from subject and nonsubject sources held in the United States. The largest share of end-of-period inventories of subject imports held during 2016-20 and the first half of 2022 were imports from South Korea held by ***. Imports from Italy held by *** accounted for the largest share of end-of-period inventories of subject imports during 2021, as importers of subject CTL plate from South Korea increased shipments from inventory stocks in that year. There were *** inventories of imports from Japan, South Africa, Taiwan, and Turkey, and minimal quantities of inventories of imports from Brazil, China, and France since 2016. Overall, end-of-period inventories of subject imports decreased by *** percent from 2016 to 2021, with most of the decrease occurring from 2016 to 2017 as subject imports decreased at the highest rate between those years.

During 2018-21, CTL plate imported from nonsubject sources accounted for the vast majority of responding U.S. importers' end-of-period inventories, mostly imports from Sweden, Finland, and Canada held by *** and imports from Canada held by ***. From 2016 to 2021, the overall quantity of end-of-period inventories of imports from nonsubject sources fluctuated upward, but were lower in June 2022 compared with June 2021.

**Table IV-6**
**CTL plate: U.S. importers' end-of-period inventories of imports, by source and period**

Quantity in short tons; ratios in percent

| Measure | Source | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Inventories quantity | Austria | *** | *** | *** |
| Ratio to imports | Austria | *** | *** | *** |
| Ratio to U.S. shipments of imports | Austria | *** | *** | *** |
| Ratio to total shipments of imports | Austria | *** | *** | *** |
| Inventories quantity | Belgium | *** | *** | *** |
| Ratio to imports | Belgium | *** | *** | *** |
| Ratio to U.S. shipments of imports | Belgium | *** | *** | *** |
| Ratio to total shipments of imports | Belgium | *** | *** | *** |
| Inventories quantity | Brazil | *** | *** | *** |
| Ratio to imports | Brazil | *** | *** | *** |
| Ratio to U.S. shipments of imports | Brazil | *** | *** | *** |
| Ratio to total shipments of imports | Brazil | *** | *** | *** |
| Inventories quantity | China | *** | *** | *** |
| Ratio to imports | China | *** | *** | *** |
| Ratio to U.S. shipments of imports | China | *** | *** | *** |
| Ratio to total shipments of imports | China | *** | *** | *** |
| Inventories quantity | France | *** | *** | *** |
| Ratio to imports | France | *** | *** | *** |
| Ratio to U.S. shipments of imports | France | *** | *** | *** |
| Ratio to total shipments of imports | France | *** | *** | *** |
| Inventories quantity | Germany | *** | *** | *** |
| Ratio to imports | Germany | *** | *** | *** |
| Ratio to U.S. shipments of imports | Germany | *** | *** | *** |
| Ratio to total shipments of imports | Germany | *** | *** | *** |
| Inventories quantity | Italy | *** | *** | *** |
| Ratio to imports | Italy | *** | *** | *** |
| Ratio to U.S. shipments of imports | Italy | *** | *** | *** |
| Ratio to total shipments of imports | Italy | *** | *** | *** |

Table continued.

**Table IV-6 Continued**
**CTL plate: U.S. importers' end-of-period inventories of imports, by source and period**

Quantity in short tons; ratios in percent

| Measure | Source | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Inventories quantity | Austria | *** | *** | *** | *** | *** |
| Ratio to imports | Austria | *** | *** | *** | *** | *** |
| Ratio to U.S. shipments of imports | Austria | *** | *** | *** | *** | *** |
| Ratio to total shipments of imports | Austria | *** | *** | *** | *** | *** |
| Inventories quantity | Belgium | *** | *** | *** | *** | *** |
| Ratio to imports | Belgium | *** | *** | *** | *** | *** |
| Ratio to U.S. shipments of imports | Belgium | *** | *** | *** | *** | *** |
| Ratio to total shipments of imports | Belgium | *** | *** | *** | *** | *** |
| Inventories quantity | Brazil | *** | *** | *** | *** | *** |
| Ratio to imports | Brazil | *** | *** | *** | *** | *** |
| Ratio to U.S. shipments of imports | Brazil | *** | *** | *** | *** | *** |
| Ratio to total shipments of imports | Brazil | *** | *** | *** | *** | *** |
| Inventories quantity | China | *** | *** | *** | *** | *** |
| Ratio to imports | China | *** | *** | *** | *** | *** |
| Ratio to U.S. shipments of imports | China | *** | *** | *** | *** | *** |
| Ratio to total shipments of imports | China | *** | *** | *** | *** | *** |
| Inventories quantity | France | *** | *** | *** | *** | *** |
| Ratio to imports | France | *** | *** | *** | *** | *** |
| Ratio to U.S. shipments of imports | France | *** | *** | *** | *** | *** |
| Ratio to total shipments of imports | France | *** | *** | *** | *** | *** |
| Inventories quantity | Germany | *** | *** | *** | *** | *** |
| Ratio to imports | Germany | *** | *** | *** | *** | *** |
| Ratio to U.S. shipments of imports | Germany | *** | *** | *** | *** | *** |
| Ratio to total shipments of imports | Germany | *** | *** | *** | *** | *** |
| Inventories quantity | Italy | *** | *** | *** | *** | *** |
| Ratio to imports | Italy | *** | *** | *** | *** | *** |
| Ratio to U.S. shipments of imports | Italy | *** | *** | *** | *** | *** |
| Ratio to total shipments of imports | Italy | *** | *** | *** | *** | *** |

Table continued.

**Table IV-6 Continued**
**CTL plate: U.S. importers' end-of-period inventories of imports, by source and period**

Quantity in short tons; ratios in percent

| Measure | Source | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Inventories quantity | Japan | *** | *** | *** |
| Ratio to imports | Japan | *** | *** | *** |
| Ratio to U.S. shipments of imports | Japan | *** | *** | *** |
| Ratio to total shipments of imports | Japan | *** | *** | *** |
| Inventories quantity | South Africa | *** | *** | *** |
| Ratio to imports | South Africa | *** | *** | *** |
| Ratio to U.S. shipments of imports | South Africa | *** | *** | *** |
| Ratio to total shipments of imports | South Africa | *** | *** | *** |
| Inventories quantity | South Korea, subject | *** | *** | *** |
| Ratio to imports | South Korea, subject | *** | *** | *** |
| Ratio to U.S. shipments of imports | South Korea, subject | *** | *** | *** |
| Ratio to total shipments of imports | South Korea, subject | *** | *** | *** |
| Inventories quantity | Taiwan | *** | *** | *** |
| Ratio to imports | Taiwan | *** | *** | *** |
| Ratio to U.S. shipments of imports | Taiwan | *** | *** | *** |
| Ratio to total shipments of imports | Taiwan | *** | *** | *** |
| Inventories quantity | Turkey | *** | *** | *** |
| Ratio to imports | Turkey | *** | *** | *** |
| Ratio to U.S. shipments of imports | Turkey | *** | *** | *** |
| Ratio to total shipments of imports | Turkey | *** | *** | *** |
| Inventories quantity | Subject | *** | *** | *** |
| Ratio to imports | Subject | *** | *** | *** |
| Ratio to U.S. shipments of imports | Subject | *** | *** | *** |
| Ratio to total shipments of imports | Subject | *** | *** | *** |
| Inventories quantity | Nonsubject | *** | *** | *** |
| Ratio to imports | Nonsubject | *** | *** | *** |
| Ratio to U.S. shipments of imports | Nonsubject | *** | *** | *** |
| Ratio to total shipments of imports | Nonsubject | *** | *** | *** |
| Inventories quantity | All | *** | *** | *** |
| Ratio to imports | All | *** | *** | *** |
| Ratio to U.S. shipments of imports | All | *** | *** | *** |
| Ratio to total shipments of imports | All | *** | *** | *** |

Table continued.

**Table IV-6 Continued**
**CTL plate: U.S. importers' end-of-period inventories of imports, by source and period**

Quantity in short tons; ratios in percent

| Measure | Source | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Inventories quantity | Japan | *** | *** | *** | *** | *** |
| Ratio to imports | Japan | *** | *** | *** | *** | *** |
| Ratio to U.S. shipments of imports | Japan | *** | *** | *** | *** | *** |
| Ratio to total shipments of imports | Japan | *** | *** | *** | *** | *** |
| Inventories quantity | South Africa | *** | *** | *** | *** | *** |
| Ratio to imports | South Africa | *** | *** | *** | *** | *** |
| Ratio to U.S. shipments of imports | South Africa | *** | *** | *** | *** | *** |
| Ratio to total shipments of imports | South Africa | *** | *** | *** | *** | *** |
| Inventories quantity | South Korea, subject | *** | *** | *** | *** | *** |
| Ratio to imports | South Korea, subject | *** | *** | *** | *** | *** |
| Ratio to U.S. shipments of imports | South Korea, subject | *** | *** | *** | *** | *** |
| Ratio to total shipments of imports | South Korea, subject | *** | *** | *** | *** | *** |
| Inventories quantity | Taiwan | *** | *** | *** | *** | *** |
| Ratio to imports | Taiwan | *** | *** | *** | *** | *** |
| Ratio to U.S. shipments of imports | Taiwan | *** | *** | *** | *** | *** |
| Ratio to total shipments of imports | Taiwan | *** | *** | *** | *** | *** |
| Inventories quantity | Turkey | *** | *** | *** | *** | *** |
| Ratio to imports | Turkey | *** | *** | *** | *** | *** |
| Ratio to U.S. shipments of imports | Turkey | *** | *** | *** | *** | *** |
| Ratio to total shipments of imports | Turkey | *** | *** | *** | *** | *** |
| Inventories quantity | Subject | *** | *** | *** | *** | *** |
| Ratio to imports | Subject | *** | *** | *** | *** | *** |
| Ratio to U.S. shipments of imports | Subject | *** | *** | *** | *** | *** |
| Ratio to total shipments of imports | Subject | *** | *** | *** | *** | *** |
| Inventories quantity | Nonsubject | *** | *** | *** | *** | *** |
| Ratio to imports | Nonsubject | *** | *** | *** | *** | *** |
| Ratio to U.S. shipments of imports | Nonsubject | *** | *** | *** | *** | *** |
| Ratio to total shipments of imports | Nonsubject | *** | *** | *** | *** | *** |
| Inventories quantity | All | *** | *** | *** | *** | *** |
| Ratio to imports | All | *** | *** | *** | *** | *** |
| Ratio to U.S. shipments of imports | All | *** | *** | *** | *** | *** |
| Ratio to total shipments of imports | All | *** | *** | *** | *** | *** |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

## U.S. importers' imports subsequent to June 30, 2022

The Commission requested importers to indicate whether they had imported or arranged for the importation of CTL plate from subject and nonsubject sources for delivery after June 30, 2022, and to provide data for such arranged imports. Table IV-7 presents data provided by U.S. importers on their arranged imports after June 30, 2022. The largest share of arranged imports are reported *** from South Korea (*** percent) and are expected for delivery during ***. The second largest share of the arranged imports are from nonsubject sources (*** percent), most of which are expected for delivery during ***. There are relatively smaller amounts of imports from Austria, Belgium, Brazil, France, Germany, Italy, and Japan arranged for delivery subsequent to June 30, 2022, and *** reported imports from China, South Africa, Taiwan, and Turkey arranged for delivery subsequent to June 30, 2022.

**Table IV-7**
**CTL plate: Arranged imports, by source and period**

Quantity in short tons

| Source | Jul-Sept 2022 | Oct-Dec 2022 | Jan-Mar 2023 | Apr-Jun 2023 | Total |
|---|---|---|---|---|---|
| Austria | *** | *** | *** | *** | *** |
| Belgium | *** | *** | *** | *** | *** |
| Brazil | *** | *** | *** | *** | *** |
| China | *** | *** | *** | *** | *** |
| France | *** | *** | *** | *** | *** |
| Germany | *** | *** | *** | *** | *** |
| Italy | *** | *** | *** | *** | *** |
| Japan | *** | *** | *** | *** | *** |
| South Africa | *** | *** | *** | *** | *** |
| South Korea | *** | *** | *** | *** | *** |
| Taiwan | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** |
| Subject sources | *** | *** | *** | *** | *** |
| Nonsubject sources | *** | *** | *** | *** | *** |
| All import sources | *** | *** | *** | *** | *** |

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

# The industry in Austria

## Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from three firms, Boehler Bleche, Böhler Edelstahl, and voestalpine, which accounted for *** production of CTL plate in Austria during 2015, and *** of CTL plate exports from Austria to the United States during 2015.[6] Boehler Bleche accounted for *** percent of reported production in Austria and *** percent of reported exports to the United States in 2015, Böhler Edelstahl accounted for *** percent and *** percent, and voestalpine accounted for *** percent and *** percent.

In these full first five-year reviews, the Commission issued a foreign producers' questionnaire to five firms believed to produce CTL plate in Austria and received responses from four firms: voestalpine Böhler Edelstahl, voestalpine Böhler Bleche, voestalpine Grobblech, and voestalpine Steel & Service Center (collectively "Voestalpine"). According to the responding firms, collectively they accounted for *** capacity to produce CTL plate in Austria.[7]

Table IV-8 presents data on gross production and apparent gross consumption of reversing mill plate in Austria.[8]

**Table IV-8**
**Reversing mill plate: Gross production and apparent gross consumption in Austria, by period**

Quantity in short tons

| Item | 2016 | 2017 | 2018 |
|---|---|---|---|
| Gross production | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** |

Table continued.

[6] Original confidential report, p. VII-3.

[7] Voestalpine's response to the notice of institution, January 3, 2022, pp. 13-14. Austrian responding producers reported in 2021 they collectively accounted for *** percent of CTL plate production in Austria and *** percent of exports to the United States from Austria in their questionnaire responses.

[8] ***. Email from ***. For more information on mill differences see Part I, Manufacturing processes.

**Table IV-8 Continued**
**CTL plate: Gross production and apparent gross consumption in Austria, by period**

Quantity in short tons

| Item | 2019 | 2020 | 2021 | Projected 2022 |
|---|---|---|---|---|
| Gross production | *** | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** | *** |

Source: ***.

Table IV-9 presents summary information on the CTL plate operations of the responding producers and exporters in Austria.

**Table IV-9**
**CTL plate: Summary data for producers in Austria, 2021**

| Firm | Production (short tons) | Share of reported production (percent) | Exports to the United States (short tons) | Share of reported exports to the United States (percent) | Total shipments (short tons) | Share of firm's total shipments exported to the United States (percent) |
|---|---|---|---|---|---|---|
| Voestalpine Boehler Bleche | *** | *** | *** | *** | *** | *** |
| Voestalpine Böhler Edelstahl | *** | *** | *** | *** | *** | *** |
| Voestalpine Grobblech | *** | *** | *** | *** | *** | *** |
| Voestalpine Steel & Service Center | *** | *** | *** | *** | *** | *** |
| All firms | *** | 100.0 | *** | 100.0 | *** | *** |

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

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

## Recent developments

Table IV-10 presents events that occurred in the Austrian industry since the original investigations.

**Table IV-10**
**CTL plate: Important industry events in Austria since 2016**

| Item | Firm | Event |
|---|---|---|
| Expansion | Voestalpine | In October 2017, Voestalpine announced an EUR 16 million expansion of its steel blank production facility in Linz. |
| Plant opening | Voestalpine | In April 2018, Voestalpine broke ground on the construction of a new EUR 350 million stainless steel plant in Kapfenberg. The plant is expected to be fully operational by mid-2022. |

Source: Voestalpine, “Voestalpine Invests EUR 16 Million in Expanding the World’s Largest Site for Automotive Blanks in Linz,” October 30, 2017, https://www.voestalpine.com/group/en/media/press-releases/2017-10-30-voestalpine-invests-eur-16-million-in-expanding-the-worlds-largest-site-for-automotive-blanks-in-linz/; Varriale, Laura, “Steelmaker Voestalpine to Convert Three Blast Furnaces to EAFs by 2030,” June 9, 2021, https://www.spglobal.com/platts/en/market-insights/latest-news/metals/060921-steelmaker-voestalpine-to-convert-three-blast-furnaces-to-eafs-by-2030.

## Changes in operations

Producers in Austria were asked to report any change in the character of their operations or organization relating to the production of CTL plate since 2016. Two firms indicated in their questionnaire responses that they had experienced such changes. Table IV-11 presents the changes identified by these firms.

**Table IV-11**
**CTL plate: Reported changes in operations in Austria, since January 1, 2016, by firm**

| Item | Firm name and narrative on changes in operations |
|---|---|
| Consolidations | *** |
| Other | *** |
| Other | *** |

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

## Operations on CTL plate

Table IV-12 presents data on the CTL plate operations of the responding producers and exporters in Austria. Overall, during 2016-21, Austrian producers' capacity for CTL plate increased by *** percent while its production of CTL plate decreased by *** percent.[9] Austrian producers' capacity and production were both higher in January-June ("interim") 2022 compared to interim 2021 (by *** percent and by *** percent, respectively). During the period for which data were collected, export shipments accounted for the majority (approximately ***) of total shipments, by quantity. Meanwhile, export shipments to the United States accounted for less than *** percent of total shipments in each period. Austrian producers' end-of-period inventories held by producers in Austria fluctuated within a relatively narrow range from 2016 to 2021, but were *** percent higher in interim 2022 than in interim 2021.

[9] Voestalpine reported in the original investigations that it began production in August 2016 for the largest pipeline plate order in the firm's history to supply plate for pipe for use in the Nord Stream 2 gas pipeline project in Eastern Europe. Voestalpine reported that it would be supplying over *** tons of CTL plate for that project through February 2018. Original confidential report, p. VII-5.

**Table IV-12**
**CTL plate: Data on industry in Austria, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** |
| Production | Quantity | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** |
| United States | Quantity | *** | *** | *** |
| European Union markets | Quantity | *** | *** | *** |
| Asian markets | Quantity | *** | *** | *** |
| American markets excluding U.S. | Quantity | *** | *** | *** |
| All other markets | Quantity | *** | *** | *** |
| Non-U.S. destination markets | Quantity | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** |
| United States | Value | *** | *** | *** |
| European Union markets | Value | *** | *** | *** |
| Asian markets | Value | *** | *** | *** |
| American markets excluding U.S. | Value | *** | *** | *** |
| All other markets | Value | *** | *** | *** |
| Non-U.S. destination markets | Value | *** | *** | *** |
| Export shipments | Value | *** | *** | *** |
| Total shipments | Value | *** | *** | *** |

Table continued.

**Table IV-12 Continued**
**CTL plate: Data on industry in Austria, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** | *** | *** |
| Production | Quantity | *** | *** | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** | *** | *** |
| United States | Quantity | *** | *** | *** | *** | *** |
| European Union markets | Quantity | *** | *** | *** | *** | *** |
| Asian markets | Quantity | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Quantity | *** | *** | *** | *** | *** |
| All other markets | Quantity | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Quantity | *** | *** | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** | *** | *** |
| United States | Value | *** | *** | *** | *** | *** |
| European Union markets | Value | *** | *** | *** | *** | *** |
| Asian markets | Value | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Value | *** | *** | *** | *** | *** |
| All other markets | Value | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Value | *** | *** | *** | *** | *** |
| Export shipments | Value | *** | *** | *** | *** | *** |
| Total shipments | Value | *** | *** | *** | *** | *** |

Table continued.

**Table IV-12 Continued**
**CTL plate: Data on industry in Austria, by period**

Unit values in dollars per short ton; ratios and shares in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** |
| United States | Unit value | *** | *** | *** |
| European Union markets | Unit value | *** | *** | *** |
| Asian markets | Unit value | *** | *** | *** |
| American markets excluding U.S. | Unit value | *** | *** | *** |
| All other markets | Unit value | *** | *** | *** |
| Non-U.S. destination markets | Unit value | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** |
| United States | Share | *** | *** | *** |
| European Union markets | Share | *** | *** | *** |
| Asian markets | Share | *** | *** | *** |
| American markets excluding U.S. | Share | *** | *** | *** |
| All other markets | Share | *** | *** | *** |
| Non-U.S. destination markets | Share | *** | *** | *** |
| Export shipments | Share | *** | *** | *** |
| Total shipments | Share | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-12 Continued**
**CTL plate: Data on industry in Austria, by period**

Unit values in dollars per short ton; ratios and shares in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** | *** | *** |
| United States | Unit value | *** | *** | *** | *** | *** |
| European Union markets | Unit value | *** | *** | *** | *** | *** |
| Asian markets | Unit value | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Unit value | *** | *** | *** | *** | *** |
| All other markets | Unit value | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Unit value | *** | *** | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** | *** | *** |
| United States | Share | *** | *** | *** | *** | *** |
| European Union markets | Share | *** | *** | *** | *** | *** |
| Asian markets | Share | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Share | *** | *** | *** | *** | *** |
| All other markets | Share | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Share | *** | *** | *** | *** | *** |
| Export shipments | Share | *** | *** | *** | *** | *** |
| Total shipments | Share | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## CTL plate thickness and steel type

Producers were asked to indicate whether their firm had the ability or capacity to produce various CTL plate product types and thicknesses in 2021 and whether their firm actually produced the various CTL plate product types and thicknesses in 2021. Table IV-13 presents the count of producers that reported the ability or capacity to produce these items and table IV-14 presents the count of producers that reported actual production.

**Table IV-13**
**CTL plate: Count of producers in Austria with ability or capacity by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | *** | *** | *** | *** |
| CrMo pressure vessel plate | *** | *** | *** | *** |
| Ni pressure vessel plate | *** | *** | *** | *** |
| Other pressure vessel plate | *** | *** | *** | *** |
| Tool steel plate | *** | *** | *** | *** |
| Mold steel plate | *** | *** | *** | *** |
| AR400-AR600 wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Other wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Oil-drilling platform plate | *** | *** | *** | *** |
| Offshore wind energy plate | *** | *** | *** | *** |
| Shipbuilding plate | *** | *** | *** | *** |
| X-70 (or higher) plate width < 120 inches | *** | *** | *** | *** |
| X-70 (or higher) plate width ≥ 120 inches | *** | *** | *** | *** |
| Other plate for line pipe | *** | *** | *** | *** |
| Sour service plate | *** | *** | *** | *** |
| High-speed steel plate | *** | *** | *** | *** |
| Heat-resisting steel plate | *** | *** | *** | *** |
| UHSS or AHSS plate | *** | *** | *** | *** |
| HSLA plate | *** | *** | *** | *** |
| Forged alloy steel plate | *** | *** | *** | *** |
| A553, Type 1, 9% nickel | *** | *** | *** | *** |
| API2W grade 50 or 60 | *** | *** | *** | *** |
| SA387 grade 11 or 22 | *** | *** | *** | *** |
| SA516 grade 70/65, HIC tested | *** | *** | *** | *** |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | *** | *** | *** | *** |
| All product types | *** | *** | *** | *** |

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

**Table IV-14**
**CTL plate: Count of producers in Austria with actual production by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | *** | *** | *** | *** |
| CrMo pressure vessel plate | *** | *** | *** | *** |
| Ni pressure vessel plate | *** | *** | *** | *** |
| Other pressure vessel plate | *** | *** | *** | *** |
| Tool steel plate | *** | *** | *** | *** |
| Mold steel plate | *** | *** | *** | *** |
| AR400-AR600 wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Other wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Oil-drilling platform plate | *** | *** | *** | *** |
| Offshore wind energy plate | *** | *** | *** | *** |
| Shipbuilding plate | *** | *** | *** | *** |
| X-70 (or higher) plate width < 120 inches | *** | *** | *** | *** |
| X-70 (or higher) plate width ≥ 120 inches | *** | *** | *** | *** |
| Other plate for line pipe | *** | *** | *** | *** |
| Sour service plate | *** | *** | *** | *** |
| High-speed steel plate | *** | *** | *** | *** |
| Heat-resisting steel plate | *** | *** | *** | *** |
| UHSS or AHSS plate | *** | *** | *** | *** |
| HSLA plate | *** | *** | *** | *** |
| Forged alloy steel plate | *** | *** | *** | *** |
| A553, Type 1, 9% nickel | *** | *** | *** | *** |
| API2W grade 50 or 60 | *** | *** | *** | *** |
| SA387 grade 11 or 22 | *** | *** | *** | *** |
| SA516 grade 70/65, HIC tested | *** | *** | *** | *** |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | *** | *** | *** | *** |
| All product types | *** | *** | *** | *** |

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

Table IV-15 presents quantity data on responding producers' total shipments of CTL plate in Austria by plate thickness and steel type in 2021. Alloy plate as rolled accounted for the majority of total CTL plate shipments by the responding producers in Austria in 2021 (*** percent), followed by heat treated alloy plate (*** percent). Almost *** (*** percent) of total shipments made by responding producers in Austria were of the smaller category of plate thickness (<1"), whereas almost *** (*** percent) were of the medium category of thickness (≥1" but <4"). Only *** percent of total shipments were reported in the thickest category of CTL plate (≥4").

**Table IV-15**
**CTL plate: Total shipments of producers in Austria, by steel type and steel thickness, 2021**

Quantity in short tons; shares in percent

| Product type | Measure | <1" | ≥1" but <4" | ≥4" | Total plate thicknesses |
|---|---|---|---|---|---|
| Carbon plate: As rolled | Quantity | *** | *** | *** | *** |
| Carbon plate: Heat treated | Quantity | *** | *** | *** | *** |
| Carbon plate | Quantity | *** | *** | *** | *** |
| Alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Alloy plate | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate | Quantity | *** | *** | *** | *** |
| Carbon plate: As rolled | Share down | *** | *** | *** | *** |
| Carbon plate: Heat treated | Share down | *** | *** | *** | *** |
| Carbon plate | Share down | *** | *** | *** | *** |
| Alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Alloy plate | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate | Share down | 100.0 | 100.0 | 100.0 | 100.0 |
| Carbon plate: As rolled | Share across | *** | *** | *** | --- |
| Carbon plate: Heat treated | Share across | *** | *** | *** | --- |
| Carbon plate | Share across | *** | *** | *** | --- |
| Alloy plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Alloy plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Alloy plate | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate | Share across | *** | *** | *** | 100.0 |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## Alternative products

All four responding firms produced other products on the same equipment and machinery used to produce CTL plate. As shown in table IV-16, CTL plate accounted for *** percent of total production on shared equipment during 2016-21, January to June 2021, and January to June 2022. ***.

**Table IV-16**
**CTL plate: Overall capacity and production on the same equipment as in-scope production in Austria, by period**

Quantities in short tons; shares and ratios in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Overall capacity | Quantity | *** | *** | *** |
| CTL plate production | Quantity | *** | *** | *** |
| Other production | Quantity | *** | *** | *** |
| Total production | Quantity | *** | *** | *** |
| Overall capacity utilization | Ratio | *** | *** | *** |
| CTL plate production | Share | *** | *** | *** |
| Other production | Share | *** | *** | *** |
| Total production | Share | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-16 Continued**
**CTL plate: Overall capacity and production on the same equipment as in-scope production in Austria, by period**

Quantities in short tons; shares and ratios in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Overall capacity | Quantity | *** | *** | *** | *** | *** |
| CTL plate production | Quantity | *** | *** | *** | *** | *** |
| Other production | Quantity | *** | *** | *** | *** | *** |
| Total production | Quantity | *** | *** | *** | *** | *** |
| Overall capacity utilization | Ratio | *** | *** | *** | *** | *** |
| CTL plate production | Share | *** | *** | *** | *** | *** |
| Other production | Share | *** | *** | *** | *** | *** |
| Total production | Share | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

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

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

## Exports

Table IV-17 presents data for exports of CTL plate from Austria, by destination market in descending order of quantity for 2021. The leading export markets for CTL plate from Austria in 2021, by quantity, were Germany and the Czech Republic, accounting for 35.8 percent and 10.3 percent, respectively. The United States accounted for 0.1 percent of exports of CTL plate from Austria, by quantity, in 2021.

**Table IV-17**
**CTL plate: Exports from Austria, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Quantity | 14,919 | 1,723 | 1,443 |
| Germany | Quantity | 368,424 | 362,933 | 372,116 |
| Czech Republic | Quantity | 89,905 | 89,408 | 91,537 |
| Switzerland | Quantity | 55,257 | 72,887 | 81,934 |
| Italy | Quantity | 42,218 | 45,353 | 46,344 |
| Poland | Quantity | 26,714 | 20,844 | 30,425 |
| Hungary | Quantity | 38,381 | 41,088 | 34,366 |
| United Arab Emirates | Quantity | 4,466 | 6,177 | 22,036 |
| Belgium | Quantity | 40,592 | 75,428 | 56,304 |
| All other destination markets | Quantity | 555,161 | 685,826 | 464,545 |
| All non-U.S. destination markets | Quantity | 1,221,119 | 1,399,945 | 1,199,608 |
| All destination markets | Quantity | 1,236,038 | 1,401,668 | 1,201,051 |
| United States | Value | 19,373 | 6,439 | 4,621 |
| Germany | Value | 225,904 | 262,087 | 311,849 |
| Czech Republic | Value | 53,550 | 62,649 | 75,977 |
| Switzerland | Value | 32,459 | 53,010 | 65,522 |
| Italy | Value | 33,214 | 40,511 | 44,412 |
| Poland | Value | 19,240 | 18,742 | 30,313 |
| Hungary | Value | 19,693 | 26,195 | 25,790 |
| United Arab Emirates | Value | 3,060 | 4,516 | 16,314 |
| Belgium | Value | 22,244 | 43,247 | 39,560 |
| All other destination markets | Value | 316,896 | 472,043 | 393,347 |
| All non-U.S. destination markets | Value | 726,259 | 983,000 | 1,003,084 |
| All destination markets | Value | 745,632 | 989,439 | 1,007,704 |

Table continued.

**Table IV-17 Continued**
**CTL plate: Exports from Austria, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Quantity | 2,051 | 2,452 | 835 |
| Germany | Quantity | 345,062 | 304,797 | 384,922 |
| Czech Republic | Quantity | 74,845 | 74,278 | 110,492 |
| Switzerland | Quantity | 66,936 | 82,510 | 78,512 |
| Italy | Quantity | 44,579 | 33,274 | 70,647 |
| Poland | Quantity | 47,039 | 29,849 | 41,841 |
| Hungary | Quantity | 42,941 | 24,228 | 40,675 |
| United Arab Emirates | Quantity | 3,102 | 4,445 | 39,322 |
| Belgium | Quantity | 28,690 | 26,793 | 36,232 |
| All other destination markets | Quantity | 351,061 | 293,998 | 272,654 |
| All non-U.S. destination markets | Quantity | 1,004,254 | 874,173 | 1,075,297 |
| All destination markets | Quantity | 1,006,305 | 876,624 | 1,076,132 |
| United States | Value | 3,956 | 4,518 | 4,531 |
| Germany | Value | 265,693 | 219,063 | 381,210 |
| Czech Republic | Value | 57,697 | 52,044 | 110,426 |
| Switzerland | Value | 50,121 | 55,225 | 73,132 |
| Italy | Value | 44,705 | 32,311 | 71,880 |
| Poland | Value | 44,941 | 28,339 | 50,490 |
| Hungary | Value | 29,594 | 15,743 | 40,656 |
| United Arab Emirates | Value | 2,426 | 2,998 | 33,942 |
| Belgium | Value | 22,098 | 17,788 | 30,316 |
| All other destination markets | Value | 287,605 | 233,424 | 306,577 |
| All non-U.S. destination markets | Value | 804,879 | 656,936 | 1,098,629 |
| All destination markets | Value | 808,835 | 661,454 | 1,103,161 |

Table continued.

**Table IV-17 Continued**
**CTL plate: Exports from Austria, by destination market and period**

Unit values in dollars per short ton; shares in percent

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Unit value | 1,299 | 3,737 | 3,202 |
| Germany | Unit value | 613 | 722 | 838 |
| Czech Republic | Unit value | 596 | 701 | 830 |
| Switzerland | Unit value | 587 | 727 | 800 |
| Italy | Unit value | 787 | 893 | 958 |
| Poland | Unit value | 720 | 899 | 996 |
| Hungary | Unit value | 513 | 638 | 750 |
| United Arab Emirates | Unit value | 685 | 731 | 740 |
| Belgium | Unit value | 548 | 573 | 703 |
| All other destination markets | Unit value | 571 | 688 | 847 |
| All non-U.S. destination markets | Unit value | 595 | 702 | 836 |
| All destination markets | Unit value | 603 | 706 | 839 |
| United States | Share of quantity | 1.2 | 0.1 | 0.1 |
| Germany | Share of quantity | 29.8 | 25.9 | 31.0 |
| Czech Republic | Share of quantity | 7.3 | 6.4 | 7.6 |
| Switzerland | Share of quantity | 4.5 | 5.2 | 6.8 |
| Italy | Share of quantity | 3.4 | 3.2 | 3.9 |
| Poland | Share of quantity | 2.2 | 1.5 | 2.5 |
| Hungary | Share of quantity | 3.1 | 2.9 | 2.9 |
| United Arab Emirates | Share of quantity | 0.4 | 0.4 | 1.8 |
| Belgium | Share of quantity | 3.3 | 5.4 | 4.7 |
| All other destination markets | Share of quantity | 44.9 | 48.9 | 38.7 |
| All non-U.S. destination markets | Share of quantity | 98.8 | 99.9 | 99.9 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-17 Continued**
**CTL plate: Exports from Austria, by destination market and period**

Unit values in dollars per short ton; shares in percent

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Unit value | 1,929 | 1,843 | 5,428 |
| Germany | Unit value | 770 | 719 | 990 |
| Czech Republic | Unit value | 771 | 701 | 999 |
| Switzerland | Unit value | 749 | 669 | 931 |
| Italy | Unit value | 1,003 | 971 | 1,017 |
| Poland | Unit value | 955 | 949 | 1,207 |
| Hungary | Unit value | 689 | 650 | 1,000 |
| United Arab Emirates | Unit value | 782 | 675 | 863 |
| Belgium | Unit value | 770 | 664 | 837 |
| All other destination markets | Unit value | 819 | 794 | 1,124 |
| All non-U.S. destination markets | Unit value | 801 | 751 | 1,022 |
| All destination markets | Unit value | 804 | 755 | 1,025 |
| United States | Share of quantity | 0.2 | 0.3 | 0.1 |
| Germany | Share of quantity | 34.3 | 34.8 | 35.8 |
| Czech Republic | Share of quantity | 7.4 | 8.5 | 10.3 |
| Switzerland | Share of quantity | 6.7 | 9.4 | 7.3 |
| Italy | Share of quantity | 4.4 | 3.8 | 6.6 |
| Poland | Share of quantity | 4.7 | 3.4 | 3.9 |
| Hungary | Share of quantity | 4.3 | 2.8 | 3.8 |
| United Arab Emirates | Share of quantity | 0.3 | 0.5 | 3.7 |
| Belgium | Share of quantity | 2.9 | 3.1 | 3.4 |
| All other destination markets | Share of quantity | 34.9 | 33.5 | 25.3 |
| All non-U.S. destination markets | Share of quantity | 99.8 | 99.7 | 99.9 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official export statistics under HS subheading, 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91, as reported by Eurostat in the Global Trade Atlas database, accessed September 29, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

# The industry in Belgium

## Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from two firms, ArcelorMittal (BE) and NLMK Plates, which accounted for approximately *** of production of CTL plate in Belgium during 2015, and *** U.S. imports of CTL plate from Belgium during 2015.[10]

In these full first five-year reviews, the Commission issued a foreign producers' questionnaire to ten firms believed to produce CTL plate in Belgium and received responses from three firms: Industeel Belgium, NLMK Plate Sales S.A. ("NLMK Plate Sales"),[11] and NLMK Sales Europe S.A. ("NLMK Sales Europe").[12] According to the responding firms, collectively they accounted for over *** percent of CTL plate production in Belgium in 2021.[13]

Table IV-18 presents summary information on the CTL plate operations of the responding producers and exporters in Belgium.

**Table IV-18**
**CTL plate: Summary data for producers in Belgium, 2021**

| Firm | Production (short tons) | Share of reported production (percent) | Exports to the United States (short tons) | Share of reported exports to the United States (percent) | Total shipments (short tons) | Share of firm's total shipments exported to the United States (percent) |
|---|---|---|---|---|---|---|
| Industeel Belgium | *** | *** | *** | *** | *** | *** |
| NLMK Plate Sales | *** | *** | *** | *** | *** | *** |
| NLMK Sales Europe | *** | *** | *** | *** | *** | *** |
| All firms | *** | 100.0 | *** | 100.0 | *** | *** |

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

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

[10] Original confidential report, p. VII-11.

[11] This includes NLMK Clabecq.

[12] This includes NLMK Manage.

[13] Belgian responding producers reported in 2021 they collectively accounted for *** percent of CTL plate production in Belgium and *** percent of exports to the United States from Belgium in their questionnaire responses.

## Recent developments

Table IV-19 presents events in the Belgian industry that have occurred since the original investigations.

**Table IV-19**
**CTL plate: Recent developments in the Belgian industry**

| Item | Company | Event |
|---|---|---|
| Temporary Shutdown | NLMK Clabecq | In January 2019, NLMK Clabecq's plate rolling plant was temporarily shut down due to a worker strike. The plant restarted production in late February. |
| Plant upgrade | NLMK Clabecq | In October 2020, NLMK Clabecq announced an EUR 30 million upgrade to its plate rolling mill. |

Sources: The Ukrainian Metal, "Russia: NLMK's Belgium Plant Goes on Strike Over 50 Percent Personnel Cut," January 18, 2021, https://metalukraine.com/2019/01/18/russia-nlmks-belgium-plant-goes-on-strike-over-50-personnel-cut.html; Kallanish Steel, "NLMK Clabecq to Restart Production Next Week," February 22, 2019, https://eurometal.net/nlmk-clabecq-to-restart-production-next-week/; NLMK, "NLMK Clabecq Launches a 30M € Rolling Mill Upgrade to Expand Thin & High Added Value Steel Plate Range," October 20, 2020, https://nlmk.com/en/media-center/press-releases/nlmk-clabecq-launches-a-30m-rolling-mill-upgrade-to-expand-thin-high-added-value-steel-plate-range/.

