

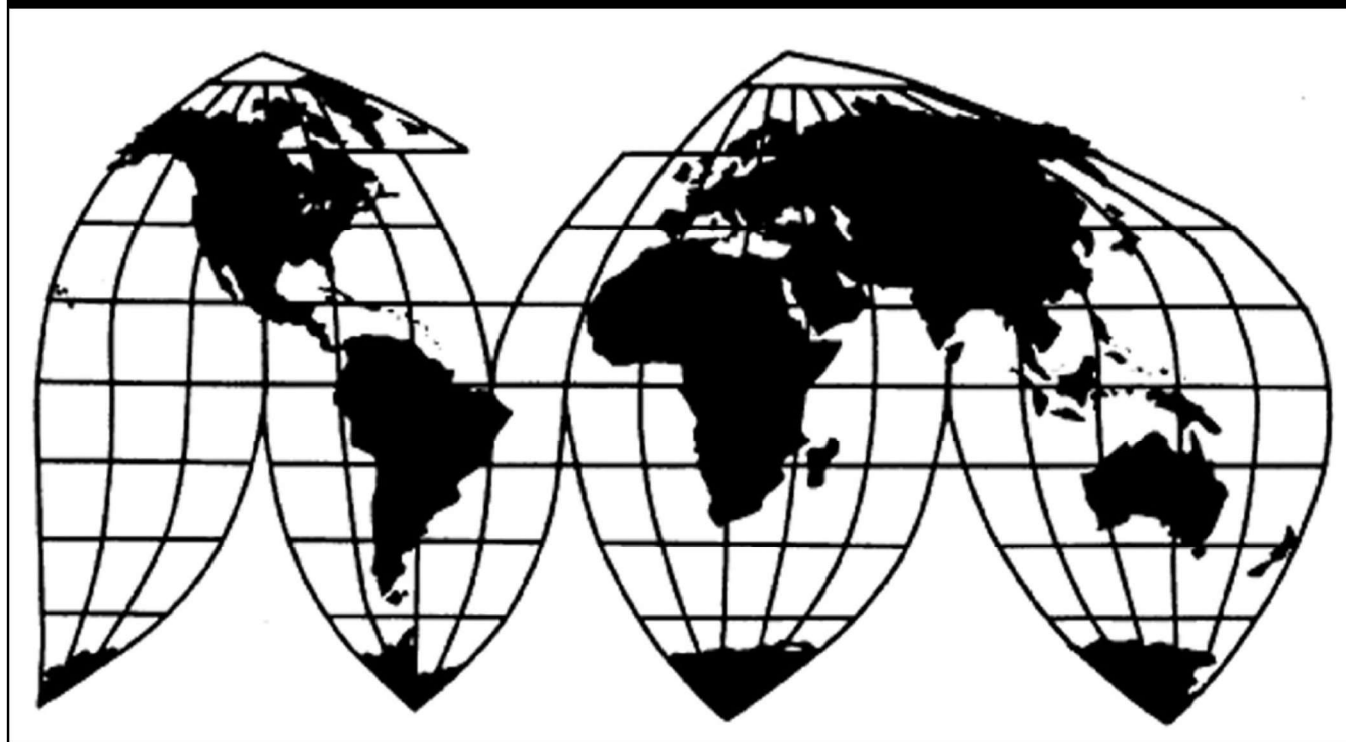
Cut-to-Length Carbon-Quality Steel Plate from India, Indonesia, and South Korea

Investigation Nos. 701-TA-388, 389, and 391 and 731-TA-817, 818, and 821
(Fourth Review)

Publication 5455

August 2023

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual concerns may not be published.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

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-388, 389, and 391 and 731-TA-817, 818, and 821 (Fourth Review)

Cut-to-Length Carbon-Quality Steel Plate from India, Indonesia, and South Korea

DETERMINATIONS

On the basis of the record¹ developed in the subject five-year reviews, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that revocation of the antidumping duty and countervailing duty orders on cut-to-length carbon-quality steel plate (“CTL plate”) from India, Indonesia, and South Korea 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 February 1, 2023 (88 FR 6781) and determined on May 8, 2023 that it would conduct expedited reviews (88 FR 37098, June 6, 2023).

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

Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the antidumping and countervailing duty orders on cut-to-length carbon-quality steel plate (“CTL plate”) from India, Indonesia, and South Korea 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. In February 2000, the Commission determined that an industry in the United States was being materially injured by reason of imports of CTL plate from France, India, Indonesia, Italy, Japan, and South Korea that were being sold at less than fair value (“LTFV”), and of CTL plate from France, India, Indonesia, Italy, and South Korea that were being subsidized by their respective governments.¹ The Department of Commerce (“Commerce”) issued antidumping duty orders on CTL plate from France, India, Indonesia, Italy, Japan, and South Korea and countervailing duty orders on CTL plate from France, India, Indonesia, Italy, and South Korea, effective February 3, 2000.² Certain Commerce determinations were the subject of a World Trade Organization (“WTO”) challenge by the European Union, following

¹ *Certain Cut-to-Length Steel Plate from France, India, Indonesia, Italy, Japan, and Korea*, Inv. Nos. 701-TA-387-391 (Final) and 731-TA-816-821 (Final), USITC Pub. 3273 (Jan. 2000) (“*Original Investigations*”). For consistency, we use the term “South Korea” throughout, including where in the prior proceedings the terms “Korea” or “Republic of Korea” were used.

² Notice of Amendment of Final Determinations of Sales at Less Than Fair Value and Antidumping Duty Orders: Certain Cut-to-Length Carbon-Quality Steel Plate Products from France, India, Indonesia, Italy, Japan, and the Republic of Korea, 65 Fed. Reg. 6585 (Feb. 10, 2000); Notice of Amended Final Determinations: Certain Cut-to-Length Carbon Quality Steel Plate from India and the Republic of Korea; and Notice of Countervailing Duty Orders: Certain Cut-to-Length Carbon-Quality Steel Plate from France, India, Indonesia, Italy, and the Republic of Korea, 65 Fed. Reg. 6587 (Feb. 10, 2000).

In February 2000, Commerce amended its final antidumping duty determinations for Indonesia and Italy, resulting in amended dumping margins for certain imports from these countries, and amended the net subsidy rate for certain imports from India and South Korea. South Korean producer/exporter Pohang Iron and Steel Co., Ltd. (“POSCO”) and Italian producer ILVA S.p.A. were excluded from the antidumping duty orders due to *de minimis* margins in the final determinations, and POSCO, Indonesian steel producers P.T. Gunawan Steel and P.T. Jaya Pari, and Italian steel producer Palini and Bertoli S.p.A. were excluded from the countervailing duty orders due to *de minimis* net subsidy rates in the final determinations.

which Commerce revoked, pursuant to section 129 of the Uruguay Round Agreements Act (“URAA”), the countervailing duty order on France.³

First Five-Year Reviews. On January 3, 2005, the Commission instituted its first five-year reviews of the orders, and on April 8, 2005, the Commission determined that it would conduct full reviews. In November 2005, the Commission determined that revocation of the antidumping and countervailing duty orders on CTL plate from India, Indonesia, Italy, and South Korea and the antidumping duty order on CTL plate from Japan would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.⁴ The Commission also determined that revocation of the antidumping duty order on CTL plate from France would not be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.⁵ Commerce subsequently revoked the antidumping duty order on CTL plate from France, effective February 10, 2005.⁶

Second Five-Year Reviews. On November 1, 2010, the Commission instituted its second five-year reviews of the orders, and on February 4, 2011, the Commission determined that it would conduct full reviews. In December 2011, the Commission determined that revocation of the countervailing and antidumping duty orders on CTL plate from India, Indonesia, and South Korea would likely lead to the continuation or recurrence of material injury to a domestic industry within a reasonably foreseeable time.⁷ The Commission also determined that revocation of the countervailing and antidumping duty orders on CTL plate from Italy and the antidumping duty order on CTL plate from Japan would not be likely to lead to continuation or

³ Notice of Implementation Under Section 129 of the Uruguay Round Agreements Act; Countervailing Measures Concerning Certain Steel Products from the European Communities, 68 Fed. Reg. 64858 (Nov. 17, 2003).

Separately, pursuant to a changed circumstances review of the antidumping duty order on Japan, in which the domestic parties expressed no interest in the continuation of the order with respect to particular abrasion-resistant steel products, Commerce revoked the order in part on these products. *Notice of Final Results of Changed Circumstances Antidumping Duty Administrative Review, and Determination to Revoke the Order in Part: Certain Cut-to-Length Carbon-Quality Steel Plate Products from Japan*, 68 Fed. Reg. 9975 (Mar. 3, 2003).

⁴ Cut-to-Length Carbon-Quality Steel Plate from France, India, Indonesia, Italy, Japan, and Korea, Inv. Nos. 701-TA-388-391 and 731-TA-816-821 (Reviews), USITC Pub. 3816 (Nov. 2005) (“First Reviews”) at 1.

⁵ *First Reviews*, USITC Pub. 3816 at 1.

⁶ Revocation of Antidumping Duty Order: Certain Cut-to-Length Carbon-Quality Steel Plate from France, 70 Fed. Reg. 72787 (Dec. 7, 2005).

⁷ *Cut-to-Length Carbon-Quality Steel Plate from India, Indonesia, Italy, Japan, and Korea*, Inv. Nos. 701-TA-388-391 and 731-TA-817-821 (Second Review), USITC Pub. 4296 (Dec. 2011) (“Second Reviews”) at 1.

recurrence of material injury to an industry in the United States within a reasonably foreseeable time.⁸ Commerce subsequently revoked the antidumping duty orders on CTL plate from Italy and Japan and the countervailing duty order on CTL plate from Italy, effective January 4, 2012.⁹

Third Five-Year Reviews. On December 1, 2016, the Commission instituted its third five-year reviews of the orders, and on March 6, 2017, the Commission determined that it would conduct full reviews. In February 2018, the Commission determined that revocation of the countervailing and antidumping duty orders on CTL plate from India, Indonesia, and South Korea would likely lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.¹⁰

Current Five-Year Reviews. The Commission instituted these five-year reviews on February 1, 2023.¹¹ It received two responses to the notice of institution: one from Cleveland-Cliffs, Inc. (“Cleveland-Cliffs”) and one joint response from SSAB Enterprises, LLC (“SSAB”) and Nucor Corp. (“Nucor”), all of which are domestic producers of CTL plate (collectively, “Domestic Interested Parties”).¹² No respondent interested party responded to the notice of institution or participated in these reviews. On May 8, 2023, the Commission determined that the domestic interested party group response was adequate but that the respondent interested party group response was inadequate.¹³ Finding no other circumstances that would warrant conducting full reviews, the Commission determined to conduct expedited reviews of the countervailing and antidumping duty orders.¹⁴ SSAB and Nucor (jointly) and Cleveland-Cliffs submitted final

⁸ *Second Reviews*, USITC Pub. 4296 at 1.

⁹ Certain Cut-to-Length Carbon-Quality Steel Plate from Italy and Japan: Revocation of Antidumping and Countervailing Duty Orders, 77 Fed. Reg. 263 (Jan. 4, 2012).

¹⁰ *Cut-to-Length Carbon-Quality Steel Plate from India, Indonesia, and Korea*, Inv. Nos. 701-TA-388, 389, and 391 and 731-TA-817, 818, and 821 (Third Review), USITC Pub. 4764 (Feb. 2018) (“*Third Reviews*”) at 1.

