

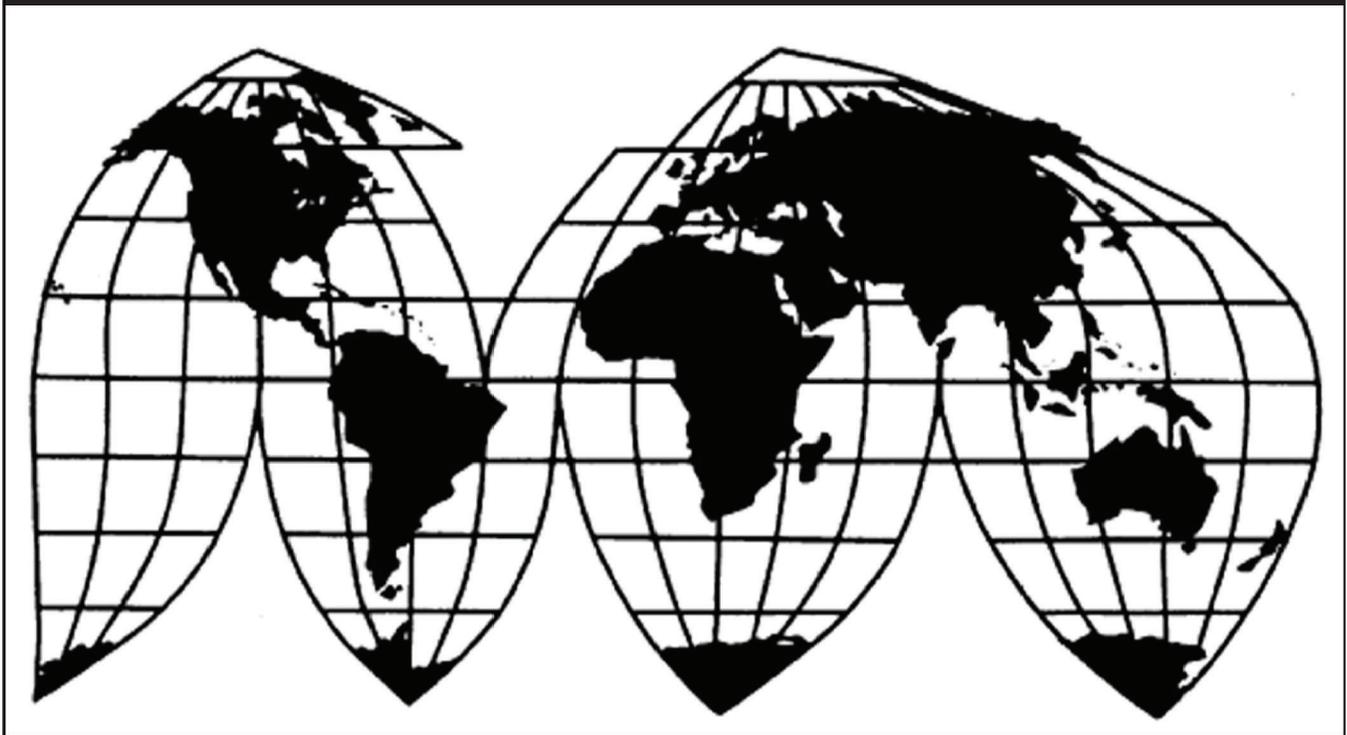
# **Carbon and Certain Alloy Steel Wire Rod from Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom**

Investigation Nos. 701-TA-573-574 and 731-TA-1349-1358 (Review)

**Publication 5449**

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Note.—Information that would reveal confidential operations of individual concerns may not be published.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



## UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-573-574 and 731-TA-1349-1358 (Review)

Carbon and Certain Alloy Steel Wire Rod from Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom

### DETERMINATIONS

On the basis of the record<sup>1</sup> 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 certain alloy steel wire rod from Italy and Turkey and the antidumping duty orders on carbon and certain alloy steel wire rod from Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

### BACKGROUND

The Commission instituted these reviews on December 1, 2022 (87 FR 73789) and determined on March 6, 2023 that it would conduct expedited reviews (88 FR 22069, April 12, 2023).

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



## Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the countervailing duty orders on carbon and certain alloy steel wire rod (“wire rod”) from Italy and Turkey and the antidumping duty orders on wire rod from Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

### I. Background

*Original Investigations.* The petitions in these investigations were filed on March 28, 2017, by Gerdau Ameristeel U.S. Inc.; Nucor Corporation; Keystone Consolidated Industries, Inc.; and Charter Steel (collectively “petitioners”), domestic producers of wire rod.<sup>1</sup> In January 2018, the Commission determined that a domestic industry was materially injured by reason of imports of wire rod from Belarus, Russia, and the United Arab Emirates that the Department of Commerce (“Commerce”) found to sold at less than fair value.<sup>2</sup> On January 24, 2018,

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<sup>1</sup> Carbon and Certain Alloy Steel Wire Rod from Belarus, Russia, and the United Arab Emirates, Inv. Nos. 731-TA-1349, 1352, and 1357 (Final), USITC Pub. 4752 (Jan. 2018) (“Original Belarus, Russia, and the United Arab Emirates Determinations”) at 3.

<sup>2</sup> *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 1. Although the petitions for the investigations of wire rod from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom were filed on the same day, March 28, 2017, the investigation schedules became staggered when Commerce extended the deadline for making preliminary determinations in all investigations, except those concerning imports from Belarus, Russia, and the United Arab Emirates, thereby necessitating earlier final determinations by the Commission in the investigations involving wire rod from Belarus, Russia, and the United Arab Emirates in January 2018. *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 3. Commerce subsequently reached final determinations concerning wire rod from South Africa and Ukraine in January 2018, thereby necessitating earlier final determinations by the Commission in those investigations than those in the investigations of wire rod from Italy, Korea, Spain, Turkey, and the United Kingdom. *Carbon and Certain Alloy Steel Wire Rod from South Africa and Ukraine*, Inv. Nos. 731-TA-1353 and 1356 (Final), USITC Pub. 4766 (Mar. 2018) (“*Original South Africa and Ukraine Determinations*”); *Carbon and Certain Alloy Steel Wire Rod from Italy, Korea, Spain, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-573-574 and 731-TA-1350, 1354-1355, and 1358 (Final), USITC Pub. 4782 (May 2018) (“*Original Italy, Korea, Spain, Turkey, and the United Kingdom Determinations*”). Commissioner Kearns did not participate in the investigations with respect to Italy, Korea, Spain, Turkey, and the United Kingdom. *Id.* at 1 n.2.

(Continued...)

Commerce issued antidumping duty orders on wire rod from Belarus, Russia, and the United Arab Emirates.<sup>3</sup> In March 2018, the Commission determined that a domestic industry was materially injured by reason of subject imports of wire rod from South Africa and Ukraine that Commerce found to be sold at less than fair value.<sup>4</sup> On March 24, 2018, Commerce issued its antidumping duty orders on wire rod from South Africa and Ukraine.<sup>5</sup> In May 2018, the Commission determined that a domestic industry was materially injured by reason of imports of wire rod from Italy, Korea, Spain, Turkey, and the United Kingdom found by Commerce to be sold in the United States at less than fair value and imports of wire rod that Commerce found to be subsidized by the governments of Italy and Turkey.<sup>6</sup> On May 21, 2018, Commerce issued antidumping duty orders on wire rod from Italy, Korea, Spain, Turkey, and the United Kingdom,<sup>7</sup> and it issued countervailing duty orders on wire rod from Italy and Turkey.<sup>8</sup>

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(...Continued)

The Commission made affirmative determinations on the basis of cumulated imports from all subject countries in all determinations in the wire rod investigations. *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 21. In each of the subsequent determinations, the Commission adopted the findings and analyses in its determination and views regarding subject imports from Belarus, Russia, and the United Arab Emirates with respect to the issues of domestic like product, domestic industry, cumulation, conditions of competition, and material injury by reason of cumulated subject imports. *Original South Africa and Ukraine Determinations*, USITC Pub. 4766 at 4-5; *Original Italy, Korea, Spain, Turkey, and the United Kingdom Determinations*, USITC Pub. 4782 at 3-4.

<sup>3</sup> 83 Fed. Reg. 3297 (Jan. 24, 2018). Commerce subsequently published a correction to its notice of antidumping duty orders on wire rod from Belarus, Russia, and the United Arab Emirates noting that there had been typographical error in the Appendix to the orders. Specifically, in the scope description, Harmonized Tariff Schedule of the United States (“HTSUS”) subheading 7213.91.3015 was incorrectly published as HTSUS subheading 213.91.3015. 83 Fed. Reg. 5402 (Feb. 7, 2018).

<sup>4</sup> *Original South Africa and Ukraine Determinations*, USITC Pub. 4766 at 1.

<sup>5</sup> 83 Fed. Reg. 11175 (Mar. 14, 2018).

<sup>6</sup> *Original Italy, Korea, Spain, Turkey, and the United Kingdom Determinations*, USITC Pub. 4782 at 1.

<sup>7</sup> 83 Fed. Reg. 23417 (May 21, 2018). Effective June 13, 2019, Commerce revoked, in part, the antidumping duty order with respect to imports of valve spring quality wire rod from South Korea, following an antidumping changed circumstances review. 84 Fed. Reg. 27582 (June 13, 2019). Additionally, due to litigation in the United States Court of International Trade (“CIT”) that resulted in remands, Commerce amended final weighted-average dumping margins with respect to imports of wire rod from Turkey and excluded merchandise produced and exported by Habas Sinai ve Tibbi Gazlar Istihsal Endustrisi A.S. from the order. 86 Fed. Reg. 28749 (May 28, 2021).

<sup>8</sup> 83 Fed. Reg. 23420 (May 21, 2018). Following litigation before the CIT that resulted in remands, Commerce subsequently issued revised net subsidy rates for imports of wire rod from Turkey. 85 Fed. Reg. 42356 (July 14, 2020).

*Current Reviews.* On December 1, 2022, the Commission instituted these first five-year reviews of the countervailing duty orders on wire rod from Italy and Turkey and the antidumping duty orders on wire rod from Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom.<sup>9</sup> The Commission received a joint response to its notice of institution from Charter Steel, Commercial Metals Company, Liberty Steel USA, Nucor Corporation, and Optimus Steel LLC (collectively, “Domestic Producers”), domestic producers of wire rod.<sup>10</sup> The Commission did not receive a response from any respondent interested party.<sup>11</sup> On March 6, 2023, the Commission determined that the domestic interested party group response was adequate for all reviews and that the respondent interested party group response was inadequate for all reviews.<sup>12</sup> Finding no other circumstances that would warrant conducting full reviews, the Commission determined to conduct expedited reviews of the orders.<sup>13</sup> Domestic Producers subsequently submitted final comments pursuant to Commission Rule 207.62(d)(1).<sup>14</sup>

U.S. industry data are based on information supplied by Domestic Producers in their response to the notice of institution. The five responding U.S. producers accounted for an estimated \*\*\* percent of domestic production of wire rod in 2021.<sup>15</sup> U.S. import data and

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<sup>9</sup> 87 Fed. Reg. 73789 (Dec. 1, 2022).

<sup>10</sup> Domestic Producers Response to the Notice of Institution, EDIS Doc. No. 787198 (Jan. 3, 2023) (“Domestic Producers Response”). Domestic Producers subsequently filed a response to a cure letter from Commission staff. Domestic Producers Response to Cure Letter, EDIS Doc. No. 788140 (Jan. 17, 2023) (“Domestic Producers Cure Response”). The Commission also received comments on the adequacy of responses to the notice of institution from Domestic Producers, requesting that the Commission conduct expedited reviews of the wire rod orders. Domestic Producers Adequacy Comments, EDIS Doc. No. 789996 (Feb. 9, 2023) at 3-4.

<sup>11</sup> Confidential Report, INV-VV-015, February 22, 2023 (“CR”) at I-2; Carbon and Certain Alloy Steel Wire Rod from Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom, Inv. Nos. 701-TA-573-574 and 731-TA-1349-1358 (Review), USITC Pub. 5449 (July 2023) (“PR”) at I-2.

<sup>12</sup> 88 Fed. Reg. 22069 (Apr. 12, 2023); Explanation of Commission Determination on Adequacy, EDIS Doc. 793233.

<sup>13</sup> 88 Fed. Reg. 22069 (Apr. 12, 2023); Explanation of Commission Determination on Adequacy, EDIS Doc. 793233.

<sup>14</sup> Domestic Producers Final Comments, EDIS Doc. 799842 (July 5, 2023).

<sup>15</sup> CR/PR at Table I-2. The Domestic Producers also provided trade and financial information on behalf of nonparticipating U.S. producers \*\*\*. The information submitted was certified for accuracy and completeness and is reflected in the U.S. producers’ trade, financial, and apparent U.S. consumption data tables presented in the Confidential Report. CR/PR at I-2, n.5. The participating and nonparticipating firms in aggregate account for approximately \*\*\* percent of production of wire rod in the United States during 2021. CR/PR at I-19, n.41.

(Continued...)

related information are based on official import statistics.<sup>16</sup> Foreign industry data and related information are based on information from the original investigations, information supplied by Domestic Producers in their response to the notice of institution, and publicly available information gathered by the Commission. Four U.S. purchasers of wire rod, \*\*\*, responded to the Commission’s adequacy phase questionnaire.<sup>17</sup>

## II. Domestic Like Product and Industry

### A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the “domestic like product” and the “industry.”<sup>18</sup> The Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this subtitle.”<sup>19</sup> 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.<sup>20</sup>

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

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For the years 2014-16, U.S. producers’ U.S. shipments data are compiled using data submitted in the Commission’s original investigations, which accounted for “virtually all” U.S. production of wire rod during the period of investigation.

<sup>16</sup> CR/PR at Table I-8. U.S. imports data are compiled from official Commerce statistics for HTS statistical reporting numbers 7213.91.3011, 7213.91.3015, 7213.91.3020, 7213.91.3093, 7213.91.4500, 7213.91.6000, 7213.99.0030, 7227.20.0030, 7227.20.0080, 7227.90.6010, 7227.90.6020, 7227.90.6030, and 7227.90.6035, accessed January 12, 2023. CR/PR at Table I-8.

<sup>17</sup> CR/PR at D-3.

<sup>18</sup> 19 U.S.C. § 1677(4)(A).

<sup>19</sup> 19 U.S.C. § 1677(10); *see, e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Dep’t of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991); *see also* S. Rep. No. 249, 96<sup>th</sup> Cong., 1<sup>st</sup> Sess. 90-91 (1979).

<sup>20</sup> *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).

The merchandise covered by these investigations are certain hot-rolled products of carbon steel and alloy steel, in coils, of approximately round cross section, less than 19.00 mm in actual solid cross-sectional diameter. Specifically excluded are steel products possessing the above-noted physical characteristics and meeting the Harmonized Tariff Schedule of the United States (HTSUS) definitions for (a) stainless steel; (b) tool steel; (c) high-nickel steel; (d) ball bearing steel; or (e) concrete reinforcing bars and rods. Also excluded are free cutting steel (also known as free machining steel) products (i.e., products that contain by weight one or more of the following elements: 0.1 percent or more of lead, 0.05 percent or more of bismuth, 0.08 percent or more of sulfur, more than 0.04 percent of phosphorous, more than 0.05 percent of selenium, or more than 0.01 percent of tellurium). All products meeting the physical description of subject merchandise that are not specifically excluded are included in this scope.<sup>21</sup>

The scope remains unchanged from the original investigations.<sup>22</sup>

Wire rod is a hot-rolled intermediate steel product of circular or approximately circular cross section that typically is produced in nominal fractional diameters up to 47/64 inch (18.7 mm) and sold in irregularly wound coils, primarily for subsequent drawing and finishing by wire drawers.<sup>23</sup> Wire rod sold in the United States is categorized by quality/type and end use.<sup>24</sup>

In the original investigations, the Commission defined a single domestic like product consisting of wire rod, coextensive with Commerce's scope.<sup>25</sup> In these reviews, there is no new

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<sup>21</sup> 88 Fed. Reg. 15953 (Mar. 15, 2023) and accompanying Issues and Decisions Memorandum at 3, EDIS Doc. 799324; 88 Fed. Reg. 18296 (Mar. 28, 2023) and accompanying Issues and Decisions Memorandum at 2, EDIS Doc. 799324; 88 Fed. Reg. 201127 (Apr. 5, 2023) and accompanying Issues and Decisions Memorandum at 2, EDIS Doc. 799324.

<sup>22</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 6.

<sup>23</sup> CR/PR at I-14; Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 7.

<sup>24</sup> CR/PR at I-14; Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 7.

<sup>25</sup> *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 5-15. The Commission defined a single domestic like product, rejecting respondents' arguments to define grade 1080 tire cord and tire bead wire rod as a separate domestic like product. It observed that in investigations in which domestically manufactured merchandise is made up of a grouping of similar products or involves niche products, it does not consider each item of merchandise to be a separate like product that is only "like" its identical counterpart in the scope but considers the grouping itself to constitute the domestic like product and disregards minor variations, absent a clear dividing line between particular products in the group. The Commission noted that in prior investigations involving (Continued...)

information on the record suggesting that the characteristics and uses of domestically produced wire rod have changed since the original investigations so as to warrant the Commission’s reconsideration of this definition,<sup>26</sup> and Domestic Producers agree with the prior definition of the domestic like product.<sup>27</sup> We consequently define a single domestic like product consisting of wire rod, coextensive with Commerce’s scope.

## **B. Domestic Industry**

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”<sup>28</sup> In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

In the original investigations, the Commission considered whether to exclude \*\*\* from the domestic industry under the related parties provision<sup>29</sup> because \*\*\*, which imported

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wire rod, it found that distinctions between different types of wire rod did not constitute clear dividing lines warranting the definition of separate domestic like products. Notwithstanding respondents’ contention that product characteristics for grade 1080 tire cord and tire bead wire rod have changed since these prior proceedings, the Commission concluded that the record warranted the same result. It found that, while grade 1080 tire cord and tire bead wire rod are high-end specialized products that may have certain unique characteristics and are made using specialized processes to specific customer requirements and standards, the same is true for other types of high-end specialized wire rod. It further found that all types of wire rod share certain basic physical properties, are generally manufactured in the same domestic facilities using the same processes, and are sold primarily to end users. The Commission noted that limited interchangeability in some end-uses and price differences are consistent with a wide range of products comprising a continuum. Accordingly, it defined a single domestic like product consisting of all wire rod, including grade 1080 tire cord and tire bead wire rod, corresponding to the scope of the investigations. *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 9-15.

<sup>26</sup> See generally CR/PR at I-14 – I-16.

<sup>27</sup> Domestic Producers Response at 27.

<sup>28</sup> 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.

<sup>29</sup> 19 U.S.C. § 1677(7)(4)(B)(ii)(III). This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers. *Id.*

subject wire rod from \*\*\* during the period of investigation (“POI”).<sup>30</sup> The Commission determined that appropriate circumstances did not exist for \*\*\* exclusion.<sup>31</sup> Accordingly, the Commission defined the domestic industry as all U.S. producers of wire rod.<sup>32</sup>

In these reviews, Domestic Producers agree with the Commission’s definition of the domestic industry in the original investigations.<sup>33</sup> There are no related parties or other domestic industry issues in these reviews.<sup>34</sup> Therefore, consistent with our definition of the domestic like product, we define the domestic industry to include all U.S. producers of wire rod.

### III. Cumulation

#### A. Legal Standard

With respect to five-year reviews, section 752(a) of the Tariff Act provides as follows: the Commission may cumulatively assess the volume and effect of imports of the subject merchandise from all countries with respect to which reviews under section 1675(b) or (c) of this title were initiated on the same day, if such imports would be likely to compete with each other and with domestic like products in the United States market. The Commission shall not cumulatively assess the volume and effects of imports of the subject merchandise in a case in which it determines that such imports are likely to have no discernible adverse impact on the domestic industry.<sup>35</sup>

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<sup>30</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 15-17; Confidential Original Belarus, Russia, and the United Arab Emirates Determinations, EDIS Doc. 788856 (“Confidential Original Belarus, Russia, and the United Arab Emirates Determinations”) at 23-25.

<sup>31</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 15-17; Confidential Original Belarus, Russia, and the United Arab Emirates Determinations at 23-25.

<sup>32</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 15-17; Confidential Original Belarus, Russia, and the United Arab Emirates Determinations at 23-25.

<sup>33</sup> Domestic Producers Response at 27.

<sup>34</sup> Domestic Producers state that none of the participating domestic producers is an importer of subject merchandise or related to an importer or foreign producer and exporter of subject merchandise. They state that they are aware that a domestic producer, EVRAZ Inc., is related to a foreign producer and exporter of subject merchandise in Russia, EVRAZ ZSMK, although the record does not contain any information regarding the nature of this relationship. Domestic Producers state that EVRAZ ZSMK \*\*\*, and we note that the available information indicates that there have been no subject imports from Russia since 2017. Domestic Producers Response at 23; Domestic Producers Cure Response at 4; CR/PR at Table I-8.

<sup>35</sup> 19 U.S.C. § 1675a(a)(7).

Cumulation therefore is discretionary in five-year reviews, unlike original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.<sup>36</sup> The Commission may exercise its discretion to cumulate, however, only if the reviews are initiated on the same day, the Commission determines that the subject imports are likely to compete with each other and the domestic like product in the U.S. market, and imports from each such subject country are not likely to have no discernible adverse impact on the domestic industry in the event of revocation. Our focus in five-year reviews is not only on present conditions of competition, but also on likely conditions of competition in the reasonably foreseeable future.

The statutory threshold for cumulation is satisfied in these reviews because all reviews were initiated on the same day, December 1, 2022.<sup>37</sup>

*Original Investigations.* The Commission cumulated subject imports from Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom, finding a reasonable overlap of competition between the domestic like product and imports from each subject country and among imports from the subject countries.<sup>38</sup>

*Current Reviews.* Domestic Producers argue that the Commission should exercise its discretion to cumulate imports from each of the subject sources in these reviews. In this regard, they assert that there is no basis to conclude that subject imports from any of the subject countries would be likely to have no discernible adverse impact on the domestic industry and that subject imports are likely to compete with each other and the domestic like product, as they did in the original investigations.<sup>39</sup>

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<sup>36</sup> 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).

<sup>37</sup> CR/PR at Table I-1; 87 Fed. Reg. 73789 (Dec. 1, 2022).

<sup>38</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 18-21.

<sup>39</sup> Domestic Producers Final Comments at 4-5.

## B. 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.<sup>40</sup> 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.<sup>41</sup> With respect to this provision, the Commission generally considers the likely volume of subject imports and the likely impact of those imports on the domestic industry within a reasonably foreseeable time if the orders are revoked. Our analysis for each of the subject countries takes into account, among other things, the nature of the product and the behavior of subject imports in the original investigations.

Based on the record in these reviews, we do not find that imports from any of the subject countries would likely have no discernible adverse impact on the domestic industry in the event of revocation, for the reasons detailed below.<sup>42</sup>

*Belarus.* In the original investigations, subject imports from Belarus increased from no presence in the U.S. market in 2014 to 9,059 short tons in 2015 and to 35,381 short tons in 2016; they were 35,359 short tons in the January to September period (“interim”) 2016 and 27,757 in interim 2017.<sup>43</sup> Subject imports from Belarus accounted for 0.2 percent of apparent U.S. consumption in 2015 and 0.7 percent in 2016; they accounted for 0.9 percent in interim 2016 and 0.6 percent in interim 2017.<sup>44</sup> In the current period of review, subject imports from

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<sup>40</sup> 19 U.S.C. § 1675a(a)(7).

<sup>41</sup> SAA, H.R. Rep. No. 103-316, vol. I at 887 (1994).

<sup>42</sup> In addition to the country-specific information detailed below, we note that there are several antidumping duty actions in third country markets covering imports of wire rod from subject countries, as well as four global safeguard measures imposed by third countries on imports of wire rod, in addition to other trade remedies (including prohibitions on imports from Belarus and Russia implemented by the European union and the United Kingdom in March 2022). CR/PR at Table I-26. These third-country barriers would provide additional incentives for subject producers to increase their exports to the United States in the event of revocation, and further support our finding that imports from any of the subject countries would not likely have no discernible adverse impact on the domestic industry in the event of revocation.

<sup>43</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table IV-2.

<sup>44</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table C-1.

Belarus were 27,757 short tons in 2017 but absent from the U.S. market during the 2018-2021 period.<sup>45</sup>

During the original investigations, one firm, accounting for \*\*\* percent of wire rod production in Belarus and whose exports accounted for \*\*\* percent of U.S imports from Belarus in 2016, responded to the Commission's foreign producers' questionnaire.<sup>46</sup> The responding producer reported production capacity of \*\*\* short tons and a capacity utilization rate of \*\*\* percent in 2016.<sup>47</sup> It reported exporting \*\*\* percent of its total shipments in 2016, with \*\*\* percent of their total shipments exported to the United States that year.<sup>48</sup>

In the current reviews, the record contains limited information concerning the wire rod industry in Belarus because no producer in Belarus responded to the Commission's notice of institution. Domestic Producers provided a list of two possible producers of wire rod in Belarus.<sup>49</sup> According to information submitted by Domestic Producers, the subject industry in Belarus continues to have large production capacity, is export oriented, and remains focused on North American markets.<sup>50</sup> Global Trade Atlas ("GTA") data indicate that the volume of exports of bars and rods of carbon and alloy steel from Belarus, a category that contains both in-scope wire rod as well as out-of-scope products, was substantial throughout the period of review, although it decreased irregularly from 380,171 short tons in 2017 to 316,261 short tons in 2021.<sup>51</sup>

In the original investigations, subject imports from Belarus undersold the domestic like product in 12 out of 13 (or 92.3 percent of) quarterly comparisons, which encompassed \*\*\* percent of the volume of subject imports from Belarus covered by the quarterly comparisons.<sup>52</sup> No product specific pricing data concerning subject imports from Belarus were obtained in these reviews.

In light of the foregoing, including the significant and increasing volume of subject imports from Belarus in the original investigations, the facts available concerning the large size

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<sup>45</sup> CR/PR at Table I-8.

<sup>46</sup> *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at VII-3; Confidential Report, INV-PP-161, EDIS Doc. 78849 (Dec. 8, 2017), as revised by INV-PP-164, EDIS Doc. No. 78850 (Dec. 13, 2017) ("Original Confidential Report") at VII-3.

<sup>47</sup> Original Confidential Report at Table VII-1.

<sup>48</sup> Original Confidential Report at Table VII-1.

<sup>49</sup> CR/PR at I-29; Domestic Producers Response at 9, Exhs. 3, 5.

<sup>50</sup> Domestic Producers Response at 9, Exhs. 4, 5.

<sup>51</sup> CR/PR at Table I-10.

<sup>52</sup> Original Confidential Report at Table V-10a.

and exports of the subject industry in Belarus, and the underselling by subject imports from Belarus during the original investigations, we do not find that subject imports from Belarus would likely have no discernible adverse impact on the domestic industry if the pertinent order were revoked.

*Italy.* In the original investigations, subject imports from Italy initially decreased from 346 short tons in 2014 to 246 short tons in 2015 before increasing to 33,163 short tons in 2016; they were 12,007 short tons in interim 2016 and 29,609 in interim 2017.<sup>53</sup> Subject imports from Italy accounted for less than 0.05 percent of apparent U.S. consumption in 2014 and 2015 and 0.6 percent in 2016; they accounted for 0.3 percent in interim 2016 and 0.7 percent in interim 2017.<sup>54</sup> In the current period of review, subject imports from Italy were 29,609 short tons in 2017, 82 short tons in 2019, and 19 short tons in 2021 but absent from the U.S. market in 2018 and 2020.<sup>55</sup>

During the original investigations, four firms, accounting for \*\*\* of wire rod production in Italy and whose exports accounted for \*\*\* of U.S. imports from Italy in 2016, responded to the Commission's foreign producers' questionnaire.<sup>56</sup> The responding producers reported production capacity of \*\*\* short tons and a capacity utilization rate of \*\*\* percent in 2016.<sup>57</sup> They reported exporting \*\*\* percent of their total shipments in 2016, with \*\*\* percent of their total shipments exported to the United States that year.<sup>58</sup>

In the current reviews, the record contains limited information concerning the wire rod industry in Italy because no producer in Italy responded to the Commission's notice of institution. Domestic Producers provided a list of 12 possible producers of wire rod in Italy.<sup>59</sup> According to information submitted by Domestic Producers, the subject industry in Italy continues to have large production capacity and actively exports subject merchandise.<sup>60</sup> Additionally, publicly available information indicates that at least one subject producer in Italy

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<sup>53</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table IV-2.