## Changes in operations

Producers in Belgium were asked to report any change in the character of their operations or organization relating to the production of CTL plate since 2016. One of three producers indicated in their questionnaires that they had experienced such changes. Table IV-20 presents the changes identified by this producer.

**Table IV-20**
**CTL plate: Reported changes in operations in Belgium, since January 1, 2016, by firm**

| Item | Firm name and narrative on changes in operations |
|---|---|
| Consolidations | *** |

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

## Operations on CTL plate

Table IV-21 presents information on the CTL plate operations of the responding producers in Belgium. Overall, during 2016-21, Belgian producers' capacity and production of CTL plate decreased by *** percent and by *** percent, respectively. Belgian producers' capacity and production were both higher in January-June interim 2022 compared to interim 2021 (by *** percent and by *** percent, respectively). During the period of which data were collected export shipments accounted for the vast majority (over *** percent) of total shipments, by quantity. Meanwhile, export shipments to the United States accounted for less

than *** percent of all export shipments in each period.[14] Belgian producers' end-of- period inventories fluctuated during 2016-21 but overall decreased by *** percent. Meanwhile, Belgian producers' end-of- period inventories were *** percent higher in interim 2022 compared to interim 2021.

**Table IV-21**
**CTL plate: Data on industry in Belgium, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** |
| Production | Quantity | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** |
| United States | Quantity | *** | *** | *** |
| European Union markets | Quantity | *** | *** | *** |
| Asian markets | Quantity | *** | *** | *** |
| American markets excluding U.S. | Quantity | *** | *** | *** |
| All other markets | Quantity | *** | *** | *** |
| Non-U.S. destination markets | Quantity | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** |
| United States | Value | *** | *** | *** |
| European Union markets | Value | *** | *** | *** |
| Asian markets | Value | *** | *** | *** |
| American markets excluding U.S. | Value | *** | *** | *** |
| All other markets | Value | *** | *** | *** |
| Non-U.S. destination markets | Value | *** | *** | *** |
| Export shipments | Value | *** | *** | *** |
| Total shipments | Value | *** | *** | *** |

Table continued.

[14] *** reported exports of CTL plate to the United States each year during ***, however *** reported exports to the United States during *** and ***.

**Table IV-21 Continued**
**CTL plate: Data on industry in Belgium, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** | *** | *** |
| Production | Quantity | *** | *** | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** | *** | *** |
| United States | Quantity | *** | *** | *** | *** | *** |
| European Union markets | Quantity | *** | *** | *** | *** | *** |
| Asian markets | Quantity | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Quantity | *** | *** | *** | *** | *** |
| All other markets | Quantity | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Quantity | *** | *** | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** | *** | *** |
| United States | Value | *** | *** | *** | *** | *** |
| European Union markets | Value | *** | *** | *** | *** | *** |
| Asian markets | Value | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Value | *** | *** | *** | *** | *** |
| All other markets | Value | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Value | *** | *** | *** | *** | *** |
| Export shipments | Value | *** | *** | *** | *** | *** |
| Total shipments | Value | *** | *** | *** | *** | *** |

Table continued.

**Table IV-21 Continued**
**CTL plate: Data on industry in Belgium, by period**

Unit values in dollars per short ton; ratios and shares in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** |
| United States | Unit value | *** | *** | *** |
| European Union markets | Unit value | *** | *** | *** |
| Asian markets | Unit value | *** | *** | *** |
| American markets excluding U.S. | Unit value | *** | *** | *** |
| All other markets | Unit value | *** | *** | *** |
| Non-U.S. destination markets | Unit value | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** |
| United States | Share | *** | *** | *** |
| European Union markets | Share | *** | *** | *** |
| Asian markets | Share | *** | *** | *** |
| American markets excluding U.S. | Share | *** | *** | *** |
| All other markets | Share | *** | *** | *** |
| Non-U.S. destination markets | Share | *** | *** | *** |
| Export shipments | Share | *** | *** | *** |
| Total shipments | Share | *** | *** | *** |

Table continued.

**Table IV-21 Continued**
**CTL plate: Data on industry in Belgium, by period**

Unit values in dollars per short ton; ratios and shares in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** | *** | *** |
| United States | Unit value | *** | *** | *** | *** | *** |
| European Union markets | Unit value | *** | *** | *** | *** | *** |
| Asian markets | Unit value | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Unit value | *** | *** | *** | *** | *** |
| All other markets | Unit value | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Unit value | *** | *** | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** | *** | *** |
| United States | Share | *** | *** | *** | *** | *** |
| European Union markets | Share | *** | *** | *** | *** | *** |
| Asian markets | Share | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Share | *** | *** | *** | *** | *** |
| All other markets | Share | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Share | *** | *** | *** | *** | *** |
| Export shipments | Share | *** | *** | *** | *** | *** |
| Total shipments | Share | *** | *** | *** | *** | *** |

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

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

## CTL plate thickness and steel type

Producers were asked to indicate whether their firm had the ability or capacity to produce various CTL plate product types and thicknesses in 2021 and whether their firm actually produced the various CTL plate product types and thicknesses in 2021. Table IV-22 presents the count of producers that reported the ability or capacity to produce these items and table IV-23 presents the count of producers that reported actual production.

**Table IV-22**
**CTL plate: Count of producers in Belgium with ability or capacity by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | 3 | 2 | 1 | 3 |
| CrMo pressure vessel plate | 2 | 2 | 1 | 2 |
| Ni pressure vessel plate | 1 | 1 | 1 | 1 |
| Other pressure vessel plate | 2 | 2 | 1 | 2 |
| Tool steel plate | 1 | 1 | 0 | 1 |
| Mold steel plate | 1 | 1 | 1 | 1 |
| AR400-AR600 wear resistant/abrasion resistant plate | 2 | 2 | 1 | 2 |
| Other wear resistant/abrasion resistant plate | 1 | 1 | 0 | 1 |
| Oil-drilling platform plate | 0 | 0 | 0 | 0 |
| Offshore wind energy plate | 1 | 1 | 0 | 1 |
| Shipbuilding plate | 2 | 2 | 0 | 2 |
| X-70 (or higher) plate width < 120 inches | 1 | 0 | 0 | 1 |
| X-70 (or higher) plate width ≥ 120 inches | 0 | 0 | 0 | 0 |
| Other plate for line pipe | 1 | 1 | 0 | 1 |
| Sour service plate | 2 | 1 | 1 | 2 |
| High-speed steel plate | 0 | 0 | 0 | 0 |
| Heat-resisting steel plate | 0 | 0 | 0 | 0 |
| UHSS or AHSS plate | 2 | 2 | 0 | 2 |
| HSLA plate | 2 | 1 | 0 | 2 |
| Forged alloy steel plate | 0 | 0 | 0 | 0 |
| A553, Type 1, 9% nickel | 1 | 1 | 0 | 1 |
| API2W grade 50 or 60 | 0 | 0 | 0 | 0 |
| SA387 grade 11 or 22 | 2 | 2 | 1 | 2 |
| SA516 grade 70/65, HIC tested | 1 | 1 | 1 | 1 |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | 1 | 1 | 0 | 1 |
| Any product type | 3 | 2 | 1 | 3 |

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

**Table IV-23**
**CTL plate: Count of producers in Belgium with actual production by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | 3 | 2 | 0 | 3 |
| CrMo pressure vessel plate | 1 | 1 | 1 | 1 |
| Ni pressure vessel plate | 1 | 1 | 0 | 1 |
| Other pressure vessel plate | 2 | 1 | 1 | 2 |
| Tool steel plate | 1 | 1 | 0 | 1 |
| Mold steel plate | 1 | 1 | 1 | 1 |
| AR400-AR600 wear resistant/abrasion resistant plate | 2 | 2 | 0 | 2 |
| Other wear resistant/abrasion resistant plate | 1 | 0 | 0 | 1 |
| Oil-drilling platform plate | 0 | 0 | 0 | 0 |
| Offshore wind energy plate | 0 | 0 | 0 | 0 |
| Shipbuilding plate | 1 | 1 | 0 | 1 |
| X-70 (or higher) plate width < 120 inches | 0 | 0 | 0 | 0 |
| X-70 (or higher) plate width ≥ 120 inches | 0 | 0 | 0 | 0 |
| Other plate for line pipe | 1 | 1 | 0 | 1 |
| Sour service plate | 1 | 1 | 0 | 1 |
| High-speed steel plate | 0 | 0 | 0 | 0 |
| Heat-resisting steel plate | 0 | 0 | 0 | 0 |
| UHSS or AHSS plate | 1 | 1 | 0 | 1 |
| HSLA plate | 2 | 1 | 0 | 2 |
| Forged alloy steel plate | 0 | 0 | 0 | 0 |
| A553, Type 1, 9% nickel | 1 | 1 | 0 | 1 |
| API2W grade 50 or 60 | 0 | 0 | 0 | 0 |
| SA387 grade 11 or 22 | 1 | 1 | 1 | 1 |
| SA516 grade 70/65, HIC tested | 1 | 1 | 1 | 1 |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | 0 | 0 | 0 | 0 |
| Any product type | 3 | 2 | 1 | 3 |

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

Table IV-24 presents quantity data on responding producers' total shipments of CTL plate in Belgium by plate thickness and steel type in 2021. Alloy plate heat treated accounted for the majority of total CTL plate shipments by the responding producers in Belgium in 2021 (*** percent). Over *** (*** percent) of total shipments made by responding producers in Belgium were of the smaller category of plate thickness (<1").

**Table IV-24**
**CTL plate: Total shipments of producers in Belgium, by plate thickness and steel type, 2021**

Quantity in short tons; shares in percent

| Product type | Measure | <1" | ≥1" but <4" | ≥4" | Total plate thicknesses |
|---|---|---|---|---|---|
| Carbon plate: As rolled | Quantity | *** | *** | *** | *** |
| Carbon plate: Heat treated | Quantity | *** | *** | *** | *** |
| Carbon plate | Quantity | *** | *** | *** | *** |
| Alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Alloy plate | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate | Quantity | *** | *** | *** | *** |
| Carbon plate: As rolled | Share down | *** | *** | *** | *** |
| Carbon plate: Heat treated | Share down | *** | *** | *** | *** |
| Carbon plate | Share down | *** | *** | *** | *** |
| Alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Alloy plate | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate | Share down | 100.0 | 100.0 | 100.0 | 100.0 |
| Carbon plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Carbon plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Carbon plate | Share across | *** | *** | *** | 100.0 |
| Alloy plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Alloy plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Alloy plate | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate | Share across | *** | *** | *** | 100.0 |

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

## Alternative products

Two responding firms produced other products on the same equipment and machinery used to produce CTL plate. As shown in table IV-25, CTL plate accounted for over *** percent of total production on shared equipment during 2016-21, January to June 2021, and January to June 2022. ***.

**Table IV-25**
**CTL plate: Overall capacity and production on the same equipment as in-scope production in Belgium, by period**

Quantity in short tons; share and ratio in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Overall capacity | Quantity | *** | *** | *** |
| CTL plate production | Quantity | *** | *** | *** |
| Other production | Quantity | *** | *** | *** |
| Total production | Quantity | *** | *** | *** |
| Overall capacity utilization | Ratio | *** | *** | *** |
| CTL plate production | Share | *** | *** | *** |
| Other production | Share | *** | *** | *** |
| Total production | Share | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-25 Continued**
**CTL plate: Overall capacity and production on the same equipment as in-scope production in Belgium, by period**

Quantity in short tons; share and ratio in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Overall capacity | Quantity | *** | *** | *** | *** | *** |
| CTL plate production | Quantity | *** | *** | *** | *** | *** |
| Other production | Quantity | *** | *** | *** | *** | *** |
| Total production | Quantity | *** | *** | *** | *** | *** |
| Overall capacity utilization | Ratio | *** | *** | *** | *** | *** |
| CTL plate production | Share | *** | *** | *** | *** | *** |
| Other production | Share | *** | *** | *** | *** | *** |
| Total production | Share | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Source: Compiled from data in response to Commission questionnaires.

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

## Exports

Table IV-26 presents data for exports of CTL plate from Belgium, by destination market in descending order of quantity for 2021. The leading export markets for CTL plate from Belgium in 2021, by quantity, were Germany and the Netherlands, accounting for 33.3 percent and 18.5 percent, respectively. The United States accounted for 0.7 percent of exports of CTL plate from Belgium, by quantity, in 2021.

**Table IV-26**
**CTL plate: Exports from Belgium, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Quantity | 31,167 | 28,640 | 27,138 |
| Germany | Quantity | 610,839 | 554,781 | 566,476 |
| Netherlands | Quantity | 287,214 | 292,900 | 289,670 |
| France | Quantity | 277,773 | 300,417 | 279,041 |
| Poland | Quantity | 30,799 | 29,365 | 43,933 |
| Sweden | Quantity | 7,156 | 8,475 | 8,559 |
| Egypt | Quantity | 14,023 | 23,799 | 17,450 |
| Denmark | Quantity | 32,481 | 11,320 | 6,214 |
| South Africa | Quantity | 17,949 | 15,819 | 20,481 |
| All other destination markets | Quantity | 363,255 | 353,511 | 449,747 |
| All non-U.S. destination markets | Quantity | 1,641,490 | 1,590,385 | 1,681,571 |
| All destination markets | Quantity | 1,672,657 | 1,619,026 | 1,708,709 |
| United States | Value | 28,008 | 25,345 | 32,979 |
| Germany | Value | 313,762 | 353,605 | 418,015 |
| Netherlands | Value | 149,277 | 189,315 | 210,247 |
| France | Value | 154,859 | 204,934 | 222,926 |
| Poland | Value | 15,845 | 18,891 | 33,634 |
| Sweden | Value | 5,518 | 8,500 | 8,877 |
| Egypt | Value | 6,800 | 11,298 | 11,566 |
| Denmark | Value | 12,542 | 8,434 | 5,710 |
| South Africa | Value | 18,931 | 14,530 | 17,688 |
| All other destination markets | Value | 297,024 | 315,427 | 440,147 |
| All non-U.S. destination markets | Value | 974,556 | 1,124,935 | 1,368,810 |
| All destination markets | Value | 1,002,564 | 1,150,279 | 1,401,789 |

Table continued.

**Table IV-26 Continued**
**CTL plate: Exports from Belgium, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Quantity | 21,227 | 13,267 | 10,118 |
| Germany | Quantity | 419,398 | 431,296 | 451,534 |
| Netherlands | Quantity | 321,283 | 309,154 | 250,791 |
| France | Quantity | 228,915 | 209,318 | 169,152 |
| Poland | Quantity | 38,840 | 44,823 | 89,203 |
| Sweden | Quantity | 16,068 | 19,185 | 33,234 |
| Egypt | Quantity | 13,693 | 16,435 | 31,288 |
| Denmark | Quantity | 12,548 | 15,077 | 30,449 |
| South Africa | Quantity | 19,114 | 14,803 | 28,762 |
| All other destination markets | Quantity | 328,826 | 268,332 | 261,712 |
| All non-U.S. destination markets | Quantity | 1,398,686 | 1,328,423 | 1,346,125 |
| All destination markets | Quantity | 1,419,913 | 1,341,690 | 1,356,243 |
| United States | Value | 24,133 | 15,182 | 14,418 |
| Germany | Value | 282,657 | 261,717 | 410,181 |
| Netherlands | Value | 217,923 | 194,877 | 231,966 |
| France | Value | 170,433 | 152,619 | 176,880 |
| Poland | Value | 26,808 | 30,801 | 91,806 |
| Sweden | Value | 11,853 | 13,548 | 38,900 |
| Egypt | Value | 5,263 | 7,513 | 21,749 |
| Denmark | Value | 10,188 | 9,203 | 24,507 |
| South Africa | Value | 16,324 | 12,730 | 29,205 |
| All other destination markets | Value | 339,383 | 254,903 | 310,239 |
| All non-U.S. destination markets | Value | 1,080,832 | 937,911 | 1,335,433 |
| All destination markets | Value | 1,104,965 | 953,093 | 1,349,851 |

Table continued.

**Table IV-26 Continued**
**CTL plate: Exports from Belgium, by destination market and period**

Unit values in dollars per short ton; shares in percent

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Unit value | 899 | 885 | 1,215 |
| Germany | Unit value | 514 | 637 | 738 |
| Netherlands | Unit value | 520 | 646 | 726 |
| France | Unit value | 558 | 682 | 799 |
| Poland | Unit value | 514 | 643 | 766 |
| Sweden | Unit value | 771 | 1,003 | 1,037 |
| Egypt | Unit value | 485 | 475 | 663 |
| Denmark | Unit value | 386 | 745 | 919 |
| South Africa | Unit value | 1,055 | 919 | 864 |
| All other destination markets | Unit value | 818 | 892 | 979 |
| All non-U.S. destination markets | Unit value | 594 | 707 | 814 |
| All destination markets | Unit value | 599 | 710 | 820 |
| United States | Share of quantity | 1.9 | 1.8 | 1.6 |
| Germany | Share of quantity | 36.5 | 34.3 | 33.2 |
| Netherlands | Share of quantity | 17.2 | 18.1 | 17.0 |
| France | Share of quantity | 16.6 | 18.6 | 16.3 |
| Poland | Share of quantity | 1.8 | 1.8 | 2.6 |
| Sweden | Share of quantity | 0.4 | 0.5 | 0.5 |
| Egypt | Share of quantity | 0.8 | 1.5 | 1.0 |
| Denmark | Share of quantity | 1.9 | 0.7 | 0.4 |
| South Africa | Share of quantity | 1.1 | 1.0 | 1.2 |
| All other destination markets | Share of quantity | 21.7 | 21.8 | 26.3 |
| All non-U.S. destination markets | Share of quantity | 98.1 | 98.2 | 98.4 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-26 Continued**
**CTL plate: Exports from Belgium, by destination market and period**

Unit values in dollars per short ton; shares in percent

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Unit value | 1,137 | 1,144 | 1,425 |
| Germany | Unit value | 674 | 607 | 908 |
| Netherlands | Unit value | 678 | 630 | 925 |
| France | Unit value | 745 | 729 | 1,046 |
| Poland | Unit value | 690 | 687 | 1,029 |
| Sweden | Unit value | 738 | 706 | 1,170 |
| Egypt | Unit value | 384 | 457 | 695 |
| Denmark | Unit value | 812 | 610 | 805 |
| South Africa | Unit value | 854 | 860 | 1,015 |
| All other destination markets | Unit value | 1,032 | 950 | 1,185 |
| All non-U.S. destination markets | Unit value | 773 | 706 | 992 |
| All destination markets | Unit value | 778 | 710 | 995 |
| United States | Share of quantity | 1.5 | 1.0 | 0.7 |
| Germany | Share of quantity | 29.5 | 32.1 | 33.3 |
| Netherlands | Share of quantity | 22.6 | 23.0 | 18.5 |
| France | Share of quantity | 16.1 | 15.6 | 12.5 |
| Poland | Share of quantity | 2.7 | 3.3 | 6.6 |
| Sweden | Share of quantity | 1.1 | 1.4 | 2.5 |
| Egypt | Share of quantity | 1.0 | 1.2 | 2.3 |
| Denmark | Share of quantity | 0.9 | 1.1 | 2.2 |
| South Africa | Share of quantity | 1.3 | 1.1 | 2.1 |
| All other destination markets | Share of quantity | 23.2 | 20.0 | 19.3 |
| All non-U.S. destination markets | Share of quantity | 98.5 | 99.0 | 99.3 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official export statistics under HS subheading, 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91, as reported by Eurostat in the Global Trade Atlas database, accessed September 29, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

# The industry in Brazil

## Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from three firms, Gerdau Açominas, USIMINAS, and Villares, which accounted for *** production of CTL plate in Brazil during 2015, and approximately *** percent of U.S. CTL plate imports from Brazil during 2015.[15]

In these full first five-year reviews, the Commission issued a foreign producers' questionnaire to four firms believed to produce CTL plate in Brazil and received a response from one firm: Usinas Siderúrgicas de Minas Gerais S.A. - USIMINAS ("USIMINAS"). According to the responding firms, collectively they accounted for *** percent of CTL plate production in Brazil in 2021.[16]

Table IV-27 presents data on gross production and apparent gross consumption of reversing mill plate in Brazil.[17]

**Table IV-27**
**Reversing mill plate: Gross production and apparent gross consumption in Brazil, by period**

Quantity in short tons

| Item | 2016 | 2017 | 2018 |
|---|---|---|---|
| Gross production | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** |

Table continued.

**Table IV-27 Continued**
**Reversing mill plate: Gross production and apparent gross consumption in Brazil, by period**

Quantity in short tons

| Item | 2019 | 2020 | 2021 | Projected 2022 |
|---|---|---|---|---|
| Gross production | *** | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** | *** |

Source: ***

Table IV-28 presents summary information on the CTL plate operations of the responding producer in Brazil.

[15] Original confidential report, p. VII-18.

[16] According to USIMINAS, Gerdau SA (Brazil) ***. USIMINAS prehearing brief, p. 12. Hearing transcript, p. 207. Gerdau, which did not provide a questionnaire response, reported ***. ***. As indicated in Part I, ***.

[17] ***. Email from ***. For more information on mill differences see Part I, Manufacturing processes.

**Table IV-28**
**CTL plate: Summary data for producer in Brazil, 2021**

| Firm | Production (short tons) | Share of reported production (percent) | Exports to the United States (short tons) | Share of reported exports to the United States (percent) | Total shipments (short tons) | Share of firm's total shipments exported to the United States (percent) |
|---|---|---|---|---|---|---|
| USIMINAS | *** | 100.0 | *** | *** | *** | *** |
| All firms | *** | 100.0 | *** | *** | *** | *** |

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

## Recent developments

Table IV-29 presents events in the Brazilian industry that have occurred since the original investigations.

**Table IV-29**
**CTL plate: Recent developments in the Brazilian industry**

| Item | Company | Event |
|---|---|---|
| Plant upgrade | Usiminas | In June 2018, Usiminas restarted a blast furnace at its Ipatinga plant, following an upgrade which allowed for an increase of 600,000 tons of annual capacity. |
| Plant upgrade | Usiminas | In May 2019, Usiminas announced a $306 million investment to upgrade a blast furnace at its Ipatinga plant. The furnace will continue to operate normally until upgrades begin in mid-2021. |
| Plant reopening | Usiminas | In April 2021, Usiminas announced that it was reactivating its plate rolling mill in Cubatão. The plant’s operations had previously been idled since 2016. |

Sources: Cleveland-Cliffs' response to the notice of institution, January 3, 2022, exh. 12; USIMINAS' response to the notice of institution, January 3, 2022, p.18.

## Changes in operations

Producers in Brazil were asked to report any change in the character of their operations or organization relating to the production of CTL plate since 2016. One producer indicated in their questionnaires that they had experienced such changes. Table IV-30 presents the changes identified by this producer.

**Table IV-30**
**CTL plate: Reported changes in operations in Brazil, since January 1, 2016, by firm**

| Item | Firm name and narrative on changes in operations |
|---|---|
| Prolonged shutdowns or curtailments | *** |

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

## Operations on CTL plate

Table IV-31 presents information on the CTL plate operations of the responding producer in Brazil. Overall, during 2016-21, the Brazilian producer's capacity and production of CTL plate decreased by *** percent and by *** percent, respectively. Capacity and production were both lower in interim 2022 compared to interim 2021 (by *** percent and by *** percent, respectively). During the period for which data were collected, home market shipments accounted for the vast majority (over *** percent) of total shipments, by quantity. Exports to the United States accounted for *** percent of total shipments in 2016, after which there were no reported exports to the United States by the Brazilian firm. End-of-period inventories held by the producer in Brazil fluctuated since 2016, decreasing overall by *** percent from 2016 to 2021 but were *** percent higher in interim 2022 compared to interim 2021.

**Table IV-31**
**CTL plate: Data on industry in Brazil, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** |
| Production | Quantity | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** |
| United States | Quantity | *** | *** | *** |
| European Union markets | Quantity | *** | *** | *** |
| Asian markets | Quantity | *** | *** | *** |
| American markets excluding U.S. | Quantity | *** | *** | *** |
| All other markets | Quantity | *** | *** | *** |
| Non-U.S. destination markets | Quantity | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** |
| United States | Value | *** | *** | *** |
| European Union markets | Value | *** | *** | *** |
| Asian markets | Value | *** | *** | *** |
| American markets excluding U.S. | Value | *** | *** | *** |
| All other markets | Value | *** | *** | *** |
| Non-U.S. destination markets | Value | *** | *** | *** |
| Export shipments | Value | *** | *** | *** |
| Total shipments | Value | *** | *** | *** |

Table continued.

**Table IV-31 Continued**
**CTL plate: Data on industry in Brazil, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** | *** | *** |
| Production | Quantity | *** | *** | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** | *** | *** |
| United States | Quantity | *** | *** | *** | *** | *** |
| European Union markets | Quantity | *** | *** | *** | *** | *** |
| Asian markets | Quantity | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Quantity | *** | *** | *** | *** | *** |
| All other markets | Quantity | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Quantity | *** | *** | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** | *** | *** |
| United States | Value | *** | *** | *** | *** | *** |
| European Union markets | Value | *** | *** | *** | *** | *** |
| Asian markets | Value | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Value | *** | *** | *** | *** | *** |
| All other markets | Value | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Value | *** | *** | *** | *** | *** |
| Export shipments | Value | *** | *** | *** | *** | *** |
| Total shipments | Value | *** | *** | *** | *** | *** |

Table continued.

**Table IV-31 Continued**
**CTL plate: Data on industry in Brazil, by period**

Unit values in dollars per short ton; ratios and shares in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** |
| United States | Unit value | *** | *** | *** |
| European Union markets | Unit value | *** | *** | *** |
| Asian markets | Unit value | *** | *** | *** |
| American markets excluding U.S. | Unit value | *** | *** | *** |
| All other markets | Unit value | *** | *** | *** |
| Non-U.S. destination markets | Unit value | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** |
| United States | Share | *** | *** | *** |
| European Union markets | Share | *** | *** | *** |
| Asian markets | Share | *** | *** | *** |
| American markets excluding U.S. | Share | *** | *** | *** |
| All other markets | Share | *** | *** | *** |
| Non-U.S. destination markets | Share | *** | *** | *** |
| Export shipments | Share | *** | *** | *** |
| Total shipments | Share | *** | *** | *** |

Table continued.

**Table IV-31 Continued**
**CTL plate: Data on industry in Brazil, by period**

Unit values in dollars per short ton; ratios and shares in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** | *** | *** |
| United States | Unit value | *** | *** | *** | *** | *** |
| European Union markets | Unit value | *** | *** | *** | *** | *** |
| Asian markets | Unit value | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Unit value | *** | *** | *** | *** | *** |
| All other markets | Unit value | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Unit value | *** | *** | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** | *** | *** |
| United States | Share | *** | *** | *** | *** | *** |
| European Union markets | Share | *** | *** | *** | *** | *** |
| Asian markets | Share | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Share | *** | *** | *** | *** | *** |
| All other markets | Share | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Share | *** | *** | *** | *** | *** |
| Export shipments | Share | *** | *** | *** | *** | *** |
| Total shipments | Share | *** | *** | *** | *** | *** |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## CTL plate thickness and steel type

Producers were asked to indicate whether their firm had the ability or capacity to produce various CTL plate product types and thicknesses in 2021 and whether their firm actually produced the various CTL plate product types and thicknesses in 2021. Table IV-32 presents the count of producers that reported the ability or capacity to produce these items and table IV-33 presents the count of producers that reported actual production.

**Table IV-32**
**CTL plate: Count of producers in Brazil with ability or capacity by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | *** | *** | *** | *** |
| CrMo pressure vessel plate | *** | *** | *** | *** |
| Ni pressure vessel plate | *** | *** | *** | *** |
| Other pressure vessel plate | *** | *** | *** | *** |
| Tool steel plate | *** | *** | *** | *** |
| Mold steel plate | *** | *** | *** | *** |
| AR400-AR600 wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Other wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Oil-drilling platform plate | *** | *** | *** | *** |
| Offshore wind energy plate | *** | *** | *** | *** |
| Shipbuilding plate | *** | *** | *** | *** |
| X-70 (or higher) plate width < 120 inches | *** | *** | *** | *** |
| X-70 (or higher) plate width ≥ 120 inches | *** | *** | *** | *** |
| Other plate for line pipe | *** | *** | *** | *** |
| Sour service plate | *** | *** | *** | *** |
| High-speed steel plate | *** | *** | *** | *** |
| Heat-resisting steel plate | *** | *** | *** | *** |
| UHSS or AHSS plate | *** | *** | *** | *** |
| HSLA plate | *** | *** | *** | *** |
| Forged alloy steel plate | *** | *** | *** | *** |
| A553, Type 1, 9% nickel | *** | *** | *** | *** |
| API2W grade 50 or 60 | *** | *** | *** | *** |
| SA387 grade 11 or 22 | *** | *** | *** | *** |
| SA516 grade 70/65, HIC tested | *** | *** | *** | *** |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | *** | *** | *** | *** |
| Any product type | *** | *** | *** | *** |

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

**Table IV-33**
**CTL plate: Count of producers in Brazil with actual production by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | *** | *** | *** | *** |
| CrMo pressure vessel plate | *** | *** | *** | *** |
| Ni pressure vessel plate | *** | *** | *** | *** |
| Other pressure vessel plate | *** | *** | *** | *** |
| Tool steel plate | *** | *** | *** | *** |
| Mold steel plate | *** | *** | *** | *** |
| AR400-AR600 wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Other wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Oil-drilling platform plate | *** | *** | *** | *** |
| Offshore wind energy plate | *** | *** | *** | *** |
| Shipbuilding plate | *** | *** | *** | *** |
| X-70 (or higher) plate width < 120 inches | *** | *** | *** | *** |
| X-70 (or higher) plate width ≥ 120 inches | *** | *** | *** | *** |
| Other plate for line pipe | *** | *** | *** | *** |
| Sour service plate | *** | *** | *** | *** |
| High-speed steel plate | *** | *** | *** | *** |
| Heat-resisting steel plate | *** | *** | *** | *** |
| UHSS or AHSS plate | *** | *** | *** | *** |
| HSLA plate | *** | *** | *** | *** |
| Forged alloy steel plate | *** | *** | *** | *** |
| A553, Type 1, 9% nickel | *** | *** | *** | *** |
| API2W grade 50 or 60 | *** | *** | *** | *** |
| SA387 grade 11 or 22 | *** | *** | *** | *** |
| SA516 grade 70/65, HIC tested | *** | *** | *** | *** |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | *** | *** | *** | *** |
| Any product type | *** | *** | *** | *** |

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

Table IV-34 presents quantity data on responding producers' total shipments of CTL plate in Brazil by plate thickness and steel type in 2021. Carbon plate as rolled accounted for the majority of total CTL plate shipments by the responding producers in Belgium in 2021 (*** percent). Nearly *** (*** percent) of total shipments made by responding producers in Belgium were of the smaller category of plate thickness (<1").

**Table IV-34**
**CTL plate: Total shipments of producer in Brazil, by plate thickness and steel type, 2021**

Quantity in short tons; shares in percent

| Product type | Measure | <1" | ≥1" but <4" | ≥4" | Total plate thicknesses |
|---|---|---|---|---|---|
| Carbon plate: As rolled | Quantity | *** | *** | *** | *** |
| Carbon plate: Heat treated | Quantity | *** | *** | *** | *** |
| Carbon plate | Quantity | *** | *** | *** | *** |
| Alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Alloy plate | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate | Quantity | *** | *** | *** | *** |
| Carbon plate: As rolled | Share down | *** | *** | *** | *** |
| Carbon plate: Heat treated | Share down | *** | *** | *** | *** |
| Carbon plate | Share down | *** | *** | *** | *** |
| Alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Alloy plate | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate | Share down | 100.0 | 100.0 | 100.0 | 100.0 |
| Carbon plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Carbon plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Carbon plate | Share across | *** | *** | *** | 100.0 |
| Alloy plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Alloy plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Alloy plate | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate | Share across | *** | *** | *** | 100.0 |

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

## Alternative products

USIMINAS ***. As shown in table IV-35, CTL plate accounted for *** percent of total production on shared equipment during 2016-21, January to June 2021, and January to June 2022.

**Table IV-35**
**CTL plate: Overall capacity and production on the same equipment as in-scope production in Brazil, by period**

Quantity in short tons; share and ratio in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Overall capacity | Quantity | *** | *** | *** |
| CTL plate production | Quantity | *** | *** | *** |
| Other production | Quantity | *** | *** | *** |
| Total production | Quantity | *** | *** | *** |
| Overall capacity utilization | Ratio | *** | *** | *** |
| CTL plate production | Share | 100.0 | 100.0 | 100.0 |
| Other production | Share | *** | *** | *** |
| Total production | Share | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-35 Continued**
**CTL plate: Overall capacity and production on the same equipment as in-scope production in Brazil, by period**

Quantity in short tons; share and ratio in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Overall capacity | Quantity | *** | *** | *** | *** | *** |
| CTL plate production | Quantity | *** | *** | *** | *** | *** |
| Other production | Quantity | *** | *** | *** | *** | *** |
| Total production | Quantity | *** | *** | *** | *** | *** |
| Overall capacity utilization | Ratio | *** | *** | *** | *** | *** |
| CTL plate production | Share | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |
| Other production | Share | *** | *** | *** | *** | *** |
| Total production | Share | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Source: Compiled from data in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## Exports

Table IV-36 presents data for exports of CTL plate from Brazil, by destination market in descending order of quantity for 2021. The leading export markets for CTL plate from Brazil in 2021, by quantity, were Argentina and Mexico, accounting for 52.2 percent and 14.5 percent, respectively. The United States accounted for less than 0.05 percent of exports of CTL plate from Brazil, by quantity, in 2021.

**Table IV-36**
**CTL plate: Exports from Brazil, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Quantity | 7,994 | 2 | 4 |
| Argentina | Quantity | 33,556 | 48,138 | 61,606 |
| Mexico | Quantity | 40 | 11 | 119 |
| Chile | Quantity | 7,897 | 13,399 | 13,463 |
| South Africa | Quantity | 3 | 3 | 1 |
| Colombia | Quantity | 2,628 | 6,942 | 9,279 |
| Belgium | Quantity | 283 | 20,748 | 26,494 |
| Bolivia | Quantity | 896 | 4,849 | 5,011 |
| Uruguay | Quantity | 1,540 | 2,398 | 1,831 |
| All other destination markets | Quantity | 27,042 | 123,714 | 86,224 |
| Non-U.S. destination markets | Quantity | 73,885 | 220,202 | 204,029 |
| All destination markets | Quantity | 81,879 | 220,205 | 204,033 |
| United States | Value | 3,047 | 12 | 21 |
| Argentina | Value | 40,762 | 33,079 | 46,552 |
| Mexico | Value | 298 | 19 | 316 |
| Chile | Value | 2,902 | 6,058 | 7,552 |
| South Africa | Value | 3 | 6 | 2 |
| Colombia | Value | 1,008 | 3,026 | 4,999 |
| Belgium | Value | 99 | 9,299 | 16,013 |
| Bolivia | Value | 584 | 2,642 | 3,192 |
| Uruguay | Value | 924 | 1,846 | 1,425 |
| All other destination markets | Value | 8,990 | 55,847 | 47,616 |
| Non-U.S. destination markets | Value | 55,571 | 111,823 | 127,666 |
| All destination markets | Value | 58,618 | 111,834 | 127,687 |

Table continued.

**Table IV-36 Continued**
**CTL plate: Exports from Brazil, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Quantity | 14 | 1 | 5 |
| Argentina | Quantity | 47,961 | 20,856 | 63,150 |
| Mexico | Quantity | 27 | 2 | 17,520 |
| Chile | Quantity | 9,653 | 35,433 | 15,916 |
| South Africa | Quantity | 0 | 0 | 4,098 |
| Colombia | Quantity | 8,281 | 5,811 | 3,678 |
| Belgium | Quantity | 6,675 | 3,596 | 3,315 |
| Bolivia | Quantity | 4,441 | 3,048 | 3,181 |
| Uruguay | Quantity | 1,999 | 2,242 | 2,669 |
| All other destination markets | Quantity | 58,691 | 27,215 | 7,351 |
| Non-U.S. destination markets | Quantity | 137,727 | 98,203 | 120,879 |
| All destination markets | Quantity | 137,741 | 98,204 | 120,885 |
| United States | Value | 72 | 16 | 21 |
| Argentina | Value | 35,782 | 13,800 | 44,213 |
| Mexico | Value | 19 | 16 | 12,440 |
| Chile | Value | 5,219 | 15,621 | 12,570 |
| South Africa | Value | 0 | 0 | 1,667 |
| Colombia | Value | 4,674 | 2,835 | 2,324 |
| Belgium | Value | 3,595 | 1,561 | 1,829 |
| Bolivia | Value | 2,787 | 1,852 | 2,561 |
| Uruguay | Value | 1,438 | 1,360 | 2,958 |
| All other destination markets | Value | 31,026 | 12,264 | 6,482 |
| Non-U.S. destination markets | Value | 84,540 | 49,308 | 87,044 |
| All destination markets | Value | 84,613 | 49,323 | 87,065 |

Table continued.