¹¹ Cut-to-Length Carbon-Quality Steel Plate (CTL Plate) from India, Indonesia, and South Korea; Institution of Five-Year Reviews, 88 Fed. Reg. 6781 (Feb. 1, 2023).

¹² See Domestic Interested Party Cleveland-Cliffs’s Response to Notice of Institution, EDIS Doc. 791863 (Mar. 6, 2023) (“Cleveland-Cliffs Response”); Domestic Interested Parties SSAB and Nucor’s Joint Response to Notice of Institution, EDIS Doc. 791723 (Mar. 3, 2023) (“SSAB and Nucor Response”); Confidential Report, INV-VV-035 (Apr. 25, 2023) (“CR”) at I-2; Cut-to-Length Carbon-Quality Steel Plate from India, Indonesia, and South Korea, Inv. Nos. 701-TA-388, 389, and 391 and 731-TA-817, 818, and 821 (Fourth Review), USITC Pub. 5455 (Aug. 2023) (“PR”) at I-2.

¹³ Explanation of Commission Determinations on Adequacy in Cut-to-Length Carbon-Quality Steel Plate from India, Indonesia, and South Korea, EDIS Doc. 797110 (May 24, 2023).

¹⁴ Cut-to-Length Carbon-Quality Steel Plate (CTL Plate) from India, Indonesia, and South Korea; Scheduling of Expedited Five-Year Reviews, 88 Fed. Reg. 37098 (June 6, 2023).

comments pursuant to Commission Rule 207.62(d)(1) regarding the determination that the Commission should reach.¹⁵

U.S. industry data in these reviews are based on data provided by the Domestic Interested Parties in their responses to the notice of institution; these firms are estimated to have accounted for *** percent of total U.S. CTL plate production in 2022.¹⁶ U.S. import data and related data are based on Commerce’s official import statistics.¹⁷ Foreign industry data and related information are based on information from the original investigations and prior five-year reviews, information submitted by the Domestic Interested Parties in their responses to the notice of institution, and publicly available information compiled by the Commission.¹⁸ Additionally, three purchasers, ***, responded to the Commission’s adequacy phase questionnaire.¹⁹

II. Domestic Like Product and Industry

A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the “domestic like product” and the “industry.”²⁰ The Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and

¹⁵ Written Comments of Cleveland-Cliffs Inc., EDIS Doc. 800955 (July 27, 2023) (“Cleveland-Cliffs Final Comments”); Joint Final Comments, EDIS Doc. 800965 (July 27, 2023) (“SSAB and Nucor Final Comments”).

¹⁶ CR/PR at Tables I-2, I-4, I-5. This estimate was calculated by dividing the aggregate quantity of production of CTL plate in 2022 reported by the three responding firms (*** short tons) by total U.S. production of CTL plate in 2022, as reported by the *** (*** short tons). CR/PR at Table I-2, Note. We note that the ***. *See id.*

¹⁷ CR/PR at Tables I-6, I-7. Official Commerce statistics may be overstated, as the pertinent HTS statistical reporting numbers include products outside the scope of these reviews. *See* CR/PR at Table I-6, Note.

Additionally, POSCO, a manufacturer in South Korea, was excluded from the original antidumping and countervailing duty orders for South Korea. *Id.* Because official import statistics do not allow the Commission to distinguish between imports from subject and nonsubject sources within a country, data concerning subject imports from South Korea may be overstated in these reviews, while data concerning nonsubject imports, which would include nonsubject imports from South Korea, may be correspondingly understated. *Id.*

Due to the Commission’s negative determinations with respect to France in the first reviews and with respect to Italy and Japan in the second reviews, France is treated as a nonsubject source in 2010, 2016, and 2022, and Italy and Japan are treated as nonsubject sources in 2016 and 2022. CR/PR at Table I-7, Note. They are treated as subject sources in all prior years. *Id.*

¹⁸ CR/PR at Tables I-8-I-15.

¹⁹ CR/PR at D-3.

²⁰ 19 U.S.C. § 1677(4)(A).

uses with, the article subject to an investigation under this subtitle.”²¹ The Commission’s practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.²²

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

The products covered by the *Orders* are certain hot-rolled carbon-quality steel: (1) universal mill plates (*i.e.*, flat-rolled products rolled on four faces or in a closed box pass, of a width exceeding 150 mm but not exceeding 1250 mm, and of a nominal or actual thickness of not less than 4 mm, which are cut-to-length (not in coils and without patterns in relief) of iron or non-alloy quality steel); and (2) flat-rolled products, hot-rolled, of a nominal or actual thickness of 4.75 mm or more and of a width which exceeds 150 mm and measures at least twice the thickness, and which are cut-to-length (not in coils). Steel products included in the scope of the *Orders* are of rectangular, square, circular, or other shape and of rectangular or non-rectangular cross section where such non-rectangular cross-section is achieved subsequent to the rolling process (*i.e.*, products which have been “worked after rolling”) – for example, products which have been beveled or rounded at the edges. Steel products that meet the noted physical characteristics that are painted, varnished, or coated with plastic or other non-metallic substances are included within the scope. Also, specifically included in the scope of the *Orders* are high strength, low alloy (HSLA) steels. HSLA steels are recognized as steels with micro-alloying levels of elements such as chromium, copper, niobium, titanium, vanadium, and molybdenum.

Steel products included in the scope, regardless of Harmonized Tariff Schedule of the United States (HTSUS) definitions, are products in which: (1) iron predominates, by weight, over each of the other contained elements, (2) the

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

²² *See, e.g., Internal Combustion Industrial Forklift Trucks from Japan*, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8-9 (Dec. 2005); *Crawfish Tail Meat from China*, Inv. No. 731-TA-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).

carbon content is two percent or less, by weight, and (3) none of the elements listed below is equal to or exceeds the quantity, by weight, respectively indicated: 1.80 percent of manganese, or 1.50 percent of silicon, or 1.00 percent of copper, or 0.50 percent of aluminum, or 1.25 percent of chromium, or 0.30 percent of cobalt, or 0.40 percent of lead, or 1.25 percent of nickel, or 0.30 percent of tungsten, or 0.10 percent of molybdenum, or 0.10 percent of niobium, or 0.41 percent of titanium, or 0.15 percent of vanadium, or 0.15 percent of zirconium. All products that meet the written physical description, and in which the chemistry quantities do not equal or exceed any one of the levels listed above, are within the scope of the *Orders* unless otherwise specifically excluded.

The following products are specifically excluded from the *Orders*: (1) products clad, plated, or coated with metal, whether or not painted, varnished, or coated with plastic or other non-metallic substances; (2) SAE grades (formerly AISI grades) of series 2300 or above; (3) products made to ASTM A710 and A736 or their proprietary equivalents; (4) abrasion-resistant steels (*i.e.*, USS AR 400, USS AR 500); (5) products made to ASTM A202, A225, A514 grade S, A517 grade S, or their proprietary equivalents; (6) ball-bearing steels; (7) tool steels; and (8) silicon manganese steel or silicon electric steel.

The merchandise subject to these *Orders* is classified in the HTSUS under subheadings 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7208.53.0000, 7208.90.0000, 7210.70.3000, 7210.90.9000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7211.90.0000, 7212.40.1000, 7212.40.5000, 7212.50.0000, 7225.40.3050, 7225.40.7000, 7225.50.6000, 7225.99.0090, 7226.91.5000, 7226.91.7000, 7226.91.8000, and 7226.99.0000. The HTSUS subheadings are provided for convenience and customs purposes. The written description of the merchandise covered by the *Orders* is dispositive.²³

²³ Commerce memorandum from Scot Fullerton to Lisa W. Wang, Decision Memorandum for the Final Results of Expedited Fourth Sunset Reviews of the Antidumping Duty Orders on Certain Cut-to-Length Carbon-Quality Steel Plate from India, Indonesia, and the Republic of Korea, EDIS Doc. 798429 (May 26, 2023) (“Commerce AD I&D Memorandum”) at 2-3; Commerce memorandum from James Maeder to Lisa W. Wang, Issues and Decision Memorandum for the Final Results of the Fourth

CTL plate is used for welded load-bearing and structural applications. Common applications include bridgework, transmission towers and other load-bearing structures, mobile equipment, and heavy transportation equipment, such as railroad cars, ships, and barges.²⁴

1. The Original Investigations and Prior Five-Year Reviews

In the original investigations, the Commission found a single domestic like product corresponding to the scope. In the final phase of those investigations, the Commission considered whether grade X-70 CTL plate constituted a separate like product from other types of CTL plate products.²⁵ The Commission concluded that grade X-70 plate was not clearly distinct from all other types of CTL plate and constituted part of a continuum of CTL plate products included within the scope of the investigations. The Commission therefore adopted a single domestic like product definition, which included grade X-70 plate, micro-alloy steel plate, and plate cut from coils, coextensive with the scope.²⁶

In the three prior five-year reviews, the Commission found that there was no new information that would warrant the Commission revisiting the Commission's domestic like product finding from the original investigations. The Commission noted that responding parties to the reviews concurred with the Commission's domestic like product definition in the original investigations. Accordingly, the Commission continued to define a single domestic like product consisting of all domestically produced CTL plate coextensive with the scope description, including grade X-70 plate, micro-alloy plate, and plate cut from coils.²⁷

Expedited Sunset Review of the Countervailing Duty Order on Certain Cut-to-Length Carbon-Quality Steel Plate from India, EDIS Doc. 798430 (May 25, 2023) ("Commerce CVD I&D Memorandum") at 2-3.

²⁴ See generally CR/PR at I-18-25.

²⁵ In the preliminary phase of the original investigations, the Commission stated that it would not revisit its determination in *Certain Carbon Steel Plate from China, Russia, South Africa, and Ukraine*, Inv. Nos. 731-TA-753-756 (Final), USITC Pub. 3076 (Dec. 1997) ("*Carbon Steel Plate from Four Countries*") at 5-9, that the domestic like product included plate cut from coils but did not include coiled plate. The Commission thus found that plate cut from coils did not constitute a separate like product. *Certain Cut-to-Length Carbon Steel Plate from the Czech Republic, France, India, Indonesia, Italy, Japan, Korea, and Macedonia*, Inv. Nos. 701-TA-387-392 and 731-TA-815-822 (Preliminary), USITC Pub. 3181 (Apr. 1999) at 5-6 n.21.

The Commission also addressed whether micro-alloy CTL plate should be treated as a separate domestic like product. The Commission found that the differences between micro-alloy and non-alloy CTL plate were not so pronounced as to constitute clear dividing lines, whereas other alloy steel plate showed marked differences from both non-alloy and micro-alloy CTL plate. The Commission thus did not define micro-alloy as a separate domestic like product. *Id.* at 6-7. The Commission did not reconsider this issue in the final phase of the original investigations.

²⁶ *Original Investigations*, USITC Pub. 3273 at 5-7.

²⁷ *First Reviews*, USITC Pub. 3816 at 6; *Second Reviews*, USITC Pub. 4296 at 7; *Third Reviews*, USITC Pub. 4764 at 8.

2. The Current Reviews

In these expedited reviews, there is no new information on the record suggesting that the characteristics and uses of domestically produced CTL plate have changed since the prior reviews.²⁸ The Domestic Interested Parties agree with the Commission's domestic like product definition from the original investigations and prior reviews.²⁹ Accordingly, we again define a single domestic like product consisting of all domestically produced CTL plate, coextensive with the scope description, including X-70 plate, micro-alloy plate, and plate cut from coils.