<sup>54</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table C-1.

<sup>55</sup> CR/PR at Table I-8.

<sup>56</sup> Original Confidential Report at VII-9.

<sup>57</sup> Original Confidential Report at Table VII-5.

<sup>58</sup> Original Confidential Report at Table VII-5.

<sup>59</sup> CR/PR at I-31; Domestic Producers Response at 9-10, Exhs. 3, 6.

<sup>60</sup> Domestic Producers Response at 9-10, Exhs. 4, 6.

completed investments to improve wire rod mill production since the original investigations.<sup>61</sup> GTA data indicate that the volume of exports of bars and rods of carbon and alloy steel from Italy, a category that contains both in-scope wire rod as well as out-of-scope products, was substantial throughout the period of review and increased irregularly from 934,395 short tons in 2017 to 1.0 million short tons in 2021.<sup>62</sup>

In the original investigations, subject imports from Italy undersold the domestic like product in nine out of 11 (or 81.8 percent of) quarterly comparisons, which encompassed \*\*\* percent of the volume of subject imports from Italy covered by the quarterly comparisons.<sup>63</sup> No product-specific pricing data concerning subject imports from Italy were obtained in these reviews.

In light of the foregoing, including the significant and increasing volume of subject imports from Italy in the original investigations, the facts available concerning the large size and exports of the subject industry in Italy, and the underselling by subject imports from Italy during the original investigations, we do not find that subject imports from Italy would likely have no discernible adverse impact on the domestic industry if the pertinent orders were revoked.

*Russia.* In the original investigations, subject imports from Russia initially decreased from 12,329 short tons in 2014 to 6,857 short tons in 2015 before increasing to 103,322 short tons in 2016; they were 90,154 short tons in interim 2016 and 57,893 in interim 2017.<sup>64</sup> Subject imports from Russia accounted for 0.2 percent of apparent U.S. consumption in 2014, 0.1 percent 2015, and 1.9 percent in 2016; they accounted for 2.2 percent in interim 2016 and 1.3 percent in interim 2017.<sup>65</sup> In the current reviews, subject imports from Russia were 57,893 short tons 2017 but absent from the U.S. market during the 2018-2021 period.<sup>66</sup>

During the original investigations, one firm, accounting for \*\*\* percent of wire rod production in Russia and whose exports accounted for approximately \*\*\* percent of U.S imports from Russia in 2016, responded to the Commission's foreign producers' questionnaire.<sup>67</sup> The responding producer reported production capacity of \*\*\* short tons and

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<sup>61</sup> CR/PR at Table I-11.

<sup>62</sup> CR/PR at Table I-12.

<sup>63</sup> Original Confidential Report at Table V-10a.

<sup>64</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table IV-2.

<sup>65</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table C-1.

<sup>66</sup> CR/PR at Table I-8.

<sup>67</sup> Original Confidential Report at VII-21.

a capacity utilization rate of \*\*\* percent in 2016.<sup>68</sup> It reported exporting \*\*\* percent of its total shipments in 2016, with \*\*\* percent of its total shipments exported to the United States that year.<sup>69</sup>

In the current reviews, the record contains limited information concerning the wire rod industry in Russia because no producer in Russia responded to the Commission's notice of institution. Domestic Producers provided a list of 19 possible producers of wire rod in Russia.<sup>70</sup> According to information submitted by Domestic Producers, the subject industry in Russia has large and increasing production capacity and continues to export steel products.<sup>71</sup> Additionally, publicly available information indicates that at least three subject producers in Russia have expanded wire rod production since the original investigations.<sup>72</sup> GTA data indicate that the volume of exports of bars and rods of carbon and alloy steel from Russia, a category that contains both in-scope wire rod as well as out-of-scope products, was substantial throughout the period of review and increased irregularly from 1.1 million short tons in 2017 to 1.6 million short tons in 2021.<sup>73</sup>

In the original investigations, subject imports from Russia undersold the domestic like product in all 18 quarterly comparisons.<sup>74</sup> No product-specific pricing data concerning subject imports from Russia were obtained in these reviews.

In light of the foregoing, including the significant and increasing volume of subject imports from Russia in the original investigations, the facts available concerning the size and expansion of the subject industry in Russia as well as export activity, and the underselling by subject imports from Russia during the original investigations, we do not find that subject imports from Russia would likely have no discernible adverse impact on the domestic industry if the pertinent order were revoked.

*South Africa.* In the original investigations, subject imports from South Africa initially increased from no presence in the U.S. market in 2014 to 45,451 short tons in 2015 before decreasing to 22,049 short tons in 2016; they were 22,049 short tons in interim 2016 and

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<sup>68</sup> Original Confidential Report at Table VII-11.

<sup>69</sup> Original Confidential Report at Table VII-11.

<sup>70</sup> CR/PR at I-33; Domestic Producers Response at 12, Exhs. 3, 8.

<sup>71</sup> Domestic Producers Response at 12, Exhs. 4, 8.

<sup>72</sup> CR/PR at Table I-13.

<sup>73</sup> CR/PR at Table I-14.

<sup>74</sup> Original Confidential Report at Table V-10a.

31,156 in interim 2017.<sup>75</sup> Subject imports from South Africa accounted for 0.8 percent of apparent U.S. consumption in 2015 and 0.4 percent in 2016; they accounted for 0.5 percent in interim 2016 and 0.7 percent in interim 2017.<sup>76</sup> In the current reviews, subject imports from South Africa were 31,156 short tons 2017 but absent from the U.S. market during the 2018-2021 period.<sup>77</sup>

During the original investigations, one firm, accounting for \*\*\* percent of wire rod production in South Africa and whose exports accounted for \*\*\* percent of U.S imports from South Africa in 2016, responded to the Commission's foreign producers' questionnaire.<sup>78</sup> The responding producer reported production capacity of \*\*\* short tons and a capacity utilization rate of \*\*\* percent in 2016.<sup>79</sup> It reported exporting \*\*\* percent of its total shipments in 2016, with \*\*\* percent of its total shipments exported to the United States that year.<sup>80</sup>

In the current reviews, the record contains limited information concerning the wire rod industry in South Africa because no producer in South Africa responded to the Commission's notice of institution. Domestic Producers provided a list of two possible producers of wire rod in South Africa.<sup>81</sup> According to information submitted by Domestic Producers, the subject industry in South Africa continues to have large wire rod capacity and the ability to export subject products.<sup>82</sup> GTA data indicate that the volume of exports of bars and rods of carbon and alloy steel from South Africa, a category that contains both in-scope wire rod as well as out-of-scope products, was considerable throughout the period of review, increasing irregularly from 135,921 short tons in 2017 to 254,884 short tons in 2019 before decreasing to 98,713 short tons in 2021.<sup>83</sup>

In the original investigations, subject imports from South Africa undersold the domestic like product in 16 out of 20 (or 80 percent of) quarterly comparisons, which encompassed \*\*\* percent of the volume of subject imports from South Africa covered by the quarterly

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<sup>75</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table IV-2.

<sup>76</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table C-1.

<sup>77</sup> CR/PR at Table I-8.

<sup>78</sup> Original Confidential Report at VII-27.

<sup>79</sup> Original Confidential Report at Table VII-14.

<sup>80</sup> Original Confidential Report at Table VII-14.

<sup>81</sup> CR/PR at I-35; Domestic Producers Response at 12-13, Exhs. 3, 9.

<sup>82</sup> Domestic Producers Response at 12-13, Exhs. 4, 9.

<sup>83</sup> CR/PR at Table I-15.

comparisons.<sup>84</sup> No product-specific pricing data concerning subject imports from South Africa were obtained in these reviews.

In light of the foregoing, including the significant and increasing volume of subject imports from South Africa in the original investigations, the facts available concerning the large size and exports of the subject industry in South Africa, and the underselling by subject imports from South Africa during the original investigations, we do not find that subject imports from South Africa would likely have no discernible adverse impact on the domestic industry if the pertinent order were revoked.

*South Korea.* In the original investigations, subject imports from South Korea initially increased from 109,026 short tons in 2014 to 128,862 short tons in 2015 before decreasing to 101,968 short tons in 2016; they were 86,481 short tons in interim 2016 and 35,662 in interim 2017.<sup>85</sup> Subject imports from South Korea accounted for 2.0 percent of apparent U.S. consumption in 2014, 2.4 percent in 2015, and 1.9 percent in 2016; they accounted for 2.1 percent in interim 2016 and 0.8 percent in interim 2017.<sup>86</sup> In the current reviews, the volume of subject imports from South Korea was 36,018 short tons in 2017, 22,612 short tons in 2018, 31,495 short tons in 2019, 34,104 short tons in 2020, and 58,445 short tons in 2021, equivalent to \*\*\* percent of apparent U.S. consumption that year.<sup>87 88</sup>

During the original investigations, one firm, accounting for approximately \*\*\* percent of wire rod production in South Korea and whose exports accounted for \*\*\* percent of U.S imports from South Korea in 2016, responded to the Commission's foreign producers' questionnaire.<sup>89</sup> The responding producer reported production capacity of \*\*\* short tons and

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<sup>84</sup> Original Confidential Report at Table V-10a.

<sup>85</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table IV-2.

<sup>86</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table C-1.

<sup>87</sup> CR/PR at Tables I-8, I-9.

<sup>88</sup> Subject imports originating in South Korea are exempt from Section 232 duties but are instead subject to an absolute quota, which is 56,474,925 kilograms (62,253 short tons) per year. CR/PR at Table I-4. As referenced, subject imports from South Korea totaled 58,445 short tons in 2021, amounting to \*\*\* percent of apparent U.S. consumption for that year. Therefore, in addition to the already significant volume of subject imports from South Korea that continue to enter the United States under the discipline of the order, the Section 232 measures as they apply to South Korea would have allowed for approximately 3,800 additional short tons of subject imports under the absolute quota that year.

<sup>89</sup> Original Confidential Report at VII-15.

a capacity utilization rate of \*\*\* percent in 2016.<sup>90</sup> It reported exporting \*\*\* percent of its total shipments in 2016, with \*\*\* percent of its total shipments exported to the United States that year.<sup>91</sup>

In the current reviews, the record contains limited information concerning the wire rod industry in South Korea because no producer in South Korea responded to the Commission's notice of institution. Domestic Producers provided a list of 18 possible producers of wire rod in South Korea.<sup>92</sup> According to information submitted by Domestic Producers, the subject industry in South Korea continues to have large wire rod capacity and to export steel products, including subject merchandise.<sup>93</sup> Additionally, publicly available information indicates that at least one subject producer in South Korea has expanded wire rod production since the original investigations.<sup>94</sup> GTA data indicate that the volume of exports of bars and rods of carbon and alloy steel from South Korea, a category that contains both in-scope wire rod as well as out-of-scope products, was substantial throughout the period of review and increased irregularly from 872,401 short tons in 2017 to 968,907 short tons in 2021.<sup>95</sup> Additionally, GTA data show that the United States remained the sixth largest export market for South Korean producers of bars and rods of carbon and alloy steel in 2021.<sup>96</sup>

In the original investigations, subject imports from South Korea undersold the domestic like product in 17 out of 33 (or 51.5 percent of) quarterly comparisons, which encompassed \*\*\* percent of the volume of subject imports from South Korea covered by the quarterly comparisons.<sup>97</sup> No product-specific pricing data concerning subject imports from South Korea were obtained in these reviews.

In light of the foregoing, including the significant and increasing volume of subject imports from South Korea in the original investigations, their continued presence in the U.S. market throughout the period of review, the facts available concerning the large size and exports of the subject industry in South Korea, and the underselling by subject imports from South Korea during the original investigations, we do not find that subject imports from South

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<sup>90</sup> Original Confidential Report at Table VII-8.

<sup>91</sup> Original Confidential Report at Table VII-8.

<sup>92</sup> CR/PR at I-37; Domestic Producers Response at 11, Exhs. 3, 7.

<sup>93</sup> Domestic Producers Response at 11, Exhs. 4, 7.

<sup>94</sup> CR/PR at Table I-16.

<sup>95</sup> CR/PR at Table I-17.

<sup>96</sup> CR/PR at Table I-17.

<sup>97</sup> Original Confidential Report at Table V-10a.

Korea would likely have no discernible adverse impact on the domestic industry if the pertinent order were revoked.

*Spain.* In the original investigations, subject imports from Spain initially increased from 31,778 short tons in 2014 to 79,976 short tons in 2015 before decreasing to 72,779 short tons in 2016; they were 49,246 short tons in interim 2016 and 49,338 in interim 2017.<sup>98</sup> Subject imports from Spain accounted for 0.6 percent of apparent U.S. consumption in 2014, 1.5 percent in 2015, and 1.4 percent in 2016; they accounted for 1.2 percent in interim 2016 and 1.1 percent in interim 2017.<sup>99</sup> In the current reviews, subject imports from Spain were 50,299 short tons 2017, 18,106 short tons in 2018, and 11 short tons in 2021, equivalent to less than \*\*\* percent of apparent U.S. consumption that year, but absent from the U.S. market during the 2019-2020 period.<sup>100</sup>

During the original investigations, four firms, accounting for an estimated \*\*\* percent of wire rod production in Spain and whose exports accounted for \*\*\* percent of U.S imports from Spain in 2016, responded to the Commission's foreign producers' questionnaire.<sup>101</sup> The responding producers reported production capacity of \*\*\* short tons and a capacity utilization rate of \*\*\* percent in 2016.<sup>102</sup> They reported exporting \*\*\* percent of their total shipments in 2016, with \*\*\* percent of their total shipments exported to the United States that year.<sup>103</sup>

In the current reviews, the record contains limited information concerning the wire rod industry in Spain because no producer in Spain responded to the Commission's notice of institution. Domestic Producers provided a list of three possible producers of wire rod in Spain.<sup>104</sup> According to information submitted by Domestic Producers, the subject industry in Spain continues to have large wire rod capacity.<sup>105</sup> GTA data indicate that the volume of exports of bars and rods of carbon and alloy steel from Spain, a category that contains both in-scope wire rod as well as out-of-scope products, was substantial throughout the period of

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<sup>98</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table IV-2.

<sup>99</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table C-1.

<sup>100</sup> CR/PR at Table I-8.

<sup>101</sup> Original Confidential Report at VII-33.

<sup>102</sup> Original Confidential Report at Table VII-18.

<sup>103</sup> Original Confidential Report at Table VII-18.

<sup>104</sup> CR/PR at I-39; Domestic Producers Response at 13, Exhs. 3, 10.

<sup>105</sup> Domestic Producers Response at 13, Exhs. 4, 10.

review and increased irregularly from 937,289 short tons in 2017 to 1.0 million short tons in 2021.<sup>106</sup>

In the original investigations, subject imports from Spain undersold the domestic like product in 13 out of 39 (or 33.3 percent of) quarterly comparisons, which encompassed \*\*\* percent of the volume of subject imports covered by Spain covered by the quarterly comparisons.<sup>107</sup> No product-specific pricing data concerning subject imports from Spain were obtained in these reviews.

In light of the foregoing, including the significant and increasing volume of subject imports from Spain in the original investigations, the facts available concerning the large size and exports of the subject industry in Spain, and the underselling by subject imports from Spain during the original investigations, we do not find that subject imports from Spain would likely have no discernible adverse impact on the domestic industry if the pertinent order were revoked.

*Turkey.* In the original investigations, subject imports from Turkey initially increased from 210,096 short tons in 2014 to 259,183 short tons in 2015 before decreasing to 97,761 short tons in 2016; they were 69,753 short tons in interim 2016 and 113,681 in interim 2017.<sup>108</sup> Subject imports from Turkey accounted for 3.9 percent of apparent U.S. consumption in 2014, 4.8 percent in 2015, and 1.8 percent in 2016; they accounted for 1.7 percent in interim 2016 and 2.6 percent in interim 2017.<sup>109</sup> In the current period of review, subject imports from Turkey were 113,681 short tons 2017, 265 short tons in 2018, and 26 short tons in 2021, but absent from the U.S. market in 2019 and 2020.<sup>110</sup>

During the original investigations, five firms, accounting for approximately \*\*\* percent of wire rod production in Turkey and whose exports accounted for approximately \*\*\* percent of U.S imports from Turkey in 2016, responded to the Commission's foreign producers' questionnaire.<sup>111</sup> The responding producers reported production capacity of \*\*\* short tons and a capacity utilization rate of \*\*\* percent in 2016.<sup>112</sup> They reported exporting \*\*\* percent

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<sup>106</sup> CR/PR at Table I-18.

<sup>107</sup> Original Confidential Report at Table V-10a.

<sup>108</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table IV-2.

<sup>109</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table C-1.

<sup>110</sup> CR/PR at Table I-8.

<sup>111</sup> Original Confidential Report at VII-40.

<sup>112</sup> Original Confidential Report at Table VII-22.

of their total shipments in 2016, with \*\*\* percent of their total shipments exported to the United States that year.<sup>113</sup>

In the current reviews, the record contains limited information concerning the wire rod industry in Turkey because no producer in Turkey responded to the Commission's notice of institution. Domestic Producers provided a list of 23 possible producers of wire rod in Turkey.<sup>114</sup> According to information submitted by Domestic Producers, the subject industry in Turkey continues to have large and increasing production capacity and actively exports subject merchandise.<sup>115</sup> Additionally, publicly available information indicates that at least seven subject producers in Turkey have opened new plants, expanded production, or improved wire rod production since the original investigations.<sup>116</sup> GTA data indicate that the volume of exports of bars and rods of carbon and alloy steel from Turkey, a category that contains both in-scope wire rod as well as out-of-scope products, was substantial throughout the period of review, although after the volume of exports initially increased from 1.2 million short tons in 2017 to 1.5 million short tons in 2018, it decreased to 1.2 million short tons in 2021.<sup>117</sup>

In the original investigations, subject imports from Turkey undersold the domestic like product in 34 out of 42 (or 80.9 percent of) quarterly comparisons, which encompassed \*\*\* percent of the volume of subject imports from Turkey covered by the quarterly comparisons.<sup>118</sup> No product-specific pricing data concerning subject imports from Turkey were obtained in these reviews.

In light of the foregoing, including the significant volume of subject imports from Turkey in the original investigations, the facts available concerning the large and increasing size and substantial exports of the subject industry in Turkey, and the underselling by subject imports from Turkey during the original investigations, we do not find that subject imports from Turkey would likely have no discernible adverse impact on the domestic industry if the pertinent orders were revoked.

*Ukraine.* In the original investigations, subject imports from Ukraine increased from 14,625 short tons in 2014 to 79,053 short tons in 2015 and to 161,451 short tons in 2016; they

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<sup>113</sup> Original Confidential Report at Table VII-22.

<sup>114</sup> CR/PR at I-31; Domestic Producers Response at 9-113-150, Exhs. 3, 11.

<sup>115</sup> Domestic Producers Response at 13-15, Exhs. 4, 11.

<sup>116</sup> CR/PR at Table I-19.

<sup>117</sup> CR/PR at Table I-20.

<sup>118</sup> Original Confidential Report at Table V-10a.

were 130,925 short tons in interim 2016 and 103,482 in interim 2017.<sup>119</sup> Subject imports from Ukraine accounted for 0.3 percent of apparent U.S. consumption in 2014, 1.5 percent 2015, and 3.0 percent in 2016; they accounted for 3.2 percent in interim 2016 and 2.4 percent in interim 2017.<sup>120</sup> In the current reviews, subject imports from Ukraine were 103,482 short tons 2017 but absent from the U.S. market during the 2018-2021 period.<sup>121</sup>

During the original investigations, two firms, accounting for approximately \*\*\* percent of wire rod production in Ukraine and whose exports accounted for approximately \*\*\* percent of U.S imports from Ukraine in 2016, responded to the Commission's foreign producers' questionnaire.<sup>122</sup> The responding producers reported production capacity of \*\*\* short tons and a capacity utilization rate of \*\*\* percent in 2016.<sup>123</sup> They reported exporting \*\*\* percent of their total shipments in 2016, with \*\*\* percent of their total shipments exported to the United States that year.<sup>124</sup>

In the current reviews, the record contains limited information concerning the wire rod industry in Ukraine because no producer in Ukraine responded to the Commission's notice of institution. Domestic Producers provided a list of four possible producers of wire rod in Ukraine.<sup>125</sup> According to information submitted by Domestic Producers, the subject industry in Ukraine has large production capacity.<sup>126</sup> GTA data indicate that the volume of exports of bars and rods of carbon and alloy steel from Ukraine, a category that contains both in-scope wire rod as well as out-of-scope products, was substantial throughout the period of review and increased irregularly from 826,111 short tons in 2017 to 833,110 short tons in 2021.<sup>127</sup>

In the original investigations, subject imports from Ukraine undersold the domestic like product in 35 out of 36 (or 97.2 percent of) quarterly comparisons, which encompassed \*\*\* percent of the volume of subject imports from Ukraine covered by the quarterly

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<sup>119</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table IV-2.

<sup>120</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table C-1.

<sup>121</sup> CR/PR at Table I-8.

<sup>122</sup> Original Confidential Report at VII-46.

<sup>123</sup> Original Confidential Report at Table VII-26.

<sup>124</sup> Original Confidential Report at Table VII-26.

<sup>125</sup> CR/PR at I-33; Domestic Producers Response at 15, Exhs. 3, 12.

<sup>126</sup> Domestic Producers Response at 15, Exhs. 4, 12.

<sup>127</sup> CR/PR at Table I-22.

comparisons.<sup>128</sup> No product-specific pricing data concerning subject imports from Ukraine were obtained in these reviews.

In light of the foregoing, including the significant and increasing volume of subject imports from Ukraine in the original investigations, the facts available concerning the size and exports of the subject industry in Ukraine, and the underselling by subject imports from Ukraine during the original investigations, we do not find that subject imports from Ukraine would likely have no discernible adverse impact on the domestic industry if the pertinent order were revoked.<sup>129</sup>

*United Arab Emirates.* In the original investigations, subject imports from the United Arab Emirates increased from 28 short tons in 2014 to 17,673 short tons in 2015 and to 22,159 short tons in 2016; they were 22,132 short tons in interim 2016 and were not present in the market in interim 2017.<sup>130</sup> Subject imports from the United Arab Emirates accounted for less than 0.05 percent of apparent U.S. consumption in 2014, 0.3 percent in 2015, and 0.4 percent in 2016; they accounted for 0.5 percent in interim 2016 and were not present in interim 2017.<sup>131</sup> Subject imports from the United Arab Emirates were absent from the U.S. market during the current period of review.<sup>132</sup>

During the original investigations, no producer or exporter in the United Arab Emirates responded to the Commission's foreign producers' questionnaire; accordingly, the information on the wire rod industry in the United Arab Emirates was based on information received during

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<sup>128</sup> Original Confidential Report at Table V-10a.

<sup>129</sup> In February 2022, the Russian Army invaded Ukraine, creating serious challenges for Ukrainian wire rod producers, including logistical and supply chain disruptions and increased prices and supply disruptions for energy and raw materials. Available information indicates that Ukraine's energy infrastructure has been significantly damaged by Russian missile attacks, leading to production disruptions for Ukrainian wire rod producers. CR/PR at I-44. However, several Ukrainian producers continued to operate after the 2022 invasion, albeit at reportedly lower levels of capacity utilization, and Ukraine continued to export bars and rods of carbon and alloy steel, a category that contains both in-scope wire rod as well as out-of-scope products, in 2022. CR/PR at I-44-45 and Table I-21. Domestic Producers submitted evidence which indicates that at least two of Ukraine's largest producers (ArcelorMittal Kryvyi Rih and Metinvest) have resumed production in the latter portion of 2022 after temporary production suspensions earlier that year. Domestic Producers Response at 15 and Exh. 12. We note that section 232 duties on steel articles originating in Ukraine were suspended, effective June 1, 2022, to June 1, 2023. CR/PR at I-12 – I-13, n.29.

<sup>130</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table IV-2.

<sup>131</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table C-1.

<sup>132</sup> CR/PR at Table I-8.

the preliminary phase of the investigations.<sup>133</sup> In the preliminary phase, one firm, estimated to account for \*\*\* wire rod production in the United Arab Emirates and whose exports accounted for \*\*\* percent of U.S imports from the United Arab Emirates in 2014-2016, responded to the Commission's foreign producers' questionnaire.<sup>134</sup> The responding producer reported production capacity of \*\*\* short tons and a capacity utilization rate of \*\*\* percent in 2016.<sup>135</sup> It reported exporting \*\*\* percent of their total shipments in 2016, with \*\*\* percent of its total shipments exported to the United States that year.<sup>136</sup>

In the current reviews, the record contains limited information concerning the wire rod industry in the United Arab Emirates because no producer in the United Arab Emirates responded to the Commission's notice of institution. Domestic Producers provided a list of three possible producers of wire rod in the United Arab Emirates.<sup>137</sup> According to information submitted by Domestic Producers, the subject industry in the United Arab Emirates continues to have large production capacity and exports various steel products, including wire rod.<sup>138</sup> GTA data indicate that the volume of exports of bars and rods of carbon and alloy steel from the United Arab Emirates, a category that contains both in-scope wire rod as well as out-of-scope products, was substantial and increased irregularly during the period of review from 247,225 short tons in 2017 to 1.4 million short tons in 2021.<sup>139</sup>

In the original investigations, subject imports from the United Arab Emirates undersold the domestic like product in all four quarterly comparisons.<sup>140</sup> No product-specific pricing data concerning subject imports from the United Arab Emirates were obtained in these reviews.

In light of the foregoing, including the significant volume of subject imports from the United Arab Emirates in the original investigations, the facts available concerning the size and increasing exports of the subject industry in the United Arab Emirates, and the underselling by subject imports from the United Arab Emirates during the original investigations, we do not find that subject imports from the United Arab Emirates would likely have no discernible adverse impact on the domestic industry if the pertinent order were revoked.

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<sup>133</sup> Original Confidential Report at VII-53.

<sup>134</sup> Original Confidential Report at VII-53 – VII-54.

<sup>135</sup> Original Confidential Report at Table VII-29.

<sup>136</sup> Original Confidential Report at Table VII-29.

<sup>137</sup> CR/PR at I-47; Domestic Producers Response at 16, Exhs. 3, 13.

<sup>138</sup> Domestic Producers Response at 16, Exhs. 4, 13.

<sup>139</sup> CR/PR at Table I-23.

<sup>140</sup> Original Confidential Report at Table V-10a.

*The United Kingdom.* In the original investigations, subject imports from the United Kingdom initially decreased from 71,379 short tons in 2014 to 45,507 short tons in 2015 before increasing to 51,622 short tons in 2016; they were 45,494 short tons in interim 2016 and 36,254 in interim 2017.<sup>141</sup> Subject imports from the United Kingdom accounted for 1.3 percent of apparent U.S. consumption in 2014, 0.8 percent in 2015, and 1.0 percent in 2016; they accounted for 1.1 percent in interim 2016 and 0.8 percent in interim 2017.<sup>142</sup> In the current reviews, subject imports from the United Kingdom were 40,294 short tons in 2017, 14,088 short tons in 2019, 3,139 short tons in 2020, and 18,577 short tons in 2021, equivalent to \*\*\* percent of apparent U.S. consumption that year.<sup>143</sup>

During the original investigations, two firms, accounting for approximately \*\*\* percent of wire rod production in the United Kingdom and whose exports accounted for \*\*\* percent of U.S imports from the United Kingdom in 2016, responded to the Commission's foreign producers' questionnaire.<sup>144</sup> The responding producers reported production capacity of \*\*\* short tons and a capacity utilization rate of \*\*\* percent in 2016.<sup>145</sup> They reported exporting \*\*\* percent of their total shipments in 2016, with \*\*\* percent of their total shipments exported to the United States that year.<sup>146</sup>

In the current reviews, the record contains limited information concerning the wire rod industry in the United Kingdom because no producer in the United Kingdom responded to the Commission's notice of institution. Domestic Producers provided a list of six possible producers of wire rod in the United Kingdom.<sup>147</sup> According to information submitted by Domestic Producers, the subject industry in the United Kingdom continues to have large wire rod capacity.<sup>148</sup> Additionally, publicly available information indicates that at least one subject producer in the United Kingdom announced investments that would expand and upgrade its wire rod production facilities since the original investigations.<sup>149</sup> GTA data indicate that the volume of exports of bars and rods of carbon and alloy steel from the United Kingdom, a

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<sup>141</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table IV-2.