**Table IV-36 Continued**
**CTL plate: Exports from Brazil, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Unit value | 381 | 4,755 | 4,898 |
| Argentina | Unit value | 1,215 | 687 | 756 |
| Mexico | Unit value | 7,460 | 1,775 | 2,664 |
| Chile | Unit value | 367 | 452 | 561 |
| South Africa | Unit value | 1,141 | 1,889 | 1,801 |
| Colombia | Unit value | 384 | 436 | 539 |
| Belgium | Unit value | 352 | 448 | 604 |
| Bolivia | Unit value | 651 | 545 | 637 |
| Uruguay | Unit value | 600 | 770 | 778 |
| All other destination markets | Unit value | 332 | 451 | 552 |
| Non-U.S. destination markets | Unit value | 752 | 508 | 626 |
| All destination markets | Unit value | 716 | 508 | 626 |
| United States | Share of quantity | 9.8 | 0.0 | 0.0 |
| Argentina | Share of quantity | 41.0 | 21.9 | 30.2 |
| Mexico | Share of quantity | 0.0 | 0.0 | 0.1 |
| Chile | Share of quantity | 9.6 | 6.1 | 6.6 |
| South Africa | Share of quantity | 0.0 | 0.0 | 0.0 |
| Colombia | Share of quantity | 3.2 | 3.2 | 4.5 |
| Belgium | Share of quantity | 0.3 | 9.4 | 13.0 |
| Bolivia | Share of quantity | 1.1 | 2.2 | 2.5 |
| Uruguay | Share of quantity | 1.9 | 1.1 | 0.9 |
| All other destination markets | Share of quantity | 33.0 | 56.2 | 42.3 |
| Non-U.S. destination markets | Share of quantity | 90.2 | 100.0 | 100.0 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Table continued

**Table IV-36 Continued**
**CTL plate: Exports from Brazil, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Unit value | 5,121 | 12,145 | 4,087 |
| Argentina | Unit value | 746 | 662 | 700 |
| Mexico | Unit value | 698 | 8,238 | 710 |
| Chile | Unit value | 541 | 441 | 790 |
| South Africa | Unit value | 1,543 | 1,618 | 407 |
| Colombia | Unit value | 564 | 488 | 632 |
| Belgium | Unit value | 539 | 434 | 552 |
| Bolivia | Unit value | 628 | 608 | 805 |
| Uruguay | Unit value | 719 | 607 | 1,108 |
| All other destination markets | Unit value | 529 | 451 | 882 |
| Non-U.S. destination markets | Unit value | 614 | 502 | 720 |
| All destination markets | Unit value | 614 | 502 | 720 |
| United States | Share of quantity | 0.0 | 0.0 | 0.0 |
| Argentina | Share of quantity | 34.8 | 21.2 | 52.2 |
| Mexico | Share of quantity | 0.0 | 0.0 | 14.5 |
| Chile | Share of quantity | 7.0 | 36.1 | 13.2 |
| South Africa | Share of quantity | 0.0 | 0.0 | 3.4 |
| Colombia | Share of quantity | 6.0 | 5.9 | 3.0 |
| Belgium | Share of quantity | 4.8 | 3.7 | 2.7 |
| Bolivia | Share of quantity | 3.2 | 3.1 | 2.6 |
| Uruguay | Share of quantity | 1.5 | 2.3 | 2.2 |
| All other destination markets | Share of quantity | 42.6 | 27.7 | 6.1 |
| Non-U.S. destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official export statistics under HS subheading, 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91, as reported by SECEX – Foreign Trade Secretariat in the Global Trade Atlas database, accessed September 29, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

# The industry in China

## Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from one firm, Jiangyin Xingcheng, which accounted for approximately *** percent of production of CTL plate in China during 2015, and approximately *** percent of U.S. imports of CTL plate from China in 2015.[18]

In these full first five-year reviews, the Commission issued a foreign producers' questionnaire to 35 firms believed to produce CTL plate in China and received a response from one firm: Jiangsu Tiangong Tools New Materials CO., LTD ("Jiangsu Tiangong Tools"). The responding Chinese firm did not provide an estimate in its response to the Commission's questionnaire as to its share of total CTL plate production in China and ***. In 2016, the firm's exports to the United States accounted for *** percent of U.S. imports of CTL plate from China. Based on information provided by the domestic interested parties in their responses to the Commission's notice of institution, Jiangsu Tiangong Tools is believed to account for a minor amount of total CTL plate production in China.[19]

Table IV-37 presents data on gross production and apparent gross consumption of reversing mill plate in China.[20]

**Table IV-37**
**Reversing mill plate: Gross production and apparent gross consumption in China, by period**

Quantity in short tons

| Item | 2016 | 2017 | 2018 |
|---|---|---|---|
| Gross production | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** |

Table continued.

[18] Original confidential report, p. VII-26.

[19] Cleveland-Cliffs' response to the notice of institution, January 3, 2022, pp. 25-26; Nucor/SSAB's response to the notice of institution, January 3, 2022, pp. 22-24.

[20] ***. Email from ***. For more information on mill differences see Part I, Manufacturing processes.

**Table IV-37 Continued**
**Reversing mill plate: Gross production and apparent gross consumption in China, by period**

Quantity in short tons

| Item | 2019 | 2020 | 2021 | Projected 2022 |
|---|---|---|---|---|
| Gross production | *** | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** | *** |

Source: ***

Table IV-38 presents summary information on the CTL plate operations of the responding producer in China.

**Table IV-38**
**CTL plate: Summary data for producer in China, 2021**

| Firm | Production (short tons) | Share of reported production (percent) | Exports to the United States (short tons) | Share of reported exports to the United States (percent) | Total shipments (short tons) | Share of firm's total shipments exported to the United States (percent) |
|---|---|---|---|---|---|---|
| Jiangsu Tiangong Tools | *** | 100.0 | *** | *** | *** | *** |
| All firms | *** | 100.0 | *** | *** | *** | *** |

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

## Recent developments

Table IV-39 presents events in the Chinese CTL plate industry that have occurred since the original investigations. In addition to the company specific events detailed in the table, as of August 1, 2021, China has cancelled export rebates for steel exports under in-scope HTS headings 7209, 7210, 7225, and 7226.[21]

**Table IV-39**
**CTL plate: Recent developments in the Chinese industry**

| Item | Firm | Event |
|---|---|---|
| Acquisition | Baowu Group | In June 2019, Baowu Group acquired 51 percent of Manshaan Iron & Steel Co. (also known as Magang). |
| Acquisition | Baowu Group | In August 2020, Baowu Group acquired 51 percent of Taiyuan Iron & Steel. |
| Acquisition | Baowu Group | In September 2020 Baowu Group acquired Chonqing Iron & Steel Co. |
| Plant construction | Jingsui Meiyu Board Co. | In December 2020, Jiangdu District approved Jingsu Meiyu Board Co.'s plans to complete a painted steel plate production line with an annual production capacity of 210,000 metric tons. |
| Plant upgrade | Jiaxing Yihui New Material Technology Co. | In May 2021, Zhejiang Province announced that it had approved Jiaxing Yihui New Material Technology Co's request to upgrade its painted steel plate annual production capacity from 210,000 to 300,000 metric tons. |
| Acquisition | Baowu Group | In July 2021, Baowu Group announced the acquisition of Shandong Iron & Steel. |
| Merger | Ansteel and Ben Gang Group Corporation | In August 2021, Ansteel and Ben Gang Group Corporation announced their merger, creating the world's third-largest steelmaker. |
| Plant construction | Gaozhou Zhongliheng | In August 2021, the Maoming City Bureau of Ecology and Environment approved Gaozhou Zhongliheng Metal Industry Co.'s proposal to build a steel plate production line. The line is expected to have an annual production capacity of 100,000 metric tons. |
| Plant construction | Luoyang Steelite Steel Cabinet Co. | In September 2021, Luoyang Steelite Steel Cabinet Co. began construction of a steel plate production line with an annual capacity of 500,000 metric tons. |

Source: Ying, Wang, "Baowu Steel Group to Acquire Controlling Stake in Magang," June 4, 2019, https://www.chinadaily.com.cn/a/201906/04/WS5cf5cbe8a310519142700e70.html; Hu, Tracy, "China's Baowu Steel Acquiring Taiquan Iron & Steel," August 21, 2020, https://www.spglobal.com/marketintelligence/en/news-insights/latest-news-headlines/china-s-baowu-steel-acquiring-taiyuan-iron-steel-60029239; Zhang, Min and Emily Chow, "China Baowu Group Expands to Take Over Chongqing Iron & Steel," September 16, 2020, https://www.nasdaq.com/articles/china-baowu-group-expands-to-take-over-chongqing-iron-steel-2020-09-16; Cleveland-Cliffs, response to the notice of institution, January 3,2022, exh. 13; Argus Media, "Chinese Steel Producer Baowu to Acquire Shandong Steel," July 16, 2021, https://www.argusmedia.com/en/news/2234903-chinese-steel-producer-baowu-to-acquire-shandong-steel; Ansteel, "Two Chinese Steelmakers Announce Merger Become World's 3rd Largest," August 18, 2021, http://en.ansteel.cn/news/xinwenzixun/2021-10-09/2654.html.

[21] Lim, Paul, "China to Cancel More Steel Export Rebates from August 1," July 29, 2021, https://www.metalbulletin.com/Article/4000714/NEWSBREAK-China-to-cancel-more-steel-export-rebates-from-Aug-1.html.

## Changes in operations

Producers in China were asked to report any change in the character of their operations or organization relating to the production of CTL plate since 2016. Jiangsu Tiangong Tools ***.

## Operations on CTL plate

Table IV-40 presents information on the CTL plate operations of the responding producer in China. Reported annual capacity for the firm remained unchanged since 2016 at *** short tons, whereas production of CTL plate increased overall by *** percent from 2016 to 2021. Production was *** percent lower in interim 2022 compared with interim 2021. During the period for which data were collected, home market shipments accounted for the vast majority (over *** percent) of total shipments, by quantity. Exports to the United States accounted for *** percent of total shipments in 2016, after which there were no reported exports to the United States by the Chinese firm. End-of-period inventories held by the producer in China fluctuated since 2016, and were *** percent higher in 2021 than in 2016, and were *** percent higher in interim 2022 compared to interim 2021.

**Table IV-40**
**CTL plate: Data on industry in China, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** |
| Production | Quantity | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** |
| United States | Quantity | *** | *** | *** |
| European Union markets | Quantity | *** | *** | *** |
| Asian markets | Quantity | *** | *** | *** |
| American markets excluding U.S. | Quantity | *** | *** | *** |
| All other markets | Quantity | *** | *** | *** |
| Non-U.S. destination markets | Quantity | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** |
| United States | Value | *** | *** | *** |
| European Union markets | Value | *** | *** | *** |
| Asian markets | Value | *** | *** | *** |
| American markets excluding U.S. | Value | *** | *** | *** |
| All other markets | Value | *** | *** | *** |
| Non-U.S. destination markets | Value | *** | *** | *** |
| Export shipments | Value | *** | *** | *** |
| Total shipments | Value | *** | *** | *** |

Table continued.

**Table IV-40 Continued**
**CTL plate: Data on industry in China, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** | *** | *** |
| Production | Quantity | *** | *** | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** | *** | *** |
| United States | Quantity | *** | *** | *** | *** | *** |
| European Union markets | Quantity | *** | *** | *** | *** | *** |
| Asian markets | Quantity | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Quantity | *** | *** | *** | *** | *** |
| All other markets | Quantity | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Quantity | *** | *** | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** | *** | *** |
| United States | Value | *** | *** | *** | *** | *** |
| European Union markets | Value | *** | *** | *** | *** | *** |
| Asian markets | Value | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Value | *** | *** | *** | *** | *** |
| All other markets | Value | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Value | *** | *** | *** | *** | *** |
| Export shipments | Value | *** | *** | *** | *** | *** |
| Total shipments | Value | *** | *** | *** | *** | *** |

Table continued.

**Table IV-40 Continued**
**CTL plate: Data on industry in China, by period**

Unit values in dollars per short ton; ratios and shares in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** |
| United States | Unit value | *** | *** | *** |
| European Union markets | Unit value | *** | *** | *** |
| Asian markets | Unit value | *** | *** | *** |
| American markets excluding U.S. | Unit value | *** | *** | *** |
| All other markets | Unit value | *** | *** | *** |
| Non-U.S. destination markets | Unit value | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** |
| United States | Share | *** | *** | *** |
| European Union markets | Share | *** | *** | *** |
| Asian markets | Share | *** | *** | *** |
| American markets excluding U.S. | Share | *** | *** | *** |
| All other markets | Share | *** | *** | *** |
| Non-U.S. destination markets | Share | *** | *** | *** |
| Export shipments | Share | *** | *** | *** |
| Total shipments | Share | *** | *** | *** |

Table continued.

**Table IV-40 Continued**
**CTL plate: Data on industry in China, by period**

Unit values in dollars per short ton; ratios and shares in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** | *** | *** |
| United States | Unit value | *** | *** | *** | *** | *** |
| European Union markets | Unit value | *** | *** | *** | *** | *** |
| Asian markets | Unit value | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Unit value | *** | *** | *** | *** | *** |
| All other markets | Unit value | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Unit value | *** | *** | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** | *** | *** |
| United States | Share | *** | *** | *** | *** | *** |
| European Union markets | Share | *** | *** | *** | *** | *** |
| Asian markets | Share | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Share | *** | *** | *** | *** | *** |
| All other markets | Share | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Share | *** | *** | *** | *** | *** |
| Export shipments | Share | *** | *** | *** | *** | *** |
| Total shipments | Share | *** | *** | *** | *** | *** |

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

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

## CTL plate thickness and steel type

Producers were asked to indicate whether their firm had the ability or capacity to produce various CTL plate product types and thicknesses in 2021 and whether their firm actually produced the various CTL plate product types and thicknesses in 2021. Table IV-41 presents the count of producers that reported the ability or capacity to produce these items and table IV-42 presents the count of producers that reported actual production.

**Table IV-41**
**CTL plate: Count of producers in China with ability or capacity by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | *** | *** | *** | *** |
| CrMo pressure vessel plate | *** | *** | *** | *** |
| Ni pressure vessel plate | *** | *** | *** | *** |
| Other pressure vessel plate | *** | *** | *** | *** |
| Tool steel plate | *** | *** | *** | *** |
| Mold steel plate | *** | *** | *** | *** |
| AR400-AR600 wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Other wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Oil-drilling platform plate | *** | *** | *** | *** |
| Offshore wind energy plate | *** | *** | *** | *** |
| Shipbuilding plate | *** | *** | *** | *** |
| X-70 (or higher) plate width < 120 inches | *** | *** | *** | *** |
| X-70 (or higher) plate width ≥ 120 inches | *** | *** | *** | *** |
| Other plate for line pipe | *** | *** | *** | *** |
| Sour service plate | *** | *** | *** | *** |
| High-speed steel plate | *** | *** | *** | *** |
| Heat-resisting steel plate | *** | *** | *** | *** |
| UHSS or AHSS plate | *** | *** | *** | *** |
| HSLA plate | *** | *** | *** | *** |
| Forged alloy steel plate | *** | *** | *** | *** |
| A553, Type 1, 9% nickel | *** | *** | *** | *** |
| API2W grade 50 or 60 | *** | *** | *** | *** |
| SA387 grade 11 or 22 | *** | *** | *** | *** |
| SA516 grade 70/65, HIC tested | *** | *** | *** | *** |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | *** | *** | *** | *** |
| Any product type | *** | *** | *** | *** |

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

**Table IV-42**
**CTL plate: Count of producers in China with actual production by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | *** | *** | *** | *** |
| CrMo pressure vessel plate | *** | *** | *** | *** |
| Ni pressure vessel plate | *** | *** | *** | *** |
| Other pressure vessel plate | *** | *** | *** | *** |
| Tool steel plate | *** | *** | *** | *** |
| Mold steel plate | *** | *** | *** | *** |
| AR400-AR600 wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Other wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Oil-drilling platform plate | *** | *** | *** | *** |
| Offshore wind energy plate | *** | *** | *** | *** |
| Shipbuilding plate | *** | *** | *** | *** |
| X-70 (or higher) plate width < 120 inches | *** | *** | *** | *** |
| X-70 (or higher) plate width ≥ 120 inches | *** | *** | *** | *** |
| Other plate for line pipe | *** | *** | *** | *** |
| Sour service plate | *** | *** | *** | *** |
| High-speed steel plate | *** | *** | *** | *** |
| Heat-resisting steel plate | *** | *** | *** | *** |
| UHSS or AHSS plate | *** | *** | *** | *** |
| HSLA plate | *** | *** | *** | *** |
| Forged alloy steel plate | *** | *** | *** | *** |
| A553, Type 1, 9% nickel | *** | *** | *** | *** |
| API2W grade 50 or 60 | *** | *** | *** | *** |
| SA387 grade 11 or 22 | *** | *** | *** | *** |
| SA516 grade 70/65, HIC tested | *** | *** | *** | *** |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | *** | *** | *** | *** |
| Any product type | *** | *** | *** | *** |

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

Table IV-43 presents quantity data on responding producer's total shipments of CTL plate in China by plate thickness and steel type in 2021. Alloy plate as rolled accounted for *** of CTL plate shipments by the responding producer in China in 2021. Over *** (*** percent) of total shipments made by responding producers in China were of the medium category of plate thickness (≥1" but <4").

**Table IV-43**
**CTL plate: Total shipments of producer in China, by plate thickness and steel type, 2021**

Quantity in short tons; shares in percent

| Product type | Measure | <1" | ≥1" but <4" | ≥4" | Total plate thicknesses |
|---|---|---|---|---|---|
| Carbon plate: As rolled | Quantity | *** | *** | *** | *** |
| Carbon plate: Heat treated | Quantity | *** | *** | *** | *** |
| Carbon plate | Quantity | *** | *** | *** | *** |
| Alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Alloy plate | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate | Quantity | *** | *** | *** | *** |
| Carbon plate: As rolled | Share down | *** | *** | *** | *** |
| Carbon plate: Heat treated | Share down | *** | *** | *** | *** |
| Carbon plate | Share down | *** | *** | *** | *** |
| Alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Alloy plate | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate | Share down | 100.0 | 100.0 | 100.0 | 100.0 |
| Carbon plate: As rolled | Share across | *** | *** | *** | --- |
| Carbon plate: Heat treated | Share across | *** | *** | *** | --- |
| Carbon plate | Share across | *** | *** | *** | --- |
| Alloy plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Alloy plate: Heat treated | Share across | *** | *** | *** | --- |
| Alloy plate | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: Heat treated | Share across | *** | *** | *** | --- |
| Both carbon and alloy plate | Share across | *** | *** | *** | 100.0 |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## Alternative products

Jiangsu Tiangong Tools produced other products on the same equipment and machinery used to produce CTL plate. ***. As shown in table IV-44, CTL plate accounted for between *** percent and *** percent of total production on shared equipment during 2016-21, January to June 2021, and January to June 2022.

**Table IV-44**
**CTL plate: Overall capacity and production on the same equipment as in-scope production in China, by period**

Quantity in short tons; share and ratio in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Overall capacity | Quantity | *** | *** | *** |
| CTL plate production | Quantity | *** | *** | *** |
| Other production | Quantity | *** | *** | *** |
| Total production | Quantity | *** | *** | *** |
| Overall capacity utilization | Ratio | *** | *** | *** |
| CTL plate production | Share | *** | *** | *** |
| Other production | Share | *** | *** | *** |
| Total production | Share | *** | *** | *** |

Table continued.

**Table IV-44 Continued**
**CTL plate: Overall capacity and production on the same equipment as in-scope production in China, by period**

Quantity in short tons; share and ratio in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Overall capacity | Quantity | *** | *** | *** | *** | *** |
| CTL plate production | Quantity | *** | *** | *** | *** | *** |
| Other production | Quantity | *** | *** | *** | *** | *** |
| Total production | Quantity | *** | *** | *** | *** | *** |
| Overall capacity utilization | Ratio | *** | *** | *** | *** | *** |
| CTL plate production | Share | *** | *** | *** | *** | *** |
| Other production | Share | *** | *** | *** | *** | *** |
| Total production | Share | *** | *** | *** | *** | *** |

Source: Compiled from data in response to Commission questionnaires.

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

## Exports

Table IV-45 presents data for exports of CTL plate from China, by destination market in descending order of quantity for 2021. The leading export markets for CTL plate from China in 2021, by quantity, were Vietnam and South Korea, accounting for 20.0 percent and 14.1 percent, respectively. The United States accounted for 0.1 percent of exports of CTL plate from China, by quantity, in 2021.

**Table IV-45**
**CTL plate: Exports from China, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Quantity | 17,710 | 841 | 1,015 |
| Vietnam | Quantity | 1,778,693 | 1,099,625 | 1,048,974 |
| South Korea | Quantity | 883,242 | 516,732 | 434,673 |
| United Arab Emirates | Quantity | 367,852 | 304,630 | 312,592 |
| Chile | Quantity | 162,532 | 200,989 | 199,963 |
| Peru | Quantity | 157,797 | 204,813 | 173,974 |
| Philippines | Quantity | 328,954 | 342,868 | 406,918 |
| Saudi Arabia | Quantity | 304,515 | 261,038 | 201,008 |
| Colombia | Quantity | 87,830 | 78,355 | 83,598 |
| All other destination markets | Quantity | 3,479,929 | 2,502,886 | 2,397,020 |
| Non-U.S. destination markets | Quantity | 7,551,342 | 5,511,937 | 5,258,721 |
| All destination markets | Quantity | 7,569,052 | 5,512,778 | 5,259,735 |
| United States | Value | 16,335 | 1,010 | 1,095 |
| Vietnam | Value | 510,775 | 470,165 | 560,401 |
| South Korea | Value | 281,124 | 237,011 | 253,234 |
| United Arab Emirates | Value | 118,369 | 131,269 | 170,195 |
| Chile | Value | 49,620 | 88,674 | 109,868 |
| Peru | Value | 48,930 | 87,397 | 91,993 |
| Philippines | Value | 105,725 | 155,388 | 219,751 |
| Saudi Arabia | Value | 107,838 | 108,110 | 122,366 |
| Colombia | Value | 28,002 | 34,634 | 46,045 |
| All other destination markets | Value | 1,213,493 | 1,231,983 | 1,486,927 |
| Non-U.S. destination markets | Value | 2,463,875 | 2,544,631 | 3,060,782 |
| All destination markets | Value | 2,480,210 | 2,545,642 | 3,061,876 |

Table continued.

**Table IV-45 Continued**
**CTL plate: Exports from China, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Quantity | 829 | 740 | 4,477 |
| Vietnam | Quantity | 1,165,691 | 644,461 | 687,172 |
| South Korea | Quantity | 402,224 | 132,525 | 483,035 |
| United Arab Emirates | Quantity | 314,296 | 327,714 | 214,047 |
| Chile | Quantity | 246,588 | 145,393 | 180,453 |
| Peru | Quantity | 200,725 | 180,310 | 179,729 |
| Philippines | Quantity | 279,199 | 191,330 | 172,765 |
| Saudi Arabia | Quantity | 279,726 | 179,724 | 117,833 |
| Colombia | Quantity | 98,309 | 66,317 | 102,316 |
| All other destination markets | Quantity | 2,453,850 | 1,702,408 | 1,292,675 |
| Non-U.S. destination markets | Quantity | 5,440,607 | 3,570,182 | 3,430,025 |
| All destination markets | Quantity | 5,441,436 | 3,570,923 | 3,434,502 |
| United States | Value | 883 | 1,282 | 5,018 |
| Vietnam | Value | 547,316 | 302,597 | 500,195 |
| South Korea | Value | 212,058 | 77,746 | 404,185 |
| United Arab Emirates | Value | 159,240 | 180,635 | 149,196 |
| Chile | Value | 122,175 | 67,380 | 128,897 |
| Peru | Value | 95,063 | 79,953 | 120,193 |
| Philippines | Value | 129,313 | 107,499 | 144,408 |
| Saudi Arabia | Value | 161,994 | 92,911 | 90,870 |
| Colombia | Value | 48,401 | 30,891 | 69,048 |
| All other destination markets | Value | 1,386,818 | 986,634 | 1,181,143 |
| Non-U.S. destination markets | Value | 2,862,377 | 1,926,247 | 2,788,134 |
| All destination markets | Value | 2,863,260 | 1,927,529 | 2,793,152 |

Table continued.

**Table IV-45 Continued**
**CTL plate: Exports from China, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Unit value | 922 | 1,202 | 1,079 |
| Vietnam | Unit value | 287 | 428 | 534 |
| South Korea | Unit value | 318 | 459 | 583 |
| United Arab Emirates | Unit value | 322 | 431 | 544 |
| Chile | Unit value | 305 | 441 | 549 |
| Peru | Unit value | 310 | 427 | 529 |
| Philippines | Unit value | 321 | 453 | 540 |
| Saudi Arabia | Unit value | 354 | 414 | 609 |
| Colombia | Unit value | 319 | 442 | 551 |
| All other destination markets | Unit value | 349 | 492 | 620 |
| Non-U.S. destination markets | Unit value | 326 | 462 | 582 |
| All destination markets | Unit value | 328 | 462 | 582 |
| United States | Share of quantity | 0.2 | 0.0 | 0.0 |
| Vietnam | Share of quantity | 23.5 | 19.9 | 19.9 |
| South Korea | Share of quantity | 11.7 | 9.4 | 8.3 |
| United Arab Emirates | Share of quantity | 4.9 | 5.5 | 5.9 |
| Chile | Share of quantity | 2.1 | 3.6 | 3.8 |
| Peru | Share of quantity | 2.1 | 3.7 | 3.3 |
| Philippines | Share of quantity | 4.3 | 6.2 | 7.7 |
| Saudi Arabia | Share of quantity | 4.0 | 4.7 | 3.8 |
| Colombia | Share of quantity | 1.2 | 1.4 | 1.6 |
| All other destination markets | Share of quantity | 46.0 | 45.4 | 45.6 |
| Non-U.S. destination markets | Share of quantity | 99.8 | 100.0 | 100.0 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-45 Continued**
**CTL plate: Exports from China, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Unit value | 1,065 | 1,732 | 1,121 |
| Vietnam | Unit value | 470 | 470 | 728 |
| South Korea | Unit value | 527 | 587 | 837 |
| United Arab Emirates | Unit value | 507 | 551 | 697 |
| Chile | Unit value | 495 | 463 | 714 |
| Peru | Unit value | 474 | 443 | 669 |
| Philippines | Unit value | 463 | 562 | 836 |
| Saudi Arabia | Unit value | 579 | 517 | 771 |
| Colombia | Unit value | 492 | 466 | 675 |
| All other destination markets | Unit value | 565 | 580 | 914 |
| Non-U.S. destination markets | Unit value | 526 | 540 | 813 |
| All destination markets | Unit value | 526 | 540 | 813 |
| United States | Share of quantity | 0.0 | 0.0 | 0.1 |
| Vietnam | Share of quantity | 21.4 | 18.0 | 20.0 |
| South Korea | Share of quantity | 7.4 | 3.7 | 14.1 |
| United Arab Emirates | Share of quantity | 5.8 | 9.2 | 6.2 |
| Chile | Share of quantity | 4.5 | 4.1 | 5.3 |
| Peru | Share of quantity | 3.7 | 5.0 | 5.2 |
| Philippines | Share of quantity | 5.1 | 5.4 | 5.0 |
| Saudi Arabia | Share of quantity | 5.1 | 5.0 | 3.4 |
| Colombia | Share of quantity | 1.8 | 1.9 | 3.0 |
| All other destination markets | Share of quantity | 45.1 | 47.7 | 37.6 |
| Non-U.S. destination markets | Share of quantity | 100.0 | 100.0 | 99.9 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official export statistics under HS subheading, 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91, as reported by China Customs in the Global Trade Atlas database, accessed September 29, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

# The industry in France

## Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from three firms, ArcelorMittal (FR), Dillinger France, and Entrepose, which accounted for approximately *** percent of production of CTL plate in France during 2015, and *** U.S. imports of CTL plate from France in 2015.[22]

In these full first five-year reviews, the Commission issued a foreign producers' questionnaire to 13 firms believed to produce CTL plate in France and received responses from three firms: Dillinger France, Entrepose Industries ("Entrepose") and Industeel France. According to the responding firms, collectively they accounted for *** of CTL plate production in France in 2021.[23]

Table IV-46 presents data on gross production and apparent gross consumption of reversing mill plate in France.[24]

**Table IV-46**
**Reversing mill plate: Gross production and apparent gross consumption in France, by period**

Quantity in short tons

| Item | 2016 | 2017 | 2018 |
|---|---|---|---|
| Gross production | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** |

Table continued.

**Table IV-46 Continued**
**Reversing mill plate: Gross production and apparent gross consumption in France, by period**

Quantity in short tons

| Item | 2019 | 2020 | 2021 | Projected 2022 |
|---|---|---|---|---|
| Gross production | *** | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** | *** |

Source: ***.

[22] Original confidential report, p. VII-33.

[23] French responding producers reported in 2021 they collectively accounted for *** percent of CTL plate production in France in their questionnaire responses.

[24] ***. Email from ***. For more information on mill differences see Part I, Manufacturing processes.

Table IV-47 presents summary information on the CTL plate operations of the responding producers and exporters in France.

**Table IV-47**
**CTL plate: Summary data for producers in France, 2021**

| Firm | Production (short tons) | Share of reported production (percent) | Exports to the United States (short tons) | Share of reported exports to the United States (percent) | Total shipments (short tons) | Share of firm's total shipments exported to the United States (percent) |
|---|---|---|---|---|---|---|
| Dillinger France | *** | *** | *** | *** | *** | *** |
| Entrepose | *** | *** | *** | *** | *** | *** |
| Industeel France | *** | *** | *** | *** | *** | *** |
| All firms | *** | 100.0 | *** | *** | *** | *** |

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

## Recent developments

Table IV-48 presents events that have occurred in the CTL plate industry in France since the original investigations.

**Table IV-48**
**CTL plate: Recent developments in the French industry**

| Item | Firm | Event |
|---|---|---|
| Market Entry | Laminoir des Landes | In 2018, Laminoir des Landes began making heavy plate in Tarnos. The plate mill currently has approximately 500,000 tons of annual production capacity. |
| Plant upgrade | ArcelorMittal | In 2020, ArcelorMittal Industeel upgraded its continuous slab caster. |
| Plant upgrade | Dillinger France | In September 2020, Dillinger France was granted a EUR 1.8 million subsidy to modernize one of its steel furnaces, in order to increase performance, and reduce energy use and emissions. Dillinger has stated that this investment would allow it to increase its slab steel heating capacity for the rolling of heavy plates. |

Source: Cleveland-Cliffs' response to the notice of institution, January 3, 2022, exh. 14; Dillinger, "'Green Steel' Offensive with Dillinger France," January 14, 2021, https://www.dillinger.de/d/en/news/press-releases/green-steel-offensive-with-dillinger-france-96359.shtml.

## Changes in operations

Producers in France were asked to report any change in the character of their operations or organization relating to the production of CTL plate since 2016. Two of three producers indicated in their questionnaires that they had experienced such changes. Table IV-49 presents the changes identified by these producers.

**Table IV-49**
**CTL plate: Reported changes in operations in France, since January 1, 2016, by firm**

| Item | Firm name and narrative on changes in operations |
|---|---|
| Prolonged shutdowns or curtailments | *** |
| Revised labor agreements | *** |
| Other | *** |
| Other | *** |

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

## Operations on CTL plate

Table IV-50 presents information on the CTL plate operations of the responding producers in France. Reported annual capacity for the firms remained unchanged from 2016 to 2018 at almost *** short tons, before declining to about *** short tons in 2019. ***. Production of CTL plate decreased overall by *** percent from 2016 to 2021, but was *** percent higher in interim 2022 compared with interim 2021. During the period for which data were collected, home market shipments accounted for less than *** percent of total shipments, by quantity, while the majority of shipments (over *** percent) were export shipments. Export shipments to the United States as a share of total shipments declined from *** percent in 2016 to *** percent in 2019, after which, ***.[25] French producers' end-of-period inventories fluctuated during 2016-21 but overall decreased by *** percent. Meanwhile, French producers' end-of- period inventories were *** percent higher in interim 2022 compared to interim 2021.

[25] *** exported to the United States in 2016, *** reported exports to the United States in 2017, *** reported exports to the United States in 2018, and *** reported exports to the United States in 2019.

**Table IV-50**
**CTL plate: Data on industry in France, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** |
| Production | Quantity | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** |
| United States | Quantity | *** | *** | *** |
| European Union markets | Quantity | *** | *** | *** |
| Asian markets | Quantity | *** | *** | *** |
| American markets excluding U.S. | Quantity | *** | *** | *** |
| All other markets | Quantity | *** | *** | *** |
| Non-U.S. destination markets | Quantity | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** |
| United States | Value | *** | *** | *** |
| European Union markets | Value | *** | *** | *** |
| Asian markets | Value | *** | *** | *** |
| American markets excluding U.S. | Value | *** | *** | *** |
| All other markets | Value | *** | *** | *** |
| Non-U.S. destination markets | Value | *** | *** | *** |
| Export shipments | Value | *** | *** | *** |
| Total shipments | Value | *** | *** | *** |

Table continued.

**Table IV-50 Continued**
**CTL plate: Data on industry in France, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** | *** | *** |
| Production | Quantity | *** | *** | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** | *** | *** |
| United States | Quantity | *** | *** | *** | *** | *** |
| European Union markets | Quantity | *** | *** | *** | *** | *** |
| Asian markets | Quantity | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Quantity | *** | *** | *** | *** | *** |
| All other markets | Quantity | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Quantity | *** | *** | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** | *** | *** |
| United States | Value | *** | *** | *** | *** | *** |
| European Union markets | Value | *** | *** | *** | *** | *** |
| Asian markets | Value | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Value | *** | *** | *** | *** | *** |
| All other markets | Value | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Value | *** | *** | *** | *** | *** |
| Export shipments | Value | *** | *** | *** | *** | *** |
| Total shipments | Value | *** | *** | *** | *** | *** |

Table continued.

**Table IV-50 Continued**
**CTL plate: Data on industry in France, by period**

Unit values in dollars per short ton; ratios and shares in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** |
| United States | Unit value | *** | *** | *** |
| European Union markets | Unit value | *** | *** | *** |
| Asian markets | Unit value | *** | *** | *** |
| American markets excluding U.S. | Unit value | *** | *** | *** |
| All other markets | Unit value | *** | *** | *** |
| Non-U.S. destination markets | Unit value | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** |
| United States | Share | *** | *** | *** |
| European Union markets | Share | *** | *** | *** |
| Asian markets | Share | *** | *** | *** |
| American markets excluding U.S. | Share | *** | *** | *** |
| All other markets | Share | *** | *** | *** |
| Non-U.S. destination markets | Share | *** | *** | *** |
| Export shipments | Share | *** | *** | *** |
| Total shipments | Share | *** | *** | *** |

Table continued.

**Table IV-50 Continued**
**CTL plate: Data on industry in France, by period**

Unit values in dollars per short ton; ratios and shares in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** | *** | *** |
| United States | Unit value | *** | *** | *** | *** | *** |
| European Union markets | Unit value | *** | *** | *** | *** | *** |
| Asian markets | Unit value | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Unit value | *** | *** | *** | *** | *** |
| All other markets | Unit value | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Unit value | *** | *** | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** | *** | *** |
| United States | Share | *** | *** | *** | *** | *** |
| European Union markets | Share | *** | *** | *** | *** | *** |
| Asian markets | Share | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Share | *** | *** | *** | *** | *** |
| All other markets | Share | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Share | *** | *** | *** | *** | *** |
| Export shipments | Share | *** | *** | *** | *** | *** |
| Total shipments | Share | *** | *** | *** | *** | *** |

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

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

## CTL plate thickness and steel type

Producers were asked to indicate whether their firm had the ability or capacity to produce various CTL plate product types and thicknesses in 2021 and whether their firm actually produced the various CTL plate product types and thicknesses in 2021. Table IV-51 presents the count of producers that reported the ability or capacity to produce these items and table IV-52 presents the count of producers that reported actual production.