B. Domestic Industry

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."³⁰ In defining the domestic industry, the Commission's general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

1. The Original Investigations and Prior Five-Year Reviews

In the original investigations, the Commission considered whether the domestic industry should include toll and non-toll processors that changed an out-of-scope product, coiled plate, into the domestic like product, CTL plate. Such processing is performed by steel service centers, using domestic or imported coiled plate as an input, uncoiling it, and cutting it to length to form CTL plate.³¹ The Commission found that these processors invest a significant amount of capital in relatively sophisticated processing operations and account for a significant percentage of overall employment of the U.S. industry, and their manufacturing equipment and processes are the same as that used by the domestic mills to produce CTL plate from coiled plate. Based on the significance of their production-related activities, the Commission determined to include processors in the domestic industry and noted that this conclusion was consistent with its prior determination in the 1997 CTL plate investigations.³² The Commission

²⁸ See generally CR/PR at I-18-25.

²⁹ Cleveland-Cliffs Response at 43; SSAB and Nucor Response at 39.

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

³¹ *Original Investigations*, USITC Pub. 3273 at 8-10.

³² *Original Investigations*, USITC Pub. 3273 at 8-10; see *Certain Carbon Steel Plate from Four Countries*, USITC Pub. 3076 at 9-12.

therefore defined the domestic industry to include all domestic producers of CTL plate, including processors.³³

In the three prior five-year reviews, the Commission stated that no party objected to the definition of the domestic industry from the original determinations, and no evidence was presented that would support a different finding. Accordingly, the Commission again defined the domestic industry to include all domestic producers of CTL plate, including processors.³⁴

2. The Current Reviews

The Domestic Interested Parties state that they agree with the definition of the domestic industry that the Commission adopted in the third five-year reviews.³⁵ No party has objected to the definition of the domestic industry from the original determinations, and there is no evidence on the record that would support a different finding.

We also must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to Section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise, or which are themselves importers.³⁶ Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.³⁷ The

³³ *Original Investigations*, USITC Pub. 3273 at 10.

³⁴ *First Reviews*, USITC Pub. 3816 at 7; *Second Reviews*, USITC Pub. 4296 at 8; *Third Reviews*, USITC Pub. 4764 at 9.

³⁵ See Cleveland-Cliffs Response at 43; SSAB and Nucor Response at 39.

³⁶ See *Torrington Co. v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int'l Trade 1992), *aff'd without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int'l Trade 1989), *aff'd mem.*, 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int'l Trade 1987).

³⁷ The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

- (1) The percentage of domestic production attributable to the importing producer;
- (2) The reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);
- (3) Whether inclusion or exclusion of the related party will skew the data for the rest of the industry;
- (4) The ratio of import shipments to U.S. production for the imported product; and
- (5) Whether the primary interest of the importing producer lies in domestic production or importation.

Changzhou Trina Solar Energy Co. v. USITC, 100 F. Supp.3d 1314, 1326-31 (Ct. Int'l. Trade 2015), *aff'd*, 839 F.3d 1377 (Fed. Cir. 2018); see also *Torrington Co. v. United States*, 790 F. Supp. at 1168.

Commission did not exclude any producer from the domestic industry as a related party under 19 U.S.C. § 1677(4)(B) in any of the prior proceedings.³⁸

In this review, although one domestic producer, JSW Steel USA, Inc. (“JSW”), is affiliated with a foreign producer of subject merchandise, ***,³⁹ there is no information on the record concerning whether *** exported subject merchandise to the United States during the period of review or directly or indirectly controlled JSW, as would be necessary for JSW to qualify as a related party. Even if JSW were to qualify as a related party, the record of these reviews does not contain the information necessary for us to assess whether appropriate circumstances exist for JSW’s exclusion because JSW did not respond to the notice of institution, nor is there any data concerning JSW’s domestic operations on the record that could be excluded from domestic industry data.

Consequently, consistent with our definition of the domestic like product, we define the domestic industry to include all U.S. producers of CTL plate, including processors.

³⁸ In the original investigations, the record gave rise to several related parties issues based on the ownership interests of firms in subject countries in eight domestic producers and the fact that certain domestic producers also imported or purchased large volumes of subject imports. The Commission found that in no instance did appropriate circumstances exist to exclude any of the various domestic producers from the domestic industry. *Original Investigations*, USITC Pub. 3273 at 11-13.

In the first five-year reviews, the Commission found that two U.S. mills were related to firms from subject countries by virtue of corporate ties, and two domestic producers also reported importing subject imports during the period examined. After an examination of all the facts and data on the record, the Commission determined that appropriate circumstances did not exist to warrant the exclusion of any of these firms from the domestic industry as a related party. *First Reviews*, USITC Pub. 3816 at 7-8.

In the second five-year reviews, the Commission found that two producers qualified as related parties, Evraz Claymont and Evraz Oregon, both of which were under the direct control of one corporate entity, Evraz Inc., North America (“Evraz NA”), and both had a corporate affiliation with an Italian producer of CTL plate. The Commission determined, based on the record and noting that no party requested any exclusions, that appropriate circumstances did not exist to warrant the exclusion of either firm from the domestic industry as a related party. *Second Reviews*, USITC Pub. 4296 at 8-10.

In the third five-year reviews, the Commission analyzed whether a domestic producer, JSW, was a related party on the basis of being affiliated with a subject foreign producer, ***, which it described as its “ultimate parent company.” The Commission found that there was no evidence on the record to determine whether direct or indirect control existed between the entities. Assuming *arguendo* that JSW was a related party by virtue of its corporate affiliation, the Commission found that appropriate circumstances did not exist to exclude it from the domestic industry because, among other things, JSW had not imported or purchased subject CTL plate and that no party had argued for its exclusion. *Third Reviews*, USITC Pub. 4764 at 9-11.

³⁹ SSAB and Nucor Response at 34-35.

III. Cumulation

A. Legal Standards

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

{T}he 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.⁴⁰

Cumulation is therefore discretionary in five-year reviews, unlike in original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.⁴¹ 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 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 each review was initiated effective the same day: February 1, 2023.⁴²

⁴⁰ 19 U.S.C. § 1675a(a)(7).

⁴¹ 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).

⁴² Initiation of Five-Year (Sunset) Reviews, 88 Fed. Reg. 6700 (Feb. 1, 2023).

B. The Prior Proceedings and Arguments of the Parties

1. The Original Investigations and Prior Reviews

In the original investigations, the Commission found a reasonable overlap of competition among subject imports from France, India, Indonesia, Italy, Japan, and South Korea and between the subject imports and the domestic like product, and therefore cumulated imports from all the subject countries for purposes of its material injury analysis.⁴³

In its first five-year reviews, the Commission did not find that subject imports from India, Indonesia, Italy, Japan, or South Korea would be likely to have no discernible adverse impact on the domestic industry if the orders were revoked.⁴⁴ The Commission also found that there would be a likely reasonable overlap of competition between subject imports and the domestic like product, and among subject imports themselves, if the orders were revoked.⁴⁵ The Commission did not find any significant differences in the likely conditions of competition among the subject countries, except for France.⁴⁶ Therefore, the Commission exercised its discretion to cumulate subject imports from India, Indonesia, Italy, Japan, and South Korea and declined to exercise its discretion to cumulate subject imports from France.⁴⁷

In the second five-year reviews, the Commission did not find that subject imports from India, Indonesia, Italy, Japan, or South Korea would be likely to have no discernible adverse impact on the domestic industry if the orders were revoked.⁴⁸ The Commission found that there would be a likely reasonable overlap of competition between subject imports and the domestic like product, and among subject imports themselves, if the orders were revoked.⁴⁹ The Commission did not find any significant differences in the likely conditions of competition among the subject imports from India, Indonesia, and South Korea and consequently exercised its discretion to cumulate subject imports from these countries.⁵⁰ The Commission, however, found that certain factors indicated that subject imports from Italy and Japan were likely to

⁴³ *Original Investigations*, USITC Pub. 3273 at 14-18.

⁴⁴ *First Reviews*, USITC Pub. 3816 at 9-15. Because the Commission declined to cumulate subject imports from France on the basis of differences in likely conditions of competition, it found it unnecessary to decide the issue of no discernible adverse impact with respect to subject imports from France. *Id.* at 9-10.

⁴⁵ *First Reviews*, USITC Pub. 3816 at 18-19.

⁴⁶ *First Reviews*, USITC Pub. 3816 at 19-20.

⁴⁷ *First Reviews*, USITC Pub. 3816 at 21.

⁴⁸ *Second Reviews*, USITC Pub. 4296 at 13 (India), 14 (Indonesia), 15 (Italy), 16 (Japan), 17 (South Korea).

⁴⁹ *Second Reviews*, USITC Pub. 4296 at 20.

⁵⁰ *Second Reviews*, USITC Pub. 4296 at 23.

compete in the U.S. market under significantly different conditions of competition from subject imports from the other countries if the orders were revoked.⁵¹ Therefore, the Commission exercised its discretion to cumulate subject imports from India, Indonesia, and South Korea and declined to exercise its discretion to cumulate subject imports from Italy and Japan.⁵²

In the third five-year reviews, the Commission did not find that subject imports from India, Indonesia, or South Korea would be likely to have no discernible adverse impact on the domestic industry if the orders were revoked.⁵³ The Commission found that there would be a likely reasonable overlap of competition between subject imports from each source and the domestic like product, and among subject imports themselves, if the orders were revoked.⁵⁴ Additionally, the Commission did not find any significant differences in the likely conditions of competition among the subject imports from India, Indonesia, and South Korea.⁵⁵ Therefore, the Commission exercised its discretion to cumulate subject imports from India, Indonesia, and South Korea.⁵⁶

2. Party Arguments

In these reviews, the Domestic Interested Parties argue that the Commission should again exercise its discretion to cumulate subject imports from India, Indonesia, and South Korea.⁵⁷ They assert that revocation of the orders on imports from each subject country would have a discernible adverse impact on the domestic industry.⁵⁸ Additionally, they claim that there would likely be a reasonable overlap of competition between and among subject imports from India, Indonesia, and South Korea and the domestic like product if the orders were revoked because the pertinent facts have not changed since the original investigations.⁵⁹ They also argue that subject imports from each country source would likely compete under similar conditions of competition after revocation.⁶⁰

⁵¹ *Second Reviews*, USITC Pub. 4296 at 21-23.

⁵² *Second Reviews*, USITC Pub. 4296 at 23.

⁵³ *Third Reviews*, USITC Pub. 4764 at 15 (India), 16 (Indonesia), 18 (South Korea).

⁵⁴ *Third Reviews*, USITC Pub. 4764 at 18-19.

⁵⁵ *Third Reviews*, USITC Pub. 4764 at 19-20.

⁵⁶ *Third Reviews*, USITC Pub. 4764 at 20.

⁵⁷ Cleveland-Cliffs Response at 15-24; SSAB and Nucor Response at 12-13.

⁵⁸ Cleveland-Cliffs Response at 16-21; SSAB and Nucor Response at 12.

⁵⁹ Cleveland-Cliffs Response at 21-24; SSAB and Nucor Response at 12-13.

⁶⁰ Cleveland-Cliffs Response at 24; SSAB and Nucor Response at 12-13.

C. Analysis

1. Likely 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.⁶¹ Neither the statute nor the 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.⁶² 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 find that imports from each subject country are not likely to have no discernible adverse impact on the domestic industry in the event of revocation of the corresponding orders.