<sup>142</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at Table C-1.

<sup>143</sup> CR/PR at Tables I-8, I-9.

<sup>144</sup> Original Confidential Report at VII-61.

<sup>145</sup> Original Confidential Report at Table VII-33.

<sup>146</sup> Original Confidential Report at Table VII-33.

<sup>147</sup> CR/PR at I-49; Domestic Producers Response at 16, Exhs. 3, 14.

<sup>148</sup> Domestic Producers Response at 16, Exhs. 4, 14.

<sup>149</sup> CR/PR at Table I-24.

category that contains both in-scope wire rod as well as out-of-scope products, was considerable throughout the period of review, although it decreased irregularly from 546,318 short tons in 2017 to 399,577 short tons in 2021.<sup>150</sup>

In the original investigations, subject imports from the United Kingdom undersold the domestic like product in 12 out of 15 (or 80 percent of) quarterly comparisons, which encompassed \*\*\* percent of the volume of subject imports from the United Kingdom covered by the quarterly comparisons.<sup>151</sup> No product-specific pricing data concerning subject imports from the United Kingdom were obtained.

In light of the foregoing, including the significant volume of subject imports from the United Kingdom in the original investigations, their continued presence in the U.S. market throughout most of the period of review, the facts available concerning the size and exports of the subject industry in United Kingdom, and the underselling by subject imports from United Kingdom during the original investigations, we do not find that subject imports from United Kingdom would likely have no discernible adverse impact on the domestic industry if the pertinent order were revoked.

### **C. 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.<sup>152</sup> Only a “reasonable overlap” of competition is required.<sup>153</sup> In five-year reviews, the

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<sup>150</sup> CR/PR at Table I-25.

<sup>151</sup> Original Confidential Report at Table V-10a.

<sup>152</sup> 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).

<sup>153</sup> *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), (Continued...)

relevant inquiry is whether there likely would be competition even if none currently exists because the subject imports are absent from the U.S. market.<sup>154</sup>

*Fungibility.* In the original investigations, the Commission found that the record indicated that wire rod is interchangeable, regardless of source. All domestic producers reported that wire rod imports from the individual subject countries are always or frequently interchangeable with each other and with the domestic like product, and purchasers and importers generally reported that wire rod from each subject source was frequently interchangeable with each other and the domestic like product. Most responding purchasers reported domestically produced wire rod to be superior or comparable to imports from each subject source with respect to all purchasing factors except price, and most responding purchasers reported that domestically produced wire rod and imports from each subject source always or usually met minimum quality specifications.<sup>155</sup> The Commission further found that, although the types and qualities of imported wire rod varied to some extent among subject sources, generally, wire rod was imported within the same range of grades. The Commission observed that the domestic industry shipped appreciable volumes of all types of wire rod and that each subject country shipped an appreciable volume of low-carbon industrial wire rod, showing that there was an overlap between domestic and all subject sources within this grade as well as overlap between domestic and individual subject sources within other types of wire rod.<sup>156</sup> The Commission concluded that, although the record indicated varying degrees of overlap in product mix, and purchaser perceptions of the domestic like product and products from individual subject sources varied to some extent, on balance, the record indicated a reasonable level of fungibility between and among the domestic like product and wire rod from each subject source.<sup>157</sup>

In these reviews, there is no new information in the record to indicate that the degree of fungibility between and among subject imports from Belarus, Italy, Russia, South Africa,

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(...Continued)

*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).

<sup>154</sup> See generally, *Cheflin Corp. v. United States*, 219 F. Supp. 2d 1313, 1314 (Ct. Int'l Trade 2002).

<sup>155</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 20.

<sup>156</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 20.

<sup>157</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 20.

South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom, and the domestic like product has changed since the original investigations. Domestic Producers contend that wire rod from all sources continues to be fungible.<sup>158</sup>

*Channels of Distribution.* In the original investigations, the Commission found that domestic producers and importers sold wire rod to both distributors and end users. It observed that in 2016, the majority of domestic producers' U.S. shipments of wire rod, as well as substantial portions of U.S. shipments of imports of wire rod from Belarus, Russia, Spain, South Korea, Turkey, and Ukraine, were sold to end users. The Commission further observed that appreciable proportions of shipments of the domestic like product and of imports of wire rod from Belarus, South Korea, and Turkey, and the great majority of shipments of imports from Italy, South Africa, the United Arab Emirates, and the United Kingdom, were sold to distributors.<sup>159</sup>

In these reviews, there is no new information in the record to indicate that if the orders were revoked, the channels of distribution used by the domestic industry and subject imports from Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom would differ from those observed by the Commission in the original investigations. Domestic Producers contend that wire rod from all sources continues to be sold through the same channels of distribution.<sup>160</sup>

*Geographic Overlap.* In the original investigations, the Commission found that domestically produced wire rod was sold in all six regions in the contiguous United States and that subject imports were also sold to all six regions, although they were concentrated in the Southeast, Midwest, and Central Southwest regions. The Commission also observed that the majority of subject imports, and an appreciable quantity of imports from each subject source, entered through ports in the South in 2016.<sup>161</sup>

In these reviews, there is no new information in the record to indicate that if the orders were revoked, the geographic overlap of domestic and subject wire rod from Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom would differ from that observed by the Commission in the original

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<sup>158</sup> Domestic Producers Response at 4; Domestic Producers Final Comments at 5.

<sup>159</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 20.

<sup>160</sup> Domestic Producers Response at 4; Domestic Producers Final Comments at 5.

<sup>161</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 20-21.

investigations. Additionally, the record in these reviews show that imports from Belarus, Russia, and Ukraine entered through the southern and eastern borders of entry; imports from South Africa entered through the southern borders of entry; imports of wire rod from Italy, Turkey, and the United Kingdom entered through the northern, southern, and eastern borders of entry; imports of wire rod from South Korea entered through the southern, eastern, and western borders of entry; and imports from Spain entered through either the northern, southern, and eastern borders of entry.<sup>162</sup> Domestic Producers assert that wire rod from all sources continues to be sold in the same geographic markets as during the original investigations.<sup>163</sup> Thus, the record indicates that subject imports continued to geographically overlap with each other and with the domestic like product during the period of review, and would likely continue to do so after revocation.

*Simultaneous Presence.* In the original investigations, the Commission found that the domestic like product and wire rod imported from all subject countries were present in the U.S. market during both 2015 and 2016.<sup>164</sup>

In these reviews, although there were no reported imports of wire rod from Belarus, Russia, South Africa, and Ukraine during 2018-2021, in 2017 imports from Belarus were reported in three months, imports from Russia were reported in seven months, imports from South Africa were reported in five months, and imports from Ukraine were reported in six months. Although there were no reported imports from Spain and Turkey during 2019-2020, imports from Spain were reported in 16 months and imports from Turkey were reported in 10 months during 2017, 2018, and 2021. Imports from Italy were reported in eight of the 36 months for 2017, 2019 and 2021, with no imports reported in 2018 and 2020. Imports from the United Kingdom were reported in 20 of the 48 months in 2017 and 2019-2021, with no imports reported in 2018. Imports from South Korea were reported in 49 of the 60 months during the period of review. There were no reported U.S. imports of wire rod from the United Arab Emirates during the period of review.<sup>165</sup>

*Conclusion.* The record in these expedited reviews contains limited information concerning subject imports in the U.S. market during the current review period. However, the record contains no new information suggesting a change in the considerations that led the

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<sup>162</sup> CR/PR at I-25.

<sup>163</sup> Domestic Producers Response at 4; Domestic Producers Final Comments at 5.

<sup>164</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at

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<sup>165</sup> CR/PR at I-25.

Commission in its original determinations to conclude that there was a reasonable overlap of competition between and among imports from the ten subject countries and the domestic like product. In light of this, and in the absence of any contrary argument, we find that there would likely be a reasonable overlap of competition between and among subject imports of wire rod from Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom, and the domestic like product, if the orders were revoked.

#### **D. Likely Conditions of Competition**

In determining whether to exercise our discretion to cumulate the subject imports, we assess whether subject imports from Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom would likely compete under similar or different conditions of competition in the U.S. market after revocation of the orders. The record in these expedited reviews contains limited current information about the wire rod industries in the subject countries. However, the available information does not indicate that there would likely be any significant difference in the conditions of competition between subject imports from Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom, if the orders were revoked.<sup>166</sup>

#### **E. Conclusion**

In sum, we determine that subject imports of wire rod from Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom, considered individually, are not likely to have no discernible adverse impact on the domestic industry if the corresponding orders were revoked. We also find a likely reasonable overlap of competition between and among subject imports from Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom and the domestic like product if the orders were revoked. Finally, we find that imports from each subject country would be likely to compete under similar conditions of competition if the orders were revoked. We therefore exercise our discretion to cumulate subject imports from

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<sup>166</sup> We note that all of the ten subject countries are subject to Section 232 duties, tariff rate quotas or absolute quotas (as noted above, Section 232 duties on steel articles originating in Ukraine are suspended, effective June 1, 2022, to June 1, 2023). CR/PR at Table I-4. We further note that the “column 2” duty rates, applied to imports from Belarus and Russia, range only from 5.5 to 10 percent for subject merchandise. CR/PR at I-11.

Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom for purposes of our analysis in these reviews.

#### **IV. 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.”<sup>167</sup> 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.”<sup>168</sup> Thus, the likelihood standard is prospective in nature.<sup>169</sup> The CIT has found that “likely,” as used in the five-year review provisions of the Act, means “probable,” and the Commission applies that standard in five-year reviews.<sup>170</sup>

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<sup>167</sup> 19 U.S.C. § 1675a(a).

<sup>168</sup> 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.

<sup>169</sup> 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.

<sup>170</sup> 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”); (Continued...)

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.”<sup>171</sup> 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.”<sup>172</sup>

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.”<sup>173</sup> 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).<sup>174</sup> The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission’s determination.<sup>175</sup>

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

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*Usinor v. United States*, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

<sup>171</sup> 19 U.S.C. § 1675a(a)(5).

<sup>172</sup> 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.*

<sup>173</sup> 19 U.S.C. § 1675a(a)(1).

<sup>174</sup> 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings with respect to the orders. 88 Fed. Reg. 15953 (Mar. 15, 2023) and accompanying Issues and Decisions Memorandum, EDIS Doc. 799324; 88 Fed. Reg. 18296 (Mar. 28, 2023) and accompanying Issues and Decisions Memorandum, EDIS Doc. 799324; 88 Fed. Reg. 201127 (Apr. 5, 2023) and accompanying Issues and Decisions Memorandum, EDIS Doc. 799324.

<sup>175</sup> 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

or relative to production or consumption in the United States.<sup>176</sup> 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.<sup>177</sup>

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.<sup>178</sup>

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.<sup>179</sup> All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to

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<sup>176</sup> 19 U.S.C. § 1675a(a)(2).

<sup>177</sup> 19 U.S.C. § 1675a(a)(2)(A-D).

<sup>178</sup> 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.

<sup>179</sup> 19 U.S.C. § 1675a(a)(4).

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.<sup>180</sup>

No respondent interested party participated in these expedited reviews. The record, therefore, contains limited new information with respect to the wire rod industries in Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom. There also is limited information on the wire rod market in the United States during the period of review. Accordingly, for our determinations, we rely as appropriate on the facts available from the original investigations and the limited new information on the record in these five-year reviews.

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

In evaluating the likely impact of the subject imports on the domestic industry if an order 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.”<sup>181</sup> The following conditions of competition inform our determinations.

### **1. Demand Conditions**

*Original Investigations.* The Commission found that wire rod is a hot-rolled intermediate steel product that is used in a variety of downstream products used by the construction, automotive, energy, and agriculture industries, and consequently, that demand for wire rod depends on demand for these downstream products. It observed that most U.S. producers reported that U.S. demand for wire rod had decreased since January 2014 while a plurality of importers and purchasers reported that U.S. demand had increased. Apparent U.S. consumption of wire rod decreased by 4.2 percent in the merchant market from 4.4 million short tons in 2014 to 4.2 million short tons in 2016; it was higher in interim 2017 at 3.5 million short tons than in interim 2016 at 3.2 million short tons.<sup>182</sup>

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<sup>180</sup> 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.

<sup>181</sup> 19 U.S.C. § 1675a(a)(4).

<sup>182</sup> *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 27. Apparent U.S. consumption in the overall market decreased by 2.3 percent, falling from 5.4 million (Continued...)

*Current Reviews.* Domestic Producers assert that demand for wire rod continues to be tied to demand for the downstream products identified in the original investigations. They claim that apparent U.S. consumption of wire rod has remained fairly stable since the original investigations.<sup>183</sup> Apparent U.S. consumption was \*\*\* short tons in 2021.<sup>184</sup>

Purchasers \*\*\* reported \*\*\*.<sup>185</sup> With respect to demand conditions, \*\*\* reported that demand for wire rod was strong in 2018, weakened in 2019, and then strengthened after the initial effects of the COVID-19 pandemic subsided from 2020 through the first half of 2022.<sup>186</sup> \*\*\* and \*\*\* both anticipate \*\*\*.<sup>187</sup>

## 2. Supply Conditions

*Original Investigations.* The Commission found that the domestic industry was the largest supplier of wire rod to the U.S. market during the original POI, although its share of apparent U.S. consumption in the merchant market decreased from 59.3 percent in 2014 to 59.2 percent in 2015 and 58.2 percent in 2016 and was lower in interim 2017 at 57.6 percent than in interim 2016 at 57.8 percent.<sup>188</sup> It found that, in 2014, there were ten U.S. producers of wire rod, with seven of these firms internally transferring some wire rod to produce downstream products over the POI. The Commission noted that, during the POI, two domestic

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(...Continued)

short tons in 2014 to 5.3 million short tons in 2016; it was higher in interim 2017 at 4.3 million short tons than in interim 2016 at 4.1 million short tons. *Id.* at nn.156, 157. In the original determinations, the Commission found that the criteria for application of the captive production provision of the statute was satisfied. *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 25-27. Accordingly, it focused its analysis on the merchant market in analyzing the market share and financial performance of the domestic industry. *Id.* at 27. It also considered the market as a whole and the captive portion of the market for wire rod in its analysis. *Id.* The Commission has stated that the captive production provision does not apply to five-year reviews. *See, e.g., Hot-Rolled Steel Products from Argentina, China, India, Indonesia, Kazakhstan, Romania, South Africa, Taiwan, Thailand, and Ukraine*, Inv. Nos. 701-TA-404-408 & 731-TA-898-902 & 904-908 (Review), USITC Pub. 3956 at 25 n.129 (Oct. 2007). However, we find it appropriate to consider the merchant market data as a relevant condition of competition.

<sup>183</sup> Domestic Producers Response at 25-26.

<sup>184</sup> CR/PR at Table I-9.

<sup>185</sup> CR/PR at D-3-D-4.

<sup>186</sup> CR/PR at D-3-D-4.

<sup>187</sup> CR/PR at D-4. \*\*\* reported that \*\*\*. \*\*\* reported that \*\*\*. CR/PR at D-4.

<sup>188</sup> *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 27-28. The domestic industry's share of apparent U.S. consumption in the overall market increased from 66.9 percent in 2014 to 67.1 percent in 2015, before decreasing to 66.7 percent in 2016; it was lower in interim 2017 at 65.9 percent than in interim 2016 at 66.7 percent. *Id.* at nn. 158-59.

producers ceased production and that the domestic industry's capacity declined by 4.9 percent from 2014 to 2016 and was 0.3 percent lower in interim 2017 than in interim 2016. It further observed that, while domestic industry capacity was slightly below apparent U.S. consumption during the POI, domestic producers maintained that the domestic industry was capable of producing the entire range of wire rod products that were imported into the United States from the subject countries and had ample capacity to supply the vast majority of U.S. wire rod demand during the POI.<sup>189</sup>

The Commission also found that cumulated subject imports' share of apparent U.S. consumption in the merchant market increased from 10.2 percent in 2014 to 15.3 percent in 2015 and 16.5 percent in 2016; it was lower in interim 2017, at 14.0 percent, than in interim 2016, at 17.4 percent.<sup>190</sup>

Nonsubject imports' share of apparent U.S. consumption in the merchant market declined from 30.5 percent in 2014 to 25.5 percent in 2015 and 25.2 percent in 2016; it was higher in interim 2017, at 28.4 percent, than in interim 2016, at 24.8 percent.<sup>191</sup> The Commission noted that, in 2016, the largest source of nonsubject imports was Canada, which accounted for 51.6 percent of nonsubject imports and 31.2 percent of all wire rod imports in that year. It also observed that during the POI, wire rod imports from China were the subject of antidumping and countervailing duty investigations and that, in January 2015, Commerce issued antidumping and countervailing duty orders on these imports. Subsequently, wire rod imports from China largely disappeared from the U.S. market. The Commission also found that antidumping duty orders had also been in place since 2002 on U.S. wire rod imports from Brazil, China, Indonesia, Mexico, Moldova, and Trinidad and Tobago, as well as a countervailing duty order on wire rod imports from Brazil.<sup>192</sup>

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<sup>189</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 28.

<sup>190</sup> *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 28. In the overall market, cumulated subject imports' share of apparent U.S. consumption increased from 8.3 percent in 2014 to 12.4 percent in 2015 and 13.2 percent in 2016; it was lower in interim 2017 at 11.2 percent than in interim 2016 at 13.7 percent. *Id.* at nn.167-68.

<sup>191</sup> *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 28-29. Nonsubject imports share of apparent U.S. consumption in the overall market decreased from 24.8 percent in 2014 to 20.6 percent in 2015 and 20.1 percent in 2016; it was higher in interim 2017 at 22.8 percent than in interim 2016 at 19.6 percent. *Id.* at nn.169-70.

<sup>192</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 29.

*Current Reviews.* In 2021, the domestic industry accounted for the largest share of apparent U.S. consumption, at \*\*\* percent.<sup>193</sup> According to Domestic Producers, since the original investigations, there have been several changes to the domestic industry, but it asserts that all assets of the original petitioners are represented by the participating U.S. producers. In particular, Domestic Producers contend that Liberty Steel USA acquired the Georgetown, South Carolina wire rod plant from ArcelorMittal in December 2017, and also acquired Keystone Consolidated Industries, including all of its subsidiaries, in December 2018. Domestic Producers also claim that the Liberty Still USA mill in Georgetown, South Carolina \*\*\*, that Optimus Steel purchased Gerdau’s wire rod mill in Beaumont, Texas in first quarter 2018, and that CMC purchased Gerdau’s wire rod mill in Jacksonville, Florida in fourth quarter 2018.<sup>194</sup>

Cumulated subject imports were the smallest source of supply in the U.S. market, accounting for \*\*\* percent of apparent U.S. consumption in 2021.<sup>195</sup> Nonsubject imports were the second largest source of supply, accounting for \*\*\* percent of apparent U.S. consumption in 2021.<sup>196</sup> The largest country sources of nonsubject imports in 2021, were Canada, Japan, and Egypt.<sup>197</sup>

Purchasers \*\*\* reported \*\*\*.<sup>198</sup> In particular, \*\*\*.<sup>199</sup> \*\*\* reported anticipating \*\*\*.<sup>200</sup> \*\*\* reported that \*\*\*.<sup>201</sup>

### **3. Substitutability and Other Conditions**

*Original Investigations.* The Commission found that the record indicated that there was a moderate-to-high degree of substitutability between domestically produced wire rod and wire rod imported from subject sources. As discussed above, it observed that domestic producers reported that wire rod imports from the individual subject countries are always or frequently interchangeable with each other and with the domestic like product and that purchasers and importers generally reported that wire rod from each subject source was frequently interchangeable with each other and the domestic like product. The Commission

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<sup>193</sup> CR/PR at Table I-3.

<sup>194</sup> Domestic Producers Response at 26.

<sup>195</sup> CR/PR at Table I-9.

<sup>196</sup> CR/PR at Table I-9.

<sup>197</sup> CR/PR at Table I-8.

<sup>198</sup> CR/PR at D-3-D-4.

<sup>199</sup> CR/PR at D-3-D-4.

<sup>200</sup> CR/PR at D-4.

<sup>201</sup> CR/PR at D-4. \*\*\* reported that \*\*\*. CR/PR at D-4.

also noted that domestic like product and cumulated subject imports competed with one another across a range of products, but particularly in the industrial/standard quality wire rod category.<sup>202</sup>

The Commission also found that price was an important consideration for purchasers of wire rod, observing that purchasers identified price, quality, and availability as the main factors that they consider in their purchasing decisions. Purchasers listed quality most frequently as the first-most important purchasing factor, followed by price; the majority of purchasers also reported that price is very important in their purchasing decisions; and purchasers usually purchase the lowest-priced product. In response to a question regarding the significance of non-price factors when comparing the domestic like product and wire rod from the subject countries, all responding domestic producers reported that factors other than price were never significant while the majority of purchasers reported that non-price factors were sometimes or never significant and most importers reported that non-price factors were frequently or sometimes a significant difference.

The Commission also found that raw material costs accounted for a substantial portion of the domestic industry's cost of goods sold ("COGS") in the merchant market during the POI, ranging from a high of 64.0 percent in 2014 to a low of 54.2 percent in 2016. It observed that steel scrap is the primary raw material input to manufacture wire rod and that between January 2014 and September 2017, the average prices of heavy melt scrap, busheling scrap, and shredded auto scrap reported in American Metal Market \*\*\*, but declined overall.<sup>203</sup>

The Commission found that most domestic producers and most importers reported that their wire rod prices reflected changes in scrap costs with some U.S. producers and importers reporting that their wire rod prices are indexed to scrap prices while one domestic producer and some importers reported adding a separate raw material surcharge for scrap prices. It also noted that purchasers stated that price negotiations for wire rod begin with references to published steel scrap prices.<sup>204</sup>

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<sup>202</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 29.

<sup>203</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 30.

<sup>204</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 30-31.

Another condition of competition relevant to the Commission’s analysis was the prevalence of spot sales in the wire rod market.<sup>205</sup>

*Current Reviews.* The record in these reviews contains no new information to indicate that the degree of substitutability between the domestic like product and subject imports or the importance of price in purchasing decisions has changed since the original investigations. Domestic Producers argue that wire rod remains a highly substitutable product, regardless of source, and that price is an important purchasing factor.<sup>206</sup> Accordingly, we continue to find a moderate-to-high degree of substitutability between subject imports and domestically produced wire rod, and that price remains an important factor in purchasing decisions for wire rod.

Additionally, there have been changes in the tariff treatment of wire rod imports from the countries subject to these reviews. Imports from Russia and Belarus are subject to column 2 duty rates ranging between 5.5 percent and 10 percent *ad valorem*. Under Section 232 of the Trade Expansion Act of 1962 (“Section 232”),<sup>207</sup> imports of wire rod from Belarus, Russia, South Africa, Turkey, Ukraine, and the United Arab Emirates are subject to 25 percent *ad valorem* duties.<sup>208</sup> Imports of wire rod from South Korea are exempt from Section 232 duties but are instead subject to an annual absolute quota of 62,253 short tons.<sup>209</sup> Imports of wire rod from Italy, Spain, and the United Kingdom are subject to annual tariff rate quotas of 15,559 short tons, 50,152 short tons, and 13,704 short tons, respectively, with imports of wire rod above these levels subject to Section 232 duties.<sup>210</sup>

### **C. Likely Volume of Subject Imports**

*Original Investigations.* The Commission found that cumulated subject imports had a significant and increasing presence in the U.S. market during the POI. Cumulated subject import volume increased by 56.1 percent from 2014 to 2016, from 449,609 short tons in 2014

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<sup>205</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 31.

<sup>206</sup> Domestic Producers Response at 20; Domestic Producers Final Comments at 5-6.

<sup>207</sup> 19 U.S.C. §1862, as amended.

<sup>208</sup> CR/PR at I-9. Section 232 duties on imports of wire rod from Ukraine are suspended from June 1, 2022, to June 1, 2023. CR/PR at I-10 n.23.

<sup>209</sup> CR/PR at I-9.

<sup>210</sup> CR/PR at I-11 – I-13 and Table I-4.

to 671,866 short tons in 2015 and 701,654 short tons in 2016.<sup>211</sup> Cumulated subject imports increased their share of apparent U.S. consumption in the merchant market from 10.2 percent in 2014 to 15.3 percent in 2015 and 16.5 percent in 2016.<sup>212</sup> This market share gain occurred at the expense of nonsubject imports and the domestic industry. The domestic industry's share of apparent U.S. consumption in the merchant market fell from 59.3 percent in 2014 to 59.2 percent in 2015 and 58.2 percent in 2016.<sup>213 214</sup>

Accordingly, the Commission concluded that the volume of cumulated subject imports and the increase in that volume were significant in absolute terms and relative to consumption in the United States.<sup>215</sup>

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<sup>211</sup> *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 31. Cumulated subject import volume was lower in interim 2017 at 484,382 short tons than in interim 2016 at 563,600 short tons. *Id.* The Commission found that the appreciable reduction in subject imports between the interim periods was attributable to the filing of the petitions in these investigations. This was substantiated largely by responses from several U.S. purchasers. *Id.* It consequently accorded reduced weight to the trade data for interim 2017 in its analysis. *Id.*; 19 U.S.C. § 1677(7)(I).

<sup>212</sup> *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 30. Cumulated subject import market share in the merchant market was lower in interim 2017 at 14.0 percent than in interim 2016 at 17.4 percent. *Id.* Cumulated subject imports also increased as a share of apparent U.S. consumption in the overall market, increasing from 8.3 percent in 2014 to 12.4 percent in 2015 and 13.2 percent in 2016. Cumulated subject import market share in the overall market was lower in interim 2017 at 11.2 percent than in interim 2016 at 13.7 percent. *Id.*

<sup>213</sup> *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 30-31. The domestic industry's market share in the merchant market was lower in interim 2017 at 57.6 percent than in interim 2016 at 57.8 percent. *See id.* Its share of the overall market increased from 66.9 percent in 2014 to 67.1 percent in 2015 before decreasing to 66.7 percent in 2016. *Id.* The domestic industry's share of the overall market was lower in interim 2017 at 65.9 percent than in interim 2016 at 66.7 percent. *Id.*

<sup>214</sup> The Commission rejected the British and Turkish respondents' arguments that the increase in volume of cumulated subject imports was not significant because cumulated subject imports mostly replaced nonsubject imports from China rather than displacing domestic production. As an initial matter, it found that this argument was of limited pertinence to its statutory inquiry, which concerned whether subject import volume or the increase in that volume – and not total import volume – was significant. Moreover, the Commission noted that cumulated subject imports competed directly with domestically produced wire rod during the POI and that subject imports did not merely replace nonsubject imports from China, but also took market share from the domestic industry in the merchant market where the products competed. *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 32.

<sup>215</sup> *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 32.

*Current Reviews.* Cumulated subject imports of wire rod maintained a presence in the U.S. market throughout the period of review, even under the disciplining effects of the orders. The volume of cumulated subject imports declined from 490,189 short tons in 2017 to 40,984 short tons in 2018, increased to 45,665 short tons in 2019, declined to 37,242 short tons in 2020, and then increased to 77,079 short tons in 2021.<sup>216</sup> Cumulated subject imports accounted for \*\*\* percent of apparent U.S. consumption in 2021.<sup>217</sup>

The record in these expedited reviews contains limited information on the subject industries in Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom. The information available, however, indicates that the subject industries in all ten countries have the capacity to produce and export significant volumes of subject merchandise to the United States if the orders were revoked.