**Table IV-51**
**CTL plate: Count of producers in France with ability or capacity by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | 3 | 3 | 3 | 3 |
| CrMo pressure vessel plate | 1 | 2 | 1 | 2 |
| Ni pressure vessel plate | 1 | 1 | 1 | 1 |
| Other pressure vessel plate | 2 | 2 | 2 | 2 |
| Tool steel plate | 1 | 1 | 1 | 1 |
| Mold steel plate | 1 | 1 | 1 | 1 |
| AR400-AR600 wear resistant/abrasion resistant plate | 2 | 2 | 2 | 2 |
| Other wear resistant/abrasion resistant plate | 2 | 2 | 2 | 2 |
| Oil-drilling platform plate | 1 | 2 | 2 | 2 |
| Offshore wind energy plate | 3 | 3 | 2 | 3 |
| Shipbuilding plate | 2 | 2 | 2 | 2 |
| X-70 (or higher) plate width < 120 inches | 1 | 1 | 1 | 1 |
| X-70 (or higher) plate width ≥ 120 inches | 1 | 1 | 1 | 1 |
| Other plate for line pipe | 2 | 2 | 2 | 2 |
| Sour service plate | 2 | 2 | 2 | 2 |
| High-speed steel plate | 1 | 1 | 1 | 1 |
| Heat-resisting steel plate | 1 | 1 | 1 | 1 |
| UHSS or AHSS plate | 1 | 2 | 2 | 2 |
| HSLA plate | 0 | 0 | 0 | 0 |
| Forged alloy steel plate | 1 | 1 | 1 | 1 |
| A553, Type 1, 9% nickel | 2 | 2 | 0 | 2 |
| API2W grade 50 or 60 | 1 | 1 | 1 | 1 |
| SA387 grade 11 or 22 | 1 | 1 | 1 | 1 |
| SA516 grade 70/65, HIC tested | 3 | 3 | 2 | 3 |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | 2 | 2 | 2 | 2 |
| Any product type | 3 | 3 | 3 | 3 |

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

**Table IV-52**
**CTL plate: Count of producers in France with actual production by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | 1 | 3 | 2 | 3 |
| CrMo pressure vessel plate | 0 | 1 | 1 | 1 |
| Ni pressure vessel plate | 0 | 0 | 0 | 0 |
| Other pressure vessel plate | 1 | 2 | 2 | 2 |
| Tool steel plate | 1 | 1 | 1 | 1 |
| Mold steel plate | 1 | 1 | 1 | 1 |
| AR400-AR600 wear resistant/abrasion resistant plate | 2 | 2 | 2 | 2 |
| Other wear resistant/abrasion resistant plate | 2 | 2 | 2 | 2 |
| Oil-drilling platform plate | 1 | 2 | 2 | 2 |
| Offshore wind energy plate | 1 | 1 | 1 | 1 |
| Shipbuilding plate | 1 | 1 | 1 | 1 |
| X-70 (or higher) plate width < 120 inches | 1 | 1 | 1 | 1 |
| X-70 (or higher) plate width ≥ 120 inches | 1 | 1 | 1 | 1 |
| Other plate for line pipe | 1 | 1 | 1 | 1 |
| Sour service plate | 1 | 1 | 1 | 1 |
| High-speed steel plate | 1 | 1 | 1 | 1 |
| Heat-resisting steel plate | 1 | 1 | 1 | 1 |
| UHSS or AHSS plate | 1 | 1 | 2 | 2 |
| HSLA plate | 0 | 0 | 0 | 0 |
| Forged alloy steel plate | 0 | 0 | 1 | 1 |
| A553, Type 1, 9% nickel | 0 | 1 | 0 | 1 |
| API2W grade 50 or 60 | 1 | 1 | 1 | 1 |
| SA387 grade 11 or 22 | 0 | 1 | 1 | 1 |
| SA516 grade 70/65, HIC tested | 1 | 3 | 2 | 3 |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | 1 | 1 | 2 | 2 |
| Any product type | 2 | 3 | 2 | 3 |

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

Table IV-53 presents quantity data on responding producers' total shipments of CTL plate in France by plate thickness and steel type in 2021. Heat treated carbon and alloy plate accounted for the majority of total CTL plate shipments by the responding producers in France in 2021 (*** percent). Over *** (*** percent) of total shipments made by responding producers in France were of the medium category of plate thickness (≥1" but <4").

**Table IV-53**
**CTL plate: Total shipments of producers in France, by plate thickness and steel type, 2021**

Quantity in short tons; shares in percent

| Product type | Measure | <1" | ≥1" but <4" | ≥4" | Total plate thicknesses |
|---|---|---|---|---|---|
| Carbon plate: As rolled | Quantity | *** | *** | *** | *** |
| Carbon plate: Heat treated | Quantity | *** | *** | *** | *** |
| Carbon plate | Quantity | *** | *** | *** | *** |
| Alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Alloy plate | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate | Quantity | *** | *** | *** | *** |
| Carbon plate: As rolled | Share down | *** | *** | *** | *** |
| Carbon plate: Heat treated | Share down | *** | *** | *** | *** |
| Carbon plate | Share down | *** | *** | *** | *** |
| Alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Alloy plate | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate | Share down | 100.0 | 100.0 | 100.0 | 100.0 |
| Carbon plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Carbon plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Carbon plate | Share across | *** | *** | *** | 100.0 |
| Alloy plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Alloy plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Alloy plate | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate | Share across | *** | *** | *** | 100.0 |

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

## Alternative products

The *** responding firms produced other products on the same equipment and machinery used to produce CTL plate, although ***. ***. As shown in table IV-54, CTL plate accounted for more than *** percent of total production on shared equipment during 2016-21, January to June 2021, and January to June 2022.

**Table IV-54**
**CTL plate: Overall capacity and production on the same equipment as in-scope production in France, by period**

Quantity in short tons; share and ratio in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Overall capacity | Quantity | *** | *** | *** |
| CTL plate production | Quantity | *** | *** | *** |
| Other production | Quantity | *** | *** | *** |
| Total production | Quantity | *** | *** | *** |
| Overall capacity utilization | Ratio | *** | *** | *** |
| CTL plate production | Share | *** | *** | *** |
| Other production | Share | *** | *** | *** |
| Total production | Share | *** | *** | *** |

Table continued.

**Table IV-54 Continued**
**CTL plate: Overall capacity and production on the same equipment as in-scope production in France, by period**

Quantity in short tons; share and ratio in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Overall capacity | Quantity | *** | *** | *** | *** | *** |
| CTL plate production | Quantity | *** | *** | *** | *** | *** |
| Other production | Quantity | *** | *** | *** | *** | *** |
| Total production | Quantity | *** | *** | *** | *** | *** |
| Overall capacity utilization | Ratio | *** | *** | *** | *** | *** |
| CTL plate production | Share | *** | *** | *** | *** | *** |
| Other production | Share | *** | *** | *** | *** | *** |
| Total production | Share | *** | *** | *** | *** | *** |

Source: Compiled from data in response to Commission questionnaires.

## Exports

Table IV-55 presents data for exports of CTL plate from France, by destination market in descending order of quantity for 2021. The leading export markets for CTL plate from France in 2021, by quantity, were Germany and Spain, accounting for 37.8 percent and 10.8 percent, respectively. The United States accounted for 0.1 percent of exports of CTL plate from France, by quantity, in 2021.

**Table IV-55**
**CTL plate: Exports from France, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Quantity | 117,883 | 8,204 | 6,731 |
| Germany | Quantity | 216,796 | 438,702 | 393,483 |
| Spain | Quantity | 35,633 | 35,206 | 28,645 |
| Netherlands | Quantity | 48,698 | 71,348 | 64,644 |
| India | Quantity | 140,773 | 51,964 | 3,701 |
| Canada | Quantity | 903 | 1,040 | 12,588 |
| United Kingdom | Quantity | 25,519 | 50,997 | 81,019 |
| Belgium | Quantity | 33,829 | 67,306 | 43,167 |
| United Arab Emirates | Quantity | 26,212 | 22,215 | 34,993 |
| All other destination markets | Quantity | 126,243 | 161,634 | 291,704 |
| Non-U.S. destination markets | Quantity | 654,604 | 900,413 | 953,943 |
| All destination markets | Quantity | 772,487 | 908,617 | 960,674 |
| United States | Value | 82,002 | 17,249 | 15,245 |
| Germany | Value | 127,683 | 307,191 | 301,590 |
| Spain | Value | 18,787 | 23,815 | 23,952 |
| Netherlands | Value | 27,726 | 45,414 | 47,727 |
| India | Value | 67,733 | 32,864 | 4,686 |
| Canada | Value | 1,164 | 926 | 14,560 |
| United Kingdom | Value | 18,965 | 51,019 | 71,132 |
| Belgium | Value | 19,166 | 39,094 | 29,318 |
| United Arab Emirates | Value | 16,881 | 17,626 | 29,680 |
| All other destination markets | Value | 120,776 | 149,209 | 249,642 |
| Non-U.S. destination markets | Value | 418,881 | 667,158 | 772,287 |
| All destination markets | Value | 500,884 | 684,407 | 787,532 |

Table continued.

**Table IV-55 Continued**
**CTL plate: Exports from France, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Quantity | 5,805 | 948 | 368 |
| Germany | Quantity | 288,091 | 238,267 | 253,520 |
| Spain | Quantity | 46,786 | 65,322 | 72,285 |
| Netherlands | Quantity | 113,694 | 64,951 | 66,921 |
| India | Quantity | 1,956 | 27,799 | 46,542 |
| Canada | Quantity | 12,792 | 3,817 | 28,356 |
| United Kingdom | Quantity | 58,466 | 31,696 | 25,926 |
| Belgium | Quantity | 21,118 | 20,607 | 21,804 |
| United Arab Emirates | Quantity | 27,277 | 11,745 | 18,950 |
| All other destination markets | Quantity | 287,092 | 121,310 | 135,637 |
| Non-U.S. destination markets | Quantity | 857,272 | 585,514 | 669,941 |
| All destination markets | Quantity | 863,077 | 586,462 | 670,309 |
| United States | Value | 16,158 | 2,021 | 1,598 |
| Germany | Value | 218,796 | 166,295 | 234,020 |
| Spain | Value | 35,603 | 42,498 | 66,412 |
| Netherlands | Value | 78,379 | 41,837 | 57,584 |
| India | Value | 3,800 | 18,995 | 36,804 |
| Canada | Value | 14,375 | 7,011 | 35,509 |
| United Kingdom | Value | 53,118 | 39,310 | 23,433 |
| Belgium | Value | 15,456 | 13,595 | 19,262 |
| United Arab Emirates | Value | 22,484 | 9,372 | 18,103 |
| All other destination markets | Value | 248,496 | 130,900 | 163,220 |
| Non-U.S. destination markets | Value | 690,507 | 469,813 | 654,347 |
| All destination markets | Value | 706,665 | 471,835 | 655,945 |

Table continued.

**Table IV-55 Continued**
**CTL plate: Exports from France, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Unit value | 696 | 2,103 | 2,265 |
| Germany | Unit value | 589 | 700 | 766 |
| Spain | Unit value | 527 | 676 | 836 |
| Netherlands | Unit value | 569 | 637 | 738 |
| India | Unit value | 481 | 632 | 1,266 |
| Canada | Unit value | 1,289 | 890 | 1,157 |
| United Kingdom | Unit value | 743 | 1,000 | 878 |
| Belgium | Unit value | 567 | 581 | 679 |
| United Arab Emirates | Unit value | 644 | 793 | 848 |
| All other destination markets | Unit value | 957 | 923 | 856 |
| Non-U.S. destination markets | Unit value | 640 | 741 | 810 |
| All destination markets | Unit value | 648 | 753 | 820 |
| United States | Share of quantity | 15.3 | 0.9 | 0.7 |
| Germany | Share of quantity | 28.1 | 48.3 | 41.0 |
| Spain | Share of quantity | 4.6 | 3.9 | 3.0 |
| Netherlands | Share of quantity | 6.3 | 7.9 | 6.7 |
| India | Share of quantity | 18.2 | 5.7 | 0.4 |
| Canada | Share of quantity | 0.1 | 0.1 | 1.3 |
| United Kingdom | Share of quantity | 3.3 | 5.6 | 8.4 |
| Belgium | Share of quantity | 4.4 | 7.4 | 4.5 |
| United Arab Emirates | Share of quantity | 3.4 | 2.4 | 3.6 |
| All other destination markets | Share of quantity | 16.3 | 17.8 | 30.4 |
| Non-U.S. destination markets | Share of quantity | 84.7 | 99.1 | 99.3 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-55 Continued**
**CTL plate: Exports from France, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Unit value | 2,784 | 2,132 | 4,339 |
| Germany | Unit value | 759 | 698 | 923 |
| Spain | Unit value | 761 | 651 | 919 |
| Netherlands | Unit value | 689 | 644 | 860 |
| India | Unit value | 1,943 | 683 | 791 |
| Canada | Unit value | 1,124 | 1,837 | 1,252 |
| United Kingdom | Unit value | 909 | 1,240 | 904 |
| Belgium | Unit value | 732 | 660 | 883 |
| United Arab Emirates | Unit value | 824 | 798 | 955 |
| All other destination markets | Unit value | 866 | 1,079 | 1,203 |
| Non-U.S. destination markets | Unit value | 805 | 802 | 977 |
| All destination markets | Unit value | 819 | 805 | 979 |
| United States | Share of quantity | 0.7 | 0.2 | 0.1 |
| Germany | Share of quantity | 33.4 | 40.6 | 37.8 |
| Spain | Share of quantity | 5.4 | 11.1 | 10.8 |
| Netherlands | Share of quantity | 13.2 | 11.1 | 10.0 |
| India | Share of quantity | 0.2 | 4.7 | 6.9 |
| Canada | Share of quantity | 1.5 | 0.7 | 4.2 |
| United Kingdom | Share of quantity | 6.8 | 5.4 | 3.9 |
| Belgium | Share of quantity | 2.4 | 3.5 | 3.3 |
| United Arab Emirates | Share of quantity | 3.2 | 2.0 | 2.8 |
| All other destination markets | Share of quantity | 33.3 | 20.7 | 20.2 |
| Non-U.S. destination markets | Share of quantity | 99.3 | 99.8 | 99.9 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official export statistics under HS subheading, 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91, as reported by Eurostat in the Global Trade Atlas database, accessed September 29, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

# The industry in Germany

## Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from six firms, Buderus, Dillinger Huettenwerke, Doerrenberg, Thyssenkrupp Europe, Thyssenkrupp Schulte, Friedr. Lohmann, Salzgitter, and Schmiedewerke, which accounted for *** production of CTL plate in Germany during 2015, and *** U.S. imports of CTL plate from Germany in 2015.[26]

In these full first five-year reviews, the Commission issued a foreign producers' questionnaire to 23 firms believed to produce CTL plate in Germany and received responses from four firms: Dillinger Germany, Friedr. Lohmann GmbH ("Friedr. Lohmann"), Salzgitter AG ("Salzgitter"), and VDM Metals International GmbH ("VDM Metals"). According to the responding firms, collectively they accounted for *** percent of CTL plate production in Germany in 2021.[27]

Table IV-56 presents data on gross production and apparent gross consumption of reversing mill plate in Germany.[28]

**Table IV-56**
**Reversing mill plate: Gross production and apparent gross consumption in Germany, by period**

Quantity in short tons

| Item | 2016 | 2017 | 2018 |
|---|---|---|---|
| Gross production | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** |

Table continued.

**Table IV-56 Continued**
**Reversing mill plate: Gross production and apparent gross consumption in Germany, by period**

Quantity in short tons

| Item | 2019 | 2020 | 2021 | Projected 2022 |
|---|---|---|---|---|
| Gross production | *** | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** | *** |

Source: ***

[26] Original confidential report, p. VII-40.

[27] German responding producers reported in 2021 they collectively accounted for *** percent of CTL plate production in Germany and *** percent of exports to the United States from Germany in their questionnaire responses.

[28] ***. Email from ***. For more information on mill differences see Part I, Manufacturing processes.

Table IV-57 presents summary information on the CTL plate operations of the responding producers and exporters in Germany.

**Table IV-57**
**CTL plate: Summary data for producers in Germany, 2021**

| Firm | Production (short tons) | Share of reported production (percent) | Exports to the United States (short tons) | Share of reported exports to the United States (percent) | Total shipments (short tons) | Share of firm's total shipments exported to the United States (percent) |
|---|---|---|---|---|---|---|
| Dillinger Germany | *** | *** | *** | *** | *** | *** |
| Friedr. Lohmann | *** | *** | *** | *** | *** | *** |
| Salzgitter | *** | *** | *** | *** | *** | *** |
| VDM Metals | *** | *** | *** | *** | *** | *** |
| All firms | *** | 100.0 | *** | 100.0 | *** | *** |

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

## Recent developments

Table IV-58 presents events that have occurred in the CTL plate industry in Germany since the original investigations.

**Table IV-58**
**CTL plate: Recent developments in the German industry**

| Item | Firm | Event |
|---|---|---|
| Plant upgrade | Salzgitter AG | In December 2020, Salzgitter announced the completion of a new heat treatment line at its heavy plate plant in Ilsenburg. |
| Closure | Thyssenkrupp Steel | In March 2021, Thyssenkrupp Steel shut down its heavy plate mill in Duisburg-Hüttenheim, reducing German CTL plate capacity by more than 15 percent. |
| Plant upgrade | Dillinger Germany | In October 2021, Dillinger announced it was renovating a furnace at its rolling mill in Dillingen, in order to increase plate production capacity. |

Source: Salzgitter AG, "The First Plate was Successfully Produced on the New Multifunctional Quench in Ilsenburg," December 8, 2020, https://www.salzgitter-ag.com/en/newsroom/press-releases/details/the-first-plate-was-successfully-produced-on-the-new-multifunctional-quench-in-ilsenburg-14574.html; Thyssenkrupp, "Last rolling shift in Huttenheim," March 3, 2021, https://www.thyssenkrupp.com/en/newsroom/press-releases/pressdetailpage/last-rolling-shift-in-huttenheim--closure-of-heavy-plate-mill-goes-according-to-plan-employees-will-be-employed-at-other-locations-96080. Hearing transcript (Revised), p. 190 (Langheim). Domestic interested parties' response to the notice of institution, January 3, 2022, exh. 41.

## Changes in operations

Producers in Germany were asked to report any change in the character of their operations or organization relating to the production of CTL plate since 2016. Two producers indicated in their questionnaires that they had experienced such changes. Table IV-59 presents the changes identified by these producers.

**Table IV-59**
**CTL plate: Reported changes in operations in Germany, since January 1, 2016, by firm**

| Item | Firm name and narrative on changes in operations |
|---|---|
| Plant closings | *** |
| Prolonged shutdowns or curtailments | *** |
| Revised labor agreements | *** |
| Revised labor agreements | *** |
| Other | *** |
| Other | *** |

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

## Operations on CTL plate

Table IV-60 presents information on the CTL plate operations of the responding producers in Germany. Overall, during 2016-21, German producers' capacity and production of CTL plate decreased by *** percent and by *** percent, respectively. German producers' capacity and production were both higher in interim 2022 compared with interim 2021. During the period for which data were collected, home market shipments accounted for the largest share (ranging from *** percent) of total shipments, by quantity. Meanwhile, export shipments to the United States accounted for *** percent of all shipments in 2016, then for *** percent or less of all shipments in each period after 2016.[29] German producers' end-of- period inventories fluctuated during 2016-21 but overall increased by *** percent. End-of-period inventories were *** percent higher in interim 2022 compared with interim 2021.

[29] *** reported exports to the United States in each period, *** reported exports to the United States during each period except January-June 2022, and *** reported exporting to the United States each year during 2016-18.

**Table IV-60**
**CTL plate: Data on industry in Germany, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** |
| Production | Quantity | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** |
| United States | Quantity | *** | *** | *** |
| European Union markets | Quantity | *** | *** | *** |
| Asian markets | Quantity | *** | *** | *** |
| American markets excluding U.S. | Quantity | *** | *** | *** |
| All other markets | Quantity | *** | *** | *** |
| Non-U.S. destination markets | Quantity | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** |
| United States | Value | *** | *** | *** |
| European Union markets | Value | *** | *** | *** |
| Asian markets | Value | *** | *** | *** |
| American markets excluding U.S. | Value | *** | *** | *** |
| All other markets | Value | *** | *** | *** |
| Non-U.S. destination markets | Value | *** | *** | *** |
| Export shipments | Value | *** | *** | *** |
| Total shipments | Value | *** | *** | *** |

Table continued.

**Table IV-60 Continued**
**CTL plate: Data on industry in Germany, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** | *** | *** |
| Production | Quantity | *** | *** | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** | *** | *** |
| United States | Quantity | *** | *** | *** | *** | *** |
| European Union markets | Quantity | *** | *** | *** | *** | *** |
| Asian markets | Quantity | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Quantity | *** | *** | *** | *** | *** |
| All other markets | Quantity | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Quantity | *** | *** | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** | *** | *** |
| United States | Value | *** | *** | *** | *** | *** |
| European Union markets | Value | *** | *** | *** | *** | *** |
| Asian markets | Value | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Value | *** | *** | *** | *** | *** |
| All other markets | Value | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Value | *** | *** | *** | *** | *** |
| Export shipments | Value | *** | *** | *** | *** | *** |
| Total shipments | Value | *** | *** | *** | *** | *** |

Table continued.

**Table IV-60 Continued**
**CTL plate: Data on industry in Germany, by period**

Unit values in dollars per short ton; ratios and shares in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** |
| United States | Unit value | *** | *** | *** |
| European Union markets | Unit value | *** | *** | *** |
| Asian markets | Unit value | *** | *** | *** |
| American markets excluding U.S. | Unit value | *** | *** | *** |
| All other markets | Unit value | *** | *** | *** |
| Non-U.S. destination markets | Unit value | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** |
| United States | Share | *** | *** | *** |
| European Union markets | Share | *** | *** | *** |
| Asian markets | Share | *** | *** | *** |
| American markets excluding U.S. | Share | *** | *** | *** |
| All other markets | Share | *** | *** | *** |
| Non-U.S. destination markets | Share | *** | *** | *** |
| Export shipments | Share | *** | *** | *** |
| Total shipments | Share | *** | *** | *** |

Table continued.

**Table IV-60 Continued**
**CTL plate: Data on industry in Germany, by period**

Unit values in dollars per short ton; ratios and shares in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** | *** | *** |
| United States | Unit value | *** | *** | *** | *** | *** |
| European Union markets | Unit value | *** | *** | *** | *** | *** |
| Asian markets | Unit value | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Unit value | *** | *** | *** | *** | *** |
| All other markets | Unit value | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Unit value | *** | *** | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** | *** | *** |
| United States | Share | *** | *** | *** | *** | *** |
| European Union markets | Share | *** | *** | *** | *** | *** |
| Asian markets | Share | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Share | *** | *** | *** | *** | *** |
| All other markets | Share | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Share | *** | *** | *** | *** | *** |
| Export shipments | Share | *** | *** | *** | *** | *** |
| Total shipments | Share | *** | *** | *** | *** | *** |

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

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

## CTL plate thickness and steel type

Producers were asked to indicate whether their firm had the ability or capacity to produce various CTL plate product types and thicknesses in 2021 and whether their firm actually produced the various CTL plate product types and thicknesses in 2021. Table IV-61 presents the count of producers that reported the ability or capacity to produce these items and table IV-62 presents the count of producers that reported actual production.

**Table IV-61**
**CTL plate: Count of producers in Germany with ability or capacity by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | 2 | 2 | 2 | 2 |
| CrMo pressure vessel plate | 2 | 2 | 2 | 2 |
| Ni pressure vessel plate | 3 | 3 | 2 | 3 |
| Other pressure vessel plate | 2 | 2 | 2 | 2 |
| Tool steel plate | 3 | 2 | 2 | 3 |
| Mold steel plate | 4 | 3 | 2 | 4 |
| AR400-AR600 wear resistant/abrasion resistant plate | 2 | 2 | 2 | 2 |
| Other wear resistant/abrasion resistant plate | 3 | 3 | 3 | 3 |
| Oil-drilling platform plate | 2 | 2 | 1 | 2 |
| Offshore wind energy plate | 2 | 2 | 2 | 2 |
| Shipbuilding plate | 2 | 2 | 2 | 2 |
| X-70 (or higher) plate width < 120 inches | 2 | 2 | 1 | 2 |
| X-70 (or higher) plate width ≥ 120 inches | 2 | 2 | 1 | 2 |
| Other plate for line pipe | 3 | 3 | 2 | 3 |
| Sour service plate | 3 | 3 | 2 | 3 |
| High-speed steel plate | 2 | 1 | 1 | 2 |
| Heat-resisting steel plate | 3 | 3 | 2 | 3 |
| UHSS or AHSS plate | 2 | 2 | 2 | 2 |
| HSLA plate | 2 | 2 | 2 | 2 |
| Forged alloy steel plate | 0 | 0 | 0 | 0 |
| A553, Type 1, 9% nickel | 2 | 2 | 1 | 2 |
| API2W grade 50 or 60 | 2 | 2 | 2 | 2 |
| SA387 grade 11 or 22 | 2 | 2 | 2 | 2 |
| SA516 grade 70/65, HIC tested | 2 | 2 | 1 | 2 |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | 2 | 2 | 2 | 2 |
| Any product type | 4 | 3 | 3 | 4 |

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

**Table IV-62**
**CTL plate: Count of producers in Germany with actual production by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | 2 | 2 | 2 | 2 |
| CrMo pressure vessel plate | 2 | 2 | 1 | 2 |
| Ni pressure vessel plate | 2 | 2 | 1 | 2 |
| Other pressure vessel plate | 2 | 2 | 2 | 2 |
| Tool steel plate | 3 | 2 | 1 | 3 |
| Mold steel plate | 1 | 1 | 1 | 1 |
| AR400-AR600 wear resistant/abrasion resistant plate | 2 | 2 | 1 | 2 |
| Other wear resistant/abrasion resistant plate | 2 | 2 | 1 | 2 |
| Oil-drilling platform plate | 1 | 1 | 1 | 1 |
| Offshore wind energy plate | 2 | 2 | 1 | 2 |
| Shipbuilding plate | 2 | 2 | 2 | 2 |
| X-70 (or higher) plate width < 120 inches | 2 | 2 | 1 | 2 |
| X-70 (or higher) plate width ≥ 120 inches | 2 | 2 | 1 | 2 |
| Other plate for line pipe | 2 | 2 | 1 | 2 |
| Sour service plate | 2 | 2 | 1 | 2 |
| High-speed steel plate | 2 | 1 | 1 | 2 |
| Heat-resisting steel plate | 2 | 2 | 1 | 2 |
| UHSS or AHSS plate | 2 | 2 | 2 | 2 |
| HSLA plate | 2 | 2 | 2 | 2 |
| Forged alloy steel plate | 0 | 0 | 0 | 0 |
| A553, Type 1, 9% nickel | 1 | 1 | 0 | 1 |
| API2W grade 50 or 60 | 2 | 2 | 1 | 2 |
| SA387 grade 11 or 22 | 2 | 2 | 2 | 2 |
| SA516 grade 70/65, HIC tested | 1 | 1 | 1 | 1 |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | 1 | 1 | 1 | 1 |
| Any product type | 3 | 2 | 2 | 3 |

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

Table IV-63 presents quantity data on responding producers' total shipments of CTL plate in Germany by plate thickness and steel type in 2021. Carbon plate (heat treated and as rolled) accounted for the majority of total CTL plate shipments by the responding producers in Germany in 2021 (*** percent). Over *** (*** percent) of total shipments made by responding producers in Germany were of the medium category of plate thickness (≥1" but <4").

**Table IV-63**
**CTL plate: Total shipments of producers in Germany, by plate thickness and steel type, 2021**

Quantity in short tons; shares in percent

| Product type | Measure | <1" | ≥1" but <4" | ≥4" | Total plate thicknesses |
|---|---|---|---|---|---|
| Carbon plate: As rolled | Quantity | *** | *** | *** | *** |
| Carbon plate: Heat treated | Quantity | *** | *** | *** | *** |
| Carbon plate | Quantity | *** | *** | *** | *** |
| Alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Alloy plate | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate | Quantity | *** | *** | *** | *** |
| Carbon plate: As rolled | Share down | *** | *** | *** | *** |
| Carbon plate: Heat treated | Share down | *** | *** | *** | *** |
| Carbon plate | Share down | *** | *** | *** | *** |
| Alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Alloy plate | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate | Share down | 100.0 | 100.0 | 100.0 | 100.0 |
| Carbon plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Carbon plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Carbon plate | Share across | *** | *** | *** | 100.0 |
| Alloy plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Alloy plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Alloy plate | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate | Share across | *** | *** | *** | 100.0 |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## Alternative products

Three of four responding firms produced other products on the same equipment and machinery used to produce CTL plate. ***. As shown in table IV-64, CTL plate accounted for over *** percent of total production on shared equipment during 2016-21, January to June 2021, and January to June 2022.

**Table IV-64**
**CTL plate: Overall capacity and production on the same equipment as in-scope production in Germany, by period**

Quantity in short tons; share and ratio in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Overall capacity | Quantity | *** | *** | *** |
| CTL plate production | Quantity | *** | *** | *** |
| Other production | Quantity | *** | *** | *** |
| Total production | Quantity | *** | *** | *** |
| Overall capacity utilization | Ratio | *** | *** | *** |
| CTL plate production | Share | *** | *** | *** |
| Other production | Share | *** | *** | *** |
| Total production | Share | *** | *** | *** |

Table continued.

**Table IV-64 Continued**
**CTL plate: Overall capacity and production on the same equipment as in-scope production in Germany, by period**

Quantity in short tons; share and ratio in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Overall capacity | Quantity | *** | *** | *** | *** | *** |
| CTL plate production | Quantity | *** | *** | *** | *** | *** |
| Other production | Quantity | *** | *** | *** | *** | *** |
| Total production | Quantity | *** | *** | *** | *** | *** |
| Overall capacity utilization | Ratio | *** | *** | *** | *** | *** |
| CTL plate production | Share | *** | *** | *** | *** | *** |
| Other production | Share | *** | *** | *** | *** | *** |
| Total production | Share | *** | *** | *** | *** | *** |

Source: Compiled from data in response to Commission questionnaires.

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

## Exports

Table IV-65 presents data for exports of CTL plate from Germany, by destination market in descending order of quantity for 2021. The leading export markets for CTL plate from Germany in 2021, by quantity, were the Netherlands and Belgium, accounting for 12.7 percent and 9.4 percent, respectively. The United States accounted for 0.3 percent of exports of CTL plate from Germany, by quantity, in 2021.

**Table IV-65**
**CTL plate: Exports from Germany, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Quantity | 126,917 | 29,646 | 13,781 |
| Netherlands | Quantity | 326,523 | 324,274 | 254,387 |
| Belgium | Quantity | 70,747 | 92,363 | 79,355 |
| France | Quantity | 127,877 | 116,963 | 158,458 |
| Austria | Quantity | 124,052 | 120,057 | 136,784 |
| Poland | Quantity | 134,425 | 165,356 | 152,088 |
| Switzerland | Quantity | 121,020 | 114,854 | 113,523 |
| Italy | Quantity | 126,731 | 124,380 | 110,500 |
| Spain | Quantity | 85,672 | 101,296 | 69,009 |
| All other destination markets | Quantity | 669,951 | 784,239 | 817,572 |
| Non-U.S. destination markets | Quantity | 1,786,998 | 1,943,781 | 1,891,677 |
| All destination markets | Quantity | 1,913,916 | 1,973,427 | 1,905,458 |
| United States | Value | 103,693 | 33,748 | 21,309 |
| Netherlands | Value | 202,375 | 225,118 | 210,313 |
| Belgium | Value | 51,840 | 78,957 | 74,444 |
| France | Value | 83,586 | 92,641 | 132,051 |
| Austria | Value | 89,621 | 108,268 | 133,740 |
| Poland | Value | 97,389 | 132,782 | 130,760 |
| Switzerland | Value | 77,334 | 90,947 | 98,948 |
| Italy | Value | 92,107 | 106,732 | 108,099 |
| Spain | Value | 62,438 | 77,883 | 61,980 |
| All other destination markets | Value | 505,939 | 662,836 | 777,017 |
| Non-U.S. destination markets | Value | 1,262,629 | 1,576,164 | 1,727,353 |
| All destination markets | Value | 1,366,322 | 1,609,911 | 1,748,662 |

Table continued.

**Table IV-65 Continued**
**CTL plate: Exports from Germany, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Quantity | 8,645 | 4,763 | 5,998 |
| Netherlands | Quantity | 272,897 | 260,043 | 231,820 |
| Belgium | Quantity | 83,693 | 68,578 | 172,799 |
| France | Quantity | 130,231 | 127,801 | 140,117 |
| Austria | Quantity | 120,423 | 100,720 | 139,215 |
| Poland | Quantity | 121,467 | 91,336 | 119,952 |
| Switzerland | Quantity | 92,008 | 85,142 | 113,435 |
| Italy | Quantity | 94,654 | 78,396 | 106,202 |
| Spain | Quantity | 110,618 | 108,743 | 96,603 |
| All other destination markets | Quantity | 920,479 | 801,613 | 702,844 |
| Non-U.S. destination markets | Quantity | 1,946,470 | 1,722,371 | 1,822,987 |
| All destination markets | Quantity | 1,955,115 | 1,727,135 | 1,828,985 |
| United States | Value | 15,054 | 10,636 | 12,521 |
| Netherlands | Value | 207,748 | 178,107 | 222,965 |
| Belgium | Value | 69,432 | 48,855 | 143,102 |
| France | Value | 102,964 | 93,501 | 138,766 |
| Austria | Value | 113,665 | 82,896 | 157,805 |
| Poland | Value | 101,098 | 72,088 | 117,682 |
| Switzerland | Value | 74,221 | 64,097 | 114,764 |
| Italy | Value | 90,282 | 68,407 | 111,651 |
| Spain | Value | 86,429 | 77,857 | 87,573 |
| All other destination markets | Value | 800,633 | 713,490 | 783,644 |
| Non-U.S. destination markets | Value | 1,646,472 | 1,399,298 | 1,877,953 |
| All destination markets | Value | 1,661,526 | 1,409,934 | 1,890,473 |

Table continued.

**Table IV-65 Continued**
**CTL plate: Exports from Germany, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Unit value | 817 | 1,138 | 1,546 |
| Netherlands | Unit value | 620 | 694 | 827 |
| Belgium | Unit value | 733 | 855 | 938 |
| France | Unit value | 654 | 792 | 833 |
| Austria | Unit value | 722 | 902 | 978 |
| Poland | Unit value | 724 | 803 | 860 |
| Switzerland | Unit value | 639 | 792 | 872 |
| Italy | Unit value | 727 | 858 | 978 |
| Spain | Unit value | 729 | 769 | 898 |
| All other destination markets | Unit value | 755 | 845 | 950 |
| Non-U.S. destination markets | Unit value | 707 | 811 | 913 |
| All destination markets | Unit value | 714 | 816 | 918 |
| United States | Share of quantity | 6.6 | 1.5 | 0.7 |
| Netherlands | Share of quantity | 17.1 | 16.4 | 13.4 |
| Belgium | Share of quantity | 3.7 | 4.7 | 4.2 |
| France | Share of quantity | 6.7 | 5.9 | 8.3 |
| Austria | Share of quantity | 6.5 | 6.1 | 7.2 |
| Poland | Share of quantity | 7.0 | 8.4 | 8.0 |
| Switzerland | Share of quantity | 6.3 | 5.8 | 6.0 |
| Italy | Share of quantity | 6.6 | 6.3 | 5.8 |
| Spain | Share of quantity | 4.5 | 5.1 | 3.6 |
| All other destination markets | Share of quantity | 35.0 | 39.7 | 42.9 |
| Non-U.S. destination markets | Share of quantity | 93.4 | 98.5 | 99.3 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-65 Continued**
**CTL plate: Exports from Germany, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Unit value | 1,741 | 2,233 | 2,087 |
| Netherlands | Unit value | 761 | 685 | 962 |
| Belgium | Unit value | 830 | 712 | 828 |
| France | Unit value | 791 | 732 | 990 |
| Austria | Unit value | 944 | 823 | 1,134 |
| Poland | Unit value | 832 | 789 | 981 |
| Switzerland | Unit value | 807 | 753 | 1,012 |
| Italy | Unit value | 954 | 873 | 1,051 |
| Spain | Unit value | 781 | 716 | 907 |
| All other destination markets | Unit value | 870 | 890 | 1,115 |
| Non-U.S. destination markets | Unit value | 846 | 812 | 1,030 |
| All destination markets | Unit value | 850 | 816 | 1,034 |
| United States | Share of quantity | 0.4 | 0.3 | 0.3 |
| Netherlands | Share of quantity | 14.0 | 15.1 | 12.7 |
| Belgium | Share of quantity | 4.3 | 4.0 | 9.4 |
| France | Share of quantity | 6.7 | 7.4 | 7.7 |
| Austria | Share of quantity | 6.2 | 5.8 | 7.6 |
| Poland | Share of quantity | 6.2 | 5.3 | 6.6 |
| Switzerland | Share of quantity | 4.7 | 4.9 | 6.2 |
| Italy | Share of quantity | 4.8 | 4.5 | 5.8 |
| Spain | Share of quantity | 5.7 | 6.3 | 5.3 |
| All other destination markets | Share of quantity | 47.1 | 46.4 | 38.4 |
| Non-U.S. destination markets | Share of quantity | 99.6 | 99.7 | 99.7 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official export statistics under HS subheading, 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91, as reported by Eurostat in the Global Trade Atlas database, accessed September 29, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

# The industry in Italy

## Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from four firms, EVRAZ Palini, Ilva, NLMK Verona, and Officine, which accounted for approximately *** percent of production of CTL plate in Italy during 2015, and approximately *** percent of U.S. imports of CTL plate from Italy in 2015.[30]

In these full first five-year reviews, the Commission issued a foreign producers' questionnaire to 11 firms believed to produce CTL plate in Italy and received responses from two firms: NLMK Verona SPA ("NLMK Verona") and Officine Tecnosider SRL ("Officine Tecnosider"). According to the responding firms, collectively they accounted for *** of CTL plate production in Italy in 2021 and approximately *** percent of U.S. imports of CTL plate from Italy in 2021.[31]

Table IV-66 presents data on gross production and apparent gross consumption of reversing mill plate in Italy.[32]

**Table IV-66**
**Reversing mill plate: Gross production and apparent gross consumption in Italy, by period**

Quantity in short tons

| Item | 2016 | 2017 | 2018 |
|---|---|---|---|
| Gross production | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** |

Table continued.

**Table IV-66 Continued**
**Reversing mill plate: Gross production and apparent gross consumption in Italy, by period**

Quantity in short tons

| Item | 2019 | 2020 | 2021 | Projected 2022 |
|---|---|---|---|---|
| Gross production | *** | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** | *** |

Source: ***

[30] Original confidential report, p. VII-49.

[31] Italian responding producers reported in 2021 they collectively accounted for *** percent of CTL plate production in Italy and *** percent of exports to the United States from Italy in their questionnaire responses.

[32] ***. Email from ***. For more information on mill differences see Part I, Manufacturing processes.

Table IV-67 presents summary information on the CTL plate operations of the responding producers and exporters in Italy.

**Table IV-67**
**CTL plate: Summary data for producers in Italy, 2021**

| Firm | Production (short tons) | Share of reported production (percent) | Exports to the United States (short tons) | Share of reported exports to the United States (percent) | Total shipments (short tons) | Share of firm's total shipments exported to the United States (percent) |
|---|---|---|---|---|---|---|
| NLMK Verona | *** | *** | *** | *** | *** | *** |
| Officine Tecnosider | *** | *** | *** | *** | *** | *** |
| All firms | *** | 100.0 | *** | 100.0 | *** | *** |

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

## Recent developments

Table IV-68 presents events that have occurred in the Italian CTL plate industry since the original investigations.