India. During the original period of investigation, the volume of subject imports from India increased from 38,081 short tons in 1996 to 130,846 short tons in 1997 and 137,735 short tons in 1998.⁶³ In the first five-year reviews, the volume of subject imports from India declined from 6,462 short tons in 1999 to 1,585 short tons in 2004.⁶⁴ In the second five-year reviews, the volume of subject imports from India declined from 3,856 short tons in 2005 to 32 short tons in 2010.⁶⁵ In the third five-year reviews, the volume of subject imports from India increased from *** short tons in 2014 to *** short tons in 2016.⁶⁶ During the current period of review, subject imports from India remained present in the U.S. market, with volumes ranging from a low of 757 short tons in 2019 to a high of 3,241 short tons in 2022,⁶⁷ which accounted for *** percent of apparent U.S. consumption.⁶⁸

The current reviews contain limited information concerning the industry in India producing CTL plate because no producer in India responded to the notice of institution. The Domestic Interested Parties have identified 17 firms they believe to be producers of CTL plate in

⁶¹ 16 U.S.C. § 1675a(a)(7).

⁶² SAA, H.R. Rep. No. 103-316, vol. I at 887 (1994).

⁶³ CR/PR at Appendix C.

⁶⁴ CR/PR at Appendix C.

⁶⁵ CR/PR at Appendix C.

⁶⁶ CR/PR at Appendix C.

⁶⁷ CR/PR at Table I-6. Import volumes are based on official import statistics.

⁶⁸ CR/PR at Table I-7.

India.⁶⁹ In prior reviews, the Commission found that the Indian CTL plate industry possessed substantial excess capacity and was export oriented.⁷⁰ Additionally, the Commission found in the original investigations that hot-rolled sheet, strip, and coiled plate were produced on the same equipment used to produce CTL plate, and in the first five-year reviews, the Commission noted that hot-rolled steel production in India had increased.⁷¹ The information available in these reviews indicates that the subject Indian industry maintains substantial capacity to produce CTL plate and expanded its capacity during the period of review.⁷² According to *Global Trade Atlas* (“GTA”) data, in 2022, India was the world’s eleventh largest exporter of CTL plate, a category including subject CTL plate as well as out-of-scope merchandise, and India’s exports of such merchandise increased irregularly over the period of review, from 1.25 million short tons in 2017 to 1.34 million short tons in 2022.⁷³ In addition, the European Union, Mexico, Morocco, Thailand, and the United Kingdom imposed or extended trade measures covering CTL plate from India during the period of review.⁷⁴

⁶⁹ *Cleveland-Cliffs Response* at Exhibit 10; *SSAB and Nucor Response* at Exhibit 1; CR/PR at I-39.

⁷⁰ *First Reviews*, USITC Pub. 3816 at 11; *Second Reviews*, USITC Pub. 4296 at 13; *Third Reviews*, USITC Pub. 4764 at 14-15. In 2016, the Commission found that the subject Indian industry’s production was *** short tons, its excess capacity was over *** short tons, and its exports were 806,000 short tons. *Cut-to-Length Carbon-Quality Steel Plate from India, Indonesia, and Korea, Investigation Nos. 701-TA-388, 389, and 391 and 731-TA-817, 818, and 821 (Third Review)*, EDIS Doc. 793809 (Apr. 5, 2023) (“*Confidential Third Reviews*”) at 19-20.

⁷¹ *First Reviews*, USITC Pub. 3816 at 12.

⁷² See CR/PR at Table I-8. Cleveland-Cliffs reports that in January 2023, an Indian producer’s plate mill set a monthly production record. *Cleveland-Cliffs Response* at 18. SSAB and Nucor report that the Indian steel industry, which already possesses the second-largest steel production capacity in the world, has set a goal to more than double its capacity by 2030. *SSAB and Nucor Response* at 16. Additionally, multiple Indian CTL plate producers have announced plans to increase their capacity, and several acquisitions have been announced by Indian producers. *Id.* at 16-19.

⁷³ CR/PR at Table I-15.

⁷⁴ CR/PR at Table I-14. In June 2021, the European Union extended three-year safeguard tariff rate quotas on certain steel products, including CTL plate, for various countries, including India, for another three years to June 2024, and in December 2022, the European Union initiated a review of whether to end this extension one year earlier through June 2023. *Id.* In November 2021, Mexico announced a temporary import duty of 15 percent ad valorem on certain iron and steel products, including CTL plate, for all countries except Canada and the United States, which declined to 5 percent, effective September 23, 2022, and will be revoked, effective October 1, 2024. *Id.* In December 2020, CTL plate from India became subject to safeguard duties imposed by Morocco on hot-rolled steel sheets and plates, including CTL plate, with rates ranging from 25 percent ad valorem in 2020 to 23 percent ad valorem in 2023, and Morocco initiated a review of whether to extend these duties in January 2023. *Id.* In February 2019 and June 2020, Thailand terminated certain safeguard duties on CTL plate from India, and in June 2021, Thailand extended antidumping duty orders for five years on hot-rolled flat steel, including CTL plate, from India, with rates ranging from 20.02 to 31.92 percent ad valorem. *Id.* In

In the original investigations, the Commission found that subject imports from India undersold the domestic like product in 24 of 26 quarterly comparisons (involving *** short tons), with an average margin of underselling of 9.5 percent, and oversold the domestic like product in the remaining two instances (*** short tons).⁷⁵ No product-specific pricing data concerning subject imports from India were obtained in any of the subsequent reviews, including the current reviews.

In light of the foregoing, including the significant and increasing volume of subject imports in the original investigations, the continued presence of subject imports from India in the U.S. market while under the disciplining effect of the orders, the size of the Indian industry and its substantial volume of exports, and the underselling by subject imports from India during the original investigations, we find that subject imports from India would not likely have no discernible adverse impact on the domestic industry if the antidumping and countervailing duty orders covering these imports were revoked.

Indonesia. During the original investigations, the volume of subject imports of CTL plate from Indonesia increased from 13,667 short tons in 1996 to 59,837 short tons in 1997 and 168,098 short tons in 1998.⁷⁶ In the first five-year reviews, the volume of subject imports of CTL plate from Indonesia decreased from 39,553 short tons in 1999 to 627 short tons in 2004.⁷⁷ In the second five-year reviews, the volume of subject imports of CTL plate decreased from 2,682 short tons in 2005 to zero short tons in 2010.⁷⁸ In the third five-year reviews, there were *** of CTL plate from Indonesia.⁷⁹ During the current period of review, subject imports from Indonesia were absent from the U.S. market in 2017, 2018, and 2022, but were 69 short tons in 2019, six short tons in 2020, and three short tons in 2021.⁸⁰

The current reviews contain limited information concerning the industry in Indonesia producing CTL plate because no producer in Indonesia responded to the notice of institution. The Domestic Interested Parties have identified four firms they believe to be producers of CTL plate in Indonesia.⁸¹ In the prior reviews, the Commission found that the Indonesian CTL plate

October 2021, the United Kingdom determined that India was subject to safeguard tariff rate quotas on certain steel products, including CTL plate, from various countries imposed in July 2021. *Id.*

⁷⁵ *Original Investigations*, USITC Pub. 3273 at V-27.

⁷⁶ CR/PR at Appendix C.

⁷⁷ CR/PR at Appendix C.

⁷⁸ CR/PR at Appendix C.

⁷⁹ CR/PR at Appendix C.

⁸⁰ CR/PR at Table I-6.

⁸¹ *Cleveland-Cliffs Response* at Exhibit 10; *SSAB and Nucor Response* at Exhibit 1; CR/PR at I-44.

industry possessed substantial unused capacity and was export oriented.⁸² The information available in these reviews indicates that the subject Indonesian industry maintains substantial capacity to produce CTL plate, including excess capacity, and expanded its capacity during the period of review.⁸³ According to GTA data, in 2022, Indonesia was the world's twelfth-largest exporter of CTL plate, a category including subject CTL plate as well as out-of-scope merchandise, and Indonesia's exports of such merchandise increased irregularly from 567,251 short tons in 2017 to 734,288 short tons in 2022.⁸⁴ In addition, Canada, the European Union, Mexico, Morocco, Taiwan, and Thailand imposed or extended trade measures on CTL plate from Indonesia during the period of review.⁸⁵

In the original investigations, the Commission found that subject imports from Indonesia undersold the domestic like product in all 39 quarterly comparisons (involving *** short tons), with an average margin of underselling of 13.1 percent.⁸⁶ No product-specific pricing data

⁸² *First Reviews*, USITC Pub. 3816 at 12; *Second Reviews*, USITC Pub. 4296 at 13-14; *Third Reviews*, USITC Pub. 4764 at 15-16. In 2016, the Commission found that the subject Indonesian industry's production was *** short tons, its reported annual production capacity was *** short tons, its capacity utilization was *** percent, its total exports were *** short tons, and its total exports as percentage of shipments was *** percent. *Confidential Third Reviews* at 21-22.

⁸³ See CR/PR at Table I-10. Cleveland-Cliffs reports that Indonesia's state-run steelmaker agreed to spend \$3.5 billion over the next five years to build a second blast furnace in Indonesia. *Cleveland-Cliffs Response* at 19. SSAB and Nucor report that Indonesian producers maintain a substantial capacity of CTL plate and have recently announced capacity expansions, despite capacity utilization of less than 60 percent in 2021. *SSAB and Nucor Response* at 20-22.

⁸⁴ CR/PR at Table I-15.

⁸⁵ CR/PR at Table I-14. In March 2020, Canada extended antidumping duty orders on steel plates in cut lengths, including CTL plate, from Indonesia, with a 59.7 percent ad valorem. *Id.* In June 2021, the European Union extended three-year safeguard tariff rate quotas on certain steel products, including CTL plate, for various countries, including Indonesia, for another three years to June 2024, and in December 2022, the European Union initiated a review of whether to end this extension one year earlier through June 2023. *Id.* In November 2021, Mexico announced a temporary import duty of 15 percent ad valorem on certain iron and steel products, including CTL plate, for all countries except Canada and the United States, effective November 23, 2021, which declined to 5 percent, effective September 23, 2022, and will be revoked, effective October 1, 2024. *Id.* In June 2020, Morocco imposed safeguard duties on hot-rolled steel sheets and plates, including CTL plate, from various countries, including Indonesia, to last three years, with rates ranging from 25 percent ad valorem in 2020 to 23 percent ad valorem in 2023, and Morocco initiated a review of these duties to extend this timeline in January 2023. *Id.* In August 2021, Taiwan initiated a review of antidumping duty orders on carbon steel plate in cut lengths, including in-scope CTL plate, from Indonesia, with rates ranging from 42.91 to 46.84 percent ad valorem. *Id.* In June 2021, Thailand extended antidumping duty orders for five years on hot-rolled flat steel, including CTL plate, from Indonesia, with a rate of 24.48 percent ad valorem. *Id.*

⁸⁶ *Original Investigations*, USITC Pub. 3273 at V-27.

concerning subject imports from Indonesia were obtained in any of the subsequent reviews, including the current reviews.

In light of the foregoing, including the significant and increasing volume of subject imports from Indonesia in the original investigations, the size of the Indonesian industry and its substantial volume of exports, and the underselling by subject imports from Indonesia during the original investigations, we find that subject imports from Indonesia would not likely have no discernible adverse impact on the domestic industry if the antidumping and countervailing duty orders covering these imports were revoked.