As previously noted, Domestic Producers have identified two possible wire rod producers in Belarus, twelve possible producers in Italy, 19 possible producers in Russia, two possible producers in South Africa, 18 possible producers in South Korea, ten possible producers in Spain, 23 possible producers in Turkey, four possible producers in Ukraine, three possible producers in the United Arab Emirates, and six possible producers in the United Kingdom.<sup>218</sup> Domestic Producers assert that wire rod producers in the subject countries continue to maintain massive production capacity from which to produce and supply the U.S. market in the event the orders are revoked. According to third-party data provided by Domestic Producers, subject producers' capacity was at \*\*\* short tons in 2021, up from \*\*\* short tons in 2019.<sup>219</sup> Domestic Producers also provided information indicating that specific subject producers in each country possess substantial wire rod capacity and, in many cases, tout their exports of steel wire.<sup>220</sup> This information further shows that subject producers'

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<sup>216</sup> CR/PR at Table I-8.

<sup>217</sup> CR/PR at Table I-9.

<sup>218</sup> Domestic Producers' Substantive Response at Exh. 3.

<sup>219</sup> Domestic Producers Final Comments at 8; Domestic Producers Response at 8 and Exh. 4. Domestic Producers source the subject producers' wire rod production capacity from \*\*\* data are reported in metric tons and converted to short tons.

<sup>220</sup> Domestic Producers Response at 9-16, Exhs. 5-14. For example, for Belarus, BMZ reported an overall production capacity of 3 million tons of steel per year, including 490,000 metric tons of wire rod, and produced 1.9 million metric tons of steel in January-September 2021 (for a year-over-year growth rate of 2.2 percent), and exported 82.9 percent of this volume to 52 countries. *Id.* at 9, Exh. 5. For Italy, Alfa Acciai SpA is one of Italy's largest EAF steel mills and is part of the Alfa Acciai Group, which has an annual production capacity of 2.5 million metric tons of steel and long products (including wire rod), and "exports to Mediterranean countries and beyond." *Id.* at 10, Exh. 6. For Russia, Magnitogorsk Iron & (Continued...)

capacity was projected to increase even further to \*\*\* short tons in 2022, which is greater than the cumulated subject foreign producer capacity existing the year the petitions were filed (2017).<sup>221</sup>

According to Domestic Producers, this capacity projection is likely understated, as it does not necessarily include all subject foreign producers' plans to expand existing capacity.<sup>222</sup> In particular, Domestic Producers emphasize that five Turkish subject producers have announced new wire rod mills or plant expansions since 2021.<sup>223</sup> In addition, Domestic Producers claim that Yesilyurt Metallurgy is a new Turkish producer with an annual capacity of

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(...Continued)

Steel Works – MMK “is one of the world’s largest steel producers and holds leading positions among Russian steel companies,” which includes wire rod production; the company reports production of 11.6 million tons of steel and 10.8 million tons in steel sales, and in 2020, reported exporting 19 percent of its products. *Id.* at 12, Exh. 8. For South Africa, ArcelorMittal South Africa is the largest steel producer in the country, with the “capacity to produce 1.9 million tonnes million {2.09 short tons} per annum;” and seeks to serve export markets with its “spare capacity.” *Id.* at 12-13, Exh. 9. For South Korea, POSCO, as of September 2022, produced over 2 million tons of wire rod and stainless steel per year and a subsidiary Posco Steel service & Sales Co Ltd (Posteel) promotes sales abroad including to the United States. *Id.* at 11, Exh. 7. For Spain, ArcelorMittal España’s five integrated and downstream steel mills in Spain produced 4.4 million tons of steel in 2021, including wire rod products and a wire rod mill located “in a strategic location with port services close to the factory.” *Id.* at 13, Exh. 10. For Turkey, Tosyali Holding reported in 2022 the establishment of a new greenfield steel production facility in Sarieski, Turkey, with an annual capacity of 2.2 million tons of steel products, including wire rod; Tosyali, along with one of its subsidiaries, is export-oriented and aggressively expanding its production in Turkey. *Id.* at 15, Exh. 11. For Ukraine, ArcelorMittal Kryvyi Rih is reportedly “the largest producer of rolled steel in Ukraine . . . specializ{ing} in production of long products, in particular rebar and wire rod,” and also resumed production of wire rod after pausing production between March and May of 2022. *Id.* at 15, Exh. 12. The Kryvyi Rih plant alone produced 5.4 million short tons of long steel products in 2021. *Id.* ArcelorMittal announced in 2022 its intent to invest nearly \$250 million over the next five years in the company’s long steel products plant in Kryvyi Rih and to consider additional investments totaling \$500 million. *Id.* For the United Arab Emirates, Conares Metal Supply Ltd. has a total annual production capacity of 1,000,000 metric tons to produce various steel products, including wire rod, and exports to countries outside of the Middle East. *Id.* at 16, Exh. 13. For the United Kingdom, British Steel has the capacity to produce up to 3 million metric tons per year of rolled long products, including wire rod; and announced in 2018 that the company would upgrade its wire rod business at the same facility via “the biggest single investment in its manufacturing operations for a decade.” *Id.* at 16, Exh. 14. The company reportedly produced 2.8 million metric tons of steel in 2018, and has an annual steelmaking capacity of 4.5 million metric tons (of construction steel, rail, wire rod, and special profiles). *Id.*

<sup>221</sup> Domestic Producers Final Comments at 8; Domestic Producers Response at 8 and Exh. 4.

<sup>222</sup> Domestic Producers Final Comments at 9; Domestic Producers Response at 9-16.

<sup>223</sup> Domestic Producers Final Comments at 9 (citing CR/PR at Table I-8).

500,000 metric tons per year.<sup>224</sup> Domestic Producers also note that Italian subject producers ABS Acciaierie Bertoli Safau SpA, Feralpi Siderurgica SpA, and Acciaierie di Verona also recently reported investments to expand production capacity and other investments at their mills,<sup>225</sup> and that three Russian subject producers announced wire rod capacity expansions since the original investigations, most recently in 2021.<sup>226</sup> According to Domestic Producers, even though the subject producers' projected 2022 capacity is likely understated, the estimated capacity of cumulated subject producers in 2021 was already \*\*\* apparent U.S. consumption that year.<sup>227</sup> Domestic Producers also emphasize responding purchaser \*\*\*.<sup>228</sup>

The available information also indicates that producers in certain subject countries continue to export significant volumes of steel products, including wire rod, globally. According to GTA data, Russia was the world's fourth largest exporter of bars and rods of carbon and alloy steel, a category that contains both in-scope wire rod as well as out-of-scope products, in 2021 while the United Arab Emirates was the sixth largest exporter and Turkey was the eighth largest exporter.<sup>229</sup> Additionally, as discussed above in Section III.B., subject producers in Italy, Russia, South Korea, Spain, and the United Arab Emirates, increased the volume of their exports of bars and rods of carbon and alloy steel during the period of review.<sup>230</sup>

Available information further indicates that the U.S. market remains attractive to subject producers. Despite the disciplining effects of the orders, cumulated subject imports maintained a presence in the U.S. market during each year of the period of review, with the volume of cumulated subject imports increasing 107 percent from 2020 to 2021 (the most recent years encompassed within the period of review).<sup>231</sup> Thus, the record indicates that subject producers have maintained ready distribution networks in the United States through importers and sales agents that could be used to increase their exports of wire rod to the

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<sup>224</sup> Domestic Producers Final Comments at 9 (citing CR/PR at Table I-8); Domestic Producers Response at 14-15.

<sup>225</sup> Domestic Producers Final Comments at 9 (citing CR/PR at Table I-11); Domestic Producers Response at 9-10.

<sup>226</sup> Domestic Producers Final Comments at 9 (citing CR/PR at Table I-13).

<sup>227</sup> Domestic Producers Final Comments at 9 (comparing Domestic Producers Response at 8 with CR/PR at Table I-9).

<sup>228</sup> Domestic Producers Final Comments at 9 (citing CR/PR at D-3, D-4).

<sup>229</sup> CR/PR at Table I-27.

<sup>230</sup> CR/PR at Tables I-12, I-14, I-17, I-18, I-23.

<sup>231</sup> *Calculated from* CR/PR at Table I-8.

United States after revocation.<sup>232</sup> Notably, there are several antidumping duty actions in third country markets covering imports of wire rod from subject countries, as well as four global safeguard measures imposed by third countries on imports of wire rod, in addition to other trade remedies (including prohibitions on imports from Belarus and Russia implemented by the European Union and the United Kingdom in March 2022). These third-country barriers would provide additional incentives for subject producers to increase their exports to the United States in the event of revocation.<sup>233</sup>

Given the foregoing, including the significant and increasing volume of cumulated subject imports during the original investigations, the continued presence of cumulated subject imports in the U.S. market during the period of review, the subject industries' substantial capacity and exports of wire rod, and the attractiveness of the U.S. market to subject producers, we find that the volume of cumulated subject imports would likely be significant, both in absolute terms and relative to consumption in the United States, if the orders were revoked.<sup>234</sup>

#### **D. Likely Price Effects**

*Original Investigations.* The Commission reiterated that there was a moderate-to-high degree of substitutability among subject imports and the domestically produced product and

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<sup>232</sup> Further, as discussed in Section III.B., GTA data show that the United States remained the sixth largest export market for South Korean producers of bars and rods of carbon and alloy steel in 2021. CR/PR at Table I-17.

<sup>233</sup> CR/PR at Table I-26.

<sup>234</sup> As discussed above, cumulated subject import volume was lower in interim 2017 at 484,832 short tons than in interim 2016 at 563,600 short tons and that the Commission found that the appreciable reduction in subject imports between the interim periods was attributable to the filing of the petitions in these investigations, which was substantiated largely by responses from several U.S. purchasers. *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 31. Thus, this appreciable reduction in the volume of cumulated subject imports resulted from the pendency of the investigations prior to the imposition of Section 232 measures in 2018. CR/PR at Tables I-8 and C-1. Given this, the substantial capacity and exports of subject producers, and the attractiveness of the U.S. market to subject producers, the information available indicates that the Section 232 measures would not prevent subject imports from increasing significantly if the orders were revoked. Indeed, as discussed above, cumulated subject imports continued to maintain a significant presence throughout the period of review and, although the volume of cumulated subject imports decreased from 490,189 short tons in 2017 to 40,984 short tons in 2018, it subsequently increased irregularly to 77,079 short tons in 2021. CR/PR at Table I-8.

The record does not contain data addressing existing inventories of the subject merchandise or whether subject producers have the ability to product shift.

that price is an important consideration in purchasing decisions, observing that both the domestic like product and cumulated subject imports were concentrated in the industrial quality grades.<sup>235</sup>

The quarterly pricing product data from 2014 to the first quarter of 2017 showed that cumulated subject imports undersold the domestic like product in 139 of 199 (or 69.8 percent of) quarterly comparisons (involving 1.0 million short tons of subject imports) at underselling margins that ranged from less than one percent to 42.5 percent.<sup>236</sup> Based on the pervasive underselling of the domestic like product by cumulated subject imports and the importance of price in purchasing decisions, the Commission found the underselling by subject imports to be significant. Noting that purchasers confirmed purchasing subject imports instead of the domestic like product due to their lower price, the Commission found that confirmed lost sales and subject imports' capturing of significant market share from the domestic industry further supported its finding that subject import underselling was significant.<sup>237</sup>

The Commission also found that cumulated subject imports depressed prices for the domestic like product, observing that prices for the domestically produced pricing products fell sharply from the first quarter of 2014 to the fourth quarter of 2015, and subsequently remained at lower levels, while the domestic industry's average unit commercial sales values also declined.<sup>238</sup> It also found that the available data indicated that subject import prices also generally decreased from 2014 to 2015.<sup>239</sup> Although the Commission recognized that declining raw materials contributed to the declining prices between 2014 and 2015, it found that they could not explain the full magnitude of the decline. The Commission also found that U.S. demand for wire rod, which was relatively stable and declined by only 1.1 percent from 2014 to 2015, also could not explain the magnitude by which the decline in the average unit value of

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<sup>235</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 33.

<sup>236</sup> *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 33-34. Cumulated subject imports oversold the domestic like product in the remaining 60 comparisons (involving 306,700 short tons of subject imports) by overselling margins that ranged from less than one percent to 39.0 percent. *Id.*

<sup>237</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 33-34.

<sup>238</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 35-36.

<sup>239</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 36.

total domestic net sales exceeded the decline in the domestic industry's unit raw material costs and unit COGS.<sup>240</sup>

The Commission also noted petitioners' assertion that due to transparency of wire rod pricing in the U.S. market, they were forced to lower prices in order to compete with increasing volumes of low-priced subject imports. It found that these contentions were corroborated by the sharp declines in the prices of domestically produced pricing products from 2014 to 2015 and by the nine responding purchasers reporting that domestic producers had to reduce prices in order to compete with lower-priced subject imports.<sup>241</sup>

Based on the foregoing, the Commission found that cumulated subject imports had significant price effects.<sup>242</sup>

*Current Reviews.* As discussed above in Section IV.3, we continue to find a moderate-to-high degree of substitutability between subject imports and domestically produced wire rod, and that price remains an important factor in purchasing decisions for wire rod.

The record in these expedited reviews does not contain product-specific pricing information for the period of review. Based on the moderate-to-high degree of substitutability of subject imports and the domestic like product and the importance of price in purchasing decisions, we find that if the orders were revoked, the likely significant volume of cumulated subject imports would likely undersell the domestic like product to a significant degree, as during the original investigations. Absent the discipline of the orders, the likely significant volumes of low-priced cumulated subject imports would likely force the domestic industry to lower prices and/or lose sales and market share to subject imports, as occurred in the original investigations, or forgo needed price increases. Consequently, we find that if the orders were revoked, cumulated subject imports would likely have significant price effects.

#### **E. Likely Impact**

*Original Investigations.* The Commission found that most of the domestic industry's performance indicators had declined from 2014 to 2016.<sup>243</sup> In particular, the domestic

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<sup>240</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 36.

<sup>241</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 37.

<sup>242</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 37.

industry's share of apparent U.S. consumption in the merchant market fell from 2014 to 2016. Its capacity declined, and the Commission also noted that two domestic producers ceased wire rod operations during the POI.<sup>244</sup> The Commission also found that the domestic industry's production and commercial U.S. shipments decreased from 2014 to 2016, while its capacity utilization initially decreased from 2014 to 2015, before increasing in 2016.<sup>245</sup> The industry's production-related workers ("PRWs"), wages paid, and total hours worked fluctuated between years but decreased irregularly from 2014 to 2016.<sup>246</sup> The industry's financial indicators in the merchant market generally declined from 2014 to 2016, including net sales, unit net sales value, gross profit, operating income, and net income. Operating income as a share of net sales also declined irregularly from 2014 to 2016.<sup>247</sup>

The Commission found that the significant and increasing volumes of low-priced cumulated subject imports that were generally substitutable with the domestic like product had significantly undersold the domestic like product, capturing market share from the domestic industry and depressing prices for the domestic like product. As the domestic industry lost market share to the cumulated subject imports, the Commission explained, the industry's declining rate of capacity utilization led to fixed costs being spread across fewer sales than would have occurred otherwise. Consequently, from 2014 to 2016, the domestic industry's financial performance deteriorated as its output and revenues declined. The Commission therefore found that cumulated subject imports had a significant impact on the domestic industry.<sup>248</sup>

The Commission found that the record did not support respondents' argument that the domestic industry's vertical integration insulated the domestic industry from competition with subject imports. Rejecting respondents' argument that domestic preference programs had

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(...Continued)

<sup>243</sup> As discussed above, the Commission found that the filing of the petitions affected cumulated subject import volume and it consequently accorded reduced weight to trade, output, and financial data for interim 2017.

<sup>244</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 39.

<sup>245</sup> *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 40. The domestic industry's production, commercial U.S. shipments, and capacity utilization were higher in interim 2017 than in interim 2016. *Id.*

<sup>246</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 41.

<sup>247</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 41-42.

<sup>248</sup> *Original Belarus, Russia, and the United Arab Emirates Determinations*, USITC Pub. 4752 at 42-43.

shielded the domestic industry, the Commission found that Buy American preferences applied to a relatively small share of wire rod purchases in the U.S. market and did not prevent cumulated subject imports from making significant volume and market share gains during the POI.<sup>249</sup>

The Commission considered whether there were other factors that may have had an impact on the domestic industry during the POI to ensure that it was not attributing injury from such other factors to subject imports. Although apparent U.S. consumption declined during the POI, the Commission found that the decline was modest and failed to explain either the significant increase in the volume and market share of cumulated subject imports or the domestic industry's inability to increase, or even to maintain, its market share after wire rod imports from China had largely departed the U.S. market.

The Commission also found that nonsubject imports could not explain the domestic industry's loss of market share or declining performance, observing that nonsubject imports' share of apparent U.S. consumption in the merchant market decreased from 2014 to 2016. It also noted that wire rod imports from six nonsubject countries were subject to antidumping duty orders, while wire rod imports from two nonsubject countries were subject to countervailing duty orders.<sup>250</sup>

*Current Reviews.*<sup>251</sup> The record in these expedited reviews contains limited information concerning the domestic industry's performance since the original investigations.

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<sup>249</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 43.

<sup>250</sup> Original Belarus, Russia, and the United Arab Emirates Determinations, USITC Pub. 4752 at 43-44.

<sup>251</sup> In its expedited review of the countervailing duty orders, Commerce determined that revocation of the orders would result in the continuation or recurrence of countervailable subsidies, with estimated countervailing duty margins ranging from 4.16 to 44.18 percent for Italy, and from 3.81 to 6.09 percent for Turkey. *Carbon and Alloy Steel Wire Rod From Italy: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order*, 88 Fed. Reg. 18296 (March 28, 2023); *Carbon and Alloy Steel Wire Rod From the Republic of Turkey: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order*, 88 Fed. Reg. 20127 (April 5, 2023).

In its expedited reviews of the antidumping duty orders, Commerce determined that revocation of the orders would result in the continuation or recurrence of dumping, with the following margins: 280.02 percent for Belarus; 18.89 percent for Italy; 41.10 percent for Korea; 756.93 percent for Russia; 142.26 percent for South Africa; 32.64 percent for Spain; 4.44 percent for Turkey; 44.03 percent for Ukraine; 84.10 percent for the United Arab Emirates; and 147.63 percent for the United Kingdom. *Carbon and Certain Alloy Steel Wire Rod From Belarus, Italy, the Republic of Korea, the Russian Federation, the Republic of South Africa, Spain, the Republic of Turkey, Ukraine, the United Arab* (Continued...)

The information available indicates that the domestic industry's performance was generally stronger in 2021 than during the original investigations. The domestic industry's capacity and production in 2021, at \*\*\* short tons and \*\*\* short tons, respectively, remained at levels similar to those during the original investigations.<sup>252</sup> The industry's capacity utilization, at \*\*\* percent, was higher than during the original investigations.<sup>253</sup> The quantity and value of the industry's U.S. shipments, at \*\*\* short tons and \$\*\*\*, respectively, were higher in 2021 than during the original investigations.<sup>254</sup> Although the domestic industry's COGS was higher in 2021, at \$\*\*\*, than during the original investigations, its net sales were higher and its COGS to net sales ratio was lower, at \$\*\*\* and \*\*\* percent, respectively.<sup>255</sup> The domestic industry's gross profit in 2021, at \$\*\*\*, was significantly higher than during the original investigations.<sup>256</sup> Further, the domestic industry's operating income, at \$\*\*\*, and operating income to net sales ratio, at \*\*\* percent, were both higher in 2021 than during the original investigations.<sup>257</sup> The limited information available in these expedited reviews is insufficient for us to make a finding on whether the domestic industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of the orders.

Based on the information available, we find that revocation of the orders would likely result in a significant volume of cumulated subject imports that would likely undersell the domestic like product to a significant degree. Given the moderate-to-high degree of substitutability between the domestic like product and subject imports and the importance of

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(...Continued)

*Emirates, and the United Kingdom: Final Results of Expedited First Sunset Reviews of Antidumping Duty Orders*, 88 Fed. Reg. 15595 (March 15, 2023).

<sup>252</sup> CR/PR at Table I-7. The domestic industry's capacity was 4.9 million shorts tons in 2014 and 2015 and 4.7 million short tons in 2016. *Id.* Its production was 3.7 million shorts tons in 2014 and 2015 and 3.6 million short tons in 2016. *Id.*

<sup>253</sup> CR/PR at Table I-7. The domestic industry's capacity utilization was 75.6 percent in 2014, 75.2 percent in 2015, and 76.6 percent in 2016. *Id.*

<sup>254</sup> CR/PR at Table I-7. The domestic industry's quantity and value of U.S. shipments were 3.6 million short tons and \$2.3 billion, respectively, in 2014; 3.6 million short tons and \$2.1 billion, respectively, in 2015; and 3.5 million short tons and \$1.8 billion, respectively, in 2016. *Id.*

<sup>255</sup> CR/PR at Table I-7. The domestic industry's COGS was \$2.4 billion 2014, \$2.0 billion in 2015, and \$1.7 billion in 2016. *Id.* Its net sales and COGS to net sales ratio were \$2.6 billion and 93.9 percent, respectively, in 2014; \$2.1 billion and 94.7 percent, respectively, in 2015; and \$1.9 billion and 92.5 percent, respectively, in 2016. *Id.*

<sup>256</sup> CR/PR at Table I-7. The domestic industry's gross profit was \$157.7 million in 2014, \$111.6 million in 2015, and \$139.6 million in 2016. *Id.*

<sup>257</sup> CR/PR at Table I-7. The domestic industry's operating income and operating income to net sales ratio were \$75.4 million and 2.9 percent, respectively, in 2014; \$35.8 million and 1.7 percent, respectively, in 2015; and \$52.9 million and 2.8 percent, respectively, in 2016. *Id.*

price to purchasers, significant volumes of low-priced cumulated subject imports would likely capture sales and market share from the domestic industry and/or force domestic producers to lower their prices or forgo needed price increases in order to maintain their sales, thereby depressing or suppressing prices for the domestic like product to a significant degree. The likely significant volume of cumulated subject imports and their price effects would negatively affect the domestic industry's capacity, production, capacity utilization, shipments, market share, net sales values and quantities, employment levels, operating income, operating income margins, and capital investments. Consequently, we conclude that, if the orders were revoked, cumulated subject imports from Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom would be likely to have an adverse impact on the domestic industry within a reasonably foreseeable time.

We have also considered the role of factors other than subject imports in the U.S. market, including the presence of nonsubject imports. Nonsubject imports have increased their presence in the U.S. market since the original investigations, accounting for \*\*\* percent of apparent U.S. consumption in 2021.<sup>258</sup> However, the record provides no indication that the presence of nonsubject imports would prevent subject imports from entering the U.S. market in significant volumes, adversely affecting the domestic industry's prices and/or taking market share from the industry and nonsubject imports upon revocation of the orders. Given that the domestic industry supplied \*\*\* percent of apparent U.S. consumption in 2021, the moderate-to-high degree of substitutability between subject imports and the domestic like product, and the importance of price in purchasing decisions, the presence of nonsubject imports would likely not prevent the significant volume of low-priced cumulated subject imports that we have found likely after revocation from taking market share from the domestic industry, as well as from nonsubject imports, or forcing domestic producers to either lower prices or forgo price increases to retain market share. We also note that the domestic industry was able to improve its performance by many measures in 2021 compared to 2016 despite the increased presence of nonsubject imports in the U.S. market over the period of review. In light of these considerations, we find that any effects of nonsubject imports would be distinct from the likely effects attributable to cumulated subject imports.<sup>259</sup>

In sum, we conclude that if the orders were revoked, cumulated subject imports of wire rod from Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United

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<sup>258</sup> CR/PR Table I-9.

<sup>259</sup> We also note that the domestic industry would not be insulated from recurrence of material injury by the Section 232 measures, as discussed in Section C above.

Arab Emirates, and the United Kingdom would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

## **V. Conclusion**

For the foregoing reasons, we determine that revocation of the countervailing duty orders on wire rod from Italy and Turkey and the antidumping duty orders on wire rod from Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.



# Information obtained in these reviews

## Background

On December 1, 2022, the U.S. International Trade Commission (“Commission”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),<sup>1</sup> that it had instituted reviews to determine whether revocation of the countervailing duty orders on carbon and certain alloy steel wire rod (“wire rod”) from Italy and Turkey and the antidumping duty orders on wire rod from Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom would be likely to lead to continuation or recurrence of material injury.<sup>2</sup> All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.<sup>3 4</sup> Table I-1 presents information relating to the background and schedule of this proceeding:

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

Effective date	Action
December 1, 2022	Notice of initiation by Commerce (87 FR 73757 December 1, 2022)
December 1, 2022	Notice of institution by Commission (87 FR 73789 December 1, 2022)
March 6, 2023	Commission’s vote on adequacy
March 31, 2023	Commerce’s results of its expedited reviews
July 27, 2023	Commission’s determinations and views

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<sup>1</sup> 19 U.S.C. 1675(c).

<sup>2</sup> 87 FR 73789, December 1, 2022. 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. 87 FR 73757, December 1, 2022. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission’s website ([www.usitc.gov](http://www.usitc.gov)).

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

<sup>4</sup> Interested parties were also requested to provide a list of three to five leading purchasers in the U.S. market for the domestic like product and the subject merchandise. Presented in app. D are the responses received from purchaser surveys transmitted to the purchasers identified in this proceeding.

# Responses to the Commission’s notice of institution

## Individual responses

The Commission received one submission in response to its notice of institution in the subject reviews. They were filed on behalf of Charter Steel (“Charter”), Commercial Metals Company (“CMC”), Liberty Steel USA (“Liberty”), Nucor Corporation (“Nucor”), and Optimus Steel, LLC (“Optimus”), domestic producers of wire rod (collectively referred to herein as “domestic interested parties”).<sup>5</sup> No respondent interested parties filed a response to the notice of institution.

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

**Table I-2**  
**Wire rod: Summary of completed responses to the Commission’s notice of institution**

Interested party	Type	Number of firms	Coverage
U.S. producers	Domestic	5	***%

Note: The U.S. producer coverage figure presented is the domestic interested parties’ estimate of their share of total U.S. production of wire rod during 2021. Domestic interested parties’ response to the notice of institution, January 3, 2023, p. 2.

## Party comments on adequacy

The Commission received party comments on the adequacy of responses to the notice of institution and whether the Commission should conduct expedited or full reviews from the domestic interested parties. Domestic interested parties request that the Commission conduct expedited reviews of the antidumping and countervailing duty orders on wire rod.<sup>6</sup>

<sup>5</sup> The domestic interested parties also provided trade and financial information on behalf of non-participating U.S. producers \*\*\*. The information submitted was certified for accuracy and completeness and is aggregated to the U.S. producers’ trade and financial data and apparent consumption tables presented later in this report. Domestic interested parties’ response to the notice of institution, January 3, 2023, exh. 1.

<sup>6</sup> Domestic interested parties’ comments on adequacy, February 9, 2023, p. 2.

## The original investigations

The original investigations resulted from petitions filed on March 28, 2017 with Commerce and the Commission by Charter Steel (“Charter”), Saukville, Wisconsin; Gerdau Ameristeel US Inc. (“Gerdau”), Tampa, Florida; Keystone Consolidated Industries, Inc. (“Keystone”), Peoria, Illinois; and Nucor Corporation (“Nucor”), Charlotte, North Carolina. Although the petitions concerning wire rod from Belarus, Italy, South Korea, Russia, South Africa, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom were filed on the same day, the investigation schedules became staggered when Commerce extended the deadline for making preliminary determinations in all investigations, except those concerning Belarus, Russia, and the United Arab Emirates, thereby necessitating earlier final determinations by the Commission in the investigations involving wire rod from Belarus, Russia, and the United Arab Emirates. Subsequently, Commerce reached final determinations concerning wire rod from South Africa and Ukraine, thereby necessitating earlier final determinations by the Commission in those investigations, than those in the investigations of wire rod from Italy, Korea, Spain, Turkey, and the United Kingdom.<sup>7</sup>

Following Commerce’s determination that imports of wire rod from Belarus, Russia, and the United Arab Emirates were being sold at less than fair value (“LTFV”),<sup>8</sup> the Commission determined on January 11, 2018, that the domestic industry was materially injured by reason of LTFV imports of wire rod from Belarus, Russia, and the United Arab Emirates.<sup>9</sup> On January 24, 2018, Commerce issued its antidumping duty orders with final weighted-average dumping margins of 280.02 percent for Belarus, ranging from 436.8 to 756.93 percent for Russia, and 84.10 percent for the United Arab Emirates.<sup>10</sup>

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<sup>7</sup> Carbon and Certain Alloy Steel Wire Rod from Belarus, Russia, and the United Arab Emirates, Inv. Nos. 731-TA-1349, 1352, and 1357 (Final), USITC Publication 4752, January 2018, (“Original publication”), p. I-1. See Carbon and Certain Alloy Steel Wire Rod from South Africa and Ukraine, Inv. Nos. 731-TA-1353 and 1356 (Final), USITC Publication 4766, March 2018. (“Original South Africa and Ukraine publication”), p. I-1. Carbon and Certain Alloy Steel Wire Rod from Italy, Korea, Spain, Turkey, and the United Kingdom, Inv. Nos. 701-TA-573-574 and 731-TA-1350-1351, 1354-1355, and 1358 (Final), USITC Publication 4782, May 2018. (“Original Italy, South Korea, Spain, Turkey, and the United Kingdom publication”), p. I-1.