**Table IV-68**
**CTL plate: Recent developments in the Italian industry**

| Item | Firm | Event |
|---|---|---|
| Acquisition | Marcegaglia | In December 2019, Marcegaglia purchased Palini & Bertoli from Evraz. Marcegaglia claims that the purchase will lead it to become one of the leading players in heavy quarto plate rolling. |
| Temporary shutdown | NLMK Verona | Between March 25 and April 15, 2020, production was suspended at NLMK Verona's plant, which produces steel plate, due to the COVID-19 pandemic. |
| Acquisition | Trasteel and Vanomet | In April 2020, Trasteel and Vanomet (two Swiss trading firms) acquired Officine Tecnosider (OTS), a producer of heavy plates. |
| Plant upgrade | Metinvest Trametal SPA | In 2020, Metinvest Trametal SPA installed a new plasma cutting line that allowed for increased plate cutting capacity from 150,000 metric tons to 190,000 tons per year. |
| Plant upgrade | NLMK Verona | In 2020, NLMK Verona invested EUR 2 million to increase efficiency at its Verona plant. |
| Joint venture | ArcelorMittal | In 2020, ArcelorMittal entered into a joint venture with the government of Italy to purchase Ilva's steel plant in Taranto, including its plate making facilities. The plate mill has an annual capacity of 600,000 metric tons per year. |

Source: Marcegaglia, "Marcegaglia acquires Palini & Bertoli," https://www.marcegagliadobrasil.com/en/marcegaglia-acquires-palini-bertoli/; December 9, 2019, Steel Orbis, "NLMK Verona Resumes Production After Three Weeks," April 20, 2020, https://www.steelorbis.com/steel-news/latest-news/nlmk-verona-resumes-production-after-three-weeks-1142618.htm; Villa, Annalise, "Trasteel and Vanomet Acquire 100% of Italian Plate Producer OTS," April 21, 2020, https://eurometal.net/trasteel-and-vanomet-acquire-100-of-italian-plate-producer-ots/; Nucor's response to the notice of institution, January 3, 2022, exhs. 48 and 52; Cleveland-Cliffs' response to the notice of institution, January 3, 2022, exh. 16.

## Changes in operations

Producers in Italy were asked to report any change in the character of their operations or organization relating to the production of CTL plate since 2016. One of two producers indicated in its questionnaire that it had experienced such changes. Table IV-69 presents the changes identified by this producer.

**Table IV-69**
**CTL plate: Reported changes in operations in Italy, since January 1, 2016, by firm**

| Item | Firm name and narrative on changes in operations |
|---|---|
| Plant closings | *** |

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

## Operations on CTL plate

Table IV-70 presents information on the CTL plate operations of the responding producers in Italy. Overall, during 2016-21, Italian producers' capacity and production of CTL plate increased by *** percent and by *** percent, respectively. Italian producers' capacity was higher in interim 2022 compared to interim 2021 (by *** percent) meanwhile production was lower in interim 2022 compared to interim 2021 (by *** percent). During the period of which data were collected commercial home market shipments and exports accounted for approximately half of shipments, by quantity. Meanwhile, export shipments to the United States accounted for less than *** percent of all export shipments in each period.[33] Italian producers' end-of- period inventories fluctuated during 2016-21 but overall decreased by *** percent and were *** percent lower in interim 2022 compared to interim 2021.

[33] *** reported exports of CTL plate to the United States during *** while *** reported exports to the United States during ***.

**Table IV-70**
**CTL plate: Data on industry in Italy, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** |
| Production | Quantity | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** |
| United States | Quantity | *** | *** | *** |
| European Union markets | Quantity | *** | *** | *** |
| Asian markets | Quantity | *** | *** | *** |
| American markets excluding U.S. | Quantity | *** | *** | *** |
| All other markets | Quantity | *** | *** | *** |
| Non-U.S. destination markets | Quantity | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** |
| United States | Value | *** | *** | *** |
| European Union markets | Value | *** | *** | *** |
| Asian markets | Value | *** | *** | *** |
| American markets excluding U.S. | Value | *** | *** | *** |
| All other markets | Value | *** | *** | *** |
| Non-U.S. destination markets | Value | *** | *** | *** |
| Export shipments | Value | *** | *** | *** |
| Total shipments | Value | *** | *** | *** |

Table continued.

**Table IV-70 Continued**
**CTL plate: Data on industry in Italy, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** | *** | *** |
| Production | Quantity | *** | *** | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** | *** | *** |
| United States | Quantity | *** | *** | *** | *** | *** |
| European Union markets | Quantity | *** | *** | *** | *** | *** |
| Asian markets | Quantity | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Quantity | *** | *** | *** | *** | *** |
| All other markets | Quantity | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Quantity | *** | *** | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** | *** | *** |
| United States | Value | *** | *** | *** | *** | *** |
| European Union markets | Value | *** | *** | *** | *** | *** |
| Asian markets | Value | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Value | *** | *** | *** | *** | *** |
| All other markets | Value | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Value | *** | *** | *** | *** | *** |
| Export shipments | Value | *** | *** | *** | *** | *** |
| Total shipments | Value | *** | *** | *** | *** | *** |

Table continued.

**Table IV-70 Continued**
**CTL plate: Data on industry in Italy, by period**

Unit values in dollars per short ton; ratios and shares in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** |
| United States | Unit value | *** | *** | *** |
| European Union markets | Unit value | *** | *** | *** |
| Asian markets | Unit value | *** | *** | *** |
| American markets excluding U.S. | Unit value | *** | *** | *** |
| All other markets | Unit value | *** | *** | *** |
| Non-U.S. destination markets | Unit value | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** |
| United States | Share | *** | *** | *** |
| European Union markets | Share | *** | *** | *** |
| Asian markets | Share | *** | *** | *** |
| American markets excluding U.S. | Share | *** | *** | *** |
| All other markets | Share | *** | *** | *** |
| Non-U.S. destination markets | Share | *** | *** | *** |
| Export shipments | Share | *** | *** | *** |
| Total shipments | Share | *** | *** | *** |

Table continued.

**Table IV-70 Continued**
**CTL plate: Data on industry in Italy, by period**

Unit values in dollars per short ton; ratios and shares in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** | *** | *** |
| United States | Unit value | *** | *** | *** | *** | *** |
| European Union markets | Unit value | *** | *** | *** | *** | *** |
| Asian markets | Unit value | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Unit value | *** | *** | *** | *** | *** |
| All other markets | Unit value | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Unit value | *** | *** | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** | *** | *** |
| United States | Share | *** | *** | *** | *** | *** |
| European Union markets | Share | *** | *** | *** | *** | *** |
| Asian markets | Share | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Share | *** | *** | *** | *** | *** |
| All other markets | Share | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Share | *** | *** | *** | *** | *** |
| Export shipments | Share | *** | *** | *** | *** | *** |
| Total shipments | Share | *** | *** | *** | *** | *** |

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

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

## CTL plate thickness and steel type

Producers were asked to indicate whether their firm had the ability or capacity to produce various CTL plate product types and thicknesses in 2021 and whether their firm actually produced the various CTL plate product types and thicknesses in 2021. Table IV-71 presents the count of producers that reported the ability or capacity to produce these items and table IV-72 presents the count of producers that reported actual production.

**Table IV-71**
**CTL plate: Count of producers in Italy with ability or capacity by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | *** | *** | *** | *** |
| CrMo pressure vessel plate | *** | *** | *** | *** |
| Ni pressure vessel plate | *** | *** | *** | *** |
| Other pressure vessel plate | *** | *** | *** | *** |
| Tool steel plate | *** | *** | *** | *** |
| Mold steel plate | *** | *** | *** | *** |
| AR400-AR600 wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Other wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Oil-drilling platform plate | *** | *** | *** | *** |
| Offshore wind energy plate | *** | *** | *** | *** |
| Shipbuilding plate | *** | *** | *** | *** |
| X-70 (or higher) plate width < 120 inches | *** | *** | *** | *** |
| X-70 (or higher) plate width ≥ 120 inches | *** | *** | *** | *** |
| Other plate for line pipe | *** | *** | *** | *** |
| Sour service plate | *** | *** | *** | *** |
| High-speed steel plate | *** | *** | *** | *** |
| Heat-resisting steel plate | *** | *** | *** | *** |
| UHSS or AHSS plate | *** | *** | *** | *** |
| HSLA plate | *** | *** | *** | *** |
| Forged alloy steel plate | *** | *** | *** | *** |
| A553, Type 1, 9% nickel | *** | *** | *** | *** |
| API2W grade 50 or 60 | *** | *** | *** | *** |
| SA387 grade 11 or 22 | *** | *** | *** | *** |
| SA516 grade 70/65, HIC tested | *** | *** | *** | *** |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | *** | *** | *** | *** |
| Any product type | *** | *** | *** | *** |

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

**Table IV-72**
**CTL plate: Count of producers in Italy with actual production by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | *** | *** | *** | *** |
| CrMo pressure vessel plate | *** | *** | *** | *** |
| Ni pressure vessel plate | *** | *** | *** | *** |
| Other pressure vessel plate | *** | *** | *** | *** |
| Tool steel plate | *** | *** | *** | *** |
| Mold steel plate | *** | *** | *** | *** |
| AR400-AR600 wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Other wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Oil-drilling platform plate | *** | *** | *** | *** |
| Offshore wind energy plate | *** | *** | *** | *** |
| Shipbuilding plate | *** | *** | *** | *** |
| X-70 (or higher) plate width < 120 inches | *** | *** | *** | *** |
| X-70 (or higher) plate width ≥ 120 inches | *** | *** | *** | *** |
| Other plate for line pipe | *** | *** | *** | *** |
| Sour service plate | *** | *** | *** | *** |
| High-speed steel plate | *** | *** | *** | *** |
| Heat-resisting steel plate | *** | *** | *** | *** |
| UHSS or AHSS plate | *** | *** | *** | *** |
| HSLA plate | *** | *** | *** | *** |
| Forged alloy steel plate | *** | *** | *** | *** |
| A553, Type 1, 9% nickel | *** | *** | *** | *** |
| API2W grade 50 or 60 | *** | *** | *** | *** |
| SA387 grade 11 or 22 | *** | *** | *** | *** |
| SA516 grade 70/65, HIC tested | *** | *** | *** | *** |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | *** | *** | *** | *** |
| Any product type | *** | *** | *** | *** |

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

Table IV-73 presents quantity data on responding producers' total shipments of CTL plate in Italy by plate thickness and steel type in 2021. Carbon plate as rolled accounted for the majority of total CTL plate shipments by the responding producers in Italy in 2021 (*** percent). About *** (*** percent) of total shipments made by responding producers in Italy were of the medium category of plate thickness (≥1" but <4").

**Table IV-73**
**CTL plate: Total shipments of producers in Italy, by plate thickness and steel type, 2021**

Quantity in short tons; shares in percent

| Product type | Measure | <1" | ≥1" but <4" | ≥4" | Total plate thicknesses |
|---|---|---|---|---|---|
| Carbon plate: As rolled | Quantity | *** | *** | *** | *** |
| Carbon plate: Heat treated | Quantity | *** | *** | *** | *** |
| Carbon plate | Quantity | *** | *** | *** | *** |
| Alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Alloy plate | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate | Quantity | *** | *** | *** | *** |
| Carbon plate: As rolled | Share down | *** | *** | *** | *** |
| Carbon plate: Heat treated | Share down | *** | *** | *** | *** |
| Carbon plate | Share down | *** | *** | *** | *** |
| Alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Alloy plate | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate | Share down | 100.0 | 100.0 | 100.0 | 100.0 |
| Carbon plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Carbon plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Carbon plate | Share across | *** | *** | *** | 100.0 |
| Alloy plate: As rolled | Share across | *** | *** | *** | --- |
| Alloy plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Alloy plate | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate | Share across | *** | *** | *** | 100.0 |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## Alternative products

One of two responding firms produced other products on the same equipment and machinery used to produce CTL plate. ***. As shown in table IV-74, CTL plate accounted for over *** percent of total production on shared equipment during 2016-21, January to June 2021, and January to June 2022.

**Table IV-74**
**CTL plate: Overall capacity and production on the same equipment as in-scope production in Italy, by period**

Quantity in short tons; share and ratio in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Overall capacity | Quantity | *** | *** | *** |
| CTL plate production | Quantity | *** | *** | *** |
| Other production | Quantity | *** | *** | *** |
| Total production | Quantity | *** | *** | *** |
| Overall capacity utilization | Ratio | *** | *** | *** |
| CTL plate production | Share | *** | *** | *** |
| Other production | Share | *** | *** | *** |
| Total production | Share | *** | *** | *** |

Table continued.

**Table IV-74 Continued**
**CTL plate: Overall capacity and production on the same equipment as in-scope production in Italy, by period**

Quantity in short tons; share and ratio in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Overall capacity | Quantity | *** | *** | *** | *** | *** |
| CTL plate production | Quantity | *** | *** | *** | *** | *** |
| Other production | Quantity | *** | *** | *** | *** | *** |
| Total production | Quantity | *** | *** | *** | *** | *** |
| Overall capacity utilization | Ratio | *** | *** | *** | *** | *** |
| CTL plate production | Share | *** | *** | *** | *** | *** |
| Other production | Share | *** | *** | *** | *** | *** |
| Total production | Share | *** | *** | *** | *** | *** |

Source: Compiled from data in response to Commission questionnaires.

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

## Exports

Table IV-75 presents data for exports of CTL plate from Italy, by destination market in descending order of quantity for 2021. The leading export markets for CTL plate from Italy in 2021, by quantity, were Germany and Turkey, accounting for 26.7 percent and 9.0 percent, respectively. The United States accounted for 0.5 percent of exports of CTL plate from Italy, by quantity, in 2021.

**Table IV-75**
**CTL plate: Exports from Italy, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Quantity | 23,569 | 12,826 | 12,636 |
| Germany | Quantity | 426,867 | 488,023 | 462,725 |
| Turkey | Quantity | 68,707 | 81,038 | 67,884 |
| France | Quantity | 166,256 | 174,511 | 180,282 |
| Austria | Quantity | 128,765 | 141,433 | 140,484 |
| Hungary | Quantity | 76,260 | 98,506 | 93,621 |
| Czech Republic | Quantity | 49,952 | 76,361 | 71,611 |
| Slovenia | Quantity | 92,849 | 92,867 | 88,112 |
| Poland | Quantity | 46,977 | 42,078 | 29,308 |
| All other destination markets | Quantity | 529,699 | 502,377 | 467,521 |
| Non-U.S. destination markets | Quantity | 1,586,332 | 1,697,194 | 1,601,547 |
| All destination markets | Quantity | 1,609,901 | 1,710,021 | 1,614,183 |
| United States | Value | 12,909 | 9,588 | 12,871 |
| Germany | Value | 200,304 | 286,032 | 311,533 |
| Turkey | Value | 25,414 | 40,033 | 41,073 |
| France | Value | 81,437 | 103,705 | 121,987 |
| Austria | Value | 59,720 | 83,748 | 93,796 |
| Hungary | Value | 33,730 | 57,479 | 60,312 |
| Czech Republic | Value | 23,760 | 45,967 | 48,284 |
| Slovenia | Value | 43,545 | 57,545 | 63,131 |
| Poland | Value | 23,595 | 27,266 | 20,656 |
| All other destination markets | Value | 259,874 | 304,895 | 328,726 |
| Non-U.S. destination markets | Value | 751,378 | 1,006,671 | 1,089,498 |
| All destination markets | Value | 764,286 | 1,016,259 | 1,102,370 |

Table continued.

**Table IV-75 Continued**
**CTL plate: Exports from Italy, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Quantity | 8,522 | 8,445 | 7,393 |
| Germany | Quantity | 453,823 | 335,130 | 437,492 |
| Turkey | Quantity | 68,930 | 135,049 | 146,908 |
| France | Quantity | 166,134 | 129,616 | 135,946 |
| Austria | Quantity | 125,816 | 114,953 | 120,066 |
| Hungary | Quantity | 83,317 | 70,732 | 96,032 |
| Czech Republic | Quantity | 73,792 | 57,908 | 88,004 |
| Slovenia | Quantity | 83,684 | 71,337 | 86,421 |
| Poland | Quantity | 39,396 | 28,867 | 62,971 |
| All other destination markets | Quantity | 463,654 | 446,664 | 457,042 |
| Non-U.S. destination markets | Quantity | 1,558,547 | 1,390,255 | 1,630,881 |
| All destination markets | Quantity | 1,567,069 | 1,398,700 | 1,638,274 |
| United States | Value | 10,098 | 10,002 | 10,011 |
| Germany | Value | 273,126 | 184,689 | 428,281 |
| Turkey | Value | 33,977 | 59,996 | 100,320 |
| France | Value | 104,521 | 76,154 | 134,504 |
| Austria | Value | 73,940 | 62,362 | 114,285 |
| Hungary | Value | 48,488 | 37,436 | 87,247 |
| Czech Republic | Value | 44,253 | 32,579 | 85,397 |
| Slovenia | Value | 53,248 | 42,620 | 86,825 |
| Poland | Value | 25,296 | 17,853 | 61,563 |
| All other destination markets | Value | 294,202 | 265,943 | 451,345 |
| Non-U.S. destination markets | Value | 951,050 | 779,633 | 1,549,765 |
| All destination markets | Value | 961,147 | 789,635 | 1,559,776 |

Table continued.

**Table IV-75 Continued**
**CTL plate: Exports from Italy, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Unit value | 548 | 748 | 1,019 |
| Germany | Unit value | 469 | 586 | 673 |
| Turkey | Unit value | 370 | 494 | 605 |
| France | Unit value | 490 | 594 | 677 |
| Austria | Unit value | 464 | 592 | 668 |
| Hungary | Unit value | 442 | 584 | 644 |
| Czech Republic | Unit value | 476 | 602 | 674 |
| Slovenia | Unit value | 469 | 620 | 716 |
| Poland | Unit value | 502 | 648 | 705 |
| All other destination markets | Unit value | 491 | 607 | 703 |
| Non-U.S. destination markets | Unit value | 474 | 593 | 680 |
| All destination markets | Unit value | 475 | 594 | 683 |
| United States | Share of quantity | 1.5 | 0.8 | 0.8 |
| Germany | Share of quantity | 26.5 | 28.5 | 28.7 |
| Turkey | Share of quantity | 4.3 | 4.7 | 4.2 |
| France | Share of quantity | 10.3 | 10.2 | 11.2 |
| Austria | Share of quantity | 8.0 | 8.3 | 8.7 |
| Hungary | Share of quantity | 4.7 | 5.8 | 5.8 |
| Czech Republic | Share of quantity | 3.1 | 4.5 | 4.4 |
| Slovenia | Share of quantity | 5.8 | 5.4 | 5.5 |
| Poland | Share of quantity | 2.9 | 2.5 | 1.8 |
| All other destination markets | Share of quantity | 32.9 | 29.4 | 29.0 |
| Non-U.S. destination markets | Share of quantity | 98.5 | 99.2 | 99.2 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-75 Continued**
**CTL plate: Exports from Italy, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Unit value | 1,185 | 1,184 | 1,354 |
| Germany | Unit value | 602 | 551 | 979 |
| Turkey | Unit value | 493 | 444 | 683 |
| France | Unit value | 629 | 588 | 989 |
| Austria | Unit value | 588 | 543 | 952 |
| Hungary | Unit value | 582 | 529 | 909 |
| Czech Republic | Unit value | 600 | 563 | 970 |
| Slovenia | Unit value | 636 | 597 | 1,005 |
| Poland | Unit value | 642 | 618 | 978 |
| All other destination markets | Unit value | 635 | 595 | 988 |
| Non-U.S. destination markets | Unit value | 610 | 561 | 950 |
| All destination markets | Unit value | 613 | 565 | 952 |
| United States | Share of quantity | 0.5 | 0.6 | 0.5 |
| Germany | Share of quantity | 29.0 | 24.0 | 26.7 |
| Turkey | Share of quantity | 4.4 | 9.7 | 9.0 |
| France | Share of quantity | 10.6 | 9.3 | 8.3 |
| Austria | Share of quantity | 8.0 | 8.2 | 7.3 |
| Hungary | Share of quantity | 5.3 | 5.1 | 5.9 |
| Czech Republic | Share of quantity | 4.7 | 4.1 | 5.4 |
| Slovenia | Share of quantity | 5.3 | 5.1 | 5.3 |
| Poland | Share of quantity | 2.5 | 2.1 | 3.8 |
| All other destination markets | Share of quantity | 29.6 | 31.9 | 27.9 |
| Non-U.S. destination markets | Share of quantity | 99.5 | 99.4 | 99.5 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official export statistics under HS subheading, 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91, as reported by Eurostat in the Global Trade Atlas database, accessed September 29, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

# The industry in Japan

## Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from six firms, Daido, Hitachi, JFE Corporation, Kobe Steel, NSSMC, and Tokyo Steel, which accounted for *** production of CTL plate in Japan during 2015, and approximately *** percent of U.S. imports of CTL plate from Japan in 2015.[34]

In these full first five-year reviews, the Commission issued a foreign producers' questionnaire to 14 firms believed to produce CTL plate in Japan and received responses from five firms: Daido Steel Co., Ltd. ("Daido Steel"), JFE Steel Corporation ("JFE Steel"), Kobe Steel Ltd. ("Kobe Steel"), Nippon Steel Corporation ("Nippon Steel"), and Tokyo Steel Co., Ltd. ("Tokyo Steel"). According to the responding firms, collectively they accounted for *** percent of CTL plate production in Japan in 2021.[35]

Table IV-76 presents data on gross production and apparent gross consumption of reversing mill plate in Japan.[36]

**Table IV-76**
**Reversing mill plate: Gross production and apparent gross consumption in Japan, by period**

Quantity in short tons

| Item | 2016 | 2017 | 2018 |
|---|---|---|---|
| Gross production | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** |

Table continued.

[34] Original confidential report, p. VII-57.

[35] Japanese responding producers reported in 2021 they collectively accounted for *** percent of CTL plate production in Japan and *** percent of exports to the United States from Japan in their questionnaire responses.

[36] ***. Email from ***. For more information on mill differences see Part I, Manufacturing processes.

**Table IV-76 Continued**
**Reversing mill plate: Gross production and apparent gross consumption in Japan, by period**

Quantity in short tons

| Item | 2019 | 2020 | 2021 | Projected 2022 |
|---|---|---|---|---|
| Gross production | *** | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** | *** |

Source: ***

Table IV-77 presents summary information on the CTL plate operations of the responding producers and exporters in Japan.

**Table IV-77**
**CTL plate: Summary data for producers in Japan, 2021**

| Firm | Production (short tons) | Share of reported production (percent) | Exports to the United States (short tons) | Share of reported exports to the United States (percent) | Total shipments (short tons) | Share of firm's total shipments exported to the United States (percent) |
|---|---|---|---|---|---|---|
| Daido Steel | *** | *** | *** | *** | *** | *** |
| JFE Steel | *** | *** | *** | *** | *** | *** |
| Kobe Steel | *** | *** | *** | *** | *** | *** |
| Nippon Steel | *** | *** | *** | *** | *** | *** |
| Tokyo Steel | *** | *** | *** | *** | *** | *** |
| All firms | *** | 100.0 | *** | 100.0 | *** | *** |

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

## Recent developments

Table IV-78 presents events that have occurred in the Japanese CTL plate industry since the original investigations.

**Table IV-71**
**CTL plate: Recent developments in the Japanese industry**

| Item | Firm | Event |
|---|---|---|
| Temporary shutdown | JFE Steel | In April 2020, JFE Steel, a producer of steel plate, shut down two blast furnaces accounting for 25 percent of the company's production capacity, citing a COVID-19-related decrease in demand for steel. The two furnaces, located in Fukuyama and Kurashiki were restarted in September 2020 and December 2021, respectively. The furnace at Kurashiki was modernized to optimize capacity before being restarted. |
| Plant upgrade | JFE Steel | In November 2020, JFE announced it would be revamping its Chiba blast furnace by December 2022. |
| Plant shutdown | JFE Steel | In November 2020, JFE Steel announced plans to close its upstream processes and hot rolling equipment at its Keihan facility by September 2023. |
| Plant shutdown | Nippon Steel | In March 2021, Nippon Steel announced the closure of two plate mills which produce CTL plate. One mill in Nagoya was set to close at the end of 2021, while the other in Kashima was set to close by the second half of 2024. |
| Plant opening | JFE Steel | In June 2021, JFE started production at a new continuous casting facility at its West Japan Works. The facility's production capacity is expected to be 2 million metric tons per year and is designed to produce plate for offshore wind power structures. |
| Plant upgrade | Nippon Steel | In June 2021, Nippon Steel announced that it would be upgrading a blast furnace at its Nagoya plant. |

Sources: Obayashi, Yuka, "Japan's JFE Steel to Halt Two Blast Furnaces as Demand Plunges," April 15, 2020, https://www.reuters.com/article/health-coronavirus-jfe-holdings/japans-jfe-steel-to-halt-two-blast-furnaces-as-demand-plunges-idUSL3N2C32TO; Steel Orbis, "JFE Steel Restarts Blast Furnace No. 4 at Fukuyama Plant," September 23, 2020, https://www.steelorbis.com/steel-news/latest-news/jfe-steel-restarts-blast-furnace-no-4-at-fukuyama-plant-1165226.htm; Steel Orbis, "JFE Steel Restarts Blast Furnace No. 4 at Kurashiki Plant," December 15, 2021, https://www.steelorbis.com/steel-news/latest-news/jfe-steel-restarts-blast-furnace-no-4-at-kurashiki-plant-1226375.htm#:~:text=Japanese%20steelmaker%20JFE%20Steel%20Corporation,50%20billion%20(%24439.78%20million); JFE Steel, "JFE Steel to Shutter Keihin's Upstream Processes and Hot Rolling by Sept. 2023," November 9, 2020. https://www.jfe-steel.co.jp/en/release/2020/201109_01.html#:~:text=JFE%20Steel%20Corporation%20announced%20today,which%20also%20was%20announced%20today; Nippon Steel, "Nippon Steel Group Medium- to Long-term Management Plan," March 5, 2021, p. 9, https://www.nipponsteel.com/en/ir/library/pdf/20210305_200.pdf.; Nippon's response to the notice of institution, January 3, 2022, p. 16; Cleveland-Cliffs' response to the notice of institution, January 3, 2022, exh. 17, Japanese Mills' prehearing brief, pp. 47-48.

## Changes in operations

Producers in Japan were asked to report any change in the character of their operations or organization relating to the production of CTL plate since 2016. Three of five producers indicated in their questionnaires that they had experienced such changes. Table IV-79 presents the changes identified by these producers.

**Table IV-79**
**CTL plate: Reported changes in operations in Japan, since January 1, 2016, by firm**

| Item | Firm name and narrative on changes in operations |
|---|---|
| Plant openings | *** |
| Plant closings | *** |
| Expansions | *** |
| Other | *** |
| Other | *** |

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

## Operations on CTL plate

Table IV-80 presents information on the CTL plate operations of the responding producers in Japan. Overall, during 2016-21, Japanese producers' capacity of CTL plate decreased by *** percent while production of CTL plate decreased by *** percent. Japanese producers' capacity was lower in interim 2022 compared to interim 2021 (by *** percent) meanwhile production was higher in interim 2022 compared to interim 2021 (by *** percent). During the period of which data were collected commercial home market shipments accounted for a majority (over *** percent) of shipments, by quantity. Meanwhile, export shipments to the United States accounted for less than *** percent of all export shipments in each period.[37] Japanese producers' end-of- period inventories fluctuated during 2016-21 but

[37] *** exported to the United States in 2016, two ceased in 2017, one in 2019, and one in 2020; with only ***, exporting to the United States in each period.

overall increased by *** percent and were *** percent higher in interim 2022 compared to interim 2021.

**Table IV-80**
**CTL plate: Data on industry in Japan, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** |
| Production | Quantity | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** |
| United States | Quantity | *** | *** | *** |
| European Union markets | Quantity | *** | *** | *** |
| Asian markets | Quantity | *** | *** | *** |
| American markets excluding U.S. | Quantity | *** | *** | *** |
| All other markets | Quantity | *** | *** | *** |
| Non-U.S. destination markets | Quantity | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** |
| United States | Value | *** | *** | *** |
| European Union markets | Value | *** | *** | *** |
| Asian markets | Value | *** | *** | *** |
| American markets excluding U.S. | Value | *** | *** | *** |
| All other markets | Value | *** | *** | *** |
| Non-U.S. destination markets | Value | *** | *** | *** |
| Export shipments | Value | *** | *** | *** |
| Total shipments | Value | *** | *** | *** |

Table continued.

**Table IV-80 Continued**
**CTL plate: Data on industry in Japan, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** | *** | *** |
| Production | Quantity | *** | *** | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** | *** | *** |
| United States | Quantity | *** | *** | *** | *** | *** |
| European Union markets | Quantity | *** | *** | *** | *** | *** |
| Asian markets | Quantity | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Quantity | *** | *** | *** | *** | *** |
| All other markets | Quantity | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Quantity | *** | *** | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** | *** | *** |
| United States | Value | *** | *** | *** | *** | *** |
| European Union markets | Value | *** | *** | *** | *** | *** |
| Asian markets | Value | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Value | *** | *** | *** | *** | *** |
| All other markets | Value | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Value | *** | *** | *** | *** | *** |
| Export shipments | Value | *** | *** | *** | *** | *** |
| Total shipments | Value | *** | *** | *** | *** | *** |

Table continued.

**Table IV-80 Continued**
**CTL plate: Data on industry in Japan, by period**

Unit values in dollars per short ton; ratios and shares in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** |
| United States | Unit value | *** | *** | *** |
| European Union markets | Unit value | *** | *** | *** |
| Asian markets | Unit value | *** | *** | *** |
| American markets excluding U.S. | Unit value | *** | *** | *** |
| All other markets | Unit value | *** | *** | *** |
| Non-U.S. destination markets | Unit value | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** |
| United States | Share | *** | *** | *** |
| European Union markets | Share | *** | *** | *** |
| Asian markets | Share | *** | *** | *** |
| American markets excluding U.S. | Share | *** | *** | *** |
| All other markets | Share | *** | *** | *** |
| Non-U.S. destination markets | Share | *** | *** | *** |
| Export shipments | Share | *** | *** | *** |
| Total shipments | Share | *** | *** | *** |

Table continued.

**Table IV-80 Continued**
**CTL plate: Data on industry in Japan, by period**

Unit values in dollars per short ton; ratios and shares in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** | *** | *** |
| United States | Unit value | *** | *** | *** | *** | *** |
| European Union markets | Unit value | *** | *** | *** | *** | *** |
| Asian markets | Unit value | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Unit value | *** | *** | *** | *** | *** |
| All other markets | Unit value | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Unit value | *** | *** | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** | *** | *** |
| United States | Share | *** | *** | *** | *** | *** |
| European Union markets | Share | *** | *** | *** | *** | *** |
| Asian markets | Share | *** | *** | *** | *** | *** |
| American markets excluding U.S. | Share | *** | *** | *** | *** | *** |
| All other markets | Share | *** | *** | *** | *** | *** |
| Non-U.S. destination markets | Share | *** | *** | *** | *** | *** |
| Export shipments | Share | *** | *** | *** | *** | *** |
| Total shipments | Share | *** | *** | *** | *** | *** |

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

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

## CTL plate thickness and steel type

Producers were asked to indicate whether their firm had the ability or capacity to produce various CTL plate product types and thicknesses in 2021 and whether their firm actually produced the various CTL plate product types and thicknesses in 2021. Table IV-81 presents the count of producers that reported the ability or capacity to produce these items and table IV-82 presents the count of producers that reported actual production.

**Table IV-81**
**CTL plate: Count of producers in Japan with ability or capacity by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | 4 | 4 | 5 | 5 |
| CrMo pressure vessel plate | 3 | 3 | 3 | 3 |
| Ni pressure vessel plate | 2 | 2 | 2 | 2 |
| Other pressure vessel plate | 3 | 3 | 3 | 3 |
| Tool steel plate | 2 | 1 | 1 | 2 |
| Mold steel plate | 4 | 4 | 4 | 4 |
| AR400-AR600 wear resistant/abrasion resistant plate | 3 | 3 | 1 | 3 |
| Other wear resistant/abrasion resistant plate | 3 | 3 | 1 | 3 |
| Oil-drilling platform plate | 3 | 3 | 2 | 3 |
| Offshore wind energy plate | 3 | 3 | 3 | 3 |
| Shipbuilding plate | 3 | 3 | 4 | 4 |
| X-70 (or higher) plate width < 120 inches | 3 | 2 | 0 | 3 |
| X-70 (or higher) plate width ≥ 120 inches | 3 | 2 | 0 | 3 |
| Other plate for line pipe | 3 | 3 | 0 | 3 |
| Sour service plate | 2 | 2 | 0 | 2 |
| High-speed steel plate | 1 | 1 | 1 | 1 |
| Heat-resisting steel plate | 3 | 3 | 2 | 3 |
| UHSS or AHSS plate | 2 | 2 | 1 | 2 |
| HSLA plate | 1 | 1 | 1 | 1 |
| Forged alloy steel plate | 2 | 2 | 2 | 2 |
| A553, Type 1, 9% nickel | 3 | 3 | 1 | 3 |
| API2W grade 50 or 60 | 3 | 3 | 2 | 3 |
| SA387 grade 11 or 22 | 3 | 3 | 3 | 3 |
| SA516 grade 70/65, HIC tested | 2 | 2 | 1 | 2 |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | 2 | 2 | 0 | 2 |
| Any product type | 4 | 4 | 5 | 5 |

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

**Table IV-82**
**CTL plate: Count of producers in Japan with actual production by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | 4 | 4 | 5 | 5 |
| CrMo pressure vessel plate | 3 | 3 | 1 | 3 |
| Ni pressure vessel plate | 1 | 2 | 0 | 2 |
| Other pressure vessel plate | 3 | 3 | 3 | 3 |
| Tool steel plate | 2 | 1 | 1 | 2 |
| Mold steel plate | 4 | 4 | 4 | 4 |
| AR400-AR600 wear resistant/abrasion resistant plate | 2 | 2 | 1 | 2 |
| Other wear resistant/abrasion resistant plate | 2 | 2 | 0 | 2 |
| Oil-drilling platform plate | 2 | 2 | 2 | 2 |
| Offshore wind energy plate | 2 | 2 | 1 | 2 |
| Shipbuilding plate | 3 | 3 | 4 | 4 |
| X-70 (or higher) plate width < 120 inches | 2 | 1 | 0 | 2 |
| X-70 (or higher) plate width ≥ 120 inches | 1 | 0 | 0 | 1 |
| Other plate for line pipe | 2 | 1 | 0 | 2 |
| Sour service plate | 1 | 0 | 0 | 1 |
| High-speed steel plate | 1 | 1 | 1 | 1 |
| Heat-resisting steel plate | 3 | 3 | 0 | 3 |
| UHSS or AHSS plate | 2 | 2 | 1 | 2 |
| HSLA plate | 1 | 1 | 1 | 1 |
| Forged alloy steel plate | 1 | 1 | 0 | 1 |
| A553, Type 1, 9% nickel | 1 | 1 | 0 | 1 |
| API2W grade 50 or 60 | 2 | 2 | 0 | 2 |
| SA387 grade 11 or 22 | 3 | 3 | 1 | 3 |
| SA516 grade 70/65, HIC tested | 1 | 1 | 0 | 1 |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | 0 | 0 | 0 | 0 |
| Any product type | 4 | 4 | 5 | 5 |

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

Table IV-83 presents quantity data on responding producers' total shipments of CTL plate in Japan by plate thickness and steel type in 2021. Carbon plate as rolled accounted for the majority of total CTL plate shipments by the responding producers in Japan in 2021 (*** percent). Nearly *** (*** percent) of total shipments made by responding producers in Japan were of the smaller category of plate thickness (<1").

**Table IV-83**
**CTL plate: Total shipments of producers in Japan, by plate thickness and steel type, 2021**

Quantity in short tons; shares in percent

| Product type | Measure | <1" | ≥1" but <4" | ≥4" | Total plate thicknesses |
|---|---|---|---|---|---|
| Carbon plate: As rolled | Quantity | *** | *** | *** | *** |
| Carbon plate: Heat treated | Quantity | *** | *** | *** | *** |
| Carbon plate | Quantity | *** | *** | *** | *** |
| Alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Alloy plate | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate | Quantity | *** | *** | *** | *** |
| Carbon plate: As rolled | Share down | *** | *** | *** | *** |
| Carbon plate: Heat treated | Share down | *** | *** | *** | *** |
| Carbon plate | Share down | *** | *** | *** | *** |
| Alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Alloy plate | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate | Share down | 100.0 | 100.0 | 100.0 | 100.0 |
| Carbon plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Carbon plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Carbon plate | Share across | *** | *** | *** | 100.0 |
| Alloy plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Alloy plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Alloy plate | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate | Share across | *** | *** | *** | 100.0 |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## Alternative products

Three of five responding firms produced other products on the same equipment and machinery used to produce CTL plate. ***. As shown in table IV-84, CTL plate accounted for over *** percent of total production on shared equipment during 2016-21, January to June 2021, and January to June 2022.

**Table IV-84**
**CTL plate: Overall capacity and production on the same equipment as in-scope production in Japan, by period**

Quantity in short tons; share and ratio in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Overall capacity | Quantity | *** | *** | *** |
| CTL plate production | Quantity | *** | *** | *** |
| Other production | Quantity | *** | *** | *** |
| Total production | Quantity | *** | *** | *** |
| Overall capacity utilization | Ratio | *** | *** | *** |
| CTL plate production | Share | *** | *** | *** |
| Other production | Share | *** | *** | *** |
| Total production | Share | *** | *** | *** |

Table continued.