South Korea. During the original period of investigation, the volume of subject imports from South Korea decreased from 28,495 short tons in 1996 to 25,432 short tons in 1997, before increasing to 352,056 short tons in 1998.⁸⁷ In the first five-year reviews, the volume of subject imports from South Korea declined from *** short tons in 1999 to *** short tons in 2004.⁸⁸ In the second five-year reviews, the volume of subject imports from South Korea declined from *** short tons in 2005 to *** short tons in 2010.⁸⁹ In the third five-year reviews, the volume of subject imports from South Korea increased from *** short tons in 2014 to *** short tons in 2015 and *** short tons in 2016.⁹⁰ During the current period of review, subject imports from South Korea remained present in the U.S. market, with volumes ranging from a low of 124,489 short tons in 2020 to a high of 280,286 short tons in 2017.⁹¹ In 2022, subject imports from South Korea were 276,387 short tons, accounting for *** percent of apparent U.S. consumption.⁹²

The current reviews contain limited information concerning the industry in South Korea producing CTL plate because no producer in South Korea responded to the notice of institution.⁹³ The Domestic Interested Parties have identified 23 firms they believe to be

⁸⁷ CR/PR at Appendix C. Data from the original investigations may include data from nonsubject producer POSCO. *Id.* at Table I-7, Note.

⁸⁸ CR/PR at Appendix C.

⁸⁹ CR/PR at Appendix C.

⁹⁰ CR/PR at Appendix C.

⁹¹ CR/PR at Table I-6. As noted above, POSCO, a manufacturer in South Korea, was excluded from the original antidumping and countervailing duty orders for South Korea. *Id.* at Table I-7, Note. Because import data based on official import statistics do not distinguish between imports from subject and nonsubject sources within South Korea, data for subject imports from South Korea may be overstated, while data for imports from nonsubject sources may be correspondingly understated. *Id.* In 2016, as reported in the third reviews, *** percent of U.S. imports from South Korea were from nonsubject sources. *Id.* at I-35, Table I-6, Note.

⁹² CR/PR at Table I-7.

⁹³ We note that the volume of subject imports from South Korea allowed under the Section 232 absolute quota category on CTL plate (223,252 short tons) is equivalent to approximately *** percent of

producers of CTL plate in South Korea.⁹⁴ In the prior reviews, the Commission found that the South Korean CTL plate industry possessed substantial unused capacity and was export oriented.⁹⁵ The information available in these reviews indicates that the subject South Korean industry maintains substantial capacity to produce CTL plate and expanded its capacity during the period of review.⁹⁶ According to GTA data, in 2022, South Korea exported 5.0 million short tons and was the world's third-largest exporter of CTL plate, a category including subject CTL plate as well as out-of-scope merchandise.⁹⁷ Also according to these data, South Korea exported 376,008 short tons of CTL plate to the United States in 2022, making the United States South Korea's fourth largest destination market for exports of CTL plate that year.⁹⁸ In addition, Brazil, Canada, the European Union, Mexico, Morocco, Taiwan, Thailand, Turkey, and the United Kingdom imposed or extended trade measures on CTL plate from South Korea during the period of review.⁹⁹

apparent U.S. consumption in 2022. *Calculated from* CR/PR at Table I-7. The CTL plate quota category covers imports under 12 HTS statistical reporting numbers but CTL plate is also imported under several additional HTS reporting numbers that are included in separate Section 232 quota categories. *See* CR/PR at I-17 n.38. Accordingly, the Section 232 absolute quotas on CTL plate imports from South Korea will not likely cause subject imports from South Korea to have no discernible adverse impact on the domestic industry. We note, as discussed below, that subject imports from South Korea undersold the domestic like product in the original investigations and in the prior periods of review. In addition, the continued presence of subject imports from South Korea indicates that South Korean producers remain interested in the U.S. market and maintain U.S. customers and distribution networks, which would facilitate their sales in the U.S. market after revocation.

⁹⁴ *Cleveland-Cliffs Response* at Exhibit 10; *SSAB and Nucor Response* at Exhibit 1; CR/PR at I-48.

⁹⁵ *First Reviews*, USITC Pub. 3816 at 15; *Second Reviews*, USITC Pub. 4296 at 16-17; *Third Reviews*, USITC Pub. 4764 at 17-18. In 2016, the Commission found that the subject South Korean industry's estimated production was *** short tons, its excess capacity was over *** short tons, and its exports were 602,643 short tons. *Confidential Third Reviews* at 23-24.

⁹⁶ *See* CR/PR at Table I-12. The Domestic Interested Parties claim that the subject South Korean industry possesses capacity of 5.5 million short tons. *SSAB and Nucor Response* at 24-25.

⁹⁷ CR/PR at Tables I-13, I-15. These figures include exports from nonsubject producer POSCO and thus may be overstated.

⁹⁸ CR/PR at Tables I-13.

⁹⁹ CR/PR at Table I-14. In October 2019, Brazil extended antidumping duty orders on heavy steel plates in cut lengths, including CTL plate, from South Korea, with a rate of \$135.84 per metric ton ad valorem. *Id.* In March 2020, Canada extended antidumping duty orders on steel plates in cut lengths, including CTL plate, from South Korea, with margin rates ranging from 1.9 to 59.7 percent ad valorem. *Id.* In June 2021, the European Union extended three-year safeguard tariff rate quotas on certain steel products, including CTL plate, for various countries, including South Korea, for another three years to June 2024, and in December 2022, the European Union initiated a review of whether to end this extension one year earlier through June 2023. *Id.* In November 2021, Mexico announced a temporary import duty of 15 percent ad valorem on certain iron and steel products, including CTL plate, for all countries except Canada and the United States, which declined to 5 percent, effective September 23,

In the original investigations, the Commission found that subject imports from South Korea undersold the domestic like product in 23 of 41 quarterly comparisons (involving *** short tons), with an average margin of underselling of 10.5 percent, and oversold the domestic like product in the remaining 18 instances (involving *** short tons).¹⁰⁰ In the first reviews, the Commission found that subject imports from South Korea undersold the domestic like product in 44 of 52 quarterly comparisons (involving *** short tons), with margins of underselling ranging from *** to *** percent, and oversold the domestic like product in the remaining 8 instances (*** short tons).¹⁰¹ In the second reviews, the Commission found that subject imports from South Korea undersold the domestic like product in 36 of 61 quarterly comparisons (involving *** short tons), with an average margin of underselling of 9.5 percent, and oversold the domestic like product in the remaining 25 instances (*** short tons).¹⁰² In the third reviews, the Commission found that subject imports from South Korea undersold the domestic like product in 2 of 12 quarterly comparisons (involving *** short tons), with margins of underselling ranging from *** percent to *** percent, and oversold the domestic like product in the remaining 10 instances (*** short tons).¹⁰³ No product-specific pricing data concerning subject imports from South Korea were obtained in the current reviews.

In light of the foregoing, including the significant and increasing volume of subject imports from South Korea in the original investigations, the continued presence of subject imports from South Korea in the U.S. market while under the disciplining effect of the orders, the size of the South Korean industry and its substantial volume of exports, and the underselling by subject imports from South Korea during the original investigations and prior reviews, we find that subject imports from South Korea would not likely have no discernible

2022, and will be revoked, effective October 1, 2024. *Id.* In June 2020, Morocco imposed safeguard duties on hot-rolled steel sheets and plates, including CTL plate, from nearly all countries, including South Korea, with rates ranging from 25 percent ad valorem in 2020 to 23 percent ad valorem in 2023, and Morocco initiated a review of these duties to extend this timeline in January 2023. *Id.* In August 2021, Taiwan initiated a review of antidumping duty orders on carbon steel plate in cut lengths, including CTL plate, from South Korea, with rates ranging from 70.25 to 77.30 percent ad valorem. *Id.* In June 2021, Thailand extended antidumping duty orders for five years on hot-rolled flat steel, including CTL plate, from South Korea, with rates ranging from 2.81 to 58.85 percent ad valorem. *Id.* In July 2022, Turkey imposed antidumping duty orders on hot-rolled flat steel products, including CTL plate, from South Korea, with rates ranging from 8.95 to 14.62 percent ad valorem. *Id.* In July 2021, the United Kingdom imposed safeguard tariff rate quotas on certain steel products, including CTL plate, from various countries, including South Korea. *Id.*

¹⁰⁰ *Original Investigations*, USITC Pub. 3273 at V-33.

¹⁰¹ *Second Reviews*, USITC Pub. 4296 at 17.

¹⁰² *Second Reviews*, USITC Pub. 4296 at 17.

¹⁰³ *Third Reviews*, USITC Pub. 4764 at 17; Confidential Third Reviews at 24.

adverse impact on the domestic industry if the antidumping and countervailing duty orders covering these imports were revoked.

2. Likelihood of a Reasonable Overlap of Competition

The Commission generally has considered four factors intended to provide a framework for determining whether subject imports compete with each other and with the domestic like product.¹⁰⁴ Only a “reasonable overlap” of competition is required.¹⁰⁵ In five-year reviews, the relevant inquiry is whether there likely would be competition even if none currently exists because the subject imports are absent from the U.S. market.¹⁰⁶

Fungibility. In the original investigations and subsequent reviews, the Commission found that subject imports from India, Indonesia, and South Korea were fungible with both the domestic like product and with each other.¹⁰⁷ The Commission found that CTL plate produced in the United States was highly, although not perfectly, interchangeable with CTL plate produced in the subject countries.¹⁰⁸ It also rejected arguments by respondents that their imports were only “niche” products sold in types and thicknesses that did not overlap with those of the U.S. producers, finding instead that most sales of CTL plate occurred in commodity grades and in overlapping thicknesses.¹⁰⁹ In the first and second reviews, the Commission

¹⁰⁴ 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).

¹⁰⁵ *See Mukand Ltd. v. United States*, 937 F. Supp. 910, 916 (Ct. Int’l Trade 1996); *Wieland Werke*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”); *United States Steel Group v. United States*, 873 F. Supp. 673, 685 (Ct. Int’l Trade 1994), *aff’d*, 96 F.3d 1352 (Fed. Cir. 1996). We note, however, that there have been investigations where the Commission has found an insufficient overlap in competition and has declined to cumulate subject imports. *See, e.g., Live Cattle from Canada and Mexico*, Inv. Nos. 701-TA-386 and 731-TA-812-13 (Preliminary), USITC Pub. 3155 at 15 (Feb. 1999), *aff’d sub nom., Ranchers-Cattlemen Action Legal Foundation v. United States*, 74 F. Supp. 2d 1353 (Ct. Int’l Trade 1999); *Static Random Access Memory Semiconductors from the Republic of Korea and Taiwan*, Inv. Nos. 731-TA-761-62 (Final), USITC Pub. 3098 at 13-15 (Apr. 1998).

¹⁰⁶ *See generally, Cheflene Corp. v. United States*, 219 F. Supp. 2d 1313, 1314 (Ct. Int’l Trade 2002).

¹⁰⁷ *Original Investigations*, USITC Pub. 3273 at 15-17; *First Reviews*, USITC Pub. 3816 at 16-17; *Second Reviews*, USITC Pub. 4296 at 18; *Third Reviews*, USITC Pub. 4764 at 18.

¹⁰⁸ *Original Investigations*, USITC Pub. 3273 at 15.