<sup>8</sup> 82 FR 56214, November 28, 2017.

<sup>9</sup> 83 FR 2670, January 18, 2018. The Commission also found that imports subject to Commerce’s affirmative critical circumstances determination were not likely to undermine seriously the remedial effect of the antidumping duty order on Russia.

<sup>10</sup> 83 FR 3297, January 24, 2018. Commerce published a correction to its notice of antidumping duty orders on Belarus, Russia, and the United Arab Emirates which noted that Commerce made a

(continued...)

Following notification of Commerce's determination that imports of wire rod from South Africa and Ukraine were being sold at LTFV,<sup>11</sup> the Commission determined on March 1, 2018, that the domestic industry was materially injured by reason of LTFV imports of wire rod from South Africa and Ukraine.<sup>12</sup> On March 14, 2018, Commerce issued its antidumping duty orders with final weighted-average dumping margins ranging from 135.46 to 142.26 percent for South Africa, and ranging from 34.98 to 44.03 percent for Ukraine.<sup>13</sup>

Following notification of Commerce's determination that imports of wire rod from Italy, South Korea, Spain, Turkey, and the United Kingdom were being sold at less than fair value ("LTFV"), and that imports of wire rod were being subsidized by the governments of Italy and Turkey,<sup>14</sup> the Commission determined on May 11, 2018 that the domestic industry was materially injured by reason of LTFV imports of wire rod from Italy, South Korea, Spain, Turkey, and the United Kingdom, and by imports of wire rod subsidized by the governments of Italy and Turkey.<sup>15</sup> On May 21, 2018, Commerce issued its antidumping duty orders with final weighted-average dumping margins ranging from 12.41 to 18.89 percent for Italy, 41.10 percent for South Korea, ranging from 10.11 to 32.64 percent for Spain, 4.93 to 7.94 percent for Turkey, and 147.63 percent for the United Kingdom.<sup>16 17</sup> On May 21, 2018, Commerce issued its

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typographical error in the Appendix to the orders. Specifically, in the scope description, Harmonized Tariff Schedule of the United States (HTSUS) subheading 7213.91.3015 was incorrectly published as HTSUS subheading 213.91.3015. 83 FR 5402, February 7, 2018.

<sup>11</sup> 83 FR 2141 and 83 FR 2135, January 16, 2018.

<sup>12</sup> 83 FR 9749, March 7, 2018. The Commission also found that imports subject to Commerce's affirmative critical circumstances determination were not likely to undermine seriously the remedial effect of the antidumping duty order on South Africa.

<sup>13</sup> 83 FR 11175, March 14, 2018.

<sup>14</sup> 83 FR 13230, 83 FR 13228, 83 FR 13249, 83 FR 13233, 83 FR 13252, 83 FR 13242, and 83 FR 13239, March 28, 2018.

<sup>15</sup> 83 FR 22991, April 17, 2018. The Commission also found that imports subject to Commerce's affirmative critical circumstances determination were not likely to undermine seriously the remedial effect of the antidumping duty orders on imports from Spain and the United Kingdom and the countervailing duty order on imports from Turkey.

<sup>16</sup> 83 FR 23417, May 21, 2018. The cash deposit rate (adjusted for export subsidies) for imports of wire rod from Turkey sold at LTFV ranged between 1.05 percent and 4.15 percent. Effective June 13, 2019, Commerce revoked, in part, the antidumping duty order with respect to imports of valve spring quality (VSQ) wire rod from South Korea, following an antidumping changed circumstances review. 84 FR 27582, June 13, 2019.

<sup>17</sup> Following an appeal of Commerce's final antidumping duty orders on imports of wire rod from Turkey, the United States Court of International Trade issued its final judgment in *Icdas Celik Enerji Tersane ve Ulasim Sanayi, A.S., et al. v. United States*, Consol. Court no. 18-000143, sustaining Commerce's second remand determination pertaining to the antidumping duty orders on wire rod from

(continued...)

countervailing duty orders with final net subsidy rates ranging from 4.16 to 44.18 percent for Italy, and ranging from 3.81 to 3.88 percent for Turkey.<sup>18 19</sup>

## Previous and related investigations

The Commission has conducted a number of previous import relief investigations on wire rod or similar merchandise, as presented in table I-3.<sup>20</sup>

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(...continued)

Turkey, resulting in an amended final weighted-average dumping margin of 4.44 percent, and excluding merchandise produced and exported by Habas Sinai ve Tibbi Gazlar Istihsal Endustrisi A.S. from the order. 86 FR 28749, May 28, 2021.

<sup>18</sup> 83 FR 23420, May 21, 2018.

<sup>19</sup> Following appeals of various aspects of Commerce's final determination in the countervailing duty investigation of wire rod from Turkey, the United States Court of International Trade sustained the final results of redetermination pertaining to the countervailing duty orders. Commerce subsequently issued revised net subsidy rates ranging from 3.81 to 6.09 percent for imports of wire rod from Turkey. 85 FR 42356, July 14, 2020.

<sup>20</sup> In 1999, the Commission conducted a safeguard investigation concerning imports of steel wire rod and the President issued Proclamation 7273 imposing relief in the form of a Tariff Rate Quota ("TRQ") on imports of steel wire rod for a period of three years and one day, effective March 1, 2000. The President subsequently issued Proclamation 7505 effective November 24, 2001, modifying the TRQ, by providing that the in-quota quantity of the TRQ be allocated among these four supplier country groupings: European Community; Commonwealth of Independent States; Trinidad and Tobago; and all other countries. For additional information on safeguard investigations covering wire rod, see Stainless Steel Wire Rod from India, Inv. No. 731-TA-638 (Fifth Review), USITC Publication 5396, January 2018, p. I-8.

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

<b>Date</b>	<b>Number</b>	<b>Country</b>	<b>ITC Original Determination</b>	<b>Current Status of Order</b>
1982	731-TA-88	Venezuela	Negative	N/A
1982	731-TA-113	Brazil	Affirmative	Order revoked: effective October 1, 1984
1982	731-TA-114	Trinidad & Tobago	Affirmative	Order revoked: effective October 1, 1984
1982	701-TA-148	Brazil	Affirmative	Investigation terminated: August 21, 1985
1982	701-TA-149	Belgium	Affirmative	Petition withdrawn: November 9, 1982
1982	701-TA-150	France	Affirmative	Petition withdrawn: November 9, 1982
1983	701-TA-209	Spain	Affirmative	Order revoked: effective October 1, 1984
1983	731-TA-157	Argentina	Affirmative	Order revoked: effective January 1, 2000
1983	701-TA-A	Argentina	Affirmative	Order revoked: effective January 1, 2000
1983	731-TA-158	Mexico	Negative	N/A
1983	731-TA-159	Poland	Negative	N/A
1983	731-TA-160	Spain	Affirmative	Order revoked: effective October 1, 1984
1984	731-TA-205	E. Germany	Affirmative	Petition withdrawn: August 1, 1985
1985	701-TA-243	Portugal	Negative	N/A
1985	701-TA-244	Venezuela	Affirmative	Petition withdrawn: July 24, 1985
1985	731-TA-256	Poland	Affirmative	Petition withdrawn: September 10, 1985
1985	731-TA-257	Portugal	Affirmative	Petition withdrawn: November 20, 1985

Table continued.

**Table I-3 Continued**

**Wire rod: Previous and related Commission proceedings and status of orders**

<b>Date</b>	<b>Number</b>	<b>Country</b>	<b>ITC Original Determination</b>	<b>Current Status of Order</b>
1985	731-TA-258	Venezuela	Affirmative	Petition withdrawn: August 30, 1985
1992	701-TA-314	Brazil	Affirmative	Order revoked: effective January 1, 2000
1992	701-TA-315	France	Affirmative	Order revoked: effective January 1, 2000
1992	701-TA-316	Germany	Affirmative	Order revoked: effective January 1, 1998
1992	701-TA-317	United Kingdom	Affirmative	Order revoked: effective January 1, 1995
1992	731-TA-552	Brazil	Affirmative	Order revoked: effective January 1, 2000
1992	731-TA-553	France	Affirmative	Order revoked: effective January 1, 2000
1992	731-TA-554	Germany	Affirmative	Order revoked: effective January 1, 2000
1992	731-TA-555	United Kingdom	Affirmative	Order revoked: effective January 1, 1995
1992	731-TA-572	Brazil	Negative	N/A
1993	731-TA-646	Brazil	Negative	N/A
1993	731-TA-647	Canada	Affirmative	Petition withdrawn: April 18, 1994
1993	731-TA-648	Japan	Negative	N/A
1993	731-TA-649	Trinidad & Tobago	Negative	N/A
1994	701-TA-359	Germany	Negative	N/A
1994	731-TA-686	Belgium	Affirmative	Petition withdrawn: July 7, 1994
1994	731-TA-687	Germany	Negative	N/A
1997	701-TA-368	Canada	Negative	N/A
1997	701-TA-369	Germany	Negligible	N/A

Table continued.

**Table I-3 Continued**

**Wire rod: Previous and related Commission proceedings and status of orders**

<b>Date</b>	<b>Number</b>	<b>Country</b>	<b>ITC Original Determination</b>	<b>Current Status of Order</b>
1997	701-TA-370	Trinidad & Tobago	Negative	N/A
1997	701-TA-371	Venezuela	Negative	N/A
1997	731-TA-763	Canada	Negative	N/A
1997	731-TA-764	Germany	Negative	N/A
1997	731-TA-765	Trinidad & Tobago	Negative	N/A
1997	731-TA-766	Venezuela	Negative	N/A
2001	701-TA-417	Brazil	Affirmative	Order continued: August 27, 2020
2001	701-TA-418	Canada	Affirmative	Order revoked: effective January 23, 2004
2001	701-TA-419	Germany	Negative	N/A
2001	701-TA-420	Trinidad & Tobago	Negative	N/A
2001	701-TA-421	Turkey	Negative	N/A
2001	731-TA-953	Brazil	Affirmative	Order continued: August 27, 2020
2001	731-TA-954	Canada	Affirmative	Order revoked: effective October 29, 2007
2001	731-TA-955	Egypt	Negligible	N/A
2001	731-TA-956	Germany	Negligible	N/A
2001	731-TA-957	Indonesia	Affirmative	Order continued: August 27, 2020
2001	731-TA-958	Mexico	Affirmative	Order continued: August 27, 2020
2001	731-TA-959	Moldova	Affirmative	Order continued: August 27, 2020
2001	731-TA-960	South Africa	Negligible	N/A
2001	731-TA-961	Trinidad & Tobago	Affirmative	Order continued: August 27, 2020
2001	731-TA-962	Ukraine	Affirmative	Order revoked: effective July 30, 2013
2001	731-TA-963	Venezuela	Negligible	N/A
2005	731-TA-1099	China	Negative	N/A
2005	731-TA-1100	Germany	Negative	N/A

Table continued.

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

<b>Date</b>	<b>Number</b>	<b>Country</b>	<b>ITC Original Determination</b>	<b>Current Status of Order</b>
2005	731-TA-1101	Turkey	Negative	N/A
2014	701-TA-512	China	Affirmative	Order continued: June 26, 2020
2014	731-TA-1248	China	Affirmative	Order continued: June 26, 2020
2017	701-TA-573	Italy	Affirmative	Ongoing first review
2017	701-TA-574	Turkey	Affirmative	Ongoing first review
2017	731-TA-1349	Belarus	Affirmative	Ongoing first review
2017	731-TA-1350	Italy	Affirmative	Ongoing first review
2017	731-TA-1351	South Korea	Affirmative	Ongoing first review
2017	731-TA-1352	Russia	Affirmative	Ongoing first review
2017	731-TA-1353	South Africa	Affirmative	Ongoing first review
2017	731-TA-1354	Spain	Affirmative	Ongoing first review
2017	731-TA-1355	Turkey	Affirmative	Ongoing first review
2017	731-TA-1356	Ukraine	Affirmative	Ongoing first review
2017	731-TA-1357	United Arab Emirates	Affirmative	Ongoing first review
2017	731-TA-1358	United Kingdom	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 or review was instituted by the Commission.

## Commerce's five-year reviews

Commerce announced that it would conduct expedited reviews with respect to the orders on imports of wire rod from Belarus, Italy, South Korea, Russia, South Africa, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom with the intent of issuing the final results of these reviews based on the facts available not later than March 31, 2023.<sup>21</sup> Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at <http://enforcement.trade.gov/frn/>. Issues and Decision Memoranda contain complete and up-to-date information regarding the background and history of the order, including scope rulings, duty absorption, changed circumstances reviews, and antircumvention, as well as any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping duty orders on imports of wire rod from Belarus, Italy, South Korea, Russia, South Africa, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom, and the countervailing duty orders on imports of wire rod from Italy and Turkey are noted in the sections titled "The original investigations" and "U.S. imports," if applicable.

## The product

### Commerce's scope

Commerce has defined the scope as follows:

*The merchandise covered by these investigations are certain hot-rolled products of carbon steel and alloy steel, in coils, of approximately round cross section, less than 19.00 mm in actual solid cross-sectional diameter. Specifically excluded are steel products possessing the above-noted physical characteristics and meeting the Harmonized Tariff Schedule of the United States (HTSUS) definitions for (a) stainless steel; (b) tool steel; (c) high-nickel steel; (d) ball bearing steel; or (e) concrete reinforcing bars and rods. Also excluded are free cutting steel (also known as free machining steel) products (i.e., products that contain by weight one or more of the following elements: 0.1 percent or more of lead, 0.05 percent or more of bismuth, 0.08 percent or more of sulfur, more than 0.04*

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<sup>21</sup> Letter from Alex Villanueva, Director, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, January 25, 2023.

*percent of phosphorous, more than 0.05 percent of selenium, or more than 0.01 percent of tellurium). All products meeting the physical description of subject merchandise that are not specifically excluded are included in this scope.*<sup>22</sup>

## **U.S. tariff treatment**

Wire rod is currently imported under Harmonized Tariff Schedule of the United States (“HTS”) statistical reporting numbers 7213.91.3011, 7213.91.3015, 7213.91.3020, 7213.91.3093, 7213.91.4500, 7213.91.6000, 7213.99.0030, 7227.20.0030, 7227.20.0080, 7227.90.6010, 7227.90.6020, 7227.90.6030, and 7227.90.6035. The merchandise subject to these reviews may also be imported under HTS statistical reporting numbers 7213.99.0090 and 7227.90.6090. The general rate of duty is “free” for HTS subheadings 7213.91.30, 7213.91.45, 7213.91.60, 7213.99.00, 7227.20.00, and 7227.90.60.<sup>23</sup> Effective April 9, 2022, products from Russia and Belarus are subject to duty rates set forth in column 2 of the HTS.<sup>24</sup> The column 2 rates of duty are 5.5 percent for HTS subheadings 7213.91.30, 7213.91.45, and 7213.99.00; 6 percent for 7213.91.60; and 10 percent for 7227.20.00 and 7227.90.60.<sup>25</sup> Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Effective September 1, 2019, wire rod originating in China, a nonsubject country, was subject to an additional 15 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective February 14, 2020, the section 301 duty for wire rod was reduced to 7.5 percent.<sup>26</sup>

Effective March 23, 2018, wire rod originating in Belarus, Russia, South Africa, Turkey, Ukraine, and the United Arab Emirates is subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended. Effective June 1, 2018, wire rod originating in South Korea is exempt from section 232 duties, but is instead subject to an

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<sup>22</sup> 83 FR 3297, January 24, 2018.

<sup>23</sup> USITC, HTS (2023) Basic Edition, Publication 5398, January 2023, pp. 72-20 and 72-43. HTS statistical reporting numbers 7227.20.0030, 7227.20.0080, 7227.90.6010, and 7227.90.6020 could contain out of scope products that do not have a cross section that is approximately round and/or have a diameter exceeds 19.00 mm.

<sup>24</sup> 87 FR 38875, June 30, 2022.

<sup>25</sup> USITC, HTS (2023) Basic Edition, Publication 5398, January 2023, pp. 72-20 and 72-43.

<sup>26</sup> 84 FR 45821, August 30, 2019; 85 FR 3741, January 22, 2020. See also HTS heading 9903.88.15 and U.S. notes 20(r) and 20(s) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2023) Basic Edition, Publication 5398, January 2023, pp. 99-III-86–99-III-100, 99-III-296.

absolute import quota of 56,474,925 kilograms (62,253 short tons) per year under HTS chapter 99 heading 9903.80.46.<sup>27</sup> Effective January 1, 2022, wire rod originating in Italy and Spain, and effective June 1, 2022, wire rod originating in the United Kingdom are subject to tariff-rate quotas (“TRQs”) and imports above the quota level are subject to section 232 duties. Under HTS chapter 99 heading 9903.81.07, the TRQ levels for wire rod originating in Italy is 14,115,000 kilograms (15,559 short tons) per year and for wire rod originating in Spain is 45,497,000 kilograms (50,152 short tons). Under HTS chapter 99 heading 9903.81.66, the TRQ level for wire rod originating in the United Kingdom is 12,432,104 kilograms (13,704 short tons) per year.<sup>28 29</sup>

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<sup>27</sup> HTS chapter 99 heading 9903.80.46 (Bars and rods, hot-rolled, in irregularly wound coils) contains all HTS statistical reporting numbers under which wire rod is imported except 7227.20.0080 and 7227.90.6010. HTS statistical reporting numbers 7227.20.0080 and 7227.90.6010 are included in HTS chapter 99 heading 9903.80.48 (Bars, hot-rolled, not of stainless-steel), which otherwise consists of HTS subheadings that cover out-of-scope products. South Korea’s absolute import quota for 9903.80.48 is 32,914,618 kilograms (36,282 short tons). U.S. Customs and Border Protection (“CBP”), “QB 23-601 2023 First Quarter Absolute Quota for Steel Mill Articles of Argentina, Brazil and South Korea,” December 12, 2022, <https://www.cbp.gov/trade/quota/bulletins/qb-23-601-2023>.

In 2022, South Korea utilized its entire quota limit of 56,474,925 kilograms for HTS chapter 99 heading 9903.80.46 (Bars and rods, hot-rolled, in irregularly wound coils) and utilized 32,657,324 kilograms (99.2 percent) of its 32,914,618 kilograms quota limit for HTS chapter 99 heading 9903.80.48 (Bars, hot-rolled, not of stainless-steel). CBP, “2022 Annual Usage By Quarter - Absolute Steel and Aluminum Report,” January 30, 2023, [https://www.cbp.gov/sites/default/files/assets/documents/2023-Jan/Copy%20of%202022%20Absolute%20Steel%20and%20Aluminum%20Quarter%20Usage%20Final%20JR%20DV%20JP\\_0.pdf](https://www.cbp.gov/sites/default/files/assets/documents/2023-Jan/Copy%20of%202022%20Absolute%20Steel%20and%20Aluminum%20Quarter%20Usage%20Final%20JR%20DV%20JP_0.pdf).

<sup>28</sup> HTS chapter 99 headings 9903.81.07 and 9903.81.66 (Bars and rods, hot-rolled, in irregularly wound coils) contains all HTS statistical reporting numbers under which wire rod is imported except 7227.20.0080 and 7227.90.6010. HTS statistical reporting numbers 7227.20.0080 and 7227.90.6010 are included in HTS chapter 99 headings 9903.81.09 (Bars, hot-rolled, not of stainless-steel) for Italy and Spain and 9903.81.68 (Bars, hot-rolled, not of stainless-steel) for the United Kingdom, both of which otherwise consist of HTS subheadings that cover out-of-scope products. Italy and Spain’s TRQs under 9903.81.09 are 8,888,000 kilograms (9,797 short tons) and 19,738,000 kilograms (21,757 short tons), respectively. The United Kingdom’s TRQ under 9903.81.68 is 37,008,053 kilograms (40,794 short tons).

83 FR 11625, March 15, 2018; 83 FR 20683, May 7, 2018; 87 FR 11, January 3, 2022; 87 FR 33591, June 3, 2022. See also HTS heading 9903.80.01 and U.S. notes 16(a) and 16(b) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2023) Basic Edition, Publication 5398, January 2023, pp. 99-III-5–99-III-6, 99-III-266. CBP, “QB 23-621 2023 First Quarter Tariff Rate Quota (TRQ) for Steel Articles of Japan or the United Kingdom,” January 10, 2023, <https://www.cbp.gov/trade/quota/bulletins/qb-23-621-2023>. CBP, “EU Sec 232 Steel Tariff Rate Quota (TRQ) 2023 Q1 and Q2,” undated, p. 42, [https://www.cbp.gov/sites/default/files/assets/documents/2023-Jan/EU%20Steel%20TRQ%20Limit%20Table%202023\\_Q1\\_Q2.pdf](https://www.cbp.gov/sites/default/files/assets/documents/2023-Jan/EU%20Steel%20TRQ%20Limit%20Table%202023_Q1_Q2.pdf).

<sup>29</sup> Section 232 import duties on steel articles currently cover all countries of origin except Argentina, Australia, Brazil, Canada, Mexico, and South Korea. Imports from Australia, Canada, and Mexico are

(continued...)

Tables I-4 summarizes the current Section 232 steel duties, quotas, and limits for the subject countries in this investigation.

**Table I-4**  
**Wire rod: Developments in the Italian industry**

Subject country	Tariff or quota action	Additional considerations
Belarus	Tariff	25 percent ad valorem
Italy	Tariff rate quota (“TRQ”)	TRQ of 14,115,000 kilograms (15,559 short tons) per year
Russia	Tariff	25 percent ad valorem
South Africa	Tariff	25 percent ad valorem
South Korea	Absolute import quota	Absolute import quota of 56,474,925 kilograms (62,253 short tons) per year
Spain	TRQ	TRQ of 45,497,000 kilograms (50,152 short tons) per year
Turkey	Tariff	25 percent ad valorem
Ukraine	Tariff	25 percent ad valorem
United Arab Emirates	Tariff	25 percent ad valorem
United Kingdom	TRQ	TRQ of 12,432,104 kilograms (13,704 short tons) per year

Source: 83 FR 11625, March 15, 2018; 83 FR 20683, May 7, 2018; 87 FR 11, January 3, 2022; 87 FR 33591, June 3, 2022. See also HTS heading 9903.80.01 and U.S. notes 16(a) and 16(b) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2023) Basic Edition, Publication 5398, January 2023, pp. 99-III-5–99-III-6, 99-III-266. CBP, “QB 23-621 2023 First Quarter Tariff Rate Quota (TRQ) for Steel Articles of Japan or the United Kingdom,” January 10, 2023, <https://www.cbp.gov/trade/quota/bulletins/qb-23-621-2023>. CBP, “EU Sec 232 Steel Tariff Rate Quota (TRQ) 2023 Q1 and Q2,” undated, p. 42, [https://www.cbp.gov/sites/default/files/assets/documents/2023-Jan/EU%20Steel%20TRQ%20Limit%20Table%202023\\_Q1\\_Q2.pdf](https://www.cbp.gov/sites/default/files/assets/documents/2023-Jan/EU%20Steel%20TRQ%20Limit%20Table%202023_Q1_Q2.pdf). U.S. Customs and Border Protection (“CBP”), “QB 23-601 2023 First Quarter Absolute Quota for Steel Mill Articles of Argentina, Brazil and South Korea,” December 12, 2022, <https://www.cbp.gov/trade/quota/bulletins/qb-23-601-2023>.

(...continued)

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

## Description and uses<sup>30</sup>

Wire rod is a hot-rolled intermediate steel mill product of circular or approximately circular cross section that typically is produced in nominal fractional diameters up to 47/64 inch (18.7 mm) and sold in irregularly wound coils, primarily for subsequent drawing and finishing by wire drawers.<sup>31</sup> Wire rod sold in the United States is categorized by quality/type and end use. End-use categories are broad descriptions with overlapping metallurgical qualities, chemistries,<sup>32</sup> and physical characteristics.<sup>33</sup>

Table I-5 presents quality/type and commodity descriptions for 11 major types of wire rod.

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<sup>30</sup> Unless otherwise noted, this information is based on Carbon and Certain Alloy Steel Wire Rod from Belarus, Russia, and the United Arab Emirates, Investigation Nos. 731-TA-1349 (Final), USITC Publication 4752, January 2018 (“Original publication”), pp. I-14-I-15.

<sup>31</sup> Wire drawers (also referred to as redrawers) manufacture wire and wire products and may be independent of the wire rod manufacturers or affiliated parties.

<sup>32</sup> Steel chemistries are designated as “grades” of standardized composition ranges for carbon, nonferrous metals, and nonmetallic elements.

<sup>33</sup> Steel ductility, hardness, and tensile strength are positively correlated with carbon content. Alloying elements can be added at the steel melting stage of the manufacturing process to impart various characteristics to the wire rod.

**Table I-5**  
**Wire rod: Quality/type, end uses, and important characteristics**

Quality/type	End uses	Important characteristics
Chain quality	Electric-resistance welded chain	Butt-welding properties and uniform internal soundness
Cold finishing quality	Cold-drawn bars	Good surface quality
Cold heading quality	Cold heading, cold forging, and cold extrusion products	Internal soundness and freedom from surface defects
Concrete reinforcement	Concrete reinforcing bars	Produced from steel of chemical compositions selected to meet the mechanical properties of ASTM standards for deformed and plain carbon-steel bars for concrete reinforcement (ASTM A615 and A615M)
Fine wire quality	Insect screen, weaving wire, florist wire	Suitable for drawing into wire sizes as fine as 0.035 inch (0.889 mm) in diameter without intermediate annealing
High carbon and medium-high carbon	Strand and rope, tire bead, upholstery springs, mechanical springs, screens, aluminum conductors steel reinforced core, and pre-stressed concrete strand; pipe wrap wire is a subset	Requires thermal treatment prior to drawing; however, it is not intended to be used for music wire or valve spring wire High carbon: Include grades of steel with a maximum carbon content exceeding 0.44 percent. Medium high carbon: Encompass grades of steel with a maximum carbon content exceeding 0.23 to and including 0.44 percent.
Industrial (standard) quality	Nails, coat hangers, mesh for concrete reinforcement, fencing	Can only be drawn a limited number of times before requiring thermal treatment
Music spring wire quality	Springs subject to high stress; music and spring quality wires; valve springs are a subset	Restrictive requirements for chemical analysis, cleanliness, segregation, decarbonization and surface defects
Scrapless nut quality	Fasteners produced by cold heading, cold expanding, cold punching, and thread tapping; scrapless nuts	Internal soundness and good surface quality

Table continued.

**Table I-5 Continued****Wire rod: Quality/type, end uses, and important characteristics**

Quality/type	End uses	Important characteristics
Tire cord quality	Drawn into fine wires, which are bunched into tire cord used in the manufacture of radial automobile tires (tread reinforcement of pneumatic tires)	Restrictive requirements for chemical analysis, cleanliness, segregation, decarbonization and surface imperfections
Welding quality	Wire for gas welding, electric arc welding, submerged arc welding, and metal inert gas welding	Restrictive requirements for chemical composition

Source: Iron and Steel Society, Steel Products Manual: Carbon Steel Wire and Rods, August 1993, pp. 35-37. Association for Iron and Steel Technology, "AIST Steel Glossary," at <http://apps.aist.org/asp/glossary/>, retrieved January 11, 2023.