**Table IV-84 Continued**
**CTL plate: Overall capacity and production on the same equipment as in-scope production in Japan, by period**

Quantity in short tons; share and ratio in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Overall capacity | Quantity | *** | *** | *** | *** | *** |
| CTL plate production | Quantity | *** | *** | *** | *** | *** |
| Other production | Quantity | *** | *** | *** | *** | *** |
| Total production | Quantity | *** | *** | *** | *** | *** |
| Overall capacity utilization | Ratio | *** | *** | *** | *** | *** |
| CTL plate production | Share | *** | *** | *** | *** | *** |
| Other production | Share | *** | *** | *** | *** | *** |
| Total production | Share | *** | *** | *** | *** | *** |

Source: Compiled from data in response to Commission questionnaires.

## Exports

Table IV-85 presents data for exports of CTL plate from Japan, by destination market in descending order of quantity for 2021. The leading export markets for CTL plate from Japan in 2021, by quantity, were China and South Korea, accounting for 31.3 percent and 27.2 percent, respectively. The United States accounted for 0.1 percent of exports of CTL plate from Japan, by quantity, in 2021.

**Table IV-85**
**CTL plate: Exports from Japan, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Quantity | 33,642 | 15,240 | 9,424 |
| China | Quantity | 997,501 | 860,705 | 1,110,019 |
| South Korea | Quantity | 1,094,112 | 421,621 | 878,759 |
| Vietnam | Quantity | 192,596 | 205,543 | 240,228 |
| Taiwan | Quantity | 68,741 | 88,661 | 116,773 |
| Singapore | Quantity | 199,158 | 121,604 | 211,310 |
| Philippines | Quantity | 267,829 | 261,993 | 230,553 |
| Thailand | Quantity | 84,575 | 97,646 | 116,912 |
| India | Quantity | 76,398 | 84,715 | 43,475 |
| All other destination markets | Quantity | 897,676 | 587,058 | 592,877 |
| Non-U.S. destination markets | Quantity | 3,878,586 | 2,729,547 | 3,540,907 |
| All destination markets | Quantity | 3,912,229 | 2,744,787 | 3,550,331 |
| United States | Value | 28,629 | 15,621 | 16,729 |
| China | Value | 486,195 | 472,285 | 686,400 |
| South Korea | Value | 525,699 | 268,099 | 559,112 |
| Vietnam | Value | 62,029 | 86,133 | 123,178 |
| Taiwan | Value | 36,455 | 55,384 | 77,343 |
| Singapore | Value | 76,279 | 59,139 | 133,615 |
| Philippines | Value | 104,361 | 112,715 | 121,555 |
| Thailand | Value | 57,460 | 68,637 | 89,657 |
| India | Value | 58,075 | 59,244 | 39,849 |
| All other destination markets | Value | 396,969 | 337,060 | 414,445 |
| Non-U.S. destination markets | Value | 1,803,523 | 1,518,697 | 2,245,153 |
| All destination markets | Value | 1,832,152 | 1,534,318 | 2,261,882 |

Table continued.

**Table IV-85 Continued**
**CTL plate: Exports from Japan, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Quantity | 1,449 | 1,552 | 3,650 |
| China | Quantity | 1,094,297 | 1,059,093 | 1,012,165 |
| South Korea | Quantity | 941,769 | 636,296 | 881,068 |
| Vietnam | Quantity | 196,088 | 279,348 | 292,449 |
| Taiwan | Quantity | 136,044 | 188,272 | 243,195 |
| Singapore | Quantity | 123,179 | 171,029 | 169,581 |
| Philippines | Quantity | 203,816 | 149,970 | 136,319 |
| Thailand | Quantity | 133,129 | 92,693 | 98,263 |
| India | Quantity | 52,249 | 32,939 | 68,170 |
| All other destination markets | Quantity | 295,941 | 371,199 | 329,606 |
| Non-U.S. destination markets | Quantity | 3,176,511 | 2,980,840 | 3,230,816 |
| All destination markets | Quantity | 3,177,960 | 2,982,391 | 3,234,466 |
| United States | Value | 9,112 | 10,434 | 17,020 |
| China | Value | 687,614 | 630,915 | 734,431 |
| South Korea | Value | 618,932 | 377,037 | 756,233 |
| Vietnam | Value | 96,369 | 121,123 | 211,177 |
| Taiwan | Value | 106,154 | 119,048 | 186,137 |
| Singapore | Value | 74,189 | 82,137 | 123,286 |
| Philippines | Value | 117,301 | 78,800 | 92,237 |
| Thailand | Value | 112,428 | 71,354 | 81,449 |
| India | Value | 49,135 | 33,076 | 69,756 |
| All other destination markets | Value | 233,146 | 215,830 | 271,774 |
| Non-U.S. destination markets | Value | 2,095,268 | 1,729,320 | 2,526,480 |
| All destination markets | Value | 2,104,379 | 1,739,754 | 2,543,500 |

Table continued.

**Table IV-85 Continued**
**CTL plate: Exports from Japan, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Unit value | 851 | 1,025 | 1,775 |
| China | Unit value | 487 | 549 | 618 |
| South Korea | Unit value | 480 | 636 | 636 |
| Vietnam | Unit value | 322 | 419 | 513 |
| Taiwan | Unit value | 530 | 625 | 662 |
| Singapore | Unit value | 383 | 486 | 632 |
| Philippines | Unit value | 390 | 430 | 527 |
| Thailand | Unit value | 679 | 703 | 767 |
| India | Unit value | 760 | 699 | 917 |
| All other destination markets | Unit value | 442 | 574 | 699 |
| Non-U.S. destination markets | Unit value | 465 | 556 | 634 |
| All destination markets | Unit value | 468 | 559 | 637 |
| United States | Share of quantity | 0.9 | 0.6 | 0.3 |
| China | Share of quantity | 25.5 | 31.4 | 31.3 |
| South Korea | Share of quantity | 28.0 | 15.4 | 24.8 |
| Vietnam | Share of quantity | 4.9 | 7.5 | 6.8 |
| Taiwan | Share of quantity | 1.8 | 3.2 | 3.3 |
| Singapore | Share of quantity | 5.1 | 4.4 | 6.0 |
| Philippines | Share of quantity | 6.8 | 9.5 | 6.5 |
| Thailand | Share of quantity | 2.2 | 3.6 | 3.3 |
| India | Share of quantity | 2.0 | 3.1 | 1.2 |
| All other destination markets | Share of quantity | 22.9 | 21.4 | 16.7 |
| Non-U.S. destination markets | Share of quantity | 99.1 | 99.4 | 99.7 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-85 Continued**
**CTL plate: Exports from Japan, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Unit value | 6,289 | 6,724 | 4,663 |
| China | Unit value | 628 | 596 | 726 |
| South Korea | Unit value | 657 | 593 | 858 |
| Vietnam | Unit value | 491 | 434 | 722 |
| Taiwan | Unit value | 780 | 632 | 765 |
| Singapore | Unit value | 602 | 480 | 727 |
| Philippines | Unit value | 576 | 525 | 677 |
| Thailand | Unit value | 845 | 770 | 829 |
| India | Unit value | 940 | 1,004 | 1,023 |
| All other destination markets | Unit value | 788 | 581 | 825 |
| Non-U.S. destination markets | Unit value | 660 | 580 | 782 |
| All destination markets | Unit value | 662 | 583 | 786 |
| United States | Share of quantity | 0.0 | 0.1 | 0.1 |
| China | Share of quantity | 34.4 | 35.5 | 31.3 |
| South Korea | Share of quantity | 29.6 | 21.3 | 27.2 |
| Vietnam | Share of quantity | 6.2 | 9.4 | 9.0 |
| Taiwan | Share of quantity | 4.3 | 6.3 | 7.5 |
| Singapore | Share of quantity | 3.9 | 5.7 | 5.2 |
| Philippines | Share of quantity | 6.4 | 5.0 | 4.2 |
| Thailand | Share of quantity | 4.2 | 3.1 | 3.0 |
| India | Share of quantity | 1.6 | 1.1 | 2.1 |
| All other destination markets | Share of quantity | 9.3 | 12.4 | 10.2 |
| Non-U.S. destination markets | Share of quantity | 100.0 | 99.9 | 99.9 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official export statistics under HS subheading, 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91, as reported by Japan Ministry of Finance in the Global Trade Atlas database, accessed September 29, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

# The industry in South Africa

## Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from two firms, ArcelorMittal South Africa and EVRAZ Highveld, which accounted for *** production of CTL plate in South Africa during 2015, and approximately *** percent of U.S. imports of CTL plate from South Africa in 2015.[38]

In these full first five-year reviews, the Commission issued a foreign producers' questionnaire to three firms believed to produce CTL plate in South Africa but did not receive any responses.

Table IV-86 presents data on gross production and apparent gross consumption of reversing mill plate in South Africa.[39]

**Table IV-86**
**Reversing mill plate: Gross production and apparent gross consumption in South Africa, by period**

Quantity in short tons

| Item | 2016 | 2017 | 2018 |
|---|---|---|---|
| Gross production | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** |

Table continued.

**Table IV-86 Continued**
**CTL plate: Gross production and apparent gross consumption in Austria, by period**

Quantity in short tons

| Item | 2019 | 2020 | 2021 | Projected 2022 |
|---|---|---|---|---|
| Gross production | *** | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** | *** |

Source: ***

[38] Original confidential report, January 3, 2022, p. VII-72.

[39] ***. Email from ***. For more information on mill differences see Part I, Manufacturing processes.

## Recent developments

Table IV-87 presents events that have occurred in the South African CTL plate industry since the original investigations.

**Table IV-87**
**CTL plate: Recent developments in the South African industry**

| Item | Firm | Event |
|---|---|---|
| Force majeure | ArcelorMittal | In July 2021, ArcelorMittal South Africa, a producer of steel plate, announced that it had given notice to its customers of a force majeure due to civil unrest in South Africa's KwaZulu-Natal and Gauteng provinces. |
| Plant restart | Highveld Robusteel | In November 2021, Highveld Robusteel acquired the assets of Evraz Highveld and announced a planned upgrade and restart of its steel plate facilities. |

Source: Kotze, Chantelle, "ArcelorMittal South Africa Declares Force Majeure Due to Civil Unrest," July 15, 2021, https://www.spglobal.com/platts/en/market-insights/latest-news/shipping/071521-arcelormittal-south-africa-declares-force-majeure-due-to-civil-unrest; Cleveland-Cliffs' response to the notice of institution, January 3, 2022, exh. 19.

## Exports

Table IV-88 presents data for exports of CTL plate from South Africa, by destination market in descending order of quantity for 2021. The leading export markets for CTL plate from South Africa in 2021, by quantity, were Zimbabwe and Zambia, accounting for 34.1 percent and 32.6 percent, respectively. The United States accounted for 0.3 percent of exports of CTL plate from South Africa, by quantity, in 2021.

**Table IV-88**
**CTL plate: Exports from South Africa, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Quantity | 1 | 0 | --- |
| Zimbabwe | Quantity | 7,571 | 6,718 | 7,351 |
| Zambia | Quantity | 8,735 | 9,342 | 10,315 |
| Mozambique | Quantity | 1,768 | 1,147 | 1,597 |
| Botswana | Quantity | 618 | 895 | 1,221 |
| Democratic Republic of the Congo | Quantity | 1,307 | 3,335 | 6,212 |
| Malawi | Quantity | 2,185 | 2,218 | 2,461 |
| Namibia | Quantity | 745 | 575 | 671 |
| Tanzania | Quantity | 1,802 | 1,518 | 862 |
| All other destination markets | Quantity | 1,443 | 1,646 | 8,251 |
| Non-U.S. destination markets | Quantity | 26,174 | 27,395 | 38,942 |
| All destination markets | Quantity | 26,175 | 27,395 | 38,942 |
| United States | Value | 5 | 0 | --- |
| Zimbabwe | Value | 4,490 | 5,491 | 6,768 |
| Zambia | Value | 5,688 | 7,942 | 9,213 |
| Mozambique | Value | 1,097 | 1,037 | 1,716 |
| Botswana | Value | 458 | 825 | 1,291 |
| Democratic Republic of the Congo | Value | 1,293 | 3,658 | 7,466 |
| Malawi | Value | 1,187 | 1,604 | 1,991 |
| Namibia | Value | 511 | 466 | 595 |
| Tanzania | Value | 1,715 | 1,856 | 1,335 |
| All other destination markets | Value | 1,178 | 2,737 | 4,025 |
| Non-U.S. destination markets | Value | 17,618 | 25,616 | 34,400 |
| All destination markets | Value | 17,623 | 25,616 | 34,400 |

Table continued.

**Table IV-88 Continued**
**CTL plate: Exports from South Africa, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Quantity | --- | --- | 73 |
| Zimbabwe | Quantity | 6,555 | 7,447 | 7,872 |
| Zambia | Quantity | 8,383 | 8,144 | 7,517 |
| Mozambique | Quantity | 2,005 | 1,336 | 1,796 |
| Botswana | Quantity | 1,044 | 738 | 1,482 |
| Democratic Republic of the Congo | Quantity | 4,466 | 1,546 | 1,468 |
| Malawi | Quantity | 1,628 | 2,116 | 1,395 |
| Namibia | Quantity | 1,074 | 675 | 527 |
| Tanzania | Quantity | 925 | 163 | 216 |
| All other destination markets | Quantity | 2,784 | 1,196 | 709 |
| Non-U.S. destination markets | Quantity | 28,863 | 23,361 | 22,982 |
| All destination markets | Quantity | 28,863 | 23,361 | 23,055 |
| United States | Value | --- | --- | 45 |
| Zimbabwe | Value | 5,961 | 6,374 | 9,455 |
| Zambia | Value | 7,037 | 5,859 | 8,473 |
| Mozambique | Value | 2,159 | 1,288 | 2,624 |
| Botswana | Value | 982 | 618 | 1,865 |
| Democratic Republic of the Congo | Value | 5,317 | 1,478 | 2,302 |
| Malawi | Value | 1,384 | 1,526 | 1,720 |
| Namibia | Value | 938 | 532 | 804 |
| Tanzania | Value | 866 | 188 | 454 |
| All other destination markets | Value | 2,217 | 1,492 | 1,286 |
| Non-U.S. destination markets | Value | 26,862 | 19,356 | 28,981 |
| All destination markets | Value | 26,862 | 19,356 | 29,026 |

Table continued.

**Table IV-88 Continued**
**CTL plate: Exports from South Africa, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Unit value | 3,723 | 2,649 | --- |
| Zimbabwe | Unit value | 593 | 817 | 921 |
| Zambia | Unit value | 651 | 850 | 893 |
| Mozambique | Unit value | 620 | 904 | 1,074 |
| Botswana | Unit value | 741 | 921 | 1,057 |
| Democratic Republic of the Congo | Unit value | 990 | 1,097 | 1,202 |
| Malawi | Unit value | 543 | 723 | 809 |
| Namibia | Unit value | 687 | 809 | 887 |
| Tanzania | Unit value | 952 | 1,222 | 1,548 |
| All other destination markets | Unit value | 816 | 1,663 | 488 |
| Non-U.S. destination markets | Unit value | 673 | 935 | 883 |
| All destination markets | Unit value | 673 | 935 | 883 |
| United States | Share of quantity | 0.0 | 0.0 | --- |
| Zimbabwe | Share of quantity | 28.9 | 24.5 | 18.9 |
| Zambia | Share of quantity | 33.4 | 34.1 | 26.5 |
| Mozambique | Share of quantity | 6.8 | 4.2 | 4.1 |
| Botswana | Share of quantity | 2.4 | 3.3 | 3.1 |
| Democratic Republic of the Congo | Share of quantity | 5.0 | 12.2 | 16.0 |
| Malawi | Share of quantity | 8.3 | 8.1 | 6.3 |
| Namibia | Share of quantity | 2.8 | 2.1 | 1.7 |
| Tanzania | Share of quantity | 6.9 | 5.5 | 2.2 |
| All other destination markets | Share of quantity | 5.5 | 6.0 | 21.2 |
| Non-U.S. destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-88 Continued**
**CTL plate: Exports from South Africa, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Unit value | --- | --- | 621 |
| Zimbabwe | Unit value | 909 | 856 | 1,201 |
| Zambia | Unit value | 839 | 719 | 1,127 |
| Mozambique | Unit value | 1,077 | 964 | 1,461 |
| Botswana | Unit value | 941 | 837 | 1,258 |
| Democratic Republic of the Congo | Unit value | 1,191 | 956 | 1,568 |
| Malawi | Unit value | 850 | 721 | 1,233 |
| Namibia | Unit value | 873 | 788 | 1,524 |
| Tanzania | Unit value | 937 | 1,154 | 2,104 |
| All other destination markets | Unit value | 796 | 1,248 | 1,814 |
| Non-U.S. destination markets | Unit value | 931 | 829 | 1,261 |
| All destination markets | Unit value | 931 | 829 | 1,259 |
| United States | Share of quantity | --- | --- | 0.3 |
| Zimbabwe | Share of quantity | 22.7 | 31.9 | 34.1 |
| Zambia | Share of quantity | 29.0 | 34.9 | 32.6 |
| Mozambique | Share of quantity | 6.9 | 5.7 | 7.8 |
| Botswana | Share of quantity | 3.6 | 3.2 | 6.4 |
| Democratic Republic of the Congo | Share of quantity | 15.5 | 6.6 | 6.4 |
| Malawi | Share of quantity | 5.6 | 9.1 | 6.0 |
| Namibia | Share of quantity | 3.7 | 2.9 | 2.3 |
| Tanzania | Share of quantity | 3.2 | 0.7 | 0.9 |
| All other destination markets | Share of quantity | 9.6 | 5.1 | 3.1 |
| Non-U.S. destination markets | Share of quantity | 100.0 | 100.0 | 99.7 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official export statistics under HS subheading, 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91, as reported by South African Revenue Service in the Global Trade Atlas database, accessed September 29, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

# The industry in South Korea

## Overview

During the final phase of the original investigations, the Commission received a foreign producer/exporter questionnaire from one firm, POSCO, which accounted for approximately *** percent of production of subject CTL plate in South Korea during 2015, and *** subject U.S. imports of CTL plate from South Korea in 2015.[40]

In these full first five-year reviews, the Commission issued a foreign producers' questionnaire to seven firms believed to produce CTL plate in South Korea and received responses from three firms: POSCO, POSCO International, and Samsung C&T Corporation ("Samsung C&T"). POSCO indicated that it accounted for essentially all subject CTL plate production in South Korea in 2021.[41]

Table IV-89 presents data on gross production and apparent gross consumption of reversing mill plate in South Korea.[42]

**Table IV-89**
**Reversing mill plate: Gross production and apparent gross consumption in South Korea, by period**

Quantity in short tons

| Item | 2016 | 2017 | 2018 |
|---|---|---|---|
| Gross production | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** |

Table continued.

**Table IV-89 Continued**
**Reversing mill plate: Gross production and apparent gross consumption in South Korea, by period**

Quantity in short tons

| Item | 2019 | 2020 | 2021 | Projected 2022 |
|---|---|---|---|---|
| Gross production | *** | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** | *** |

Source: ***

[40] Original confidential report, p. VII-65.
[41] POSCO's response to the notice of institution, January 3, 2022, pp. 18-19.
[42] ***. Email from ***. For more information on mill differences see Part I, Manufacturing processes.

Table IV-90 presents summary information on the CTL plate operations of the responding producers and exporters in South Korea and table IV-91 presents summary information on operations of CTL plate resellers in South Korea.[43]

**Table IV-90**
**CTL plate: Summary data for producers in South Korea, 2021**

| Firm | Production (short tons) | Share of reported production (percent) | Exports to the United States (short tons) | Share of reported exports to the United States (percent) | Total shipments (short tons) | Share of firm's total shipments exported to the United States (percent) |
|---|---|---|---|---|---|---|
| POSCO | *** | *** | *** | *** | *** | *** |
| POSCO International | *** | *** | *** | *** | *** | *** |
| Samsung C&T | *** | *** | *** | *** | *** | *** |
| All firms | *** | 100.0 | *** | *** | *** | *** |

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

**Table IV-91**
**CTL plate: Summary data on resellers in South Korea, 2021**

| Resellers | Resales exported to all destination markets (short tons) | Share of resales exported to all destination markets (percent) | Resales exported to the United States (short tons) | Share of resales exported to the United States (percent) |
|---|---|---|---|---|
| POSCO International | *** | *** | *** | *** |
| Samsung C&T | *** | *** | *** | *** |
| All firms | *** | 100.0 | *** | 100.0 |

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

[43] ***.

## Recent developments

Table IV-92 presents events that have occurred in the South Korean CTL plate industry since the original investigations.

**Table IV-92**
**CTL plate: Recent developments in the South Korean industry**

| Item | Firm | Event |
|---|---|---|
| Plant upgrade | POSCO | In 2017, POSCO, a steel plate producer announced the expansion of one of its blast furnaces, increasing the capacity of the furnace from 4350 million cubic meters to 5600 million cubic meters. |
| Plant upgrade | POSCO | In May 2020, POSCO announced a $178.2 million upgrade of the blast furnaces at its Gwangyang mill to increase productivity. |
| Plant closure | POSCO | In December 2021, POSCO announced the permanent closure of its steel blast furnace in Pohang. The blast furnace was responsible for one million metric tons of steel output per year. |

Source: Cleveland-Cliffs' response to the notice of institution, January 3, 2022, exh. 18; Steel Orbis, "POSCO Upgrade Blast Furnace at Gwangyang," May 28, 2020, https://www.steelorbis.com/steel-news/latest-news/posco-upgrades-blast-furnaces-at-gwangyang-1147874.htm; Steel Orbis, "POSCO Permanently Shuts Blast Furnace No. 1 at Pohang Plant," December 29, 2021, https://www.steelorbis.com/steel-news/latest-news/posco-permanently-shuts-blast-furnace-no-1-at-pohang-plant-1228099.htm#:~:text=South%20Korean%20steelmaker%20POSCO%20has,48%20years%20and%20six%20months.

## Changes in operations

Producers in South Korea were asked to report any change in the character of their operations or organization relating to the production of CTL plate since 2016. No producers indicated in their questionnaires that they had experienced such changes.

## Operations on CTL plate

Table IV-93 presents information on the CTL plate operations of the responding producers and resellers in South Korea. Overall, during 2016-21, South Korean producers' capacity of CTL plate remained the same, meanwhile production of CTL plate decreased by *** percent. South Korean producers' capacity was the same in interim 2022 compared to interim 2021, while production was lower (by *** percent). During the period for which data were collected commercial home market shipments accounted for a majority (over half) of shipments, by quantity. Meanwhile, export shipments to the United States accounted for between *** percent and *** percent all export shipments in each period. South Korean producers' end-of- period inventories fluctuated during 2016-21, but overall decreased by *** percent and were *** percent higher in interim 2022 compared to interim 2021.

**Table IV-93**
**CTL plate: Data on industry in South Korea, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** |
| Production | Quantity | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** |
| Export shipments to United States | Quantity | *** | *** | *** |
| Export shipments to European Union markets | Quantity | *** | *** | *** |
| Export shipments to Asian markets | Quantity | *** | *** | *** |
| Export shipments to American markets excluding U.S. | Quantity | *** | *** | *** |
| Export shipments to all other markets | Quantity | *** | *** | *** |
| Export shipments to non-U.S. destination markets | Quantity | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** |
| Export shipments to United States | Value | *** | *** | *** |
| Export shipments to European Union markets | Value | *** | *** | *** |
| Export shipments to Asian markets | Value | *** | *** | *** |
| Export shipments to American markets excluding U.S. | Value | *** | *** | *** |
| Export shipments to all other markets | Value | *** | *** | *** |
| Export shipments to non-U.S. destination markets | Value | *** | *** | *** |
| Export shipments | Value | *** | *** | *** |
| Total shipments | Value | *** | *** | *** |

Table continued.

**Table IV-93 Continued**
**CTL plate: Data on industry in South Korea, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** | *** | *** |
| Production | Quantity | *** | *** | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** | *** | *** |
| Export shipments to United States | Quantity | *** | *** | *** | *** | *** |
| Export shipments to European Union markets | Quantity | *** | *** | *** | *** | *** |
| Export shipments to Asian markets | Quantity | *** | *** | *** | *** | *** |
| Export shipments to American markets excluding U.S. | Quantity | *** | *** | *** | *** | *** |
| Export shipments to all other markets | Quantity | *** | *** | *** | *** | *** |
| Export shipments to non-U.S. destination markets | Quantity | *** | *** | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** | *** | *** |

Table continued

**Table IV-93 Continued**
**CTL plate: Data on industry in South Korea, by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Internal consumption and transfers | Value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** | *** | *** |
| Export shipments to United States | Value | *** | *** | *** | *** | *** |
| Export shipments to European Union markets | Value | *** | *** | *** | *** | *** |
| Export shipments to Asian markets | Value | *** | *** | *** | *** | *** |
| Export shipments to American markets excluding U.S. | Value | *** | *** | *** | *** | *** |
| Export shipments to all other markets | Value | *** | *** | *** | *** | *** |
| Export shipments to non-U.S. destination markets | Value | *** | *** | *** | *** | *** |
| Export shipments | Value | *** | *** | *** | *** | *** |
| Total shipments | Value | *** | *** | *** | *** | *** |

Table continued.

**Table IV-93 Continued**
**CTL plate: Data on industry in South Korea, by period**

Unit values in dollars per short ton; shares in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** |
| Export shipments to United States | Unit value | *** | *** | *** |
| Export shipments to European Union markets | Unit value | *** | *** | *** |
| Export shipments to Asian markets | Unit value | *** | *** | *** |
| Export shipments to American markets excluding U.S. | Unit value | *** | *** | *** |
| Export shipments to all other markets | Unit value | *** | *** | *** |
| Export shipments to non-U.S. destination markets | Unit value | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** |
| Export shipments to United States | Share | *** | *** | *** |
| Export shipments to European Union markets | Share | *** | *** | *** |
| Export shipments to Asian markets | Share | *** | *** | *** |
| Export shipments to American markets excluding U.S. | Share | *** | *** | *** |
| Export shipments to all other markets | Share | *** | *** | *** |
| Export shipments to non-U.S. destination markets | Share | *** | *** | *** |
| Export shipments | Share | *** | *** | *** |
| Total shipments | Share | *** | *** | *** |

Table continued.

**Table IV-93 Continued**
**CTL plate: Data on industry in South Korea, by period**

Unit values in dollars per short ton; shares in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** | *** | *** |
| Export shipments to United States | Unit value | *** | *** | *** | *** | *** |
| Export shipments to European Union markets | Unit value | *** | *** | *** | *** | *** |
| Export shipments to Asian markets | Unit value | *** | *** | *** | *** | *** |
| Export shipments to American markets excluding U.S. | Unit value | *** | *** | *** | *** | *** |
| Export shipments to all other markets | Unit value | *** | *** | *** | *** | *** |
| Export shipments to non-U.S. destination markets | Unit value | *** | *** | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** | *** | *** |
| Export shipments to United States | Share | *** | *** | *** | *** | *** |
| Export shipments to European Union markets | Share | *** | *** | *** | *** | *** |
| Export shipments to Asian markets | Share | *** | *** | *** | *** | *** |
| Export shipments to American markets excluding U.S. | Share | *** | *** | *** | *** | *** |
| Export shipments to all other markets | Share | *** | *** | *** | *** | *** |
| Export shipments to non-U.S. destination markets | Share | *** | *** | *** | *** | *** |
| Export shipments | Share | *** | *** | *** | *** | *** |
| Total shipments | Share | *** | *** | *** | *** | *** |

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

Note: Data are for both producers and resellers of CTL plate in South Korea.

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

## CTL plate thickness and steel type

Producers were asked to indicate whether their firm had the ability or capacity to produce various CTL plate product types and thicknesses in 2021 and whether their firm actually produced the various CTL plate product types and thicknesses in 2021. Table IV-94 presents the count of producers that reported the ability or capacity to produce these items and table IV-95 presents the count of producers that reported actual production.

**Table IV-94**
**CTL plate: Count of producers in South Korea with ability or capacity by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | *** | *** | *** | *** |
| CrMo pressure vessel plate | *** | *** | *** | *** |
| Ni pressure vessel plate | *** | *** | *** | *** |
| Other pressure vessel plate | *** | *** | *** | *** |
| Tool steel plate | *** | *** | *** | *** |
| Mold steel plate | *** | *** | *** | *** |
| AR400-AR600 wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Other wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Oil-drilling platform plate | *** | *** | *** | *** |
| Offshore wind energy plate | *** | *** | *** | *** |
| Shipbuilding plate | *** | *** | *** | *** |
| X-70 (or higher) plate width < 120 inches | *** | *** | *** | *** |
| X-70 (or higher) plate width ≥ 120 inches | *** | *** | *** | *** |
| Other plate for line pipe | *** | *** | *** | *** |
| Sour service plate | *** | *** | *** | *** |
| High-speed steel plate | *** | *** | *** | *** |
| Heat-resisting steel plate | *** | *** | *** | *** |
| UHSS or AHSS plate | *** | *** | *** | *** |
| HSLA plate | *** | *** | *** | *** |
| Forged alloy steel plate | *** | *** | *** | *** |
| A553, Type 1, 9% nickel | *** | *** | *** | *** |
| API2W grade 50 or 60 | *** | *** | *** | *** |
| SA387 grade 11 or 22 | *** | *** | *** | *** |
| SA516 grade 70/65, HIC tested | *** | *** | *** | *** |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | *** | *** | *** | *** |
| Any product type | *** | *** | *** | *** |

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

**Table IV-95**
**CTL plate: Count of producers in South Korea with actual production by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | *** | *** | *** | *** |
| CrMo pressure vessel plate | *** | *** | *** | *** |
| Ni pressure vessel plate | *** | *** | *** | *** |
| Other pressure vessel plate | *** | *** | *** | *** |
| Tool steel plate | *** | *** | *** | *** |
| Mold steel plate | *** | *** | *** | *** |
| AR400-AR600 wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Other wear resistant/abrasion resistant plate | *** | *** | *** | *** |
| Oil-drilling platform plate | *** | *** | *** | *** |
| Offshore wind energy plate | *** | *** | *** | *** |
| Shipbuilding plate | *** | *** | *** | *** |
| X-70 (or higher) plate width < 120 inches | *** | *** | *** | *** |
| X-70 (or higher) plate width ≥ 120 inches | *** | *** | *** | *** |
| Other plate for line pipe | *** | *** | *** | *** |
| Sour service plate | *** | *** | *** | *** |
| High-speed steel plate | *** | *** | *** | *** |
| Heat-resisting steel plate | *** | *** | *** | *** |
| UHSS or AHSS plate | *** | *** | *** | *** |
| HSLA plate | *** | *** | *** | *** |
| Forged alloy steel plate | *** | *** | *** | *** |
| A553, Type 1, 9% nickel | *** | *** | *** | *** |
| API2W grade 50 or 60 | *** | *** | *** | *** |
| SA387 grade 11 or 22 | *** | *** | *** | *** |
| SA516 grade 70/65, HIC tested | *** | *** | *** | *** |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | *** | *** | *** | *** |
| Any product type | *** | *** | *** | *** |

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

Table IV-96 presents quantity data on the responding producer's total shipments of CTL plate in South Korea by plate thickness and steel type in 2021. Carbon plate as rolled accounted for the majority of total CTL plate shipments by the responding producers in South Korea in 2021 (*** percent). Over *** (*** percent) of total shipments made by the responding producer in South Korea were of the smaller category of plate thickness (<1").

**Table IV-96**
**CTL plate: Total shipments of producers in South Korea, by plate thickness and steel type, 2021**

Quantity in short tons; shares in percent

| Product type | Measure | <1" | ≥1" but <4" | ≥4" | Total plate thicknesses |
|---|---|---|---|---|---|
| Carbon plate: As rolled | Quantity | *** | *** | *** | *** |
| Carbon plate: Heat treated | Quantity | *** | *** | *** | *** |
| Carbon plate | Quantity | *** | *** | *** | *** |
| Alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Alloy plate | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate | Quantity | *** | *** | *** | *** |
| Carbon plate: As rolled | Share down | *** | *** | *** | *** |
| Carbon plate: Heat treated | Share down | *** | *** | *** | *** |
| Carbon plate | Share down | *** | *** | *** | *** |
| Alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Alloy plate | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate | Share down | 100.0 | 100.0 | 100.0 | 100.0 |
| Carbon plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Carbon plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Carbon plate | Share across | *** | *** | *** | 100.0 |
| Alloy plate: As rolled | Share across | *** | *** | *** | --- |
| Alloy plate: Heat treated | Share across | *** | *** | *** | --- |
| Alloy plate | Share across | *** | *** | *** | --- |
| Both carbon and alloy plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate | Share across | *** | *** | *** | 100.0 |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## Alternative products

One responding firm produced other products on the same equipment and machinery used to produce CTL plate. ***. As shown in table IV-97, CTL plate accounted for *** of the total production on shared equipment during 2016-21, January to June 2021, and January to June 2022.

**Table IV-97**
**CTL plate: Overall capacity and production on the same equipment as in-scope production in South Korea, by period**

Quantity in short tons; share and ratio in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Overall capacity | Quantity | *** | *** | *** |
| CTL plate production | Quantity | *** | *** | *** |
| Other production | Quantity | *** | *** | *** |
| Total production | Quantity | *** | *** | *** |
| Overall capacity utilization | Ratio | *** | *** | *** |
| CTL plate production | Share | *** | *** | *** |
| Other production | Share | *** | *** | *** |
| Total production | Share | *** | *** | *** |

Table continued.

**Table IV-97 Continued**
**CTL plate: Overall capacity and production on the same equipment as in-scope production in South Korea, by period**

Quantity in short tons; share and ratio in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Overall capacity | Quantity | *** | *** | *** | *** | *** |
| CTL plate production | Quantity | *** | *** | *** | *** | *** |
| Other production | Quantity | *** | *** | *** | *** | *** |
| Total production | Quantity | *** | *** | *** | *** | *** |
| Overall capacity utilization | Ratio | *** | *** | *** | *** | *** |
| CTL plate production | Share | *** | *** | *** | *** | *** |
| Other production | Share | *** | *** | *** | *** | *** |
| Total production | Share | *** | *** | *** | *** | *** |

Source: Compiled from data in response to Commission questionnaires.

## Exports

Table IV-98 presents data for exports of CTL plate from South Korea, by destination market in descending order of quantity for 2021. The leading export markets for CTL plate from South Korea in 2021, by quantity, were Japan and China, accounting for 18.3 percent and 14.0 percent, respectively. The United States accounted for 9.5 percent of exports of CTL plate from South Korea, by quantity, in 2021.

**Table IV-98**
**CTL plate: Exports from South Korea, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Quantity | 408,123 | 209,653 | 227,496 |
| Japan | Quantity | 511,674 | 703,583 | 488,610 |
| China | Quantity | 538,778 | 415,327 | 541,458 |
| Vietnam | Quantity | 190,265 | 191,462 | 214,390 |
| Turkey | Quantity | 45,541 | 56,179 | 51,968 |
| Taiwan | Quantity | 38,659 | 57,684 | 59,785 |
| India | Quantity | 108,821 | 395,404 | 245,779 |
| Mexico | Quantity | 21,068 | 53,217 | 83,429 |
| Malaysia | Quantity | 59,505 | 41,650 | 61,772 |
| All other destination markets | Quantity | 1,037,137 | 1,326,558 | 954,164 |
| Non-U.S. destination markets | Quantity | 2,551,449 | 3,241,065 | 2,701,355 |
| All destination markets | Quantity | 2,959,572 | 3,450,718 | 2,928,851 |
| United States | Value | 218,273 | 113,102 | 159,834 |
| Japan | Value | 195,601 | 307,084 | 261,804 |
| China | Value | 259,235 | 224,984 | 300,478 |
| Vietnam | Value | 69,282 | 89,888 | 117,491 |
| Turkey | Value | 17,759 | 27,771 | 33,141 |
| Taiwan | Value | 16,993 | 31,910 | 39,767 |
| India | Value | 49,816 | 228,674 | 151,367 |
| Mexico | Value | 8,500 | 27,756 | 55,083 |
| Malaysia | Value | 29,148 | 23,781 | 44,991 |
| All other destination markets | Value | 430,510 | 709,742 | 631,499 |
| Non-U.S. destination markets | Value | 1,076,843 | 1,671,590 | 1,635,620 |
| All destination markets | Value | 1,295,117 | 1,784,692 | 1,795,455 |

Table continued.

**Table IV-98 Continued**
**CTL plate: Exports from South Korea, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Quantity | 177,666 | 70,931 | 251,218 |
| Japan | Quantity | 496,457 | 523,003 | 482,687 |
| China | Quantity | 616,033 | 794,748 | 370,679 |
| Vietnam | Quantity | 321,936 | 314,028 | 232,082 |
| Turkey | Quantity | 92,676 | 157,795 | 226,076 |
| Taiwan | Quantity | 58,906 | 122,289 | 176,017 |
| India | Quantity | 221,458 | 237,026 | 145,385 |
| Mexico | Quantity | 139,145 | 95,636 | 83,237 |
| Malaysia | Quantity | 99,695 | 121,023 | 79,261 |
| All other destination markets | Quantity | 946,039 | 891,122 | 592,324 |
| Non-U.S. destination markets | Quantity | 2,992,346 | 3,256,670 | 2,387,748 |
| All destination markets | Quantity | 3,170,013 | 3,327,601 | 2,638,966 |
| United States | Value | 137,762 | 38,547 | 235,941 |
| Japan | Value | 277,295 | 257,295 | 314,834 |
| China | Value | 363,636 | 399,868 | 262,993 |
| Vietnam | Value | 184,667 | 158,045 | 184,854 |
| Turkey | Value | 54,083 | 75,991 | 171,174 |
| Taiwan | Value | 38,302 | 72,923 | 130,831 |
| India | Value | 135,027 | 126,204 | 111,836 |
| Mexico | Value | 81,094 | 47,884 | 67,989 |
| Malaysia | Value | 62,776 | 64,711 | 54,657 |
| All other destination markets | Value | 575,893 | 445,973 | 474,829 |
| Non-U.S. destination markets | Value | 1,772,774 | 1,648,893 | 1,773,996 |
| All destination markets | Value | 1,910,535 | 1,687,440 | 2,009,938 |

Table continued.