¹⁰⁹ *Original Investigations*, USITC Pub. 3273 at 15.

found that although there were some differences between domestic CTL plate and subject imports, there was nevertheless a “moderate to high degree of substitution,” with a majority of responding purchasers reporting that domestic and subject CTL plate from each source were comparable in terms of many purchasing factors.¹¹⁰ In the third reviews, the Commission found that all responding U.S. producers and a majority of responding U.S. importers and purchasers reported that the domestic like product and subject imports were either always or frequently interchangeable, and that a majority of responding firms also reported that differences other than price between CTL plate from domestic and subject sources were sometimes or never significant.¹¹¹

There is no new information on the record in these reviews to indicate that there has been any change in the fungibility of subject imports from India, Indonesia, and South Korea with each other and with the domestic like product.¹¹² The Domestic Interested Parties claim that subject imports from India, Indonesia, and South Korea continue to be fungible with the domestic like product and with each other.¹¹³

Channels of Distribution. In the original investigations and subsequent reviews, the Commission found that imports from subject countries and the domestic like product were sold in similar channels of distribution, mostly to end users, distributors, and service centers.¹¹⁴

There is no new information on the record in these reviews to indicate any change from the Commission’s previous findings that subject imports from India, Indonesia, and South Korea and the domestic like product would likely overlap with respect to channels of distribution following revocation of the orders.

Geographic Overlap. In the original investigations and subsequent reviews, the Commission found that subject imports from India, Indonesia, and South Korea, and the domestic like product, were sold in overlapping geographical markets.¹¹⁵

In these reviews, subject imports from India entered through every border of entry in 2018 and 2022; the eastern, northern, and southern borders of entry in 2019 and 2021; and the eastern and northern borders in 2017 and 2020.¹¹⁶ Subject imports from Indonesia entered

¹¹⁰ *First Reviews*, USITC Pub. 3816 at 16; *Second Reviews*, USITC Pub. 4296 at 18.

¹¹¹ *Third Reviews*, USITC Pub. 4764 at 18.

¹¹² See generally CR/PR at I-36.

¹¹³ Cleveland-Cliffs Response at 21-22; SSAB and Nucor Response at 12-13.

¹¹⁴ *Original Investigations*, USITC Pub. 3273 at 17; *First Reviews*, USITC Pub. 3816 at 17-18; *Second Reviews*, USITC Pub. 4296 at 18-19; *Third Reviews*, USITC Pub. 4764 at 18-19.

¹¹⁵ *Original Investigations*, USITC Pub. 3273 at 17; *First Reviews*, USITC Pub. 3816 at 18; *Second Reviews*, USITC Pub. 4296 at 19; *Third Reviews*, USITC Pub. 4764 at 19.

¹¹⁶ CR/PR at I-36.

through southern borders of entry in 2019, 2020, and 2021.¹¹⁷ Between 2017 and 2022, subject imports from South Korea entered through all borders of entry.¹¹⁸ Thus, the record indicates that subject imports from India, Indonesia, and South Korea continued to overlap with each other and with the domestic like product in terms of geographic markets during the period of review.

Simultaneous Presence in Market. In the original investigations and first and second reviews, the Commission found that subject imports from India, Indonesia, and South Korea and the domestic like product were present in the U.S. market throughout the relevant periods.¹¹⁹ In the third five-year reviews, the Commission found that subject imports of CTL plate from India were present in *** months, and subject imports from South Korea were present in *** months, although imports of subject CTL plate from Indonesia were absent throughout the period of review.¹²⁰

In these reviews, with the orders in place, between 2017 and 2022, imports of CTL plate from India were present in 69 of the 72 months, imports from Indonesia were present in three months, and imports from South Korea were present in all 72 months.¹²¹

Conclusion. The record in these expedited reviews contains limited information concerning subject imports in the U.S. market during the current period of review. However, the record contains no information suggesting a change in the considerations that led the Commission in the original investigations and prior reviews to conclude that there was a reasonable overlap of competition between and among subject imports from India, Indonesia, and South Korea and the domestic like product. In light of this, and absent any contrary argument, we find that there would likely be a reasonable overlap of competition between subject imports from India, Indonesia, and South Korea and between the domestic like product and subject imports from each source if the orders were revoked.

3. Other Likely Conditions of Competition

In determining whether to exercise our discretion to cumulate the subject imports, we assess whether the subject imports from each group of subject countries for which we have found there is a likely reasonable overlap of competition are likely to compete under similar conditions in the U.S. market in the event of revocation. The record in these expedited reviews

¹¹⁷ CR/PR at I-36.

¹¹⁸ CR/PR at I-36.

¹¹⁹ *Original Investigations*, USITC Pub. 3273 at 18; *First Reviews*, USITC Pub. 3816 at 18-19; *Second Reviews*, USITC Pub. 4296 at 20.

¹²⁰ Third Reviews, USITC Pub. 4764 at 20; Confidential Third Reviews at 27.

¹²¹ CR/PR at I-36.

contains limited current information about the U.S. market for CTL plate and the CTL plate industries in the subject countries. Based on the information available, and the absence of any argument to the contrary, we do not find any likely significant difference in conditions of competition to warrant not cumulating subject imports from India, Indonesia, and South Korea.

4. Conclusion

In sum, we determine that subject imports of CTL plate from India, Indonesia, and South Korea, considered individually, would not likely have no discernible adverse impact on the domestic industry if the corresponding orders were revoked. We also find a likely reasonable overlap of competition among subject imports from India, Indonesia, and South Korea and between the subject imports from each subject country and the domestic like product. Finally, we find that subject imports from India, Indonesia, and South Korea are likely to compete in the U.S. market under similar conditions of competition should the orders be revoked. We therefore exercise our discretion to cumulate subject imports from India, Indonesia, and South Korea 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 duty order unless: (1) it makes a determination that dumping is likely to continue or recur, and (2) the Commission makes a determination that revocation of the antidumping duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”¹²² 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.”¹²³ Thus, the likelihood standard is prospective in nature.¹²⁴ The CIT has found that

¹²² 19 U.S.C. § 1675a(a).

¹²³ 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.

“likely,” as used in the five-year review provisions of the Act, means “probable,” and the Commission applies that standard in five-year reviews.¹²⁵

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.”¹²⁶ 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.”¹²⁷

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.”¹²⁸ 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).¹²⁹ The statute further provides

¹²⁴ 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.

¹²⁵ See *NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int’l Trade 2003) (“‘likely’ means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)”), *aff’d mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) (“more likely than not” standard is “consistent with the court’s opinion;” “the court has not interpreted ‘likely’ to imply any particular degree of ‘certainty’”); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) (“standard is based on a likelihood of continuation or recurrence of injury, not a certainty”); *Usinor v. United States*, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

¹²⁶ 19 U.S.C. § 1675a(a)(5).

¹²⁷ 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.*

¹²⁸ 19 U.S.C. § 1675a(a)(1).

¹²⁹ 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings with respect to the orders under review. *Commerce AD I&D Memorandum* at 4.

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.¹³⁰

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.¹³¹ 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.¹³²

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.¹³³

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

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

¹³¹ 19 U.S.C. § 1675a(a)(2).

¹³² 19 U.S.C. § 1675a(a)(2)(A-D).

¹³³ 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.

more advanced version of the domestic like product.¹³⁴ All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the order under review and whether the industry is vulnerable to material injury upon revocation.¹³⁵

No respondent interested party participated in these expedited reviews. The record, therefore, contains limited new information with respect to the CTL plate industries in India, Indonesia, and South Korea. There is also limited information on the market in the United States for CTL plate during the period of review. Accordingly, for our determinations, we rely as appropriate on the facts available from the original investigations and prior reviews, publicly available information gathered by the Commission, and information supplied by the Domestic Interested Parties.

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.”¹³⁶ The following conditions of competition inform our determinations.

1. Demand Conditions

Original Investigations and Prior Reviews. In the original investigations, the Commission found that demand for CTL plate generally increased over the period of investigation and depended upon the demand for various end-use products.¹³⁷

In the first five-year reviews, the Commission found that overall demand for CTL plate remained largely dependent upon demand for a variety of end-use applications, including construction, railcars, agriculture and industrial machinery, oil and gas, and shipbuilding. The Commission also found that demand declined during the early portion of the period of review but increased in 2004 and was projected to grow in 2005.¹³⁸

¹³⁴ 19 U.S.C. § 1675a(a)(4).

¹³⁵ 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.

¹³⁶ 19 U.S.C. § 1675a(a)(4).

¹³⁷ *Original Investigations*, USITC Pub. 3273 at 19.

¹³⁸ *First Reviews*, USITC Pub. 3816 at 25-27.

In the second five-year reviews, the Commission found that overall demand for CTL plate was affected by changes in overall U.S. economic activity and was mainly derived from demand in the sectors in which it was used, including construction, railcars, agricultural and industrial machinery, oil and gas (including pipelines), and shipbuilding. The Commission found that demand had fluctuated since 2005 and followed the overall trend of the economy, with strong demand through mid-2008, a steep decline in 2009, and a slow recovery through 2010.¹³⁹

In the third five-year reviews, the Commission again found that demand for CTL plate was derived from demand for downstream products that are used in heavy industrial production, line pipe, shipbuilding, railcars, wind towers, and oil and gas structures. The Commission found that demand for CTL plate had declined or fluctuated since 2011, resulting from fluctuations in the overall economy.¹⁴⁰

Current Reviews. In these reviews, there is no new information indicating that the factors influencing demand have changed since the prior proceedings. Demand for CTL plate continues to be driven by demand for its downstream uses in heavy industrial production, line pipe, shipbuilding, railcars, wind towers, and oil and gas structures.¹⁴¹ The Domestic Interested Parties argue that there have been no significant changes in end uses and applications or the existence and availability of substitute products since 2018 and do not foresee significant growth in demand in the reasonably foreseeable future.¹⁴² The Domestic Interested Parties also contend that demand for CTL plate is currently lower than in prior proceedings due to factors such as a decline in demand in certain end uses that incorporate CTL plate, the lingering effects of the COVID-19 pandemic, the Russian invasion of Ukraine, and rising interest rates.¹⁴³ Responding purchaser ***, however, reported that ***.¹⁴⁴

Apparent U.S. consumption of CTL plate was *** short tons in 2022, as compared to 7.5 million short tons in 2016, 5.9 million short tons in 2010, 7.8 million short tons in 2004, and 9.8 million short tons in 1998.¹⁴⁵

¹³⁹ *Second Reviews*, USITC Pub. 4764 at 29.

¹⁴⁰ *Third Reviews*, USITC Pub. 4764 at 27.

¹⁴¹ See CR/PR at I-18-19.

¹⁴² Cleveland-Cliffs Response at 11-12; SSAB and Nucor Response at 37-38.

¹⁴³ See Cleveland-Cliffs Response at 11-12; SSAB and Nucor Response at 37-38.

¹⁴⁴ CR/PR at D-4.

¹⁴⁵ CR/PR at Table I-7. Apparent U.S. consumption in 2022 may be overstated relative to the prior proceedings because apparent U.S. consumption in 2022 is based upon official import statistics that include out-of-scope products, whereas apparent U.S. consumption in the prior proceedings was based upon questionnaire responses. See *id.* at Table I-7, Note.