**Manufacturing process<sup>34</sup>**

The manufacturing process for wire rod consists of four stages: (1) melting and refining to establish the steel's chemical and metallurgical properties; (2) casting the steel into a semifinished shape (billet); (3) hot-rolling the billet into rod; and (4) coiling and controlled cooling of the wire rod. The equipment to produce wire rod is much the same throughout the world and utilizes similar production technology.

**Melting stage**

There are two primary process routes to produce the raw steel used to cast billets: the integrated process, which employs blast furnaces and basic oxygen furnaces ("BOFs"), and the nonintegrated (or "minimill") production process which utilizes an electric arc furnace ("EAF"). In both processes, pig iron, ferrous scrap, and/or direct reduced iron ("DRI") are charged into the furnace. In the United States, wire rod producers melt steel for billets from ferrous scrap in an EAF, along with other raw materials that may also be added as part of the EAF charge.<sup>35</sup> Alloy agents are added to the molten steel to impart specific properties to finished steel products. The molten steel is poured or tapped from the furnace into a ladle, an open-topped, refractory-lined vessel that has an off-center opening in its bottom and is equipped with a

<sup>34</sup> Unless otherwise noted, this information is based on the original publication, pp. I-16–I-20.

<sup>35</sup> Minimills use ferrous scrap as their primary raw material but may add direct reduced iron ("DRI") or hot-briquetted iron and/or pig iron, into the mix— which may vary over time and locations— depending on the relative costs of the raw materials, specifications for the end product, and individual furnace configurations. Minimills that produce high quality rod products, such as high carbon, cold heading quality, tire cord quality, and/or other special quality wire rod may use less ferrous scrap and more DRI than other steelmakers, however the production process in general does not change.

nozzle. Meanwhile, the primary steelmaking vessel (either the EAF or BOF) may be charged with new materials to begin another refining cycle.

Molten steel typically is further treated at a ladle metallurgy or secondary steel making station, where its chemistry is refined to give the steel properties required for specific applications. At the ladle metallurgy station, the chemical content (particularly that of carbon and sulfur) is adjusted, and alloying agents may be added. The steel may be degassed (eliminating oxygen and hydrogen) at low pressures.<sup>36</sup> Ladle metallurgy stations adjust the temperature of the molten steel for optimum casting and serve as a holding reservoir for the tundish.

### **Casting stage**

Once molten steel with the requisite properties has been produced, it is cast into a form that can enter the rolling process. Continuous (strand) casting is the method primarily used in the United States. In strand casting, the ladle containing molten steel is transferred from the ladle metallurgy station to the caster and the molten steel is poured at a controlled rate into a refractory-lined tundish (reservoir dam), which in turn controls the rate of flow of the molten steel into the molds at the top of the caster. The tundish may have a special design or employ electromagnetic stirring to ensure homogeneity of the steel. The strand caster is designed to produce billets in the desired cross-sectional dimensions, based on the dimensions of the rod and the design of the rolling mill. Billets may be sent directly (“hot-charged”) into the rolling mill or, depending upon the rolling mill's schedule, sent to a storage yard. While in storage, billets may be inspected and subjected to one or more surface conditioning operations (e.g., grinding or turning) to prepare them for hot rolling. This preparation is more common with cold-heading quality rods intended to be made into fasteners.

### **Rolling stage**

The rolling process determines the rod's size (diameter) and dimensional precision; depth of decarburization; surface defects and seams; amount of mill scale; structural grain size; and within limits set by the chemistry, tensile strength and other physical properties. Wire rod

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<sup>36</sup> Liquid steel absorbs gasses from the atmosphere and from the materials used in the steelmaking process. These gasses, chiefly oxygen and hydrogen, cause embrittlement, voids, and nonmetallic inclusions. Low pressures, such as in a vacuum, aid the removal of hydrogen and the release of oxygen in gas form without the need for additions of deoxidizers such as silicon, aluminum, or titanium, which form nonmetallic inclusions in steel. Additionally, the carbon content may be reduced more readily at low pressure (because it combines with oxygen to form carbon monoxide and is released in gaseous form), resulting in a more ductile steel.

rolling mills employ relatively standard technology.<sup>37</sup> Final size and weight reflect such factors as billet weight and the capabilities of the wire drawer's equipment and machinery.

Modern rod rolling mills consist of five parts: a roughing mill, an intermediate mill, a pre-finishing mill, a no-twist finishing mill, and a coiler combined with a conveyor cooling bed along which the coiled rod travels prior to being collected, tied, compacted, and readied for shipment. Wire rod mills typically consist of 22 to 29 rolling stands. Metallurgical quality, temperature, and dimensional tolerance usually are inspected in-line.

Upon exiting the reheat furnace, the billet is initially reduced on a multi-strand roughing mill. It then is passed through and successively reduced in size on several more stands, a process termed intermediate rolling. After the last intermediate rolling stand, the rolling mill usually splits into dual lines and the product is passed along to a pre-finishing mill which reduces it further in diameter. Rod mills often employ a "twist" mill for primary and intermediate rolling, but the final rolling is nearly always on a no-twist Morgan vee mill (the rolls in each of approximately five stands are set at a 90-degree angles to allow the rod to be rolled without twisting). This produces a nearly uniform non-oriented grain structure in the steel.

### **Cooling stage**

After exiting the last finishing stand, the rod is coiled into concentric loops and placed on a conveyor for cooling. The specialized Stelmor conveyor deck<sup>38</sup> provides close temperature control by accelerating or retarding the rod's cooling as it is rolled and conveyed along the Stelmor deck. Controlled cooling is accomplished by water quench, forced air drafts, or by lowering removable hoods overtop the deck. The speed at which the rod is cooled affects the consistency and formation of its metallurgical structure (grain structure and physical properties such as tensile strength). It also affects scale buildup, which determines yield losses at the wire drawer. The cooling rate may be varied through the use of removable covers (insulating hoods which may be independently raised or lowered) over the deck or blown-air cooling, or a

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<sup>37</sup> The rolling process, however, can be optimized for various quality levels. The rolling process for higher quality steel, such as for cold heading quality and other surface sensitive products, must be designed to maximize surface integrity. This is managed by the number of rolling stands used to get to a specific end diameter, the design of the reductions taken at each step, and the design of the guiding equipment used to keep the steel moving on the proper path through the mill.

<sup>38</sup> The Stelmor conveyor deck allows for controlled cooling of the wire rod. The cooling speed imparts certain physical characteristics, thereby enabling producers to produce a wider range of wire rod qualities. Likewise, the Stelmor deck may be optimized for specific end products. Most, if not all, U.S. wire rod producers have installed controlled cooling capacities.

combination of the two, or through varying the speed of the roller table. The end user often specifies the cooling practice of the rod purchased.

At the end of the cooling deck, workers crop the ends of each rod to remove the part of the rod which may be of lower quality due to uneven temperature control; the cropped ends are also used for testing and inspection. The rod is then collected onto a carrier, transferred to a “c” hook, compacted, tied, and readied for shipment, or for further finishing or in-house fabrication.

## **The industry in the United States**

### **U.S. producers**

During the final phase of the original investigations, the Commission received U.S. producer questionnaires from eight firms, which accounted for essentially all U.S. production of wire rod in the United States during 2016.<sup>39</sup>

In response to the Commission’s notice of institution in these current reviews, domestic interested parties provided a list of nine known and currently operating U.S. producers of wire rod. Five firms providing U.S. industry data in response to the Commission’s notice of institution accounted for approximately \*\*\* percent of production of wire rod in the United States during 2021.<sup>40 41</sup>

### **Recent developments**

Table I-6 presents developments in the U.S. industry since the Commission’s original investigations.<sup>42</sup>

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<sup>39</sup> Original publication, p. I-5.

<sup>40</sup> Domestic interested parties’ response to the notice of institution, January 3, 2023, p. 25.

<sup>41</sup> The domestic interested parties also provided trade and financial information on behalf of non-participating U.S. producers \*\*\*. The information submitted was certified for accuracy and completeness and is aggregated to the U.S. producers’ trade and financial data and apparent consumption tables presented in this report. The participating and non-participating firms in aggregate account for approximately \*\*\* percent of production of wire rod in the United States during 2021. Domestic interested parties’ supplemental response to the notice of institution, January 17, 2023, p. 3.

<sup>42</sup> For developments, if any, in tariff treatment, please see “U.S. tariff treatment” section.

**Table I-6**  
**Wire rod: Developments in the U.S. industry**

Item	Firm	Event
Acquisition	Optimus Steel	March 2018: Optimus Steel acquired Gerdau's wire-rod production unit located in Beaumont, Texas and two processing units (Beaumont Wire Products and Carrollton Wire Products) for \$99.5 million.
Plant opening	Liberty Steel	June 2018: Liberty Steel restarted production at the Georgetown, South Carolina wire rod mill. Liberty acquired the Georgetown mill at the end of 2017 from Arcelor Mittal, which had closed the mill.
Acquisition	Commercial Metals Company	November 2018: CMC acquired 33 rebar fabrication facilities in the United States from Gerdau S.A. for \$600 million. The Jacksonville, FL facility included in the acquisition produces both rebar and wire rod.
Acquisition	Liberty Steel	December 2018: Liberty Steel acquired wire rod producer Keystone Consolidated Industries, Inc., for \$320 million.
Sale	EvrAZ	August 2022: Evraz announced that it was beginning the process of soliciting proposals for the acquisition of its North American subsidiaries. Evraz stated that it did not intend to provide any additional information on this process unless or until the process is finalized.

Source: Gerdau, Quarterly results 1Q18, May 9, 2018, [https://mz-filemanager.s3.amazonaws.com/21e1d193-5cab-456d-8bb8-f00a49a43c1c/central-de-resultadoscentral-de-downloads/7026caf70d835f4db70bf9723ed0c350dfc882ce379d317b196d393984/1st\\_quarter\\_results.pdf](https://mz-filemanager.s3.amazonaws.com/21e1d193-5cab-456d-8bb8-f00a49a43c1c/central-de-resultadoscentral-de-downloads/7026caf70d835f4db70bf9723ed0c350dfc882ce379d317b196d393984/1st_quarter_results.pdf). GFG Alliance, GFG Alliance's Liberty Steel USA further expansion with purchase of Keystone Consolidated Industries, December 3, 2018, <https://www.gfgalliance.com/media-release/gfg-alliances-liberty-steel-usa-further-expansion-with-purchase-of-keystone-consolidated-industries/>. Commercial Metals Company, Commercial Metals Company completes acquisition of certain U.S. rebar assets from Gerdau, November 5, 2018, <https://ir.cmc.com/profiles/investor/ResLibraryView.asp?ResLibraryID=89088&BzID=653&G=597>. Commercial Metals Company, Wire rod, <https://www.cmc.com/en-us/what-we-do/america/mill-products/wire-rod>, retrieved January 17, 2023. Evraz, EVRAZ is launching soliciting of proposals for its North American subsidiaries acquisition, August 10, 2022, <https://www.evraz.com/en/news-and-media/press-releases-and-news/evraz-is-launching-soliciting-of-proposals-for-its-north-american-subsidiaries-acquisition/>.

## U.S. producers' trade and financial data

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year reviews.<sup>43</sup> Table I-7 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigations.

<sup>43</sup> Individual company trade and financial data are presented in app. B.

**Table I-7****Wire rod: Trade and financial data submitted by U.S. producers, by period<sup>44</sup>**

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

Item	Measure	2014	2015	2016	2021
Capacity	Quantity	4,900,953	4,889,826	4,661,502	***
Production	Quantity	3,707,416	3,677,468	3,570,360	***
Capacity utilization	Ratio	75.6	75.2	76.6	***
U.S. shipments	Quantity	3,646,855	3,641,848	3,548,500	***
U.S. shipments	Value	2,550,478	2,072,047	1,840,882	***
U.S. shipments	Unit value	699	569	519	***
Net sales	Value	2,578,070	2,096,056	1,856,769	***
COGS	Value	2,420,417	1,984,458	1,717,124	***
COGS to net sales	Ratio	93.9	94.7	92.5	***
Gross profit or (loss)	Value	157,653	111,598	139,645	***
SG&A expenses	Value	82,227	75,825	86,734	***
Operating income or (loss)	Value	75,426	35,773	52,911	***
Operating income or (loss) to net sales	Ratio	2.9	1.7	2.8	***

Source: For the years 2014-16, data are compiled using data submitted in the Commission's original investigations. For the year 2021, data are compiled using data submitted by domestic interested parties. Domestic interested parties' response to the notice of institution, exh. 1.

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

## Definitions of the domestic like product and domestic industry

The domestic like product is defined as the domestically produced product or products which are like, or in the absence of like, most similar in characteristics and uses with, the subject merchandise. The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like product constitutes a major proportion of the total domestic production of the product. Under the

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<sup>44</sup> The domestic interested parties also provided trade and financial information on behalf of non-participating U.S. producers \*\*\*. The information submitted was certified for accuracy and completeness and is aggregated to the U.S. producers' trade and financial data and apparent consumption tables presented in this report. Domestic interested parties' response to the notice of institution, January 3, 2023, exh. 1.

related parties provision, the Commission may exclude a U.S. producer from the domestic industry for purposes of its injury determination if “appropriate circumstances” exist.<sup>45</sup>

In its original determinations, the Commission defined a single domestic like product consisting of all wire rod, including grade 1080 tire cord and tire bead wire rod, corresponding to Commerce’s scope. In its original determinations, the Commission defined the domestic industry as all U.S. producers of the domestic like product.<sup>46</sup>

## **U.S. importers**

During the final phase of the original investigations, the Commission received U.S. importer questionnaires from 23 firms, which accounted for essentially all imports of wire rod from Belarus, Italy, Russia, South Africa, South Korea, Spain, Ukraine, United Arab Emirates, and the United Kingdom in 2016. Questionnaire response data represented approximately \*\*\* percent of imports from Turkey, and approximately \*\*\* percent of imports from all nonsubject sources in 2016.<sup>47</sup> Import data presented in the original investigations are based on official Commerce statistics.

Although the Commission did not receive responses from any respondent interested parties in these current reviews, in its response to the Commission’s notice of institution, the domestic interested parties provided a list of 83 potential U.S. importers of wire rod.<sup>48</sup>

## **U.S. imports**

Table I-8 presents the quantity, value, and unit value of U.S. imports from the ten subject countries as well as the other top sources of U.S. imports (shown in descending order of 2021 imports by quantity).

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<sup>45</sup> Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

<sup>46</sup> 87 FR 73789, December 1, 2022.

<sup>47</sup> Original confidential report, p. IV-1.

<sup>48</sup> Domestic interested parties’ response to the notice of institution, January 3, 2023, exh. 17.

**Table I-8**  
**Wire rod: U.S. imports, by source and period**

Quantity in short tons; value in 1,000 dollars

<b>U.S. imports from</b>	<b>Measure</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
South Korea	Quantity	36,018	22,612	31,495	34,104	58,445
United Kingdom	Quantity	40,294	--	14,088	3,139	18,577
Turkey	Quantity	113,681	265	--	--	26
Italy	Quantity	29,609	--	82	--	19
Spain	Quantity	50,299	18,106	--	--	11
Belarus	Quantity	27,757	--	--	--	--
Russia	Quantity	57,893	--	--	--	--
South Africa	Quantity	31,156	--	--	--	--
Ukraine	Quantity	103,482	--	--	--	--
UAE	Quantity	--	--	--	--	--
Subject sources	Quantity	490,189	40,984	45,665	37,242	77,079
Canada	Quantity	566,469	543,680	426,492	448,097	531,383
Japan	Quantity	261,677	282,253	297,788	186,993	230,039
Egypt	Quantity	48,699	55,341	46,113	8,253	138,227
All other sources	Quantity	440,345	429,464	339,247	192,261	373,118
Nonsubject sources	Quantity	1,317,190	1,310,738	1,109,640	835,604	1,272,767
All import sources	Quantity	1,807,379	1,351,721	1,155,305	872,846	1,349,845
South Korea	Value	21,836	16,277	22,559	19,533	45,397
United Kingdom	Value	24,151	--	13,795	2,038	15,776
Turkey	Value	53,301	182	--	--	27
Italy	Value	11,948	--	176	--	17
Spain	Value	33,108	18,544	--	--	3
Belarus	Value	11,228	--	--	--	--
Russia	Value	25,484	--	--	--	--
South Africa	Value	14,465	--	--	--	--
Ukraine	Value	45,897	--	--	--	--
UAE	Value	--	--	--	--	--
Subject sources	Value	241,418	35,003	36,529	21,571	61,219
Canada	Value	385,161	463,636	326,799	292,388	507,646
Japan	Value	222,967	265,902	281,688	176,654	226,185
Egypt	Value	23,946	35,996	31,885	4,384	129,753
All other sources	Value	243,665	292,747	250,805	129,171	306,266
Nonsubject sources	Value	875,738	1,058,282	891,177	602,596	1,169,849
All import sources	Value	1,117,155	1,093,285	927,706	624,167	1,231,069

Table continued.

**Table I-8 Continued**  
**Wire rod: U.S. imports, by source and period**

Unit value in dollars per short tons

<b>U.S. imports from</b>	<b>Measure</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
South Korea	Unit value	606	720	716	573	777
United Kingdom	Unit value	599	--	979	649	849
Turkey	Unit value	469	685	--	--	1,012
Italy	Unit value	404	--	2,146	--	888
Spain	Unit value	658	1,024	--	--	288
Belarus	Unit value	405	--	--	--	--
Russia	Unit value	440	--	--	--	--
South Africa	Unit value	464	--	--	--	--
Ukraine	Unit value	444	--	--	--	--
UAE	Unit value	--	--	--	--	--
Subject sources	Unit value	492	854	800	579	794
Canada	Unit value	680	853	766	653	955
Japan	Unit value	852	942	946	945	983
Egypt	Unit value	492	650	691	531	939
All other sources	Unit value	553	682	739	672	821
Nonsubject sources	Unit value	665	807	803	721	919
All import sources	Unit value	618	809	803	715	912

Source: Compiled from official Commerce statistics for HTS statistical reporting numbers 7213.91.3011, 7213.91.3015, 7213.91.3020, 7213.91.3093, 7213.91.4500, 7213.91.6000, 7213.99.0030, 7227.20.0030, 7227.20.0080, 7227.90.6010, 7227.90.6020, 7227.90.6030, and 7227.90.6035, accessed January 12, 2023.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

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

Note: For more information about South Korea's usage of its absolute import quota under section 232, see the "Tariff Treatment" section.

## Cumulation considerations<sup>49</sup>

In assessing whether imports should be cumulated in five-year reviews, the Commission considers, among other things, whether there is a likelihood of a reasonable overlap of competition among subject imports and the domestic like product. Additional information concerning geographical markets and simultaneous presence in the market is presented below.<sup>50</sup>

There were no reported U.S. imports of wire rod from the United Arab Emirates during 2017-21. There were no reported imports of wire rod from Belarus, Russia, South Africa, and Ukraine during 2018-21. In 2017, imports from Belarus were reported in three months, imports from Russia were reported in seven months, imports from South Africa were reported in five months, and imports from Ukraine were reported in six months. There were no reported imports from Spain and Turkey during 2019-20, with imports from Spain in 16, and imports from Turkey in 10 months during 2017, 2018, and 2021. Imports from Italy were reported in eight of the 36 months for 2017, 2019 and 2021, with no imports reported in 2018 and 2020. Imports from the United Kingdom were reported in 20 of the 48 months in 2017 and 2019-21, with no imports reported in 2018. Imports from South Korea were reported in 49 of the 60 months between 2017 and 2021.

During 2017-21, imports from Belarus, Russia, and Ukraine entered through the southern and eastern borders of entry. All imports from South Africa entered through the southern borders of entry, with the majority coming through the Houston-Galveston, Texas port of entry. Imports of wire rod from Italy, Turkey, and the United Kingdom entered through the northern, southern, and eastern borders of entry, with all imports from Italy in 2021 entering through the northern border of entry (Chicago, Illinois) and all imports from Turkey in 2021 entering via the northern border of entry (Cleveland, Ohio). Imports of wire rod from South Korea entered through the southern, eastern, and western borders of entry, and imports from Spain entered through either the northern, southern, and eastern borders of entry.

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<sup>49</sup> Unless otherwise noted, this information is based on official U.S. import statistics for HTS statistical reporting numbers 7213.91.3011, 7213.91.3015, 7213.91.3020, 7213.91.3093, 7213.91.4500, 7213.91.6000, 7213.99.0030, 7227.20.0030, 7227.20.0080, 7227.90.6010, 7227.90.6020, 7227.90.6030, and 7227.90.6035.

<sup>50</sup> In addition, available information concerning subject country producers and the global market is presented in the next section of this report.

## **Apparent U.S. consumption and market shares**

Table I-9 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

**Table I-9****Wire rod: Apparent U.S. consumption and market shares, by source and period**

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

Source	Measure	2014	2015	2016	2021
U.S. producers	Quantity	3,646,855	3,641,848	3,548,500	***
Belarus	Quantity	--	9,059	35,381	--
Italy	Quantity	346	246	33,163	19
Russia	Quantity	12,329	6,857	103,322	--
South Africa	Quantity	--	45,451	22,049	--
South Korea	Quantity	109,026	128,862	101,968	58,445
Spain	Quantity	31,778	79,976	72,779	11
Turkey	Quantity	210,096	259,183	97,761	26
Ukraine	Quantity	14,625	79,053	161,451	--
United Arab Emirates	Quantity	28	17,673	22,159	--
United Kingdom	Quantity	71,379	45,507	51,622	18,577
Subject sources	Quantity	449,609	671,866	701,654	77,079
Nonsubject sources	Quantity	1,350,698	1,117,214	1,070,927	1,272,767
All import sources	Quantity	1,800,307	1,789,080	1,772,581	1,349,845
Apparent U.S. consumption	Quantity	5,447,162	5,430,928	5,321,081	***
U.S. producers	Value	2,550,478	2,072,047	1,840,882	***
Belarus	Value	--	3,131	11,583	--
Italy	Value	543	291	12,697	17
Russia	Value	7,552	2,230	35,215	--
South Africa	Value	--	18,830	8,000	--
South Korea	Value	69,377	67,290	51,872	45,397
Spain	Value	22,392	52,358	44,566	3
Turkey	Value	124,577	126,483	42,798	27
Ukraine	Value	8,684	35,022	59,507	--
United Arab Emirates	Value	18	6,952	7,631	--
United Kingdom	Value	46,428	24,795	24,329	15,776
Subject sources	Value	279,572	337,383	298,198	61,219
Nonsubject sources	Value	966,807	779,772	703,176	1,169,849
All import sources	Value	1,246,379	1,117,155	1,001,373	1,231,069
Apparent U.S. consumption	Value	3,796,857	3,189,202	2,842,255	***

Table continued.

**Table I-9 Continued****Wire rod: Apparent U.S. consumption and market shares, by source and period**

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

Source	Measure	2014	2015	2016	2021
U.S. producers	Share of quantity	66.9	67.1	66.7	***
Belarus	Share of quantity	--	0.2	0.7	***
Italy	Share of quantity	0.0	0.0	0.6	***
Russia	Share of quantity	0.2	0.1	1.9	***
South Africa	Share of quantity	--	0.8	0.4	***
South Korea	Share of quantity	2.0	2.4	1.9	***
Spain	Share of quantity	0.6	1.5	1.4	***
Turkey	Share of quantity	3.9	4.8	1.8	***
Ukraine	Share of quantity	0.3	1.5	3.0	***
United Arab Emirates	Share of quantity	0.0	0.3	0.4	***
United Kingdom	Share of quantity	1.3	0.8	1.0	***
Subject sources	Share of quantity	8.3	12.4	13.2	***
Nonsubject sources	Share of quantity	24.8	20.6	20.1	***
All import sources	Share of quantity	33.1	32.9	33.3	***
U.S. producers	Share of value	67.2	65.0	64.8	***
Belarus	Share of value	--	0.1	0.4	***
Italy	Share of value	0.0	0.0	0.4	***
Russia	Share of value	0.2	0.1	1.2	***
South Africa	Share of value	--	0.6	0.3	***
South Korea	Share of value	1.8	2.1	1.8	***
Spain	Share of value	0.6	1.6	1.6	***
Turkey	Share of value	3.3	4.0	1.5	***
Ukraine	Share of value	0.2	1.1	2.1	***
United Arab Emirates	Share of value	0.0	0.2	0.3	***
United Kingdom	Share of value	1.2	0.8	0.9	***
Subject sources	Share of value	7.4	10.6	10.5	***
Nonsubject sources	Share of value	25.5	24.5	24.7	***
All import sources	Share of value	32.8	35.0	35.2	***

Source: For the years 2014-16, data are compiled using data submitted in the Commission's original investigations. For the year 2021, U.S. producers' U.S. shipments are compiled from the domestic interested parties' response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting numbers 7213.91.3011, 7213.91.3015, 7213.91.3020, 7213.91.3093, 7213.91.4500, 7213.91.6000, 7213.99.0030, 7227.20.0030, 7227.20.0080, 7227.90.6010, 7227.90.6020, 7227.90.6030, and 7227.90.6035, accessed January 12, 2023.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

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

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

## The industry in Belarus

### Producers in Belarus

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from one firm, Byelorussian Steel Works, which accounted for approximately \*\*\* percent of production of wire rod in Belarus during 2016, and approximately \*\*\* percent of wire rod exports from Belarus to the United States during 2016.<sup>51</sup>

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of two possible producers of wire rod in Belarus.<sup>52</sup>

### Recent developments

The domestic interested parties provided a description of operations for two firms in the Belarusian industry since the imposition of the orders and no relevant information from outside sources was found.<sup>53</sup>

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<sup>51</sup> Original confidential report, p. VII-3.

<sup>52</sup> Domestic interested parties' response to the notice of institution, January 3, 2023, exh. 3.

<sup>53</sup> Domestic interested parties' response to the notice of institution, January 3, 2023, p. 9 and exh. 5.

## Exports

Table I-10 presents export data for bars and rods of carbon and alloy steel, a category that includes wire rod and out-of-scope products, from Belarus (by export destination in descending order of quantity for 2021).

**Table I-10**  
**Bars and rods of carbon and alloy steel: Quantity of exports from Belarus, by destination and period**

Quantity in short tons

Destination market	2017	2018	2019	2020	2021
Netherlands	230,758	147,018	161,636	157,771	101,302
Poland	4,624	13,281	25,274	50,760	67,061
Lithuania	34,401	26,381	46,467	32,132	37,635
Bulgaria	---	28,839	---	3,178	35,594
Romania	3,884	5,863	7,831	16,482	19,014
Senegal	7,624	28,197	18,748	6,695	12,111
Russia	9,463	9,704	7,894	6,524	9,829
Serbia	---	1,782	11,653	7,954	8,477
Mali	-	2,271	5,049	8,114	5,636
Cote d'Ivoire	7,802	2,807	18,620	11,419	5,514
All other markets	81,616	81,408	117,819	82,745	14,090
All markets	380,171	347,553	420,990	383,775	316,261

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7213.91, 7213.99, 7227.20, and 7227.90, accessed January 12, 2023. These data may be overstated as HS subheadings 7213.99, 7227.20, and 7227.90 may contain products outside the scope of these reviews.

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## The industry in Italy

### Producers in Italy

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from four firms, which accounted for \*\*\* of production of wire rod in Italy during 2016, and \*\*\* of wire rod exports from Italy to the United States during 2016.<sup>54</sup>

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of twelve possible producers of wire rod in Italy.<sup>55</sup>

### Recent developments

Table I-11 presents developments in the Italian industry since the Commission's original investigations.

**Table I-11**  
**Wire rod: Developments in the Italian industry**

Item	Firm	Event
Acquisition	JSW Steel Italy	May 2018: JSW Steel Italy S.r.l. (a subsidiary of JSW Steel Limited) entered into a purchasing agreement for steel assets in Italy owned by Cevitaly S.r.l. Those assets included Aferpi S.p.A, a producer of wire rod.
Investment	Acciaierie di Verona	June 2019: Acciaierie di Verona completed investments to improve mill productivity. The investments included were a wire rod mill extension, the addition of fans for coil treatment, and the installation of a second compactor.
Sale	JSW Steel Italy	July 2022: JSW Steel stated that it would sell most of its assets in Italy, including its wire rod mill. JSW Steel was considering offers but no final sale had been announced.