**Table IV-98 Continued**
**CTL plate: Exports from South Korea, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Unit value | 535 | 539 | 703 |
| Japan | Unit value | 382 | 436 | 536 |
| China | Unit value | 481 | 542 | 555 |
| Vietnam | Unit value | 364 | 469 | 548 |
| Turkey | Unit value | 390 | 494 | 638 |
| Taiwan | Unit value | 440 | 553 | 665 |
| India | Unit value | 458 | 578 | 616 |
| Mexico | Unit value | 403 | 522 | 660 |
| Malaysia | Unit value | 490 | 571 | 728 |
| All other destination markets | Unit value | 415 | 535 | 662 |
| Non-U.S. destination markets | Unit value | 422 | 516 | 605 |
| All destination markets | Unit value | 438 | 517 | 613 |
| United States | Share of quantity | 13.8 | 6.1 | 7.8 |
| Japan | Share of quantity | 17.3 | 20.4 | 16.7 |
| China | Share of quantity | 18.2 | 12.0 | 18.5 |
| Vietnam | Share of quantity | 6.4 | 5.5 | 7.3 |
| Turkey | Share of quantity | 1.5 | 1.6 | 1.8 |
| Taiwan | Share of quantity | 1.3 | 1.7 | 2.0 |
| India | Share of quantity | 3.7 | 11.5 | 8.4 |
| Mexico | Share of quantity | 0.7 | 1.5 | 2.8 |
| Malaysia | Share of quantity | 2.0 | 1.2 | 2.1 |
| All other destination markets | Share of quantity | 35.0 | 38.4 | 32.6 |
| Non-U.S. destination markets | Share of quantity | 86.2 | 93.9 | 92.2 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-98 Continued**
**CTL plate: Exports from South Korea, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Unit value | 775 | 543 | 939 |
| Japan | Unit value | 559 | 492 | 652 |
| China | Unit value | 590 | 503 | 709 |
| Vietnam | Unit value | 574 | 503 | 797 |
| Turkey | Unit value | 584 | 482 | 757 |
| Taiwan | Unit value | 650 | 596 | 743 |
| India | Unit value | 610 | 532 | 769 |
| Mexico | Unit value | 583 | 501 | 817 |
| Malaysia | Unit value | 630 | 535 | 690 |
| All other destination markets | Unit value | 609 | 500 | 802 |
| Non-U.S. destination markets | Unit value | 592 | 506 | 743 |
| All destination markets | Unit value | 603 | 507 | 762 |
| United States | Share of quantity | 5.6 | 2.1 | 9.5 |
| Japan | Share of quantity | 15.7 | 15.7 | 18.3 |
| China | Share of quantity | 19.4 | 23.9 | 14.0 |
| Vietnam | Share of quantity | 10.2 | 9.4 | 8.8 |
| Turkey | Share of quantity | 2.9 | 4.7 | 8.6 |
| Taiwan | Share of quantity | 1.9 | 3.7 | 6.7 |
| India | Share of quantity | 7.0 | 7.1 | 5.5 |
| Mexico | Share of quantity | 4.4 | 2.9 | 3.2 |
| Malaysia | Share of quantity | 3.1 | 3.6 | 3.0 |
| All other destination markets | Share of quantity | 29.8 | 26.8 | 22.4 |
| Non-U.S. destination markets | Share of quantity | 94.4 | 97.9 | 90.5 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official export statistics under HS subheading, 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91, as reported by Korea Trade Statistics Promotion Institute (KTSPI) in the Global Trade Atlas database, accessed September 29, 2022.

Note: The data presented for South Korea include not only subject exports of CTL plate that are subject to these reviews but also include nonsubject exports of CTL plate that are subject to the earlier 1999 South Korea Orders. Therefore, the export data presented for South Korea are overstated. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

# The industry in Taiwan

## Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from three firms, CSC, Shang Chen, and Tung Ho, which accounted for *** production of CTL plate in Taiwan during 2015, and *** of U.S. imports of CTL plate from Taiwan in 2015.[44]

In these full first five-year reviews, the Commission issued a foreign producers' questionnaire to eight firms believed to produce CTL plate in Taiwan but did not receive any responses.

Table IV-99 presents data on gross production and apparent gross consumption of reversing mill plate in Taiwan.[45]

**Table IV-99**
**Reversing mill plate: Gross production and apparent gross consumption in Taiwan, by period**

Quantity in short tons

| Item | 2016 | 2017 | 2018 |
|---|---|---|---|
| Gross production | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** |

Table continued.

**Table IV-99 Continued**
**CTL plate: Gross production and apparent gross consumption in Taiwan, by period**

Quantity in short tons

| Item | 2019 | 2020 | 2021 | Projected 2022 |
|---|---|---|---|---|
| Gross production | *** | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** | *** |

Source: ***

[44] Original confidential report, January 3, 2022, p. VII-80.
[45] ***. Email from ***. For more information on mill differences see Part I, Manufacturing processes.

## Recent developments

Table IV-100 presents events that have occurred in CTL plate industry in Taiwan since the original investigations.

**Table IV-100**
**CTL plate: Recent developments in the industry in Taiwan**

| Item | Firm | Event |
|---|---|---|
| Plant upgrade | China Steel Corporation | In May 2021, China Steel Corporation (CSC) announced that it would invest $28.64 million to upgrade its plate rolling mill. The project is expected to be completed by December 2023. |

Source: Steel Orbis, "Taiwan's CSC to Invest in Plate Rolling Mill Enhancement Project," May 14, 2021, https://www.steelorbis.com/steel-news/latest-news/taiwans-csc-to-invest-in-plate-rolling-mill-enhancement-project-1199850.htm.

## Exports

Table IV-101 presents data for exports of CTL plate from Taiwan, by destination market in descending order of quantity for 2021. The leading export markets for CTL plate from Taiwan in 2021, by quantity, were Japan and Vietnam, accounting for 33.4 percent and 21.9 percent, respectively. The United States did not account for any exports of CTL plate from Taiwan, by quantity, in 2021.

**Table IV-101**
**CTL plate: Exports from Taiwan, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Quantity | 9,340 | 2,018 | 1,511 |
| Japan | Quantity | 48,495 | 51,214 | 47,197 |
| Vietnam | Quantity | 9,065 | 12,231 | 16,380 |
| Canada | Quantity | 24,278 | 31,742 | 51,259 |
| Australia | Quantity | 14,428 | 14,180 | 14,631 |
| Philippines | Quantity | 1,043 | 2,852 | 1,673 |
| Pakistan | Quantity | 1,344 | 1,391 | 1,876 |
| New Zealand | Quantity | 2,977 | 1,929 | 1,617 |
| China | Quantity | 3,758 | 3,990 | 1,649 |
| All other destination markets | Quantity | 16,535 | 14,314 | 15,438 |
| Non-U.S. destination markets | Quantity | 121,923 | 133,844 | 151,720 |
| All destination markets | Quantity | 131,263 | 135,862 | 153,231 |
| United States | Value | 3,677 | 1,128 | 964 |
| Japan | Value | 18,759 | 23,700 | 25,090 |
| Vietnam | Value | 4,034 | 6,090 | 9,962 |
| Canada | Value | 9,891 | 17,512 | 33,916 |
| Australia | Value | 6,317 | 7,442 | 8,969 |
| Philippines | Value | 630 | 1,566 | 1,129 |
| Pakistan | Value | 901 | 1,084 | 1,688 |
| New Zealand | Value | 1,480 | 1,184 | 1,099 |
| China | Value | 4,031 | 3,854 | 2,093 |
| All other destination markets | Value | 9,978 | 8,886 | 10,710 |
| Non-U.S. destination markets | Value | 56,021 | 71,319 | 94,657 |
| All destination markets | Value | 59,698 | 72,447 | 95,621 |

Table continued.

**Table IV-101 Continued**
**CTL plate: Exports from Taiwan, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Quantity | 1,615 | 25 | --- |
| Japan | Quantity | 41,220 | 37,858 | 28,473 |
| Vietnam | Quantity | 12,674 | 8,896 | 18,669 |
| Canada | Quantity | 39,583 | 12,542 | 13,770 |
| Australia | Quantity | 5,385 | 4,289 | 7,476 |
| Philippines | Quantity | 1,608 | 3,129 | 4,855 |
| Pakistan | Quantity | 1,672 | 2,216 | 3,806 |
| New Zealand | Quantity | 2,863 | 1,186 | 1,910 |
| China | Quantity | 1,830 | 1,519 | 1,673 |
| All other destination markets | Quantity | 8,804 | 7,029 | 4,607 |
| Non-U.S. destination markets | Quantity | 115,639 | 78,664 | 85,238 |
| All destination markets | Quantity | 117,254 | 78,690 | 85,238 |
| United States | Value | 1,080 | 13 | 0 |
| Japan | Value | 23,705 | 19,432 | 19,492 |
| Vietnam | Value | 7,508 | 4,951 | 13,445 |
| Canada | Value | 25,599 | 6,792 | 12,540 |
| Australia | Value | 3,111 | 2,269 | 6,014 |
| Philippines | Value | 1,168 | 1,688 | 4,163 |
| Pakistan | Value | 1,512 | 1,600 | 3,798 |
| New Zealand | Value | 1,803 | 707 | 1,683 |
| China | Value | 2,032 | 1,746 | 2,482 |
| All other destination markets | Value | 5,973 | 4,222 | 4,716 |
| Non-U.S. destination markets | Value | 72,410 | 43,407 | 68,333 |
| All destination markets | Value | 73,490 | 43,420 | 68,333 |

Table continued.

**Table IV-101 Continued**
**CTL plate: Exports from Taiwan, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Unit value | 394 | 559 | 638 |
| Japan | Unit value | 387 | 463 | 532 |
| Vietnam | Unit value | 445 | 498 | 608 |
| Canada | Unit value | 407 | 552 | 662 |
| Australia | Unit value | 438 | 525 | 613 |
| Philippines | Unit value | 604 | 549 | 675 |
| Pakistan | Unit value | 670 | 779 | 900 |
| New Zealand | Unit value | 497 | 614 | 680 |
| China | Unit value | 1,073 | 966 | 1,269 |
| All other destination markets | Unit value | 603 | 621 | 694 |
| Non-U.S. destination markets | Unit value | 459 | 533 | 624 |
| All destination markets | Unit value | 455 | 533 | 624 |
| United States | Share of quantity | 7.1 | 1.5 | 1.0 |
| Japan | Share of quantity | 36.9 | 37.7 | 30.8 |
| Vietnam | Share of quantity | 6.9 | 9.0 | 10.7 |
| Canada | Share of quantity | 18.5 | 23.4 | 33.5 |
| Australia | Share of quantity | 11.0 | 10.4 | 9.5 |
| Philippines | Share of quantity | 0.8 | 2.1 | 1.1 |
| Pakistan | Share of quantity | 1.0 | 1.0 | 1.2 |
| New Zealand | Share of quantity | 2.3 | 1.4 | 1.1 |
| China | Share of quantity | 2.9 | 2.9 | 1.1 |
| All other destination markets | Share of quantity | 12.6 | 10.5 | 10.1 |
| Non-U.S. destination markets | Share of quantity | 92.9 | 98.5 | 99.0 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-101 Continued**
**CTL plate: Exports from Taiwan, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Unit value | 669 | 519 | --- |
| Japan | Unit value | 575 | 513 | 685 |
| Vietnam | Unit value | 592 | 557 | 720 |
| Canada | Unit value | 647 | 542 | 911 |
| Australia | Unit value | 578 | 529 | 804 |
| Philippines | Unit value | 726 | 539 | 858 |
| Pakistan | Unit value | 904 | 722 | 998 |
| New Zealand | Unit value | 630 | 596 | 881 |
| China | Unit value | 1,110 | 1,149 | 1,483 |
| All other destination markets | Unit value | 678 | 601 | 1,024 |
| Non-U.S. destination markets | Unit value | 626 | 552 | 802 |
| All destination markets | Unit value | 627 | 552 | 802 |
| United States | Share of quantity | 1.4 | 0.0 | --- |
| Japan | Share of quantity | 35.2 | 48.1 | 33.4 |
| Vietnam | Share of quantity | 10.8 | 11.3 | 21.9 |
| Canada | Share of quantity | 33.8 | 15.9 | 16.2 |
| Australia | Share of quantity | 4.6 | 5.5 | 8.8 |
| Philippines | Share of quantity | 1.4 | 4.0 | 5.7 |
| Pakistan | Share of quantity | 1.4 | 2.8 | 4.5 |
| New Zealand | Share of quantity | 2.4 | 1.5 | 2.2 |
| China | Share of quantity | 1.6 | 1.9 | 2.0 |
| All other destination markets | Share of quantity | 7.5 | 8.9 | 5.4 |
| Non-U.S. destination markets | Share of quantity | 98.6 | 100.0 | 100.0 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official export statistics under HS subheading, 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91, as reported by Taiwan Directorate General of Customs in the Global Trade Atlas database, accessed September 29, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

# The industry in Turkey

## Overview

During the final phase of the original investigations, the Commission received a foreign producer/exporter questionnaire from one firm, Erdemir, which accounted for approximately *** percent of production of CTL plate in Turkey during 2015, and *** U.S. imports of CTL plate from Turkey in 2015.[46]

In these full first five-year reviews, the Commission issued a foreign producers' questionnaire to nine firms believed to produce CTL plate in Turkey but did not receive any responses to its questionnaire.

Table IV-102 presents data on gross production and apparent gross consumption of reversing mill plate in Turkey.[47]

**Table IV-102**
**CTL plate: Gross production and apparent gross consumption in Turkey, by period**

Quantity in short tons

| Item | 2016 | 2017 | 2018 |
|---|---|---|---|
| Gross production | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** |

Table continued.

**Table IV-102 Continued**
**CTL plate: Gross production and apparent gross consumption in Turkey, by period**

Quantity in short tons

| Item | 2019 | 2020 | 2021 | Projected 2022 |
|---|---|---|---|---|
| Gross production | *** | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** | *** |

Source: ***

[46] Original confidential report, p. VII-87.
[47] ***. Email from ***. For more information on mill differences see Part I, Manufacturing processes.

## Recent developments

Table IV-103 presents events that have occurred in the CTL plate industry in Turkey since the original investigations.

**Table IV-103**
**CTL plate: Recent developments in the Turkish industry**

| Item | Firm | Event |
|---|---|---|
| Plant upgrade | Erdemir | In August 2017, Eregli Demir ve Celik Fabrikalari (Erdemir) announced the building of a new heat treatment plant for plate production. |
| Plant upgrade | Erdemir | In August 2020, Erdemir announced the building of two new blast furnaces at its plants in Eregli and Iskenderun. |

Source: Cleveland-Cliffs' response to the notice of institution, January 3, 2022, exh. 21.

## Exports

Table IV-104 presents data for exports of CTL plate from Turkey, by destination market in descending order of quantity for 2021. The leading export markets for CTL plate from Turkey in 2021, by quantity, were Canada and Iraq, accounting for 25.3 percent and 11.2 percent, respectively. The United States accounted for 0.3 percent of exports of CTL plate from Turkey, by quantity, in 2021.

**Table IV-104**
**CTL plate: Exports from Turkey, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Quantity | 26,778 | 8 | 71 |
| Canada | Quantity | 20,685 | 63,960 | 82,034 |
| Iraq | Quantity | 24,339 | 24,110 | 19,319 |
| Egypt | Quantity | 4,792 | 4,050 | 15,488 |
| Israel | Quantity | 2,735 | 6,998 | 11,354 |
| Ireland | Quantity | 2,088 | 4,231 | 5,920 |
| United Kingdom | Quantity | 21,409 | 22,309 | 11,348 |
| Tunisia | Quantity | 5,078 | 4,006 | 7,235 |
| Nigeria | Quantity | 18,942 | 17,944 | 9,919 |
| All other destination markets | Quantity | 136,308 | 165,384 | 170,649 |
| Non-U.S. destination markets | Quantity | 236,375 | 312,991 | 333,267 |
| All destination markets | Quantity | 263,153 | 312,999 | 333,338 |
| United States | Value | 9,782 | 5 | 67 |
| Canada | Value | 8,973 | 31,473 | 50,724 |
| Iraq | Value | 11,756 | 14,194 | 12,233 |
| Egypt | Value | 1,873 | 2,291 | 9,019 |
| Israel | Value | 1,276 | 3,694 | 6,738 |
| Ireland | Value | 697 | 2,111 | 3,465 |
| United Kingdom | Value | 8,136 | 10,803 | 6,347 |
| Tunisia | Value | 1,866 | 2,239 | 4,326 |
| Nigeria | Value | 7,700 | 10,550 | 6,816 |
| All other destination markets | Value | 61,709 | 95,820 | 105,868 |
| Non-U.S. destination markets | Value | 103,986 | 173,175 | 205,534 |
| All destination markets | Value | 113,768 | 173,180 | 205,602 |

Table continued.

**Table IV-104 Continued**
**CTL plate: Exports from Turkey, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Quantity | 12 | --- | 700 |
| Canada | Quantity | 39,372 | 42 | 68,907 |
| Iraq | Quantity | 43,267 | 46,055 | 30,326 |
| Egypt | Quantity | 10,412 | 29,122 | 16,588 |
| Israel | Quantity | 8,921 | 15,682 | 15,572 |
| Ireland | Quantity | 910 | 3,866 | 13,526 |
| United Kingdom | Quantity | 18,302 | 1,370 | 13,256 |
| Tunisia | Quantity | 6,270 | 7,111 | 7,509 |
| Nigeria | Quantity | 5,657 | 11,728 | 5,459 |
| All other destination markets | Quantity | 194,450 | 190,137 | 100,120 |
| Non-U.S. destination markets | Quantity | 327,560 | 305,112 | 271,263 |
| All destination markets | Quantity | 327,572 | 305,112 | 271,963 |
| United States | Value | 25 | --- | 763 |
| Canada | Value | 25,790 | 28 | 59,425 |
| Iraq | Value | 22,817 | 23,269 | 26,012 |
| Egypt | Value | 5,159 | 13,907 | 15,068 |
| Israel | Value | 4,579 | 7,445 | 13,703 |
| Ireland | Value | 495 | 1,779 | 11,422 |
| United Kingdom | Value | 8,674 | 620 | 12,204 |
| Tunisia | Value | 3,187 | 3,161 | 6,232 |
| Nigeria | Value | 3,696 | 5,836 | 4,153 |
| All other destination markets | Value | 108,726 | 92,985 | 93,601 |
| Non-U.S. destination markets | Value | 183,122 | 149,031 | 241,820 |
| All destination markets | Value | 183,147 | 149,031 | 242,583 |

Table continued.

**Table IV-104 Continued**
**CTL plate: Exports from Turkey, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Unit value | 365 | 688 | 943 |
| Canada | Unit value | 434 | 492 | 618 |
| Iraq | Unit value | 483 | 589 | 633 |
| Egypt | Unit value | 391 | 566 | 582 |
| Israel | Unit value | 466 | 528 | 593 |
| Ireland | Unit value | 334 | 499 | 585 |
| United Kingdom | Unit value | 380 | 484 | 559 |
| Tunisia | Unit value | 368 | 559 | 598 |
| Nigeria | Unit value | 407 | 588 | 687 |
| All other destination markets | Unit value | 453 | 579 | 620 |
| Non-U.S. destination markets | Unit value | 440 | 553 | 617 |
| All destination markets | Unit value | 432 | 553 | 617 |
| United States | Share of quantity | 10.2 | 0.0 | 0.0 |
| Canada | Share of quantity | 7.9 | 20.4 | 24.6 |
| Iraq | Share of quantity | 9.2 | 7.7 | 5.8 |
| Egypt | Share of quantity | 1.8 | 1.3 | 4.6 |
| Israel | Share of quantity | 1.0 | 2.2 | 3.4 |
| Ireland | Share of quantity | 0.8 | 1.4 | 1.8 |
| United Kingdom | Share of quantity | 8.1 | 7.1 | 3.4 |
| Tunisia | Share of quantity | 1.9 | 1.3 | 2.2 |
| Nigeria | Share of quantity | 7.2 | 5.7 | 3.0 |
| All other destination markets | Share of quantity | 51.8 | 52.8 | 51.2 |
| Non-U.S. destination markets | Share of quantity | 89.8 | 100.0 | 100.0 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-104 Continued**
**CTL plate: Exports from Turkey, by destination market and period**

Unit value in dollars per short ton; share in percent

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Unit value | 2,027 | --- | 1,091 |
| Canada | Unit value | 655 | 679 | 862 |
| Iraq | Unit value | 527 | 505 | 858 |
| Egypt | Unit value | 495 | 478 | 908 |
| Israel | Unit value | 513 | 475 | 880 |
| Ireland | Unit value | 544 | 460 | 844 |
| United Kingdom | Unit value | 474 | 453 | 921 |
| Tunisia | Unit value | 508 | 445 | 830 |
| Nigeria | Unit value | 653 | 498 | 761 |
| All other destination markets | Unit value | 559 | 489 | 935 |
| Non-U.S. destination markets | Unit value | 559 | 488 | 891 |
| All destination markets | Unit value | 559 | 488 | 892 |
| United States | Share of quantity | 0.0 | --- | 0.3 |
| Canada | Share of quantity | 12.0 | 0.0 | 25.3 |
| Iraq | Share of quantity | 13.2 | 15.1 | 11.2 |
| Egypt | Share of quantity | 3.2 | 9.5 | 6.1 |
| Israel | Share of quantity | 2.7 | 5.1 | 5.7 |
| Ireland | Share of quantity | 0.3 | 1.3 | 5.0 |
| United Kingdom | Share of quantity | 5.6 | 0.4 | 4.9 |
| Tunisia | Share of quantity | 1.9 | 2.3 | 2.8 |
| Nigeria | Share of quantity | 1.7 | 3.8 | 2.0 |
| All other destination markets | Share of quantity | 59.4 | 62.3 | 36.8 |
| Non-U.S. destination markets | Share of quantity | 100.0 | 100.0 | 99.7 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official export statistics under HS subheading, 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91, as reported by State Institute of Statistics in the Global Trade Atlas database, accessed September 29, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.

## Subject countries combined

Table IV-105 presents data on gross production and apparent gross consumption of reversing mill plate in subject countries combined.[48]

**Table IV-105**
**CTL plate: Gross production and apparent gross consumption in aggregated subject countries, by period**

Quantity in short tons

| Item | 2016 | 2017 | 2018 |
|---|---|---|---|
| Gross production | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** |

Table continued.

**Table IV-105 Continued**
**CTL plate: Gross production and apparent gross consumption in aggregated subject countries, by period**

Quantity in short tons

| Item | 2019 | 2020 | 2021 | Projected 2022 |
|---|---|---|---|---|
| Gross production | *** | *** | *** | *** |
| Apparent gross consumption | *** | *** | *** | *** |

Source: ***

[48] ***. ***. Email from ***. For more information on mill differences see Part I, Manufacturing processes.

## Operations on CTL plate

Table IV-106 presents summary data on CTL plate operations of the reporting subject producers in the subject countries.

**Table IV-106**
**CTL plate: Data on industry in aggregated subject countries by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** |
| Production | Quantity | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** |
| Export shipments | Value | *** | *** | *** |
| Total shipments | Value | *** | *** | *** |

Table continued.

**Table IV-106 Continued**
**CTL plate: Data on industry in aggregated subject countries by period**

Quantity in short tons; value in 1,000 dollars

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Capacity | Quantity | *** | *** | *** | *** | *** |
| Production | Quantity | *** | *** | *** | *** | *** |
| End-of-period inventories | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Quantity | *** | *** | *** | *** | *** |
| Commercial home market shipments | Quantity | *** | *** | *** | *** | *** |
| Home market shipments | Quantity | *** | *** | *** | *** | *** |
| Export shipments | Quantity | *** | *** | *** | *** | *** |
| Total shipments | Quantity | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Value | *** | *** | *** | *** | *** |
| Home market shipments | Value | *** | *** | *** | *** | *** |
| Export shipments | Value | *** | *** | *** | *** | *** |
| Total shipments | Value | *** | *** | *** | *** | *** |

Table continued.

**Table IV-106 Continued**
**CTL plate: Data on industry in aggregated subject countries by period**

Unit values in dollars per short ton; ratio and shares in percent

| Item | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** |
| Export shipments | Share | *** | *** | *** |
| Total shipments | Share | *** | *** | *** |

Table continued.

**Table IV-106 Continued**
**CTL plate: Data on industry in aggregated subject countries by period**

Unit values in dollars per short ton; ratio and shares in percent

| Item | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| Internal consumption and transfers | Unit value | *** | *** | *** | *** | *** |
| Commercial home market shipments | Unit value | *** | *** | *** | *** | *** |
| Home market shipments | Unit value | *** | *** | *** | *** | *** |
| Export shipments | Unit value | *** | *** | *** | *** | *** |
| Total shipments | Unit value | *** | *** | *** | *** | *** |
| Capacity utilization ratio | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to production | Ratio | *** | *** | *** | *** | *** |
| Inventory ratio to total shipments | Ratio | *** | *** | *** | *** | *** |
| Internal consumption and transfers | Share | *** | *** | *** | *** | *** |
| Commercial home market shipments | Share | *** | *** | *** | *** | *** |
| Home market shipments | Share | *** | *** | *** | *** | *** |
| Export shipments | Share | *** | *** | *** | *** | *** |
| Total shipments | Share | *** | *** | *** | *** | *** |

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

Table IV-107 presents aggregate data for export shipments of CTL plate by producers and resellers.

**Table IV-107**
**CTL plate: Export shipments by producers and resellers in aggregated subject countries, by destination market and period**

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

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Quantity | 689,680 | 94,741 | 168,953 |
| European Union markets | Quantity | 2,548,820 | 2,867,330 | 2,629,872 |
| Asian markets | Quantity | 4,728,849 | 4,115,229 | 4,255,979 |
| American markets excluding U.S. | Quantity | 535,113 | 560,316 | 510,486 |
| All other markets | Quantity | 636,405 | 810,289 | 611,498 |
| Non-U.S. destination markets | Quantity | 8,449,187 | 8,353,164 | 8,007,835 |
| All destination markets | Quantity | 9,138,867 | 8,447,905 | 8,176,788 |
| United States | Value | 451,244 | 107,630 | 174,653 |
| European Union markets | Value | 1,604,784 | 2,073,662 | 2,188,419 |
| Asian markets | Value | 2,139,456 | 2,226,711 | 2,709,738 |
| American markets excluding U.S. | Value | 234,457 | 362,851 | 404,863 |
| All other markets | Value | 372,562 | 533,364 | 488,837 |
| Non-U.S. destination markets | Value | 4,351,259 | 5,196,588 | 5,791,857 |
| All destination markets | Value | 4,802,503 | 5,304,218 | 5,966,510 |
| United States | Unit value | 654 | 1,136 | 1,034 |
| European Union markets | Unit value | 630 | 723 | 832 |
| Asian markets | Unit value | 452 | 541 | 637 |
| American markets excluding U.S. | Unit value | 438 | 648 | 793 |
| All other markets | Unit value | 585 | 658 | 799 |
| Non-U.S. destination markets | Unit value | 515 | 622 | 723 |
| All destination markets | Unit value | 526 | 628 | 730 |

Table continued.

**Table IV-107 Continued**
**CTL plate: Export shipments by producers and resellers in aggregated subject countries, by destination market and period**

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

| Destination market | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| United States | Quantity | 129,083 | 59,347 | 130,985 | 61,425 | 94,021 |
| European Union markets | Quantity | 2,517,580 | 2,182,983 | 2,462,188 | 1,222,648 | 1,558,639 |
| Asian markets | Quantity | 4,131,253 | 4,527,176 | 4,162,196 | 1,993,551 | 1,866,379 |
| American markets excluding U.S. | Quantity | 387,078 | 300,504 | 311,375 | 160,876 | 246,064 |
| All other markets | Quantity | 723,038 | 479,596 | 486,018 | 289,827 | 280,513 |
| Non-U.S. destination markets | Quantity | 7,758,949 | 7,490,259 | 7,421,777 | 3,666,902 | 3,951,595 |
| All destination markets | Quantity | 7,888,032 | 7,549,606 | 7,552,762 | 3,728,327 | 4,045,616 |
| United States | Value | 138,172 | 63,685 | 163,119 | 59,434 | 138,199 |
| European Union markets | Value | 1,982,632 | 1,600,711 | 2,395,427 | 1,028,271 | 1,867,554 |
| Asian markets | Value | 2,736,073 | 2,632,630 | 3,230,834 | 1,281,616 | 1,749,813 |
| American markets excluding U.S. | Value | 289,516 | 208,145 | 325,446 | 123,803 | 269,096 |
| All other markets | Value | 562,244 | 348,314 | 458,705 | 233,784 | 335,717 |
| Non-U.S. destination markets | Value | 5,570,465 | 4,789,800 | 6,410,412 | 2,667,474 | 4,222,180 |
| All destination markets | Value | 5,708,637 | 4,853,485 | 6,573,531 | 2,726,908 | 4,360,379 |
| United States | Unit value | 1,070 | 1,073 | 1,245 | 968 | 1,470 |
| European Union markets | Unit value | 788 | 733 | 973 | 841 | 1,198 |
| Asian markets | Unit value | 662 | 582 | 776 | 643 | 938 |
| American markets excluding U.S. | Unit value | 748 | 693 | 1,045 | 770 | 1,094 |
| All other markets | Unit value | 778 | 726 | 944 | 807 | 1,197 |
| Non-U.S. destination markets | Unit value | 718 | 639 | 864 | 727 | 1,068 |
| All destination markets | Unit value | 724 | 643 | 870 | 731 | 1,078 |

Table continued.

**Table IV-107 Continued**
**CTL plate: Export shipments by producers and resellers in aggregated subject countries, by destination market and period**

Shares and ratios in percent; ratios represent the ratio to quantity of total shipments

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Share of quantity | 7.5 | 1.1 | 2.1 |
| European Union markets | Share of quantity | 27.9 | 33.9 | 32.2 |
| Asian markets | Share of quantity | 51.7 | 48.7 | 52.0 |
| American markets excluding U.S. | Share of quantity | 5.9 | 6.6 | 6.2 |
| All other markets | Share of quantity | 7.0 | 9.6 | 7.5 |
| Non-U.S. destination markets | Share of quantity | 92.5 | 98.9 | 97.9 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |
| United States | Share of value | 9.4 | 2.0 | 2.9 |
| European Union markets | Share of value | 33.4 | 39.1 | 36.7 |
| Asian markets | Share of value | 44.5 | 42.0 | 45.4 |
| American markets excluding U.S. | Share of value | 4.9 | 6.8 | 6.8 |
| All other markets | Share of value | 7.8 | 10.1 | 8.2 |
| Non-U.S. destination markets | Share of value | 90.6 | 98.0 | 97.1 |
| All destination markets | Share of value | 100.0 | 100.0 | 100.0 |
| United States | Ratio | 2.7 | 0.4 | 0.7 |
| European Union markets | Ratio | 10.1 | 12.0 | 10.7 |
| Asian markets | Ratio | 18.8 | 17.2 | 17.3 |
| American markets excluding U.S. | Ratio | 2.1 | 2.3 | 2.1 |
| All other markets | Ratio | 2.5 | 3.4 | 2.5 |
| Non-U.S. destination markets | Ratio | 33.6 | 35.0 | 32.6 |
| All destination markets | Ratio | 36.3 | 35.4 | 33.3 |

Table continued.

**Table IV-107 Continued**
**CTL plate: Export shipments by producers and resellers in aggregated subject countries, by destination market and period**

Shares and ratios in percent; ratios represent the ratio to quantity of total shipments

| Destination market | Measure | 2019 | 2020 | 2021 | Jan-Jun 2021 | Jan-Jun 2022 |
|---|---|---|---|---|---|---|
| United States | Share of quantity | 1.6 | 0.8 | 1.7 | 1.6 | 2.3 |
| European Union markets | Share of quantity | 31.9 | 28.9 | 32.6 | 32.8 | 38.5 |
| Asian markets | Share of quantity | 52.4 | 60.0 | 55.1 | 53.5 | 46.1 |
| American markets excluding U.S. | Share of quantity | 4.9 | 4.0 | 4.1 | 4.3 | 6.1 |
| All other markets | Share of quantity | 9.2 | 6.4 | 6.4 | 7.8 | 6.9 |
| Non-U.S. destination markets | Share of quantity | 98.4 | 99.2 | 98.3 | 98.4 | 97.7 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |
| United States | Share of value | 2.4 | 1.3 | 2.5 | 2.2 | 3.2 |
| European Union markets | Share of value | 34.7 | 33.0 | 36.4 | 37.7 | 42.8 |
| Asian markets | Share of value | 47.9 | 54.2 | 49.1 | 47.0 | 40.1 |
| American markets excluding U.S. | Share of value | 5.1 | 4.3 | 5.0 | 4.5 | 6.2 |
| All other markets | Share of value | 9.8 | 7.2 | 7.0 | 8.6 | 7.7 |
| Non-U.S. destination markets | Share of value | 97.6 | 98.7 | 97.5 | 97.8 | 96.8 |
| All destination markets | Share of value | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |
| United States | Ratio | 0.5 | 0.3 | 0.6 | 0.6 | 0.8 |
| European Union markets | Ratio | 10.5 | 10.5 | 11.3 | 11.2 | 13.7 |
| Asian markets | Ratio | 17.2 | 21.8 | 19.1 | 18.3 | 16.4 |
| American markets excluding U.S. | Ratio | 1.6 | 1.4 | 1.4 | 1.5 | 2.2 |
| All other markets | Ratio | 3.0 | 2.3 | 2.2 | 2.7 | 2.5 |
| Non-U.S. destination markets | Ratio | 32.2 | 36.1 | 34.0 | 33.7 | 34.7 |
| All destination markets | Ratio | 32.8 | 36.4 | 34.6 | 34.3 | 35.5 |

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

## CTL plate thickness and steel type

Table IV-108 presents the count of subject producers in all subject countries combined that reported the ability or capacity to produce various CTL plate product types and thicknesses in 2021 and table IV-109 presents the count of subject producers in all subject countries combined that reported actual production.

**Table IV-108**
**CTL plate: Count of producers in aggregated subject countries with ability or capacity by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | 18 | 17 | 17 | 19 |
| CrMo pressure vessel plate | 12 | 13 | 10 | 13 |
| Ni pressure vessel plate | 10 | 10 | 6 | 10 |
| Other pressure vessel plate | 14 | 15 | 13 | 15 |
| Tool steel plate | 11 | 9 | 8 | 11 |
| Mold steel plate | 13 | 12 | 12 | 15 |
| AR400-AR600 wear resistant/abrasion resistant plate | 13 | 13 | 9 | 13 |
| Other wear resistant/abrasion resistant plate | 12 | 12 | 9 | 13 |
| Oil-drilling platform plate | 9 | 10 | 7 | 10 |
| Offshore wind energy plate | 13 | 13 | 10 | 13 |
| Shipbuilding plate | 14 | 15 | 11 | 16 |
| X-70 (or higher) plate width < 120 inches | 10 | 8 | 4 | 10 |
| X-70 (or higher) plate width ≥ 120 inches | 9 | 8 | 4 | 9 |
| Other plate for line pipe | 14 | 14 | 7 | 14 |
| Sour service plate | 12 | 11 | 7 | 12 |
| High-speed steel plate | 6 | 6 | 5 | 7 |
| Heat-resisting steel plate | 9 | 8 | 5 | 9 |
| UHSS or AHSS plate | 10 | 11 | 5 | 11 |
| HSLA plate | 9 | 9 | 7 | 10 |
| Forged alloy steel plate | 3 | 3 | 4 | 4 |
| A553, Type 1, 9% nickel | 10 | 10 | 2 | 10 |
| API2W grade 50 or 60 | 9 | 9 | 7 | 9 |
| SA387 grade 11 or 22 | 11 | 10 | 10 | 12 |
| SA516 grade 70/65, HIC tested | 11 | 12 | 8 | 13 |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | 10 | 10 | 6 | 10 |
| Any product type | 23 | 21 | 21 | 24 |

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

**Table IV-109**
**CTL plate: Count of producers in aggregated subject countries with actual production by specific product type and steel thickness, 2021**

Count in number of firms reporting

| Item | <1" | ≥1" but <4" | ≥4" | Any thickness |
|---|---|---|---|---|
| Carbon structural steel plate | 16 | 17 | 15 | 19 |
| CrMo pressure vessel plate | 9 | 9 | 6 | 10 |
| Ni pressure vessel plate | 6 | 6 | 1 | 7 |
| Other pressure vessel plate | 12 | 13 | 12 | 14 |
| Tool steel plate | 10 | 9 | 7 | 11 |
| Mold steel plate | 9 | 10 | 11 | 12 |
| AR400-AR600 wear resistant/abrasion resistant plate | 12 | 12 | 6 | 12 |
| Other wear resistant/abrasion resistant plate | 10 | 8 | 5 | 11 |
| Oil-drilling platform plate | 6 | 7 | 6 | 7 |
| Offshore wind energy plate | 7 | 7 | 4 | 7 |
| Shipbuilding plate | 11 | 12 | 8 | 13 |
| X-70 (or higher) plate width < 120 inches | 7 | 5 | 2 | 7 |
| X-70 (or higher) plate width ≥ 120 inches | 5 | 4 | 2 | 6 |
| Other plate for line pipe | 10 | 8 | 3 | 10 |
| Sour service plate | 6 | 5 | 2 | 6 |
| High-speed steel plate | 6 | 6 | 4 | 7 |
| Heat-resisting steel plate | 7 | 6 | 2 | 7 |
| UHSS or AHSS plate | 9 | 9 | 5 | 10 |
| HSLA plate | 9 | 9 | 6 | 10 |
| Forged alloy steel plate | 1 | 1 | 2 | 3 |
| A553, Type 1, 9% nickel | 3 | 4 | --- | 4 |
| API2W grade 50 or 60 | 5 | 6 | 3 | 6 |
| SA387 grade 11 or 22 | 8 | 8 | 6 | 9 |
| SA516 grade 70/65, HIC tested | 7 | 9 | 7 | 11 |
| API Quad (API-2H/A633-C/SA537-1/ABS EH-DH36) w/3.2 | 4 | 4 | 4 | 5 |
| Any product type | 20 | 20 | 19 | 23 |

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

Table IV-110 presents quantity data on responding producers' total shipments of CTL plate for all subject countries combined by plate thickness and steel type in 2021.