2. Supply Conditions

Original Investigations and Prior Reviews. In the original investigations, the Commission found that the domestic industry underwent considerable consolidation over the period of investigation, added significant capacity, and increased production, although some producers experienced setbacks and delays in bringing new capacity online. Additionally, it noted that the shares of apparent U.S. consumption accounted for by total imports, both subject and nonsubject, decreased from 1996 to 1997 following the affirmative determinations in the antidumping duty investigations of CTL plate from China, Russia, South Africa, and Ukraine, and then increased in 1998. It further noted that nonsubject market share decreased over the period of investigation, while subject import market share increased.¹⁴⁶

In the first five-year reviews, the Commission found that the domestic industry continued to restructure during the period of review, and the domestic industry's capacity fluctuated as capacity losses from the closure of mills such as Geneva Steel and Gulf States Steel were offset by the ramping up of production by Nucor and IPSCO Steel, Inc. and the reactivation of Mittal Steel USA ISG, Inc.'s Burns Harbor, Indiana plate mill. It also noted that cumulated subject imports declined overall after the imposition of the orders.¹⁴⁷

In the second five-year reviews, the Commission found that the U.S. market was supplied mainly by the domestic industry, as well as by subject and nonsubject imports. It found that the domestic industry experienced growth in production capacity from the restart of idled capacity and changes in ownership and consolidation, as well as new investment, generally in heat-treating facilities over the period of review, although capacity and production fluctuated, and production declined overall. The Commission also found that cumulated subject imports declined irregularly and that subject import market share followed the same trend. It noted that nonsubject imports decreased over the period of review, while Canada was the leading nonsubject source of CTL plate throughout the period.¹⁴⁸

In the third five-year reviews, the Commission found that the domestic industry supplied the largest share of the U.S. CTL plate market, followed by nonsubject imports and then subject imports. The Commission found that the domestic industry experienced a number of plant closures during the period of review, as well as the announced idling of one plant. It also noted that nonsubject imports from 12 countries, including POSCO in South Korea, had become subject to antidumping and/or countervailing duty orders in 2017.¹⁴⁹

¹⁴⁶ *Original Investigations*, USITC Pub. 3273 at 20.

¹⁴⁷ *First Reviews*, USITC Pub. 3816 at 25-26.

¹⁴⁸ *Second Reviews*, USITC Pub. 4296 at 30.

¹⁴⁹ *Third Reviews*, USITC Pub. 4764 at 27-28.

Current Reviews. During the period of review, the CTL plate market in the United States was supplied primarily by the domestic industry, followed by nonsubject imports and then cumulated subject imports.¹⁵⁰

The domestic industry was the largest source of supply in the U.S. market in 2022, accounting for *** percent of apparent U.S. consumption that year.¹⁵¹ This was lower than the domestic industry's share of apparent U.S. consumption in 2016, at *** percent.¹⁵² The Domestic Interested Parties contend that there have been no significant changes to technology, production methods, development efforts, or the ability to increase or shift production or supply since 2018.¹⁵³ The information available indicates that there were several changes to the domestic industry during the period of review, including multiple expansions and upgrades, a new plant opening, two acquisitions, a plant divestiture, and temporary plant disruptions.¹⁵⁴ Notably, ArcelorMittal announced that it would idle its rolling mill in Pennsylvania in September

¹⁵⁰ CR/PR at Table I-7.

¹⁵¹ CR/PR at Table I-7. As noted earlier, apparent U.S. consumption in 2022 may be overstated relative to the prior proceedings, thereby causing the domestic industry's market share to be understated. *See id.* at Table I-7, Note.

¹⁵² CR/PR at Table I-7.

¹⁵³ Cleveland-Cliffs Response at 12; SSAB and Nucor Response at 37.

¹⁵⁴ *See* CR/PR at Table I-4. JSW announced an expansion of its plate and pipe facility in Texas in March 2018. *Id.* In October 2018, SSAB announced capital investments to increase the annual production capacity for various steel types and reduce the need for alloys in steel production at its Alabama mill. *Id.*

In February 2019, Nucor contracted with a company to upgrade the plate production equipment at its Alabama facility, with installation to be completed in early 2020. *Id.* In May 2019, ArcelorMittal S.A. ("ArcelorMittal") announced equipment upgrades over the next few years to its facility in Burns Harbor, Indiana, which include new finishing equipment, a new in-line temper mill, and a new basic oxygen furnace vessel. *Id.*

In June 2020, Evraz NA announced layoffs at its plate mill in Oregon. *Id.*

In July 2021, SSAB announced an expansion and update to its Alabama facility, with new equipment to increase production capacity and efficiencies for quenched and tempered steels, which it anticipates will expand its current workforce by 31 employees over the next three years. *Id.* In November 2021, JSW commenced second-phase upgrades to its plate mill in Texas, which it anticipates will be completed by 2023 and will improve the mill's product quality, productivity, yields, and overall cost-effectiveness. *Id.* In November 2021, Nucor announced the addition of a blast and prime line to remove mill scale from steel surfaces at its plate mill in Kentucky. *Id.*

In August 2022, Evraz NA's Russian parent firm, Evraz plc, announced its solicitation of buyers for its Canadian and U.S. steel facilities, including its steel plate mill in Oregon. *Id.* In August 2022, Cleveland-Cliffs announced a new four-year labor agreement concluded with United Steel Workers, effective September 2022. *Id.*

In February 2023, Commercial Metals Co. announced an expansion and update to the production capabilities of its facility in Alabama. *Id.*

2017.¹⁵⁵ In October 2020, Nucor began construction on a plate mill in Kentucky, which has an annual production capacity of 1.2 million short tons, and the plate mill rolled its first batch of steel plate in December 2022, with its first customer shipments scheduled for early 2023.¹⁵⁶ Additionally, in December 2020, Cleveland-Cliffs acquired domestic CTL plate producer ArcelorMittal USA and its subsidiaries, with the exception of a steel processing facility in Alabama that is a joint venture with Nippon Steel Corp., and in November 2021, it acquired Ferrous Processing and Trading Co., a leading domestic prime ferrous scrap processor.¹⁵⁷ Responding purchaser *** reported that ***.”¹⁵⁸

Cumulated subject imports were the smallest source of supply to the U.S. market in 2022, accounting for *** percent of apparent U.S. consumption that year.¹⁵⁹ This was higher than their share of apparent U.S. consumption in 2016, at *** percent.¹⁶⁰ Nonsubject imports were the second largest source of supply in 2022, accounting for *** percent of apparent U.S. consumption.¹⁶¹ The largest sources of nonsubject imports in 2022 were Canada, the United Kingdom, and Mexico.¹⁶²

3. Substitutability and Other Conditions

Original Investigations and Prior Reviews. In the original investigations, the Commission found that despite some perceived differences in quality, most producers and importers considered the subject imports to be highly substitutable with the domestic like product, although substitutability might have been limited with respect to CTL plate used in specific applications or with greater thickness. The Commission also found that price was an important factor in purchasing decisions and that the costs of raw materials for CTL plate showed differing trends, with the costs of coal and iron ore relatively stable, while the cost of scrap fell dramatically in 1998.¹⁶³

¹⁵⁵ CR/PR at Table I-4.

¹⁵⁶ CR/PR at Table I-4.

¹⁵⁷ CR/PR at Table I-4.

¹⁵⁸ CR/PR at D-3.

¹⁵⁹ CR/PR at Table I-7. As explained earlier, due to POSCO’s exclusion from the antidumping and countervailing duty orders on South Korea, and the fact that official import statistics do not allow the Commission to distinguish between subject and nonsubject imports from South Korea, data for imports from subject sources may be overstated, while data for imports from nonsubject sources may be correspondingly understated. *Id.*

¹⁶⁰ CR/PR at Table I-7.

¹⁶¹ CR/PR at Table I-7. Nonsubject imports’ share of apparent U.S. consumption in 2016 was *** percent. *Id.*

¹⁶² CR/PR at Tables I-6.

¹⁶³ *Original Investigations*, USITC Pub. 3273 at 21, 23.

In the first five-year reviews, the Commission found a “fairly high” degree of substitutability between CTL plate produced in the United States and the subject countries and that price remained an important factor in purchasing decisions.¹⁶⁴

In the second five-year reviews, the Commission found a moderate to high degree of substitutability, although domestic manufacturers produced a wide variety of grades and types of CTL plate within the scope and there was some variation among the grades and types of subject CTL plate, and price continued to be a very important factor in purchasing decisions. The Commission also found that the costs of the principal raw material inputs used to produce CTL plate, iron ore, coal, and steel scrap increased substantially during the period of review.¹⁶⁵

In the third five-year reviews, the Commission found that domestically produced CTL plate and subject imports from India, Indonesia, and South Korea were moderately to highly substitutable. Additionally, it found that price was a very important factor in purchasing decisions, with all responding purchasers reporting that price was a very important factor and a majority reporting that they usually purchased the lowest-priced CTL plate.¹⁶⁶

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 prior reviews. The Domestic Interested Parties claim that there has been no significant change in the level of competition among domestic, subject, and non-subject CTL plate since 2018, and that price continues to be an important factor in the market for CTL plate.¹⁶⁷ Accordingly, we find that there is a moderate to high degree of substitutability between the domestic like product and subject imports, and that price remains an important factor in purchasing decisions.

Effective March 23, 2018, CTL plate originating from India, Indonesia, and certain nonsubject countries became subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended (“Section 232”).¹⁶⁸ Effective June

¹⁶⁴ *First Reviews*, USITC Pub. 3816 at 26-27, 31-32.

¹⁶⁵ *Second Reviews*, USITC Pub. 4296 at 30-31.

¹⁶⁶ *Third Reviews*, USITC Pub. 4296 at 28.

¹⁶⁷ Cleveland-Cliffs Response at 13-14; SSAB and Nucor Response at 31-32, 37.

¹⁶⁸ CR/PR at I-16-17. Section 232 import duties on steel articles currently cover all countries of origin except Argentina, Australia, Brazil, Canada, Mexico, and South Korea. Imports from Australia, Canada, and Mexico are exempt from Section 232 duties and quotas on steel articles, while imports originating in Argentina, Brazil, and South Korea are exempt from duties but are instead subject to absolute quotas, effective June 1, 2018. 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 for steel articles, and imports that exceed these limits are subject to the Section 232 tariffs. CR/PR at I-17 n.39.

1, 2018, CTL plate originating from South Korea, which includes subject CTL plate and out-of-scope products, is exempted from Section 232 duties but is subject to an absolute import quota of 223,252 short tons year.¹⁶⁹

C. Likely Volume of Subject Imports

1. The Original Investigations and Prior Five-Year Reviews

In the original investigations, the Commission found that the volume and market share of cumulated subject imports (which included imports from France, Italy, and Japan) had increased significantly over the period of investigation, with subject import volume increasing by 318.4 percent and subject import market share more than tripling. Though the increase in subject imports had initially been at the expense of nonsubject imports, with the domestic industry gaining market share in 1997, the Commission found that domestic producers had lost market share to subject imports in 1998, particularly in the second half of 1998. The Commission acknowledged that the domestic industry had experienced “sporadic problems” meeting demand during the period of investigation, but rejected the respondents’ argument that these occurrences evidenced a supply shortage that pulled subject imports into the U.S. market.¹⁷⁰

In the first five-year reviews, the Commission noted that cumulated subject imports (which included imports from Italy and Japan) had declined significantly following imposition of the orders but had increased in the most recent period. The Commission found that subject producers had the ability and incentive to increase exports to the United States if the orders were revoked because: (1) subject producers demonstrated the ability to rapidly increase exports to the United States prior to the imposition of the orders, and they maintained a presence in the United States since the orders; (2) subject countries showed considerable production and capacity increases over the period of review; (3) subject producers would be likely to shift their exports destined for other export markets to the United States if the orders were revoked due to generally higher prices in the United States than in other markets; (4) China had shifted from being a net importer to a net exporter of CTL plate; and (5) antidumping duties were in place in third-country markets.¹⁷¹

¹⁶⁹ CR/PR at I-16-17.