Source: JSW Steel, SW Steel enters into an agreement to acquire steel facilities at Piombino, <https://www.jsw.in/steel/jsw-steel-acquires-facilities-piombino>, retrieved January 20, 2023. Danieli & C S.p.A., Perfect start for WRM phase 2 at Acciaierie di Verona, Pittini Group, June 21, 2019, <https://www.danieli.com/en/news-media/news/perfect-start-wrm-phase-2-acciaierie-di-verona-pittini-group-37-434.htm>. The Hindu Businessline, JSW Steel to exit Italy partially, plans to retain rail mill, July 24, 2022, <https://www.thehindubusinessline.com/news/jsw-steel-to-exit-italy-partially-plans-to-retain-rail-mill/article65677936.ece>.

<sup>54</sup> Original confidential report, p. VII-9.

<sup>55</sup> Domestic interested parties' response to the notice of institution, January 3, 2023, exh. 3.

## Exports

Table I-12 presents export data for bars and rods of carbon and alloy steel, a category that includes wire rod and out-of-scope products, from Italy (by export destination in descending order of quantity for 2021).

**Table I-12**  
**Bars and rods of carbon and alloy steel: Quantity of exports from Italy, by destination and period**

Quantity in short tons

Destination market	2017	2018	2019	2020	2021
Germany	187,003	188,172	221,477	196,854	237,127
Poland	57,854	53,600	60,837	47,593	105,359
Austria	129,563	130,089	99,238	87,342	101,410
Czech Republic	59,594	67,122	72,783	70,409	100,668
Slovenia	56,096	63,627	61,104	64,037	64,879
Spain	30,125	21,517	19,854	77,783	55,738
Slovakia	37,152	38,371	39,531	56,214	52,100
France	40,019	32,977	40,469	30,420	44,240
Netherlands	2,486	3,224	77,648	12,869	26,800
Mexico	21,549	56,743	208	18,894	23,214
All other markets	312,953	296,044	334,619	258,988	206,895
All markets	934,395	951,487	1,027,768	921,403	1,018,428

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7213.91, 7213.99, 7227.20, and 7227.90, accessed January 12, 2023. These data may be overstated as HS subheadings 7213.99, 7227.20, and 7227.90 may contain products outside the scope of these reviews.

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

# The industry in Russia

## Producers in Russia

During the final phase of the original investigations, the Commission received a foreign producer/exporter questionnaire from one firm, NLMK Ural, which accounted for approximately \*\*\* percent of production of wire rod in Russia during 2016, and approximately \*\*\* percent of U.S. imports of wire rod during 2016.<sup>56</sup>

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of 19 possible producers of wire rod in Russia.<sup>57</sup>

## Recent developments

Table I-13 presents developments in the Russian industry since the Commission's original investigations.

**Table I-13**  
**Wire rod: Developments in the Russian industry**

Item	Firm	Event
Expansion	Abinsk Electric Steel Works Ltd.	March 2019: Danieli & C. S.p.A., announced that Abinsk Electric Steel Works Ltd. ordered a new wire rod line with annual production capacity of 600,000 metric tons.
Expansion	Novorossiysk Rolling Plant LLC	March 2019: Danieli & C. S.p.A., announced that Novorossiysk Rolling Plant LLC. ordered a new wire rod line with annual production capacity of 500,000 metric tons.
Expansion	NLMK Russia	January 2021: NLMK Ural began production of 150x150 mm continuously cast steel billets. The new billet production enabled NLMK Ural to expand production of high-carbon wire rod by 40 percent per year and to increase their wire rod offering in terms of grade and width.

Source: Danieli & C. S.p.A., Danieli to supply two new H3 wire rod mills in Russia, March 1, 2019, [https://www.danieli.com/en/news-media/news/danieli-supply-two-new-h3-wirerod-mills-russia\\_37\\_398.htm](https://www.danieli.com/en/news-media/news/danieli-supply-two-new-h3-wirerod-mills-russia_37_398.htm). NLMK Ural, NLMK Russia long launches new products, January 11, 2021, <https://ural.nlmk.com/en/media-center/press-releases/nlmk-russia-long-launches-new-products/>.

<sup>56</sup> Original confidential report, p. VII-21.

<sup>57</sup> Domestic interested parties' response to the notice of institution, January 3, 2023, exh. 3.

## Exports

Table I-14 presents export data for bars and rods of carbon and alloy steel, a category that includes wire rod and out-of-scope products, from Russia (by export destination in descending order of quantity for 2021).

**Table I-14**  
**Bars and rods of carbon and alloy steel: Quantity of exports from Russia, by destination and period**

Quantity in short tons

Destination market	2017	2018	2019	2020	2021
Israel	77,266	114,958	69,091	107,940	144,565
Kazakhstan	121,127	118,481	132,974	131,150	133,991
Turkey	66,134	21,719	6,128	5,307	130,320
Colombia	5,645	32,457	4,971	---	113,579
Lithuania	109,715	129,970	57,514	42,039	82,812
Netherlands	131,709	111,725	80,750	62,918	78,037
Guatemala	2,139	7,215	11,299	---	74,104
Taiwan	104,748	111,961	111,317	102,719	60,327
Romania	24,934	52,042	47,047	47,892	57,004
Nicaragua	2,418	2,847	---	---	47,903
All other markets	502,935	531,000	459,314	477,588	671,053
All markets	1,148,769	1,234,376	980,405	977,554	1,593,694

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7213.91, 7213.99, 7227.20, and 7227.90, accessed January 12, 2023. These data may be overstated as HS subheadings 7213.99, 7227.20, and 7227.90 may contain products outside the scope of these reviews.

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## The industry in South Africa

### Producers in South Africa

During the final phase of the original investigations, the Commission received a foreign producer/exporter questionnaire from one firm, ArcelorMittal South Africa, which accounted for approximately \*\*\* percent of production of wire rod in South Africa during 2016, and approximately \*\*\* percent of wire rod exports from South Africa to the United States during 2016.<sup>58</sup>

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of two possible producers of wire rod in South Africa.<sup>59</sup>

### Recent developments

The domestic interested parties provided a description of operations for two firms in the South African industry since the imposition of the orders and no relevant information from outside sources was found.<sup>60</sup>

### Exports

Table I-15 presents export data for bars and rods of carbon and alloy steel, a category that includes wire rod and out-of-scope products, from South Africa (by export destination in descending order of quantity for 2021).

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<sup>58</sup> Original confidential report, p. VII-27.

<sup>59</sup> Domestic interested parties' response to the notice of institution, January 3, 2023, exh. 3.

<sup>60</sup> Domestic interested parties' response to the notice of institution, January 3, 2023, pp. 12-13 and exh. 9.

**Table I-15****Bars and rods of carbon and alloy steel: Quantity of exports from South Africa, by destination and period**

Quantity in short tons

Destination market	2017	2018	2019	2020	2021
Kenya	29,806	31,888	93,667	44,373	33,373
Tanzania	9,111	7,330	39,780	15,332	18,476
Uganda	16,749	37,953	57,342	17,159	14,209
Zambia	4,938	5,143	5,327	8,940	11,210
Zimbabwe	4,412	4,379	3,959	5,069	5,264
Ghana	14	---	29,032	624	3,378
Eswatini	3,331	3,917	2,965	2,778	2,992
Namibia	3,364	3,350	2,211	3,157	2,986
Botswana	1,167	2,541	4,196	4,849	1,947
Mozambique	1,247	1,331	1,739	1,549	1,665
All other markets	61,781	5,781	14,667	5,560	3,214
All markets	135,921	103,613	254,884	109,389	98,713

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7213.91, 7213.99, 7227.20, and 7227.90, accessed January 12, 2023. These data may be overstated as HS subheadings 7213.99, 7227.20, and 7227.90 may contain products outside the scope of these reviews.

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## The industry in South Korea

### Producers in South Korea

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from one firm, POSCO, which accounted for approximately \*\*\* percent of production of wire rod in South Korea during 2016, and approximately \*\*\* percent of wire rod exports from South Korea to the United States during 2016.<sup>61</sup>

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of 18 possible producers of wire rod in South Korea.<sup>62</sup>

### Recent developments

Table I-16 presents developments in the South Korean industry since the Commission's original investigations.

**Table I-16**  
**Wire rod: Developments in the South Korean industry**

Item	Firm	Event
Investment	Hyundai Steel	April 2018: Hyundai Steel issued a final acceptance certificate for a large bar mill and a small bar and wire rod mill supplied by Primetals Technologies. The small bar and wire rod mill had a capacity of 800,000 metric tons per year and would process billets produced by the large bar mill.

Source: Primetals Technologies, Hyundai issues final acceptance certificates for two long-rolling mills supplied by Primetals Technologies, April 5, 2018, <https://www.primetals.com/press-media/news/hyundai-issues-final-acceptance-certificates-for-two-long-rolling-mills-supplied-by-primetals-technologies>.

### Exports

Table I-17 presents export data for bars and rods of carbon and alloy steel, a category that includes wire rod and out-of-scope products, from South Korea (by export destination in descending order of quantity for 2021).

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<sup>61</sup> Original confidential report, p. VII-15.

<sup>62</sup> Domestic interested parties' response to the notice of institution, January 3, 2023, exh. 3.

**Table I-17****Bars and rods of carbon and alloy steel: Quantity of exports from South Korea, by destination and period**

Quantity in short tons

<b>Destination market</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Vietnam	170,518	222,265	215,721	139,870	177,169
Taiwan	106,052	105,659	98,803	145,351	162,744
Malaysia	137,653	184,127	169,460	113,267	132,565
Japan	88,288	65,866	129,161	164,595	112,777
China	126,219	101,478	114,297	168,418	86,589
United States	33,888	38,704	34,911	31,311	80,983
Thailand	66,666	65,306	77,798	117,717	58,524
Indonesia	13,051	16,907	17,978	20,719	37,952
Turkey	24,504	20,464	35,897	29,705	36,254
Mexico	12,159	24,834	22,572	12,385	22,475
All other markets	93,404	115,118	111,790	115,999	60,876
All markets	872,401	960,728	1,028,390	1,059,337	968,907

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7213.91, 7213.99, 7227.20, and 7227.90, accessed January 12, 2023. These data may be overstated as HS subheadings 7213.99, 7227.20, and 7227.90 may contain products outside the scope of these reviews.

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

## The industry in Spain

### Producers in Spain

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from four firms, which accounted for approximately \*\*\* percent of production of wire rod in Spain during 2016. These firms' estimated exports accounted for approximately \*\*\* percent of U.S. imports of wire rod from Spain during 2016.<sup>63</sup>

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of ten possible producers of wire rod in Spain.<sup>64</sup>

### Recent developments

The domestic interested parties provided a description of operations for three firms in the Spanish industry since the imposition of the orders and no relevant information from outside sources was found.<sup>65</sup>

### Exports

Table I-18 presents export data for bars and rods of carbon and alloy steel, a category that includes wire rod and out-of-scope products, from Spain (by export destination in descending order of quantity for 2021).

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<sup>63</sup> Original confidential report, p. VII-33.

<sup>64</sup> Domestic interested parties' response to the notice of institution, January 3, 2023, exh. 3.

<sup>65</sup> Domestic interested parties' response to the notice of institution, January 3, 2023, p. 13 and exh.

**Table I-18****Bars and rods of carbon and alloy steel: Quantity of exports from Spain, by destination and period**

Quantity in short tons

<b>Destination market</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
France	331,542	272,631	321,747	247,832	280,067
Belgium	17,108	40,645	234,237	195,227	174,235
Turkey	177,004	153,725	149,469	121,824	110,972
Portugal	101,714	73,748	131,830	58,723	109,193
Italy	95,261	130,606	64,728	64,539	99,256
Germany	77,660	75,550	74,340	43,864	59,005
Egypt	---	40	9,574	24,297	29,511
Sweden	4,786	17,785	14,139	798	23,796
Netherlands	3,987	3,938	13,046	34,931	19,067
Taiwan	763	6,835	4,418	10,033	18,436
All other markets	127,463	136,013	217,014	97,731	102,046
All markets	937,289	911,516	1,234,542	899,799	1,025,585

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7213.91, 7213.99, 7227.20, and 7227.90, accessed January 12, 2023. These data may be overstated as HS subheadings 7213.99, 7227.20, and 7227.90 may contain products outside the scope of these reviews.

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## **The industry in Turkey**

### **Producers in Turkey**

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from five firms, which accounted for approximately \*\*\* percent of production of wire rod in Turkey during 2016, and approximately \*\*\* percent of U.S. imports of wire rod from Turkey during 2016.<sup>66</sup>

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of 23 possible producers of wire rod in Turkey.<sup>67</sup>

### **Recent developments**

Table I-19 presents developments in the Turkish industry since the Commission's original investigations.

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<sup>66</sup> Original confidential report, p. VII-40.

<sup>67</sup> Domestic interested parties' response to the notice of institution, January 3, 2023, exh. 3.

**Table I-19**  
**Wire rod: Developments in the Turkish industry**

Item	Firm	Event
Plant opening	Habaş Sınai ve Tibbi Gazlar İstihsal Endüstrisi (“Habas”)	November 2020: Habas selected Danieli & C. S.p.A. to build a new wire rod line that was expected to start operation in the third quarter of 2021.
Modernization	Karabük Demir Çelik Fabrikaları A.S. (“Kardemir”)	February 2021: Kardemir commissioned the modernization of its wire rod plant to produce more compact coils for transport and container shipping.
Plant opening	Kaptan Demir Çelik (“Kaptan”)	March 2021: Kaptan contracted Primetals Technologies to build a new wire rod mill in Marmara Ereglisi, with an estimated completion date of mid-2022. The mill would produce rebar and wire rod products ranging from 4.5 mm to 26 mm in diameter.
Plant opening	Icdas Çelik Enerji Tersane ve Ulaşım Sanayi (“Icdas”)	February 2022: Icdas began trial production at its third wire rod mill that has production capacity of 600,000 metric tons per year. Full production was scheduled to begin at the end of March 2022.
Expansion	Ege Çelik Endüstrisi Sanayi ve Ticaret A.S. (“Ege Çelik”)	February 2022: Ege Çelik contracted with Primetals Technologies to upgrade its wire rod mill in Izmir. The new mill would expand its product range and will be capable of rolling rods with a diameter of 5.5–26 mm. Commissioning is expected to occur in summer 2023.
Plant opening	Tosyali Demir Çelik Sanayi (“Tosyali”)	April 2022: An environmental impact assessment began for Tosyali’s planned wire rod mill in Iskenderun with production capacity of 900,000 metric tons per year.
Plant opening	Yesilyurt Metallurgy	July 2022: Yesilyurt began production of wire rod with an annual capacity of 500,000 metric tons per year. The wire rod sizes ranged from 5.5 mm to 27 mm in diameter.

Source: Danieli & C. S.p.A., Habas orders new wire rod mill and slab caster automation, November 16, 2020, [https://www.danieli.com/en/news-media/news/habas-orders-new-wirerod-mill-and-slab-caster-automation\\_37\\_588.htm](https://www.danieli.com/en/news-media/news/habas-orders-new-wirerod-mill-and-slab-caster-automation_37_588.htm). SMS Group, Turkish steel producer Kardemir awards SMS group a contract to modernize its wire rod mill for the production of wire rod coils that are optimized for shipping, February 25, 2021, <https://www.sms-group.com/en-us/press-and-media/press-releases/press-release-detail/turkish-steel-producer-kardemir-awards-sms-group-a-contract-to-modernize-its-wire-rod-mill-for-the-production-of-wire-rod-coils-that-are-optimized-for-shipping>. Primetals Technologies, New wire rod outlet from Primetals Technologies to Expand product portfolio for Kaptan, March 2, 2021, <https://www.primetals.com/press-media/news/new-wire-rod-outlet-from-primetals-technologies-to-expand-product-portfolio-for-kaptan>. Steel Orbis, Turkey’s Icdas starts trial production at new wire rod mill, February 21, 2022, <https://www.steelorbis.com/steel-news/latest-news/turkeys-icdas-starts-trial-production-at-new-wire-rod-mill-1234261.htm>. Primetals Technologies, Turkish metals producer Ege Çelik Endüstrisi Sanayi ve Ticaret A.S. to upgrade wire rod mill with Primetals Technologies, February 9, 2022, <https://www.primetals.com/press-media/news/turkish-metals-producer-ege-celik-to-upgrade-wire-rod-mill-with-primetals-technologies>. Steel Orbis, Turkey’s Tosyali to build new wire rod plant in Iskenderun, April 22, 2022, <https://www.steelorbis.com/steel-news/latest-news/turkeys-tosyali-to-build-new-wire-rod-plant-in-iskenderun-1241734.htm>. Steel Orbis, Turkey’s Yesilyurt Metallurgy begins wire rod production, July

13, 2022, <https://www.steelorbis.com/steel-news/latest-news/turkeys-yesilyurt-metallurgy-begins-wire-rod-production-1252067.htm>.

## Exports

Table I-20 presents export data for bars and rods of carbon and alloy steel, a category that includes wire rod and out-of-scope products, from Turkey (by export destination in descending order of quantity for 2021).

**Table I-20**  
**Bars and rods of carbon and alloy steel: Quantity of exports from Turkey, by destination and period**

Quantity in short tons

Destination market	2017	2018	2019	2020	2021
Netherlands	147,829	214,395	169,370	98,581	162,935
Israel	126,313	121,432	162,309	178,319	146,577
Brazil	769	12,704	23,528	18,773	113,393
Cote d'Ivoire	19,922	12,328	47,829	122,103	83,804
Spain	47,641	77,905	21,734	16,327	61,085
Belgium	87,634	423,416	41,342	557	57,193
Italy	73,896	106,256	14,798	25,062	45,292
Senegal	30,044	16,817	63,072	91,228	42,268
Romania	22,816	61,093	65,144	24,299	41,038
Morocco	27,287	35,941	84,287	56,583	38,263
All other markets	580,395	441,959	673,848	540,462	365,924
All markets	1,164,546	1,524,246	1,367,262	1,172,295	1,157,772

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7213.91, 7213.99, 7227.20, and 7227.90, accessed January 12, 2023. These data may be overstated as HS subheadings 7213.99, 7227.20, and 7227.90 may contain products outside the scope of these reviews.

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

# The industry in Ukraine

## Producers in Ukraine

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from two firms, which accounted for approximately \*\*\* percent of production of wire rod in Ukraine during 2016, and approximately \*\*\* percent of U.S. imports of wire rod from Ukraine during 2016.<sup>68</sup>

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of four possible producers of wire rod in Ukraine.<sup>69</sup>

## Recent developments

Table I-21 presents developments in the Ukrainian industry since the Commission's original investigations. On February 24, 2022, the Russian army invaded Ukraine, creating serious challenges for Ukrainian wire rod producers, including logistical and supply chain disruptions and increased prices and supply disruptions for energy and raw materials.<sup>70</sup> On May 2, 2022, Ukraine formally closed its four Black Sea and Azov Sea ports at Mariupol, Berdiansk, Skadovsk, and Kherson. Russia had either captured or blockaded the ports.<sup>71</sup> Ukraine's ports remain blocked, requiring Ukrainian steel producers to find alternative shipping routes with higher shipping costs.<sup>72</sup> Ukraine's energy infrastructure has been significantly damaged by Russian missile attacks, leading to production disruptions for Ukrainian wire rod producers, particularly in November 2022.<sup>73</sup> Ukrainian exports of wire rod decreased to 406,884 short tons

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<sup>68</sup> Original confidential report, p. VII-46.

<sup>69</sup> Domestic interested parties' response to the notice of institution, January 3, 2023, exh. 3.

<sup>70</sup> Metinvest, Update on operations of Kamet Steel and Metinvest's iron ore assets, June 29, 2022, <https://metinvestholding.com/en/media/news/gzk-u-krivomu-roz-ta-kametstal-j-chastkovo-pripinyayuti-robotu-z-1-lipnya-cherez-logstichn-ta-ekonomchn-chinniki>.

<sup>71</sup> Polityu, Pavel, Ukraine formally closes seaports captured by Russia, May 2, 2022, <https://www.reuters.com/world/europe/ukraine-formally-closes-seaports-captured-by-russia-2022-05-02/>.

<sup>72</sup> Steel Orbis, Ukraine's AMRK to reach 50% of utilization with stable energy supply, February 8, 2023, <https://www.steelorbis.com/steel-news/latest-news/ukraines-amkr-to-reach-50-of-utilization-with-stable-energy-supply-1278073.htm>.

<sup>73</sup> Wright, George, Ukraine war: Almost half Ukraine's energy system disabled, PM says, November 19, 2022, <https://www.bbc.com/news/world-europe-63681401>. The New Voice of Ukraine, ArcelorMittal Kryvyi Rih CEO on blackouts, dumping by Russia and Turkey, and plans ahead, December 21, 2022, <https://english.nv.ua/business/arcelormittal-kryvyi-rih-ceo-on-blackout-dumping->

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in January to November 2022 from 745,521 short tons in January to November 2021 (a decrease of 45.4 percent).<sup>74</sup>

**Table I-21**  
**Wire rod: Developments in the Ukrainian industry**

Item	Firm	Event
Acquisition	Metinvest	July 2021: Metinvest acquired PJSC Dneprovsky Iron & Steel Integrated Works (DMK) in Kamianske, Ukraine, for UAH 9.17 billion (approximately US\$340 million). The acquisition allowed Metinvest to replace production of wire rod and other products that used to be produced at an asset located in eastern Ukraine which was taken over by separatists in 2014. After being purchased by Metinvest, DMK was renamed Kamet Steel.
Production interruption	Kamet Steel (subsidiary of Metinvest)	March 2022: Kamet Steel continued to operate but was producing at about 60 percent of 2021 production levels.
Production restart	ArcelorMittal Kryvyi Rih	May 2022: Restarted production of wire rod after shutting down steel production in March 2022.
Maintenance	Kamet Steel (subsidiary of Metinvest)	May 2022: Kamet Steel halted production at one of its three blast furnaces for scheduled maintenance.
Production interruption	Kamet Steel (subsidiary of Metinvest)	June 2022: Kamet Steel reduced operations to use only one blast furnace.
Production interruption	ArcelorMittal Kryvyi Rih	November 2022: ArcelorMittal Kryvyi Rih halted all production because it lacked electricity following Russian missile strikes on Ukraine's energy infrastructure. In February 2023, it was reported that overall, the plant was producing at 25 percent capacity utilization. However, the status of wire rod production was not known.
Production interruption	Kamet Steel (subsidiary of Metinvest)	November 2022: Kamet Steel suffered an emergency stoppage due to a lack of power supply because of infrastructure damage during the war in Ukraine. Some production was restarted in late December.

Source: Metinvest, Metinvest Wins Auction to Acquire DMK's Production Complex, July 26, 2021, <https://metinvestholding.com/en/media/news/metinvest-stal-pobeditelem-torgov-po-prodazhe-proizvodstvennogo-kompleksa-dneprovskogo-metkombinata>. NPR, Russia's at war with Ukraine. Here's how we got here, February 24, 2022, <https://www.npr.org/2022/02/12/1080205477/history-ukraine-russia>. Metinvest, Update on operations from Metinvest in Ukraine, March 22, 2022, <https://metinvestholding.com/en/media/news/update-on-operations-from-metinvest-in-ukraine>. Igor

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[by-russia-and-turkey-and-plans-ahead-50292495.html](https://metinvestholding.com/en/media/news/update-on-ukrainian-operations). Metinvest, Update on Ukrainian operations, November 28, 2022, <https://metinvestholding.com/en/media/news/update-on-ukrainian-operations>.

<sup>74</sup> Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7213.91, 7213.99, 7227.20, and 7227.90, accessed February 21, 2023. These data may be overstated as HS subheadings 7213.99, 7227.20, and 7227.90 may contain products outside the scope of these reviews.

Sheludchenko, ArcelorMittal has launched rolling mill No. 3, May 25, 2022, <https://gmk.center/en/news/arcelormittal-has-launched-rolling-mill-3/>. Metinvest, Metinvest—update on operations 13.05.2022, May 17, 2022, <https://metinvestholding.com/en/media/news/metinvest-update-on-operations-13-05-2022>. Metinvest, Update on operations of Kamet Steel and Metinvest’s iron ore assets, June 29, 2022, <https://metinvestholding.com/en/media/news/gzk-u-krivomu-roz-ta-kametstalj-chastkovo-pripinyayutj-robotu-z-1-lipnya-cherez-logstichn-ta-ekonomchn-chinniki>. Hunder, Max, ArcelorMittal plant in Ukraine aims to resume production as soon as possible, November 25, 2022, <https://www.reuters.com/markets/commodities/arcelormittal-plant-ukraine-aims-resume-production-soon-possible-2022-11-25/>. Steel Orbis, Ukraine’s AMRK to reach 50% of utilization with stable energy supply, February 8, 2023, <https://www.steelorbis.com/steel-news/latest-news/ukraines-amkr-to-reach-50-of-utilization-with-stable-energy-supply-1278073.htm>. Metinvest, Update on Ukrainian operations, November 28, 2022, <https://metinvestholding.com/en/media/news/update-on-ukrainian-operations>. Metinvest, Kamet Steel resumes production after blackout, December 28, 2022, <https://metinvestholding.com/en/media/news/kametstalj-vdnovila-viplavku-stal-pslyya-blekautu>.

## Exports

Table I-22 presents export data for bars and rods of carbon and alloy steel, a category that includes wire rod and out-of-scope products, from Ukraine (by export destination in descending order of quantity for 2021).

**Table I-22**  
**Bars and rods of carbon and alloy steel: Quantity of exports from Ukraine, by destination and period**

Quantity in short tons

Destination market	2017	2018	2019	2020	2021
Senegal	94,509	121,994	127,484	66,642	73,002
Ghana	62,121	53,432	63,105	87,775	72,174
Poland	42,007	53,638	46,868	49,598	66,905
Cote d’Ivoire	60,785	55,103	50,159	73,477	59,641
Romania	51,995	54,084	62,575	75,653	52,891
Netherlands	18,634	66,390	45,121	33,461	50,030
Cameroon	21,231	20,332	25,004	32,396	46,015
Benin	12,146	17,156	62,677	19,689	38,955
Dominican Republic	---	---	---	---	37,981
Gambia	13,349	17,847	29,963	27,278	37,206
All other markets	449,333	356,411	251,463	259,461	298,309
All markets	826,111	816,388	764,419	725,431	833,110

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7213.91, 7213.99, 7227.20, and 7227.90, accessed January 12, 2023. These data may be overstated as HS subheadings 7213.99, 7227.20, and 7227.90 may contain products outside the scope of these reviews.

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## The industry in the United Arab Emirates

### Producers in the United Arab Emirates

During the final phase of the original investigations, the Commission received a foreign producer/exporter questionnaire from one firm, which accounted for all production of wire rod in the United Arab Emirates during 2014-16, and approximately \*\*\* percent of U. S. imports of wire rod from the United Arab Emirates to the United States during 2016.<sup>75</sup>

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of three possible producers of wire rod in the United Arab Emirates.<sup>76</sup>

### Recent developments

The domestic interested parties provided a description of operations for three firms in the United Arab Emirates' industry since the imposition of the orders and no relevant information from outside sources was found.<sup>77</sup>

### Exports

Table I-23 presents export data for bars and rods of carbon and alloy steel, a category that includes wire rod and out-of-scope products, from the United Arab Emirates (by export destination in descending order of quantity for 2021).

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<sup>75</sup> Original confidential report, p. VII-53, 54. The Commission received no responses to its final phase questionnaire from the United Arab Emirates producers or exporters of wire rod, and as such, the information provided above is based on information obtained during the preliminary phase of the investigations.

<sup>76</sup> Domestic interested parties' response to the notice of institution, January 3, 2023, exh. 3.

<sup>77</sup> Domestic interested parties' response to the notice of institution, January 3, 2023, p. 16 and exh. 13.