**Table IV-110**
**CTL plate: Total shipments of producers in aggregated subject countries, by steel type and steel thickness, 2021**

Quantity in short tons; shares in percent

| Product type | Measure | <1" | ≥1" but <4" | ≥4" | Total plate thicknesses |
|---|---|---|---|---|---|
| Carbon plate: As rolled | Quantity | *** | *** | *** | *** |
| Carbon plate: Heat treated | Quantity | *** | *** | *** | *** |
| Carbon plate | Quantity | *** | *** | *** | *** |
| Alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Alloy plate | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Quantity | *** | *** | *** | *** |
| Both carbon and alloy plate | Quantity | *** | *** | *** | *** |
| Carbon plate: As rolled | Share down | *** | *** | *** | *** |
| Carbon plate: Heat treated | Share down | *** | *** | *** | *** |
| Carbon plate | Share down | *** | *** | *** | *** |
| Alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Alloy plate | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: As rolled | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate: Heat treated | Share down | *** | *** | *** | *** |
| Both carbon and alloy plate | Share down | 100.0 | 100.0 | 100.0 | 100.0 |
| Carbon plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Carbon plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Carbon plate | Share across | *** | *** | *** | 100.0 |
| Alloy plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Alloy plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Alloy plate | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: As rolled | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate: Heat treated | Share across | *** | *** | *** | 100.0 |
| Both carbon and alloy plate | Share across | *** | *** | *** | 100.0 |

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

## Exports

Table IV-111 presents data for exports of CTL plate from all subject countries combined, by destination market.

**Table IV-111**
**CTL plate: Exports from aggregated subject sources, by destination market and period**

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

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Quantity | 818,042 | 308,801 | 301,250 |
| Non-U.S. destination markets | Quantity | 21,330,279 | 19,708,700 | 19,557,284 |
| All destination markets | Quantity | 22,148,321 | 20,017,501 | 19,858,534 |
| United States | Value | 525,733 | 223,247 | 265,735 |
| Non-U.S. destination markets | Value | 9,711,141 | 11,474,778 | 13,364,844 |
| All destination markets | Value | 10,236,874 | 11,698,025 | 13,630,579 |
| United States | Unit value | 643 | 723 | 882 |
| Non-U.S. destination markets | Unit value | 455 | 582 | 683 |
| All destination markets | Unit value | 462 | 584 | 686 |
| United States | Share of quantity | 3.7 | 1.5 | 1.5 |
| Non-U.S. destination markets | Share of quantity | 96.3 | 98.5 | 98.5 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-111 Continued**
**CTL plate: Exports from aggregated subject sources, by destination market and period**

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

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Quantity | 227,836 | 103,125 | 284,836 |
| Non-U.S. destination markets | Quantity | 18,984,482 | 16,213,768 | 16,094,182 |
| All destination markets | Quantity | 19,212,318 | 16,316,893 | 16,379,018 |
| United States | Value | 218,334 | 92,652 | 301,888 |
| Non-U.S. destination markets | Value | 12,271,093 | 9,809,150 | 14,030,915 |
| All destination markets | Value | 12,489,427 | 9,901,803 | 14,332,803 |
| United States | Unit value | 958 | 898 | 1,060 |
| Non-U.S. destination markets | Unit value | 646 | 605 | 872 |
| All destination markets | Unit value | 650 | 607 | 875 |
| United States | Share of quantity | 1.2 | 0.6 | 1.7 |
| Non-U.S. destination markets | Share of quantity | 98.8 | 99.4 | 98.3 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official export statistics under HS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91 reported by various national statistical authorities in the Global Trade Atlas database, accessed September 29, 2022.

## Third-country trade actions

Since the original investigations, the third country trade actions listed in table IV-101 have occurred.

**Table IV-112**
**CTL plate: Third-country trade actions since 2016**

| Third Country | Date | Action |
|---|---|---|
| **Armenia, Belarus, Kazakhstan, Kyrgyz Republic, and Russia** | September 2019 | Safeguard tariff rate quotas imposed on imports of certain flat-rolled steel products, including hot-rolled steel into each of the Eurasian Economic Union ("EEU") member countries from other than developing and least-developed countries or South Korea. Imports exceeding these quotas are subject to a 20 percent additional ad valorem tariff. |
| **Australia** | September 2021 | Australia extended antidumping duty orders on quenched and tempered steel plate from Japan. |
| **Brazil** | November 2019 | Antidumping duties orders extended on heavy plates from China, South Korea, and South Africa. |
| **Brazil** | October 2021 | Countervailing duties imposed on hot-rolled steel from China. These measures are currently in force but suspended. |
| **Canada** | August 2018 | Antidumping duty orders extended on certain hot-rolled carbon steel plate from China. |
| **Canada** | October 2020 | Antidumping duty orders imposed on heavy plate from Germany and Turkey. South Korea was also a subject country in these investigations on heavy plate imports to Canada but was found to supply a negligible volume. Dumping margins were 4.8 percent for imports from Germany, and 2.9 percent for imports from Turkey. |
| **European Union** | June 2017 | Antidumping duties imposed on hot-rolled flat products of iron, non-alloy or other alloy steel from Brazil and China. |
| **European Union** | June 2021 | The EU announces a three-year safeguard measure on certain steel products (including CTL plate) from all countries. The safeguard measure consists of a tariff-rate-quota (TRQ) with an out-of-quota duty of 25 percent duty applies. |
| **Taiwan** | March 2017 | Antidumping price undertaking orders imposed on carbon steel plate from Brazil, China, and South Korea. |
| **Turkey** | November 2017 | Antidumping duty orders with margins ranging from 16.89 percent to 22.55 percent imposed on heavy plate from China. |
| **Turkey** | October 2019 | Antidumping duty orders extended on certain hot-rolled carbon steel plate from Brazil, Italy, Japan, and South Korea. |

Sources: Nucor and SSAB's response to the notice of institution, January 3, 2022, exhs. 108, 109, 110, 112, and 114; Government of Canada, "Certain Hot-Rolled Carbon Steel Plate, Expiry Review Decision," March 2, 2018, https://www.cbsa-asfc.gc.ca/sima-lmsi/er-rre/pla32017/pla32017-nd-eng.html; Government of Canada, "Certain Hot-Rolled Carbon Steel Plate, Statement of Reasons," October 18, 2019, https://www.cbsa-asfc.gc.ca/sima-lmsi/er-rre/pla72019/pla72019-de-eng.html. World Trade Organization ("WTO"), Committee on Anti-Dumping Practices, Semi-Annual Report Under Article l6.4 of the WTO Antidumping Agreement: Canada, July 1 to December 31, 2020, retrieved February 1, 2022; World Trade Organization ("WTO"), Committee on Anti-Dumping Practices, Semi-Annual Report Under Article l6.4 of the WTO Antidumping Agreement: Chinese Taipei, January 1 to June 30, 2017, retrieved February 1, 2022; World Trade Organization ("WTO"), Committee on Anti-Dumping Practices, Semi-Annual Report Under Article l6.4 of the WTO Antidumping Agreement: European Union, July 1 to December 31, 2017, retrieved February 1, 2022; World Trade Organization ("WTO"), Committee on Anti-Dumping Practices, Semi-Annual Report Under Article l6.4 of the WTO Antidumping Agreement: Turkey, July 1 to December 31, 2017, retrieved February 1, 2022; World Trade Organization ("WTO"), Committee on Anti-Dumping Practices, Semi-Annual Report Under Article l6.4 of the WTO Antidumping Agreement: Canada, July 1 to December 31, 2020, retrieved February 1, 2022.

# Global market

## Global exports

Table IV-113 presents global export data for CTL plate by source in descending order of quantity for 2021. China, representing 11.7 percent of global export volumes in 2021, is the largest global exporter with exports of 3.4 million short tons. The next leading exporters in 2021, by volume, were Japan and South Korea. Paired with China, these three countries represented 31.8 percent of global export volume in 2021. Exports from the United States totaled 1.1 million short tons, which represented 3.7 percent of global export volume in 2021.

**Table IV-113**
**CTL plate: Global exports, by reporting country and period**

Quantity in short tons

| Exporting country | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Quantity | 1,066,449 | 1,102,908 | 867,919 |
| Austria | Quantity | 1,236,038 | 1,401,668 | 1,201,051 |
| Belgium | Quantity | 1,672,657 | 1,619,026 | 1,708,709 |
| Brazil | Quantity | 81,879 | 220,205 | 204,033 |
| China | Quantity | 7,569,052 | 5,512,778 | 5,259,735 |
| France | Quantity | 772,487 | 908,617 | 960,674 |
| Germany | Quantity | 1,913,916 | 1,973,427 | 1,905,458 |
| Italy | Quantity | 1,609,901 | 1,710,021 | 1,614,183 |
| Japan | Quantity | 3,912,229 | 2,744,787 | 3,550,331 |
| South Africa | Quantity | 26,175 | 27,395 | 38,942 |
| South Korea | Quantity | 2,959,572 | 3,450,718 | 2,928,851 |
| Taiwan | Quantity | 131,263 | 135,862 | 153,231 |
| Turkey | Quantity | 263,153 | 312,999 | 333,338 |
| Subject exporters | Quantity | 22,148,321 | 20,017,501 | 19,858,534 |
| Ukraine | Quantity | 2,439,556 | 2,274,904 | 2,235,709 |
| Sweden | Quantity | 985,522 | 1,135,862 | 1,095,274 |
| Russia | Quantity | 951,725 | 1,001,373 | 1,011,583 |
| Netherlands | Quantity | 706,644 | 864,446 | 951,150 |
| All other exporters | Quantity | 5,780,674 | 6,877,272 | 7,202,297 |
| Non-U.S. exporters | Quantity | 33,012,442 | 32,171,357 | 32,354,547 |
| All reporting exporters | Quantity | 34,078,891 | 33,274,265 | 33,222,466 |

Table continued.

**Table IV-113 Continued**
**CTL plate: Global exports, by reporting country and period**

Quantity in short tons

| Exporting country | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Quantity | 768,362 | 848,166 | 1,095,855 |
| Austria | Quantity | 1,006,305 | 876,624 | 1,076,132 |
| Belgium | Quantity | 1,419,913 | 1,341,690 | 1,356,243 |
| Brazil | Quantity | 137,741 | 98,204 | 120,885 |
| China | Quantity | 5,441,436 | 3,570,923 | 3,434,502 |
| France | Quantity | 863,077 | 586,462 | 670,309 |
| Germany | Quantity | 1,955,115 | 1,727,135 | 1,828,985 |
| Italy | Quantity | 1,567,069 | 1,398,700 | 1,638,274 |
| Japan | Quantity | 3,177,960 | 2,982,391 | 3,234,466 |
| South Africa | Quantity | 28,863 | 23,361 | 23,055 |
| South Korea | Quantity | 3,170,013 | 3,327,601 | 2,638,966 |
| Taiwan | Quantity | 117,254 | 78,690 | 85,238 |
| Turkey | Quantity | 327,572 | 305,112 | 271,963 |
| Subject exporters | Quantity | 19,212,318 | 16,316,893 | 16,379,018 |
| Ukraine | Quantity | 2,403,674 | 1,933,735 | 2,024,472 |
| Sweden | Quantity | 1,062,397 | 988,245 | 1,193,613 |
| Russia | Quantity | 798,964 | 1,031,565 | 856,927 |
| Netherlands | Quantity | 843,573 | 782,164 | 843,715 |
| All other exporters | Quantity | 6,999,284 | 6,304,365 | 6,845,639 |
| Non-U.S. exporters | Quantity | 31,320,210 | 27,356,967 | 28,143,383 |
| All reporting exporters | Quantity | 32,088,571 | 28,205,133 | 29,239,238 |

Table continued.

**Table IV-113 Continued**
**CTL plate: Global exports, by reporting country and period**

Value in 1,000 dollars

| Exporting country | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Value | 831,030 | 938,406 | 850,544 |
| Austria | Value | 745,632 | 989,439 | 1,007,704 |
| Belgium | Value | 1,002,564 | 1,150,279 | 1,401,789 |
| Brazil | Value | 58,618 | 111,834 | 127,687 |
| China | Value | 2,480,210 | 2,545,642 | 3,061,876 |
| France | Value | 500,884 | 684,407 | 787,532 |
| Germany | Value | 1,366,322 | 1,609,911 | 1,748,662 |
| Italy | Value | 764,286 | 1,016,259 | 1,102,370 |
| Japan | Value | 1,832,152 | 1,534,318 | 2,261,882 |
| South Africa | Value | 17,623 | 25,616 | 34,400 |
| South Korea | Value | 1,295,117 | 1,784,692 | 1,795,455 |
| Taiwan | Value | 59,698 | 72,447 | 95,621 |
| Turkey | Value | 113,768 | 173,180 | 205,602 |
| Subject exporters | Value | 10,236,874 | 11,698,025 | 13,630,579 |
| Ukraine | Value | 854,301 | 1,043,021 | 1,257,150 |
| Sweden | Value | 917,398 | 1,125,464 | 1,210,650 |
| Russia | Value | 335,900 | 497,681 | 571,645 |
| Netherlands | Value | 343,694 | 482,961 | 617,035 |
| All other exporters | Value | 2,827,019 | 4,169,983 | 4,950,570 |
| Non-U.S. exporters | Value | 15,515,185 | 19,017,134 | 22,237,629 |
| All reporting exporters | Value | 16,346,216 | 19,955,539 | 23,088,173 |

Table continued.

**Table IV-113 Continued**
**CTL plate: Global exports, by reporting country and period**

Value in 1,000 dollars

| Exporting country | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Value | 774,571 | 711,567 | 1,352,809 |
| Austria | Value | 808,835 | 661,454 | 1,103,161 |
| Belgium | Value | 1,104,965 | 953,093 | 1,349,851 |
| Brazil | Value | 84,613 | 49,323 | 87,065 |
| China | Value | 2,863,260 | 1,927,529 | 2,793,152 |
| France | Value | 706,665 | 471,835 | 655,945 |
| Germany | Value | 1,661,526 | 1,409,934 | 1,890,473 |
| Italy | Value | 961,147 | 789,635 | 1,559,776 |
| Japan | Value | 2,104,379 | 1,739,754 | 2,543,500 |
| South Africa | Value | 26,862 | 19,356 | 29,026 |
| South Korea | Value | 1,910,535 | 1,687,440 | 2,009,938 |
| Taiwan | Value | 73,490 | 43,420 | 68,333 |
| Turkey | Value | 183,147 | 149,031 | 242,583 |
| Subject exporters | Value | 12,489,427 | 9,901,803 | 14,332,803 |
| Ukraine | Value | 1,229,918 | 852,057 | 1,569,781 |
| Sweden | Value | 1,194,218 | 1,088,046 | 1,598,388 |
| Russia | Value | 434,786 | 465,563 | 635,128 |
| Netherlands | Value | 563,227 | 485,044 | 715,753 |
| All other exporters | Value | 4,487,232 | 3,680,862 | 6,297,985 |
| Non-U.S. exporters | Value | 20,398,808 | 16,473,375 | 25,149,838 |
| All reporting exporters | Value | 21,173,379 | 17,184,942 | 26,502,647 |

Table continued.

**Table IV-113 Continued**
**CTL plate: Global exports, by reporting country and period**

Unit values in dollars per short ton

| Exporting country | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Unit value | 779 | 851 | 980 |
| Austria | Unit value | 603 | 706 | 839 |
| Belgium | Unit value | 599 | 710 | 820 |
| Brazil | Unit value | 716 | 508 | 626 |
| China | Unit value | 328 | 462 | 582 |
| France | Unit value | 648 | 753 | 820 |
| Germany | Unit value | 714 | 816 | 918 |
| Italy | Unit value | 475 | 594 | 683 |
| Japan | Unit value | 468 | 559 | 637 |
| South Africa | Unit value | 673 | 935 | 883 |
| South Korea | Unit value | 438 | 517 | 613 |
| Taiwan | Unit value | 455 | 533 | 624 |
| Turkey | Unit value | 432 | 553 | 617 |
| Subject exporters | Unit value | 462 | 584 | 686 |
| Ukraine | Unit value | 350 | 458 | 562 |
| Sweden | Unit value | 931 | 991 | 1,105 |
| Russia | Unit value | 353 | 497 | 565 |
| Netherlands | Unit value | 486 | 559 | 649 |
| All other exporters | Unit value | 489 | 606 | 687 |
| Non-U.S. exporters | Unit value | 470 | 591 | 687 |
| All reporting exporters | Unit value | 480 | 600 | 695 |

Table continued.

**Table IV-113 Continued**
**CTL plate: Global exports, by reporting country and period**

Unit values in dollars per short ton

| Exporting country | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Unit value | 1,008 | 839 | 1,234 |
| Austria | Unit value | 804 | 755 | 1,025 |
| Belgium | Unit value | 778 | 710 | 995 |
| Brazil | Unit value | 614 | 502 | 720 |
| China | Unit value | 526 | 540 | 813 |
| France | Unit value | 819 | 805 | 979 |
| Germany | Unit value | 850 | 816 | 1,034 |
| Italy | Unit value | 613 | 565 | 952 |
| Japan | Unit value | 662 | 583 | 786 |
| South Africa | Unit value | 931 | 829 | 1,259 |
| South Korea | Unit value | 603 | 507 | 762 |
| Taiwan | Unit value | 627 | 552 | 802 |
| Turkey | Unit value | 559 | 488 | 892 |
| Subject exporters | Unit value | 650 | 607 | 875 |
| Ukraine | Unit value | 512 | 441 | 775 |
| Sweden | Unit value | 1,124 | 1,101 | 1,339 |
| Russia | Unit value | 544 | 451 | 741 |
| Netherlands | Unit value | 668 | 620 | 848 |
| All other exporters | Unit value | 641 | 584 | 920 |
| Non-U.S. exporters | Unit value | 651 | 602 | 894 |
| All reporting exporters | Unit value | 660 | 609 | 906 |

Table continued.

**Table IV-113 Continued**
**CTL plate: Global exports, by reporting country and period**

Shares in percent

| Exporting country | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Share of quantity | 3.1 | 3.3 | 2.6 |
| Austria | Share of quantity | 3.6 | 4.2 | 3.6 |
| Belgium | Share of quantity | 4.9 | 4.9 | 5.1 |
| Brazil | Share of quantity | 0.2 | 0.7 | 0.6 |
| China | Share of quantity | 22.2 | 16.6 | 15.8 |
| France | Share of quantity | 2.3 | 2.7 | 2.9 |
| Germany | Share of quantity | 5.6 | 5.9 | 5.7 |
| Italy | Share of quantity | 4.7 | 5.1 | 4.9 |
| Japan | Share of quantity | 11.5 | 8.2 | 10.7 |
| South Africa | Share of quantity | 0.1 | 0.1 | 0.1 |
| South Korea | Share of quantity | 8.7 | 10.4 | 8.8 |
| Taiwan | Share of quantity | 0.4 | 0.4 | 0.5 |
| Turkey | Share of quantity | 0.8 | 0.9 | 1.0 |
| Subject exporters | Share of quantity | 65.0 | 60.2 | 59.8 |
| Ukraine | Share of quantity | 7.2 | 6.8 | 6.7 |
| Sweden | Share of quantity | 2.9 | 3.4 | 3.3 |
| Russia | Share of quantity | 2.8 | 3.0 | 3.0 |
| Netherlands | Share of quantity | 2.1 | 2.6 | 2.9 |
| All other exporters | Share of quantity | 17.0 | 20.7 | 21.7 |
| Non-U.S. exporters | Share of quantity | 96.9 | 96.7 | 97.4 |
| All reporting exporters | Share of quantity | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-113 Continued**
**CTL plate: Global exports, by reporting country and period**

Shares in percent

| Exporting country | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Share of quantity | 2.4 | 3.0 | 3.7 |
| Austria | Share of quantity | 3.1 | 3.1 | 3.7 |
| Belgium | Share of quantity | 4.4 | 4.8 | 4.6 |
| Brazil | Share of quantity | 0.4 | 0.3 | 0.4 |
| China | Share of quantity | 17.0 | 12.7 | 11.7 |
| France | Share of quantity | 2.7 | 2.1 | 2.3 |
| Germany | Share of quantity | 6.1 | 6.1 | 6.3 |
| Italy | Share of quantity | 4.9 | 5.0 | 5.6 |
| Japan | Share of quantity | 9.9 | 10.6 | 11.1 |
| South Africa | Share of quantity | 0.1 | 0.1 | 0.1 |
| South Korea | Share of quantity | 9.9 | 11.8 | 9.0 |
| Taiwan | Share of quantity | 0.4 | 0.3 | 0.3 |
| Turkey | Share of quantity | 1.0 | 1.1 | 0.9 |
| Subject exporters | Share of quantity | 59.9 | 57.9 | 56.0 |
| Ukraine | Share of quantity | 7.5 | 6.9 | 6.9 |
| Sweden | Share of quantity | 3.3 | 3.5 | 4.1 |
| Russia | Share of quantity | 2.5 | 3.7 | 2.9 |
| Netherlands | Share of quantity | 2.6 | 2.8 | 2.9 |
| All other exporters | Share of quantity | 21.8 | 22.4 | 23.4 |
| Non-U.S. exporters | Share of quantity | 97.6 | 97.0 | 96.3 |
| All reporting exporters | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official export statistics under HS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91 reported by various national statistical authorities in the Global Trade Atlas database, accessed September 29, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top followed by the countries under investigation, all remaining top exporting countries in descending order of 2021 data.

## Nonsubject countries

### Canada

Canada was the largest nonsubject source of U.S. CTL plate imports, by volume, from 2016 to 2021. In 2021, Canada accounted for 81.0 percent of all nonsubject U.S. imports by quantity and 43.5 percent of U.S. imports from all sources.[49] Table IV-114 presents Canada's global CTL plate exports by destination market in descending order of quantity based on 2021. The United States accounted for the vast majority of exports originating in Canada each year. In 2021, Canada exported 95.5 percent of its CTL plate exports to the United States. Canadian steel plate and sheet producer Algoma Steel Group Inc. ("Algoma") has a production capacity of 3.7 million metric tons (4.1 million short tons) per year. In November 2021, Algoma announced the construction of two new electric arc furnaces to replace its existing blast furnaces.[50]

[49] Official U.S. import statistics using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000.

[50] Algoma Steel Inc., "Algoma Steel Announces Final Investment Decision for Electric Arc Steelmaking," November 11, 2021, https://www.algoma.com/algoma-steel-announces-final-investment-decision-for-electric-arc-steelmaking/.

**Table IV-114**
**CTL plate: Exports from Canada, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Quantity | 271,043 | 355,049 | 328,862 |
| Mexico | Quantity | 8,928 | 7,189 | 9,611 |
| Cuba | Quantity | 158 | 508 | 628 |
| China | Quantity | 42 | 117 | 178 |
| Pakistan | Quantity | 111 | 265 | --- |
| Chile | Quantity | --- | --- | --- |
| Burkina Faso | Quantity | --- | 9 | 8 |
| Madagascar | Quantity | --- | --- | --- |
| United Arab Emirates | Quantity | 42 | 42 | --- |
| All other destination markets | Quantity | 1,700 | 443 | 182 |
| Non-U.S. destination markets | Quantity | 10,982 | 8,573 | 10,607 |
| All destination markets | Quantity | 282,025 | 363,622 | 339,469 |
| United States | Value | 165,016 | 261,254 | 255,014 |
| Mexico | Value | 6,299 | 5,559 | 8,189 |
| Cuba | Value | 113 | 439 | 629 |
| China | Value | 31 | 73 | 171 |
| Pakistan | Value | 35 | 87 | --- |
| Chile | Value | --- | --- | --- |
| Burkina Faso | Value | --- | 4 | 10 |
| Madagascar | Value | --- | --- | --- |
| United Arab Emirates | Value | 172 | 157 | --- |
| All other destination markets | Value | 1,357 | 777 | 207 |
| Non-U.S. destination markets | Value | 8,007 | 7,096 | 9,205 |
| All destination markets | Value | 173,023 | 268,350 | 264,219 |

Table continued.

**Table IV-114 Continued**
**CTL plate: Exports from Canada, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Quantity | 264,058 | 230,714 | 302,511 |
| Mexico | Quantity | 9,008 | 3,495 | 13,825 |
| Cuba | Quantity | 410 | 346 | 169 |
| China | Quantity | 93 | 144 | 102 |
| Pakistan | Quantity | --- | --- | 39 |
| Chile | Quantity | --- | 2 | 21 |
| Burkina Faso | Quantity | 0 | 5 | 18 |
| Madagascar | Quantity | 2 | --- | 18 |
| United Arab Emirates | Quantity | --- | --- | 12 |
| All other destination markets | Quantity | 1,328 | 1,349 | 51 |
| Non-U.S. destination markets | Quantity | 10,841 | 5,341 | 14,255 |
| All destination markets | Quantity | 274,899 | 236,054 | 316,767 |
| United States | Value | 184,898 | 149,522 | 367,990 |
| Mexico | Value | 8,368 | 2,838 | 17,915 |
| Cuba | Value | 309 | 413 | 284 |
| China | Value | 87 | 141 | 113 |
| Pakistan | Value | --- | --- | 39 |
| Chile | Value | --- | 2 | 26 |
| Burkina Faso | Value | 0 | 6 | 22 |
| Madagascar | Value | 3 | --- | 22 |
| United Arab Emirates | Value | --- | --- | 15 |
| All other destination markets | Value | 1,113 | 1,478 | 66 |
| Non-U.S. destination markets | Value | 9,879 | 4,879 | 18,503 |
| All destination markets | Value | 194,777 | 154,400 | 386,492 |

Table continued.

**Table IV-114 Continued**
**CTL plate: Exports from Canada, by destination market and period**

Unit values in dollars per short ton; shares in percent

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Unit value | 609 | 736 | 775 |
| Mexico | Unit value | 705 | 773 | 852 |
| Cuba | Unit value | 714 | 864 | 1,001 |
| China | Unit value | 732 | 622 | 956 |
| Pakistan | Unit value | 318 | 328 | --- |
| Chile | Unit value | --- | --- | --- |
| Burkina Faso | Unit value | --- | 500 | 1,247 |
| Madagascar | Unit value | --- | --- | --- |
| United Arab Emirates | Unit value | 4,054 | 3,693 | --- |
| All other destination markets | Unit value | 798 | 1,755 | 1,137 |
| Non-U.S. destination markets | Unit value | 729 | 828 | 868 |
| All destination markets | Unit value | 614 | 738 | 778 |
| United States | Share of quantity | 96.1 | 97.6 | 96.9 |
| Mexico | Share of quantity | 3.2 | 2.0 | 2.8 |
| Cuba | Share of quantity | 0.1 | 0.1 | 0.2 |
| China | Share of quantity | 0.0 | 0.0 | 0.1 |
| Pakistan | Share of quantity | 0.0 | 0.1 | --- |
| Chile | Share of quantity | --- | --- | --- |
| Burkina Faso | Share of quantity | --- | 0.0 | 0.0 |
| Madagascar | Share of quantity | --- | --- | --- |
| United Arab Emirates | Share of quantity | 0.0 | 0.0 | --- |
| All other destination markets | Share of quantity | 0.6 | 0.1 | 0.1 |
| Non-U.S. destination markets | Share of quantity | 3.9 | 2.4 | 3.1 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-114 Continued**
**CTL plate: Exports from Canada, by destination market and period**

Unit values in dollars per short ton; shares in percent

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Unit value | 700 | 648 | 1,216 |
| Mexico | Unit value | 929 | 812 | 1,296 |
| Cuba | Unit value | 754 | 1,194 | 1,679 |
| China | Unit value | 938 | 975 | 1,101 |
| Pakistan | Unit value | --- | --- | 981 |
| Chile | Unit value | --- | 1,213 | 1,260 |
| Burkina Faso | Unit value | 943 | 1,327 | 1,260 |
| Madagascar | Unit value | 1,199 | --- | 1,263 |
| United Arab Emirates | Unit value | --- | --- | 1,281 |
| All other destination markets | Unit value | 838 | 1,096 | 1,282 |
| Non-U.S. destination markets | Unit value | 911 | 913 | 1,298 |
| All destination markets | Unit value | 709 | 654 | 1,220 |
| United States | Share of quantity | 96.1 | 97.7 | 95.5 |
| Mexico | Share of quantity | 3.3 | 1.5 | 4.4 |
| Cuba | Share of quantity | 0.1 | 0.1 | 0.1 |
| China | Share of quantity | 0.0 | 0.1 | 0.0 |
| Pakistan | Share of quantity | --- | --- | 0.0 |
| Chile | Share of quantity | --- | 0.0 | 0.0 |
| Burkina Faso | Share of quantity | 0.0 | 0.0 | 0.0 |
| Madagascar | Share of quantity | 0.0 | --- | 0.0 |
| United Arab Emirates | Share of quantity | --- | --- | 0.0 |
| All other destination markets | Share of quantity | 0.5 | 0.6 | 0.0 |
| Non-U.S. destination markets | Share of quantity | 3.9 | 2.3 | 4.5 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official export statistics under HS subheading, 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91, as reported by Statistics Canada in the Global Trade Atlas database, accessed October 17, 2022.

## Mexico

Mexico is also a large source of nonsubject U.S. imports of CTL plate, although imports have significantly decreased in recent years. While U.S. imports of CTL plate from Mexico reached 103,357 short tons in 2017, this number fell to 2,836 short tons in 2021.[51] Mexico's global CTL plate exports have also decreased significantly in recent years (table IV-115). The United States accounted for the largest share of Mexico's CTL plate exports over the period. In 2021, 96.8 percent of Mexico's CTL plate exports went to the United States. Altos Hornos de México ("AHMSA"), a CTL plate producer from Mexico has a total steel production capacity of 3.5 million metric tons (3,858,090 short tons) per year.[52]

**Table IV-115**
**CTL plate: Exports from Mexico, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Quantity | 54,134 | 105,177 | 71,321 |
| Guatemala | Quantity | 1,415 | 1,890 | 1,399 |
| El Salvador | Quantity | 414 | 169 | 162 |
| Costa Rica | Quantity | 13 | 32 | 789 |
| Colombia | Quantity | 253 | 1,125 | 683 |
| Nicaragua | Quantity | 201 | 724 | 609 |
| Chile | Quantity | --- | --- | 542 |
| Indonesia | Quantity | 171 | 535 | 499 |
| Honduras | Quantity | 267 | 919 | 284 |
| All other destination markets | Quantity | 1,032 | 2,231 | 916 |
| Non-U.S. destination markets | Quantity | 3,766 | 7,626 | 5,883 |
| All destination markets | Quantity | 57,900 | 112,803 | 77,203 |
| United States | Value | 26,073 | 61,782 | 48,044 |
| Guatemala | Value | 1,073 | 1,652 | 1,484 |
| El Salvador | Value | 282 | 125 | 160 |
| Costa Rica | Value | 21 | 24 | 651 |
| Colombia | Value | 228 | 1,044 | 739 |
| Nicaragua | Value | 181 | 652 | 580 |
| Chile | Value | --- | --- | 566 |
| Indonesia | Value | 145 | 476 | 536 |
| Honduras | Value | 194 | 778 | 342 |
| All other destination markets | Value | 1,273 | 1,952 | 1,122 |
| Non-U.S. destination markets | Value | 3,396 | 6,702 | 6,180 |
| All destination markets | Value | 29,470 | 68,484 | 54,224 |

Table continued.

[51] Official U.S. import statistics using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000.

[52] AHMSA, "About Us," http://ahmsainternational.com/about.html, retrieved February 2, 2022.

**Table IV-115 Continued**
**CTL plate: Exports from Mexico, by destination market and period**

Quantity in short tons; value in 1,000 dollars

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Quantity | 15,307 | 3,380 | 4,097 |
| Guatemala | Quantity | 400 | 201 | 134 |
| El Salvador | Quantity | 70 | --- | --- |
| Costa Rica | Quantity | --- | --- | --- |
| Colombia | Quantity | --- | --- | --- |
| Nicaragua | Quantity | --- | --- | --- |
| Chile | Quantity | --- | --- | --- |
| Indonesia | Quantity | --- | --- | --- |
| Honduras | Quantity | --- | --- | --- |
| All other destination markets | Quantity | --- | --- | --- |
| Non-U.S. destination markets | Quantity | 470 | 201 | 134 |
| All destination markets | Quantity | 15,777 | 3,582 | 4,231 |
| United States | Value | 10,985 | 2,604 | 5,336 |
| Guatemala | Value | 336 | 155 | 199 |
| El Salvador | Value | 70 | --- | --- |
| Costa Rica | Value | --- | --- | --- |
| Colombia | Value | --- | --- | --- |
| Nicaragua | Value | --- | --- | --- |
| Chile | Value | --- | --- | --- |
| Indonesia | Value | --- | --- | --- |
| Honduras | Value | --- | --- | --- |
| All other destination markets | Value | --- | --- | --- |
| Non-U.S. destination markets | Value | 406 | 155 | 199 |
| All destination markets | Value | 11,391 | 2,760 | 5,535 |

Table continued.

**Table IV-115 Continued**
**CTL plate: Exports from Mexico, by destination market and period**

Unit values in dollars per short ton; shares in percent

| Destination market | Measure | 2016 | 2017 | 2018 |
|---|---|---|---|---|
| United States | Unit value | 482 | 587 | 674 |
| Guatemala | Unit value | 758 | 874 | 1,061 |
| El Salvador | Unit value | 680 | 737 | 989 |
| Costa Rica | Unit value | 1,653 | 743 | 826 |
| Colombia | Unit value | 900 | 928 | 1,082 |
| Nicaragua | Unit value | 901 | 900 | 953 |
| Chile | Unit value | --- | --- | 1,044 |
| Indonesia | Unit value | 846 | 889 | 1,074 |
| Honduras | Unit value | 728 | 846 | 1,203 |
| All other destination markets | Unit value | 1,234 | 875 | 1,225 |
| Non-U.S. destination markets | Unit value | 902 | 879 | 1,050 |
| All destination markets | Unit value | 509 | 607 | 702 |
| United States | Share of quantity | 93.5 | 93.2 | 92.4 |
| Guatemala | Share of quantity | 2.4 | 1.7 | 1.8 |
| El Salvador | Share of quantity | 0.7 | 0.2 | 0.2 |
| Costa Rica | Share of quantity | 0.0 | 0.0 | 1.0 |
| Colombia | Share of quantity | 0.4 | 1.0 | 0.9 |
| Nicaragua | Share of quantity | 0.3 | 0.6 | 0.8 |
| Chile | Share of quantity | --- | --- | 0.7 |
| Indonesia | Share of quantity | 0.3 | 0.5 | 0.6 |
| Honduras | Share of quantity | 0.5 | 0.8 | 0.4 |
| All other destination markets | Share of quantity | 1.8 | 2.0 | 1.2 |
| Non-U.S. destination markets | Share of quantity | 6.5 | 6.8 | 7.6 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Table continued.

**Table IV-115 Continued**
**CTL plate: Exports from Mexico, by destination market and period**

Unit values in dollars per short ton; shares in percent

| Destination market | Measure | 2019 | 2020 | 2021 |
|---|---|---|---|---|
| United States | Unit value | 718 | 770 | 1,303 |
| Guatemala | Unit value | 841 | 772 | 1,483 |
| El Salvador | Unit value | 1,001 | --- | --- |
| Costa Rica | Unit value | --- | --- | --- |
| Colombia | Unit value | --- | --- | --- |
| Nicaragua | Unit value | --- | --- | --- |
| Chile | Unit value | --- | --- | --- |
| Indonesia | Unit value | --- | --- | --- |
| Honduras | Unit value | --- | --- | --- |
| All other destination markets | Unit value | --- | --- | --- |
| Non-U.S. destination markets | Unit value | 864 | 772 | 1,483 |
| All destination markets | Unit value | 722 | 770 | 1,308 |
| United States | Share of quantity | 97.0 | 94.4 | 96.8 |
| Guatemala | Share of quantity | 2.5 | 5.6 | 3.2 |
| El Salvador | Share of quantity | 0.4 | --- | --- |
| Costa Rica | Share of quantity | --- | --- | --- |
| Colombia | Share of quantity | --- | --- | --- |
| Nicaragua | Share of quantity | --- | --- | --- |
| Chile | Share of quantity | --- | --- | --- |
| Indonesia | Share of quantity | --- | --- | --- |
| Honduras | Share of quantity | --- | --- | --- |
| All other destination markets | Share of quantity | --- | --- | --- |
| Non-U.S. destination markets | Share of quantity | 3.0 | 5.6 | 3.2 |
| All destination markets | Share of quantity | 100.0 | 100.0 | 100.0 |

Source: Official export statistics under HS subheading, 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91, as reported by INEGI in the Global Trade Atlas database, accessed October 17, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data.