**Table I-23****Bars and rods of carbon and alloy steel: Quantity of exports from the United Arab Emirates, by destination and period**

Quantity in short tons

<b>Destination market</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Belgium	28	28	-	-	1,055,470
Oman	39,562	17,890	59,856	92,209	104,978
Saudi Arabia	64,442	43,761	119,058	171,003	100,891
Italy	220	12,594	10,616	18,372	31,438
Thailand	621	527	3,374	18,382	22,456
Singapore	649	1,097	206	659	18,154
Cote d'Ivoire	-	-	-	-	13,833
Kenya	180	55	163	7,043	12,171
Pakistan	1,911	285	27	388	11,857
Qatar	14,518	-	-	-	9,171
All other markets	125,094	116,281	109,755	65,102	23,918
All markets	247,225	192,518	303,054	373,159	1,404,337

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7213.91, 7213.99, 7227.20, and 7227.90, accessed January 12, 2023. These data may be overstated as HS subheadings 7213.99, 7227.20, and 7227.90 may contain products outside the scope of these reviews.

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

# The industry in the United Kingdom

## Producers in the United Kingdom

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from two firms, which accounted for approximately \*\*\* percent of production of wire rod in the United Kingdom during 2016, and approximately \*\*\* percent of U.S. imports of wire rod from the United Kingdom during 2016.<sup>78</sup>

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of six possible producers of wire rod in the United Kingdom.<sup>79</sup>

## Recent developments

Table I-24 presents events in the United Kingdom's industry since the Commission's original investigations.

**Table I-24**  
**Wire rod: Developments in the United Kingdom's industry**

Item	Firm	Event
Investment	British Steel	July 2018: British Steel announced that it would invest £50 million (€56 million) to upgrade its wire rod production facilities. The investments included a new wire rod line to be commissioned in fall 2019. The investments were expected to improve the quality of products and allow for size ranges of up to 28 mm in diameter.
Acquisition	British Steel	March 2020: Jingye Group, a Chinese steelmaker, completed its purchase of British Steel. Jingye said that it would invest £1.2 billion in British Steel within five years; however, no specific investments in wire rod facilities were announced.

Source: British Steel, British Steel announces £50 million investment to upgrade wire rod business, July 18, 2018, <https://britishsteel.co.uk/news/british-steel-announces-50-million-investment-to-upgrade-wire-rod-business/>. British Steel, Jingye completes acquisition of British Steel, March 9, 2020, <https://britishsteel.co.uk/news/jingye-completes-acquisition-of-british-steel/>.

<sup>78</sup> Original confidential report, p. VII-61.

<sup>79</sup> Domestic interested parties' response to the notice of institution, January 3, 2023, exh. 3.

## Exports

Table I-25 presents export data for bars and rods of carbon and alloy steel, a category that includes wire rod and out-of-scope products, from the United Kingdom (by export destination in descending order of quantity for 2021).

**Table I-25**  
**Bars and rods of carbon and alloy steel: Quantity of exports from the United Kingdom, by destination and period**

Quantity in short tons

<b>Destination market</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Germany	76,093	82,426	75,334	104,528	70,499
Taiwan	37,149	29,690	34,434	82,661	51,614
Belgium	86,796	94,153	72,751	95,767	43,916
Italy	85,519	70,207	39,111	40,639	42,772
Sweden	47,430	36,727	35,059	27,121	37,070
Spain	19,419	36,143	28,977	23,582	25,266
Netherlands	8,026	13,147	52,149	72,866	20,963
Czech Republic	12,619	16,575	15,659	16,069	20,527
Turkey	46,671	41,821	39,364	22,349	17,615
Ireland	6,054	15,310	29,494	24,410	16,635
All other markets	120,543	75,342	96,942	64,752	52,699
All markets	546,318	511,540	519,273	574,744	399,577

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7213.91, 7213.99, 7227.20, and 7227.90, accessed January 12, 2023. These data may be overstated as HS subheadings 7213.99, 7227.20, and 7227.90 may contain products outside the scope of these reviews.

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

## Third-country trade actions

Table I-26 presents information on third-country trade actions against subject countries.

**Table I-26**

**Wire rod: Antidumping duties, countervailing duties, and safeguard actions in third-country markets**

<b>Country imposing trade action</b>	<b>Subject countries subject to trade remedy action</b>	<b>Type of remedy</b>	<b>Covered products</b>	<b>Status</b>
European Union	All subject countries except South Africa and the United Arab Emirates	Safeguard measure in the form of a TRQ	Non alloy and other alloy wire rod	Implemented on January 31, 2019. Extended until July 1, 2024. The measures are currently under review to determine if they should end on July 1, 2023.
European Union	Belarus and Russia	Import prohibition	Iron and steel products, including non alloy and other alloy wire rod	Implemented in March 2022.
Mexico	Ukraine	Antidumping	Bars and rods, hot-rolled, in irregularly wound coils, of iron or non-alloy steel	Implemented September 2000. Most recently renewed in December 2021.
Morocco	All subject countries except South Africa, Turkey, and the United Arab Emirates	Safeguard measure in the form of a TRQ	Wire rods with a diameter of 5.5 to 14 mm	Implemented December 2013. Extended until October 15, 2023.
Ukraine	Russia	Antidumping	Rebar and wire rod	Implemented September 2018.
United Arab Emirates	All subject countries	Increase of import duty	Rebar and wire rod	Increased duty from 5 percent to 10 percent in January 2019. In January 2023, the duty increase was extended until November 7, 2023.

Table continued.

**Table I-26 Continued**

**Wire rod: Antidumping duties, countervailing duties, and safeguard actions in third-country markets**

<b>Country imposing trade action</b>	<b>Subject countries subject to trade remedy action</b>	<b>Type of remedy</b>	<b>Covered products</b>	<b>Status</b>
United Kingdom	All subject countries except South Africa, Turkey, Ukraine, and the United Arab Emirates.	Safeguard measure in the form of a TRQ	Non alloy and other alloy wire rod	Implemented January 1, 2021.
United Kingdom	Belarus and Russia	Import prohibition	Iron and steel products, including non alloy and other alloy wire rod	Implemented in April 2022 for Russia and July 2022 for Belarus.
Vietnam	All subject countries except Belarus, South Africa, Turkey, and Ukraine	Safeguard measure in the form of import duties	Certain semi-finished and finished products of ally and non-alloy steel, including rods of iron or non-alloy steel	Implemented August 2016. An investigation was ongoing to decide whether to extend the measures.

Source: European Commission, Commission implementing regulation (EU) 2019/159 of 31 January 2019 imposing definitive safeguard measures with regard to imports of certain steel products, February 1, 2019, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0159&from=EN>. European Commission, Notice of Initiation concerning a review of the safeguard measure applicable to imports of certain steel products, December 2, 2022, [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:JOC\\_2022\\_459\\_R\\_0006&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:JOC_2022_459_R_0006&from=EN). European Commission, Commission implementing regulation (EU) 2022/355 of 2 March 2022 amending Regulation (EC) No 765/2006 concerning restrictive measures in view of the situation in Belarus, March 2, 2022, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022R0355&from=EN>. European Commission, Commission implementing regulation (EU) 2022/428 of 15 March 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, March 15, 2022, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022R0428&qid=1676582364126&from=en>. World Trade Organization, Semi-Annual Report under Article 16.4 of the Agreement: Mexico, February 15, 2001, <https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=Q:/G/ADP/N72MEX.pdf&Open=True>. World Trade Organization, Semi-Annual Report under Article 16.4 of the Agreement: Mexico, March 21, 2022, <https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/ADP/N364MEX.pdf&Open=True>. World Trade Organization, Notification under Article 12.1(B) of the Agreement on Safeguards on finding a serious injury or threat thereof caused by increased imports: Morocco, December 20, 2013, <https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/SG/N8MAR3S1.pdf&Open=True>. World Trade Organization, Notification under Article 12.1(C) of the Agreement on Safeguards (Extension of the existing measures): Morocco, December 22, 2021, <https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/SG/N10MAR3S5.pdf&Open=True>.

World Trade Organization, Semi-Annual Report under Article 16.4 of the Agreement: Ukraine, September 18, 2018, <https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/ADP/N314UKR.pdf&Open=True>. Steel Orbis, UAE extends increased import duty on rebar and wire rod, January 26, 2023, <https://www.steelorbis.com/steel-news/latest-news/uae-extends-increased-import-duty-on-rebar-and-wire-rod-1276611.htm>. GOV.UK, Taxation notice 2020/06: safeguard measures on certain steel products – application of tariff rate quotas, October 7, 2022, <https://www.gov.uk/government/publications/trade-remedies-notices-tariff-rate-quotas-on-steel-goods/taxation-notice-202006-safeguard-measures-on-certain-steel-products-application-of-tariff-rate-quotas>. GOV.UK, NTI 2952: Republic of Belarus import sanctions, July 5, 2022, <https://www.gov.uk/government/publications/notice-to-importers-2952-belarus-import-sanctions/nti-2952-republic-of-belarus-import-sanctions#:~:text=Import%20prohibitions,-The%20Republic%20of&text=On%204%20July%202022%2C%20The,and%20iron%20and%20steel%20products>. GOV.UK, NTI 2953: Russia import sanctions, November 25, 2022, <https://www.gov.uk/government/publications/notice-to-importers-2953-russia-import-sanctions/nti-2953-russia-import-sanctions>. World Trade Organization, Notification under Article 12.1(B) of the Agreement on Safeguards on finding a serious injury or threat thereof caused by increased imports: Vietnam, August 2, 2016, <https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/SG/N8VNM3.pdf&Open=True>. World Trade Organization, Notification under Article 12.1(A) of the Agreement on Safeguards on initiation of investigation and the reasons for it: Vietnam, November 9, 2022, <https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/SG/N6VNM5S2.pdf&Open=True>.

Note: The United Kingdom’s wire rod safeguard measures were originally EU safeguard measures and were transitioned to continue applying to the United Kingdom after it withdrew from the EU.

## The global market

Table I-27 presents global export data for bars and rods of carbon and alloy steel, a category that includes wire rod and out-of-scope products, (by source in descending order of quantity for 2021).

**Table I-27****Bars and rods of carbon and alloy steel: Quantity of global exports by country and period**

Quantity in short tons

<b>Exporting country</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
China	6,896,674	6,131,441	4,545,188	3,048,994	3,360,168
Malaysia	57,746	203,053	1,804,218	3,187,858	2,142,321
Germany	1,852,905	1,740,555	1,543,343	1,440,255	1,817,116
Russia	1,148,769	1,234,376	980,405	977,554	1,593,694
Japan	1,780,850	1,659,425	1,429,275	1,061,897	1,480,481
United Arab Emirates	247,225	192,518	303,054	373,159	1,404,337
India	416,908	374,509	398,845	468,401	1,383,068
Turkey	1,164,546	1,524,246	1,367,262	1,172,295	1,157,772
Vietnam	288,721	460,728	386,926	756,777	1,142,499
Czech Republic	974,294	947,237	900,034	989,759	1,029,707
All other exporters	10,234,342	10,739,164	9,440,784	9,125,903	10,657,851
All exporters	25,062,980	25,207,252	23,099,334	22,602,851	27,169,014

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7213.91, 7213.99, 7227.20, and 7227.90, accessed January 12, 2023. These data may be overstated as HS subheadings 7213.99, 7227.20, and 7227.90 may contain products outside the scope of these reviews.

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

**APPENDIX A**  
**FEDERAL REGISTER NOTICES**



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

Citation	Title	Link
87 FR 73757, December 1, 2022	<i>Initiation of Five-Year (Sunset) Reviews</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2022-12-01/pdf/2022-26154.pdf">https://www.govinfo.gov/content/pkg/FR-2022-12-01/pdf/2022-26154.pdf</a>
87 FR 73789, December 1, 2022	<i>Carbon and Certain Alloy Steel Wire Rod From Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom; Institution of Five-Year Reviews</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2022-12-01/pdf/2022-26043.pdf">https://www.govinfo.gov/content/pkg/FR-2022-12-01/pdf/2022-26043.pdf</a>



**APPENDIX B**  
**COMPANY-SPECIFIC DATA**



\* \* \* \* \*



**APPENDIX C**  
**SUMMARY DATA COMPILED IN PRIOR PROCEEDINGS**



## Total Market

Table C-1

Wire rod: Summary data concerning the U.S. market, 2014-16, January to September 2016, and January to September 2017

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	2014	Calendar year 2015	2016	January to September 2016	January to September 2017	2014-16	Calendar year 2014-15	2015-16	Jan-Sep 2016-17
<b>U.S. consumption quantity:</b>									
Amount.....	5,447,162	5,430,928	5,321,081	4,104,862	4,322,014	(2.3)	(0.3)	(2.0)	5.3
Producers' share (fn1).....	66.9	67.1	66.7	66.7	65.9	(0.3)	0.1	(0.4)	(0.7)
Importers' share (fn1):									
Belarus.....	---	0.2	0.7	0.9	0.6	0.7	0.2	0.5	(0.2)
Italy.....	0.0	0.0	0.6	0.3	0.7	0.6	(0.0)	0.6	0.4
Korea.....	2.0	2.4	1.9	2.1	0.8	(0.1)	0.4	(0.5)	(1.3)
Russia.....	0.2	0.1	1.9	2.2	1.3	1.7	(0.1)	1.8	(0.9)
South Africa.....	---	0.8	0.4	0.5	0.7	0.4	0.8	(0.4)	0.2
Spain.....	0.6	1.5	1.4	1.2	1.1	0.8	0.9	(0.1)	(0.1)
Turkey.....	3.9	4.8	1.8	1.7	2.6	(2.0)	0.9	(2.9)	0.9
Ukraine.....	0.3	1.5	3.0	3.2	2.4	2.8	1.2	1.6	(0.8)
United Arab Emirates.....	0.0	0.3	0.4	0.5	---	0.4	0.3	0.1	(0.5)
United Kingdom.....	1.3	0.8	1.0	1.1	0.8	(0.3)	(0.5)	0.1	(0.3)
Subject sources.....	8.3	12.4	13.2	13.7	11.2	4.9	4.1	0.8	(2.5)
Canada.....	9.6	10.3	10.4	10.3	10.1	0.8	0.7	0.0	(0.2)
China.....	6.9	0.0	0.0	0.0	0.0	(6.9)	(6.8)	(0.0)	(0.0)
All other sources.....	8.3	10.2	9.7	9.3	12.8	1.5	1.9	(0.5)	3.5
Nonsubject sources.....	24.8	20.6	20.1	19.6	22.8	(4.7)	(4.2)	(0.4)	3.2
All import sources.....	33.1	32.9	33.3	33.3	34.1	0.3	(0.1)	0.4	0.7
<b>U.S. consumption value:</b>									
Amount.....	3,796,857	3,189,202	2,842,255	2,188,179	2,587,275	(25.1)	(16.0)	(10.9)	18.2
Producers' share (fn1).....	67.2	65.0	64.8	65.1	65.5	(2.4)	(2.2)	(0.2)	0.3
Importers' share (fn1):									
Belarus.....	---	0.1	0.4	0.5	0.4	0.4	0.1	0.3	(0.1)
Italy.....	0.0	0.0	0.4	0.2	0.5	0.4	(0.0)	0.4	0.3
Korea.....	1.8	2.1	1.8	1.9	0.9	(0.0)	0.3	(0.3)	(1.1)
Russia.....	0.2	0.1	1.2	1.4	1.0	1.0	(0.1)	1.2	(0.4)
South Africa.....	---	0.6	0.3	0.4	0.6	0.3	0.6	(0.3)	0.2
Spain.....	0.6	1.6	1.6	1.3	1.3	1.0	1.1	(0.1)	(0.1)
Turkey.....	3.3	4.0	1.5	1.4	2.1	(1.8)	0.7	(2.5)	0.7
Ukraine.....	0.2	1.1	2.1	2.1	1.8	1.9	0.9	1.0	(0.4)
United Arab Emirates.....	0.0	0.2	0.3	0.3	---	0.3	0.2	0.1	(0.3)
United Kingdom.....	1.2	0.8	0.9	1.0	0.8	(0.4)	(0.4)	0.1	(0.1)
Subject sources.....	7.4	10.6	10.5	10.6	9.2	3.1	3.2	(0.1)	(1.4)
Canada.....	10.7	11.2	11.5	11.4	11.4	0.8	0.6	0.2	(0.0)
China.....	5.2	0.0	0.0	0.0	0.0	(5.2)	(5.2)	(0.0)	(0.0)
All other sources.....	9.6	13.2	13.3	12.9	13.9	3.7	3.6	0.1	1.1
Nonsubject sources.....	25.5	24.5	24.7	24.3	25.3	(0.7)	(1.0)	0.3	1.1
All import sources.....	32.8	35.0	35.2	34.9	34.5	2.4	2.2	0.2	(0.3)
<b>U.S. imports from:</b>									
<b>Belarus:</b>									
Quantity.....	---	9,059	35,381	35,359	27,757	fn2	fn2	290.6	(21.5)
Value.....	---	3,131	11,583	11,571	11,228	fn2	fn2	269.9	(3.0)
Unit value.....	\$---	\$346	\$327	\$327	\$405	fn2	fn2	(5.3)	23.6
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---
<b>Italy:</b>									
Quantity.....	346	246	33,163	12,007	29,609	9,484.7	(28.9)	13,380.9	146.6
Value.....	543	291	12,697	4,533	11,948	2,236.6	(46.4)	4,259.7	163.6
Unit value.....	\$1,570	\$1,184	\$383	\$378	\$404	(75.6)	(24.6)	(67.7)	6.9
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---
<b>Korea:</b>									
Quantity.....	109,026	128,862	101,968	86,481	35,662	(6.5)	18.2	(20.9)	(58.8)
Value.....	69,377	67,290	51,872	42,291	22,203	(25.2)	(3.0)	(22.9)	(47.5)
Unit value.....	\$636	\$522	\$509	\$489	\$623	(20.1)	(17.9)	(2.6)	27.3
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---
<b>Russia:</b>									
Quantity.....	12,329	6,857	103,322	90,154	57,893	738.0	(44.4)	1,406.8	(35.8)
Value.....	7,552	2,230	35,215	30,310	25,484	366.3	(70.5)	1,479.1	(15.9)
Unit value.....	\$613	\$325	\$341	\$336	\$440	(44.4)	(46.9)	4.8	30.9
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---
<b>South Africa:</b>									
Quantity.....	---	45,451	22,049	22,049	31,156	fn2	fn2	(51.5)	41.3
Value.....	---	18,830	8,000	8,000	14,465	fn2	fn2	(57.5)	80.8
Unit value.....	\$---	\$414	\$363	\$363	\$464	fn2	fn2	(12.4)	28.0
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---
<b>Spain:</b>									
Quantity.....	31,778	79,976	72,779	49,246	49,338	129.0	151.7	(9.0)	0.2
Value.....	22,392	52,358	44,566	29,373	32,341	99.0	133.8	(14.9)	10.1
Unit value.....	\$705	\$655	\$612	\$596	\$656	(13.1)	(7.1)	(6.5)	9.9
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---
<b>Turkey:</b>									
Quantity.....	210,096	259,183	97,761	69,753	113,681	(53.5)	23.4	(62.3)	63.0
Value.....	124,577	126,483	42,798	29,852	53,301	(65.6)	1.5	(66.2)	78.6
Unit value.....	\$593	\$488	\$438	\$428	\$469	(26.2)	(17.7)	(10.3)	9.6
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---
<b>Ukraine:</b>									
Quantity.....	14,625	79,053	161,451	130,925	103,482	1,003.9	440.5	104.2	(21.0)
Value.....	8,684	35,022	59,507	46,571	45,305	585.3	303.3	69.9	(2.7)
Unit value.....	\$594	\$443	\$369	\$356	\$438	(37.9)	(25.4)	(16.8)	23.1
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---
<b>United Arab Emirates:</b>									
Quantity.....	28	17,673	22,159	22,132	---	79,039.3	63,017.9	25.4	(100.0)
Value.....	18	6,952	7,631	7,618	---	42,847.1	39,026.8	9.8	(100.0)
Unit value.....	\$635	\$393	\$344	\$344	\$---	(45.7)	(38.0)	(12.5)	(100.0)
Ending inventory quantity.....	---	---	---	---	---	---	---	---	---

Table continued on next page.

Table C-1--Continued

Wire rod: Summary data concerning the U.S. market, 2014-16, January to September 2016, and January to September 2017

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	2014	Calendar year 2015	2016	January to September 2016	2017	2014-16	Calendar year 2014-15	2015-16	Jan-Sep 2016-17
U.S. imports from:									
United Kingdom:									
Quantity.....	71,379	45,507	51,622	45,494	36,254	(27.7)	(36.2)	13.4	(20.3)
Value.....	46,428	24,795	24,329	21,270	21,427	(47.6)	(46.6)	(1.9)	0.7
Unit value.....	\$650	\$545	\$471	\$468	\$591	(27.5)	(16.2)	(13.5)	26.4
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Subject sources:									
Quantity.....	449,609	671,866	701,654	563,600	484,832	56.1	49.4	4.4	(14.0)
Value.....	279,572	337,383	298,198	231,389	237,703	6.7	20.7	(11.6)	2.7
Unit value.....	\$622	\$502	\$425	\$411	\$490	(31.7)	(19.2)	(15.4)	19.4
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Canada:									
Quantity.....	524,324	561,752	552,375	421,875	434,431	5.3	7.1	(1.7)	3.0
Value.....	405,564	358,637	326,208	249,909	295,378	(19.6)	(11.6)	(9.0)	18.2
Unit value.....	\$773	\$638	\$591	\$592	\$680	(23.7)	(17.5)	(7.5)	14.8
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
China:									
Quantity.....	374,785	1,672	81	81	36	(100.0)	(99.6)	(95.2)	(55.3)
Value.....	196,661	887	56	56	34	(100.0)	(99.5)	(93.7)	(39.5)
Unit value.....	\$525	\$530	\$686	\$686	\$928	30.8	1.1	29.4	35.3
All other sources:									
Quantity.....	451,589	553,790	518,471	383,059	552,688	14.8	22.6	(6.4)	44.3
Value.....	364,582	420,248	376,912	281,490	360,378	3.4	15.3	(10.3)	28.0
Unit value.....	\$807	\$759	\$727	\$735	\$652	(10.0)	(6.0)	(4.2)	(11.3)
Ending inventory quantity (fn3).....	***	***	***	***	***	***	***	***	***
Nonsubject sources:									
Quantity.....	1,350,698	1,117,214	1,070,927	805,016	987,155	(20.7)	(17.3)	(4.1)	22.6
Value.....	966,807	779,772	703,176	531,455	655,790	(27.3)	(19.3)	(9.8)	23.4
Unit value.....	\$716	\$698	\$657	\$660	\$664	(8.3)	(2.5)	(5.9)	0.6
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All import sources:									
Quantity.....	1,800,307	1,789,080	1,772,581	1,368,616	1,471,988	(1.5)	(0.6)	(0.9)	7.6
Value.....	1,246,379	1,117,155	1,001,373	762,845	893,494	(19.7)	(10.4)	(10.4)	17.1
Unit value.....	\$692	\$624	\$565	\$557	\$607	(18.4)	(9.8)	(9.5)	8.9
Ending inventory quantity.....	117,182	150,944	122,654	118,657	140,507	4.7	28.8	(18.7)	18.4
U.S. producers:									
Average capacity quantity.....	4,900,953	4,889,826	4,661,502	3,497,913	3,488,453	(4.9)	(0.2)	(4.7)	(0.3)
Production quantity.....	3,707,416	3,677,468	3,570,360	2,754,756	2,895,305	(3.7)	(0.8)	(2.9)	5.1
Capacity utilization (fn1).....	75.6	75.2	76.6	78.8	83.0	0.9	(0.4)	1.4	4.2
U.S. shipments:									
Quantity.....	3,646,855	3,641,848	3,548,500	2,736,246	2,850,026	(2.7)	(0.1)	(2.6)	4.2
Value.....	2,550,478	2,072,047	1,840,882	1,425,334	1,693,781	(27.8)	(18.8)	(11.2)	18.8
Unit value.....	\$699	\$569	\$519	\$521	\$594	(25.8)	(18.6)	(8.8)	14.1
Export shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	270,611	271,472	268,396	270,799	291,976	(0.8)	0.3	(1.1)	7.8
Inventories/total shipments (fn1).....	***	***	***	***	***	***	***	***	***
Production workers.....	2,299	2,410	2,222	2,242	2,238	(3.3)	4.8	(7.8)	(0.2)
Hours worked (1,000s).....	4,835	4,938	4,754	3,565	3,596	(1.7)	2.1	(3.7)	0.9
Wages paid (\$1,000).....	170,593	172,268	168,288	124,641	129,142	(1.4)	1.0	(2.3)	3.6
Hourly wages (dollars).....	\$35.28	\$34.89	\$35.40	\$34.96	\$35.91	0.3	(1.1)	1.5	2.7
Productivity (short tons per 1,000 hour).....	766.8	744.7	751.0	772.7	805.1	(2.1)	(2.9)	0.8	4.2
Unit labor costs.....	\$46.01	\$46.84	\$47.13	\$45.25	\$44.60	2.4	1.8	0.6	(1.4)
Net sales:									
Quantity.....	3,680,257	3,676,608	3,573,436	2,755,429	2,871,656	(2.9)	(0.1)	(2.8)	4.2
Value.....	2,578,070	2,096,056	1,856,769	1,437,464	1,709,007	(28.0)	(18.7)	(11.4)	18.9
Unit value.....	\$701	\$570	\$520	\$522	\$595	(25.8)	(18.6)	(8.9)	14.1
Cost of goods sold (COGS).....	2,420,417	1,984,458	1,717,124	1,317,267	1,568,486	(29.1)	(18.0)	(13.5)	19.1
Gross profit or (loss).....	157,653	111,598	139,645	120,197	140,521	(11.4)	(29.2)	25.1	16.9
SG&A expenses.....	82,227	75,825	86,734	65,225	67,706	5.5	(7.8)	14.4	3.8
Operating income or (loss).....	75,426	35,773	52,911	54,972	72,815	(29.9)	(52.6)	47.9	32.5
Net income or (loss).....	62,191	22,140	44,319	48,343	68,483	(28.7)	(64.4)	100.2	41.7
Capital expenditures.....	90,906	68,673	52,873	33,847	41,560	(41.8)	(24.5)	(23.0)	22.8
Unit COGS.....	\$658	\$540	\$481	\$478	\$546	(26.9)	(17.9)	(11.0)	14.3
Unit SG&A expenses.....	\$22	\$21	\$24	\$24	\$24	8.6	(7.7)	17.7	(0.4)
Unit operating income or (loss).....	\$20	\$10	\$15	\$20	\$25	(27.8)	(52.5)	52.2	27.1
Unit net income or (loss).....	\$17	\$6	\$12	\$18	\$24	(26.6)	(64.4)	106.0	35.9
COGS/sales (fn1).....	93.9	94.7	92.5	91.6	91.8	(1.4)	0.8	(2.2)	0.1
Operating income or (loss)/sales (fn1).....	2.9	1.7	2.8	3.8	4.3	(0.1)	(1.2)	1.1	0.4
Net income or (loss)/sales (fn1).....	2.4	1.1	2.4	3.4	4.0	(0.0)	(1.4)	1.3	0.6

## Notes:

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

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Undefined.

fn3.--Includes inventories of imports from China.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 7213.91.3011, 7213.91.3015, 7213.91.3020, 7213.91.3093, 7213.91.4500, 7213.91.6000, 7213.99.0030, 7227.20.0030, 7227.20.0080, 7227.90.6010, 7227.90.6020 7227.90.6030, and 7227.90.6035, accessed October 10, 20

**APPENDIX D**  
**PURCHASER QUESTIONNAIRE RESPONSES**



As part of their response to the notice of institution, interested parties were asked to provide a list of three to five leading purchasers in the U.S. market for the domestic like product. A response was received from domestic interested parties and it provided contact information for the following five firms as top purchasers of wire rod: \*\*\*. Purchaser questionnaires were sent to these five firms and four firms (\*\*\*) provided responses, which are presented below.

1. Have there been any significant changes in the supply and demand conditions for wire rod that have occurred in the United States or in the market for wire rod since January 1, 2018?

Purchaser	Yes / No	Changes that have occurred
***	***	***
***	***	***
***	***	***
***	***	***

2. Do you anticipate any significant changes in the supply and demand conditions for wire rod in the United States or in the market for wire rod in Belarus, Italy, Russia, South Africa, South Korea, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom within a reasonably foreseeable time?

Purchaser	Yes / No	Anticipated changes
***	***	***
***	***	***
***	***	***
***	***	***