¹⁷⁰ *Original Investigations*, USITC Pub. 3273 at 21-23. Cumulated subject import volume increased from 274,859 short tons in 1996, or 3.3 percent of apparent U.S. consumption, to 1.15 million short tons in 1998, or 11.7 percent of apparent U.S. consumption. *Id.* at 21. Imports from India, Indonesia, and South Korea increased by 261.7 percent, 1,130.0 percent, and 1,135.5 percent, respectively. CR/PR at C-3.

¹⁷¹ *First Reviews*, USITC Pub. 3816 at 27-31.

In the second five-year reviews, the Commission found that the ongoing presence in the U.S. market of subject imports during the period of review demonstrated the continued importance of the U.S. market to subject producers in the face of expanding global production and showed that subject imports already had U.S. distributors or customers. The Commission found that cumulated subject capacity had increased significantly over the period of review and production had not kept up with the capacity increases, resulting in additional excess capacity, and subject producers were planning to bring on even more capacity in the reasonably foreseeable future. Additionally, the Commission found that subject producers were at least moderately export-oriented and would likely shift some of their exports destined for other export markets to the United States if the orders were revoked. Finally, the Commission noted that exports from India, Indonesia, and South Korea were all subject to antidumping duties in third-country markets. Thus, the Commission found that the likely volume of subject imports, both in absolute terms and relative to production and consumption in the United States, would be significant.¹⁷²

In the third five-year reviews, the Commission found that subject producers had the means and incentive to export subject merchandise to the U.S. market in significant volumes within a reasonably foreseeable time if the orders were revoked. It found that the subject industries in these countries had substantial production capacity and unused capacity and remained export oriented, while the United States remained an important and attractive export market for CTL plate. The Commission noted that cumulated subject imports continued to be present in the U.S. market even under the discipline of the orders. Additionally, CTL plate exports from each of the three subject countries were subject to numerous antidumping duty orders, tariffs, and related trade measures in other markets during the period of review, which would provide an incentive for them to direct export shipments to the U.S. market if the orders were revoked. Thus, the Commission found that cumulated subject import volumes would likely be significant, both in absolute terms and relative to U.S. consumption, upon revocation of the orders.¹⁷³

2. The Current Reviews

The record in these reviews indicates that subject imports maintained a significant presence in the U.S. market during the period of review even under the disciplining effect of the orders. Cumulated subject import volume fluctuated but decreased overall during the period of review, declining from 282,067 short tons in 2017 to 279,118 short tons in 2018,

¹⁷² *Second Reviews*, USITC Pub. 4296 at 31-33.

¹⁷³ *Third Reviews*, USITC Pub. 4764 at 30-32.

270,774 short tons in 2019, and 125,651 short tons in 2020, and then increasing to 272,451 short tons in 2021 and 279,628 short tons in 2022, equivalent to *** percent of apparent U.S. consumption that year.¹⁷⁴

The record in these expedited reviews contains limited information on the CTL plate industries in India, Indonesia, and South Korea. Nonetheless, the information available indicates that subject producers continue to have the ability and incentive to export significant levels of subject merchandise to the U.S. market in the event of revocation of the orders. As previously noted, the Domestic Interested Parties have identified 17 possible producers of CTL plate in India, four possible producers in Indonesia, and 23 possible producers in South Korea.¹⁷⁵ The Domestic Interested Parties contend that the subject industries continue to have substantial capacity and have significantly increased their capacity during the period of review, despite the existence of antidumping and countervailing duties and other trade measures imposed by multiple countries on their exports of CTL plate.¹⁷⁶

The information available indicates that the industries in each of the subject countries increased their respective production capacities during the period of review.¹⁷⁷ Additionally, producers in each of the subject countries continue to export substantial volumes of CTL plate. According to GTA data, in every year of the period of review, all three subject countries were ranked among the top twelve global exporters of CTL plate, a category that includes in-scope CTL plate and out-of-scope products.¹⁷⁸ These data show that in 2022, exports of such products

¹⁷⁴ CR/PR at Tables I-6, I-7. As previously noted, apparent U.S. consumption in 2022 may be overstated relative to apparent U.S. consumption in the prior proceedings because apparent U.S. consumption in 2022 is based upon official import statistics that include out-of-scope products, whereas apparent U.S. consumption in the prior proceedings was based upon questionnaire responses. *See id.* at Table I-7, Note. This would tend to understate subject import market share in the current reviews relative to that in the prior proceedings.

Although POSCO was excluded from the original antidumping and countervailing duty orders for South Korea, the official import statistics utilized in these reviews do not permit the Commission to distinguish between subject and nonsubject CTL plate imported from South Korea, unlike the questionnaire data used in the prior proceedings. *Id.* at Table I-6, Note. This would tend to overstate subject import market share in the current reviews relative to that in the prior proceedings. *Id.*

¹⁷⁵ CR/PR at I-39, I-44, I-48.

¹⁷⁶ *Cleveland-Cliffs Response* at 27-29; *SSAB and Nucor Response* at 16-27. Specifically, Cleveland-Cliffs notes that two CTL plate and steel producers in Indonesia agreed to finance building a second furnace to increase the country's annual steelmaking capacity; India's government is encouraging future growth in the steel production industry; and the South Korean CTL plate industry has a large amount of excess capacity. *Cleveland-Cliffs Response* at 27-29.

¹⁷⁷ CR/PR at Tables I-8, I-10, I-12.

¹⁷⁸ CR/PR at Table I-15.

from the cumulated subject countries totaled 7.1 million short tons – cumulatively accounting for 12.3 percent of global exports of CTL plate that year.¹⁷⁹

The information available also indicates that the U.S. market remains attractive to subject producers. Cumulated subject imports maintained a significant presence in the U.S. market throughout the period of review, while under the restraining effect of the orders, thereby retaining customers and distribution networks.¹⁸⁰ GTA data indicate that the United States was the world’s fourth-largest destination market for exports of CTL plate, a category that includes CTL plate and out-of-scope products, from South Korea in 2022.¹⁸¹ Additionally, CTL plate from India, Indonesia, and South Korea are subject to antidumping and countervailing duty orders in six third-country markets and safeguard measures in three third-country markets, which would make the U.S. market relatively more attractive to subject producers if the U.S. orders were revoked.¹⁸²

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, 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.¹⁸³

¹⁷⁹ See CR/PR at Table I-15. Exports reported by South Korea include CTL plate exported by excluded producer POSCO.

¹⁸⁰ CR/PR at Table I-6.

¹⁸¹ CR/PR at Table I-13. Exports reported by South Korea include CTL plate exported by excluded producer POSCO.

¹⁸² See CR/PR at Table I-14; *see also* Section III.C.1.

¹⁸³ Although subject imports from India and Indonesia are currently subject to duties under Section 232, and subject imports from South Korea are subject to a quota, neither the Domestic Interested Parties nor the responding purchasers indicated that these measures would prevent cumulated subject imports from entering the U.S. market at significant levels if the orders were revoked. *See Cleveland-Cliffs Response* at 31; *SSAB and Nucor Response* at 25; CR/PR at D-3-4. Furthermore, the imposition of these trade measures did not prevent the volume of cumulated subject imports from increasing 116.8 percent from 2020 to 2021 and 2.6 percent from 2021 to 2022. CR/PR at Table I-6. In addition, although subject import volume from South Korea is constrained by the Section 232 quota applicable to imports of CTL plate from South Korea, subject imports from India and Indonesia are not constrained by any quantitative restriction on their exports.

We note that the record of these expedited reviews does not contain information concerning inventories of subject merchandise.

D. Likely Price Effects

1. The Original Investigations and Prior Five-Year Reviews

In the original investigations, the Commission found subject imports had undersold the domestic like product in 62.7 percent of quarterly pricing product comparisons and oversold the domestic like product in 37.3 percent of comparisons, with the frequency and severity of underselling increasing in 1998. The Commission also found that subject import average unit values (“AUVs”) had declined throughout the period of investigation and had been lower than domestic producers’ AUVs, except in 1996 and the first half of 1999. The Commission concluded that the increase in lower-priced subject imports had significantly contributed to the depression of domestic producer prices.¹⁸⁴

In the first five-year reviews, the Commission noted that there was a degree of product differentiation in the market, yet common grades remained prevalent. The Commission found that subject imports from the cumulated countries undersold the domestic like product in 55 of 70 available quarterly comparisons. Given the likely significant volume of imports, the importance of price in the CTL plate market, the fairly high degree of substitutability of subject imports and the domestic like product, the price effects of low-priced imports in the original investigations, the underselling by subject imports during the period of review, and the incentive that existed for subject imports to enter the U.S. market, the Commission found a likelihood of significant negative price effects from the subject imports. The Commission concluded that if the orders were revoked, significant volumes of subject imports (which included imports from Italy and Japan) would likely significantly undersell the domestic product and gain market share and would likely have significant depressing or suppressing effects on the prices of the domestic like product.¹⁸⁵

In the second five-year reviews, the Commission found that there continued to be a degree of product differentiation in the market, although the common grades predominated, with a moderate-to-high degree of substitutability between CTL plate produced in the United States and the subject countries. The Commission found that the prices for all domestically produced CTL plate products fluctuated during the period of review but increased substantially from their levels in 2005. The Commission found that at least some of the increase was due to increased raw material costs. It noted that although pricing data were limited, subject imports undersold the domestic like product in 36 of 61 available quarterly comparisons. The

¹⁸⁴ *Original Investigations*, USITC Pub. 3273 at 23-24.

¹⁸⁵ *First Reviews*, USITC Pub. 3816 at 31-32.

Commission concluded that there was a likelihood of significant negative price effects from the subject imports upon revocation of the orders.¹⁸⁶

In the third five-year reviews, the Commission found a moderate to high degree of substitution between subject imports and the domestic like product. The Commission noted that prices of all domestically produced CTL plate products fluctuated during the period of review, but overall fell by 4.0 to 13.5 percent between January 2014 and September 2017. While noting that price comparison data were limited and therefore not particularly probative of pricing activity in the U.S. market during the period of review, the Commission found that subject imports undersold the domestic like product in 2 of 12 quarterly price comparisons and oversold the domestic like product in the remaining instances. The Commission found that significant underselling was likely after revocation based on the underselling in the original investigations and during the period of review, the significance of price in purchasing decisions, and the moderate-to-high degree of substitutability between subject and domestic CTL plate. The Commission also found that the likely significant volume of low-priced subject imports after revocation would likely depress and/or suppress prices for the domestic like product.¹⁸⁷

2. The Current Reviews

As discussed above, we continue to find a moderate-to-high degree of substitutability between the domestic like product and subject imports and that price remains an important factor in purchasing decisions.

The record in these expedited reviews does not contain new product-specific pricing information. Based on the available information, including the moderate-to-high degree of substitutability between the domestic like product and subject imports, the importance of price in purchasing decisions, and the attractiveness of the U.S. market to subject producers, we find that if the orders were revoked, significant volumes of subject imports would likely undersell the domestic like product, as they did in the original investigations. Absent the discipline of the orders, the significant volumes of low-priced subject imports would likely take sales and market share from domestic producers and/or force the domestic industry to cut prices or restrain price increases necessary to cover any increasing costs, thereby depressing or suppressing prices for the domestic like product. Consequently, we find that if the orders were revoked, significant volumes of subject imports would likely undersell the domestic like product and cause significant price effects.

¹⁸⁶ *Second Reviews*, USITC Pub. 4296 at 34.

¹⁸⁷ *Third Reviews*, USITC Pub. 4764 at 34-35.

E. Likely Impact¹⁸⁸

1. The Original Investigations and Prior Five-Year Reviews

In the original investigations, the Commission found that the domestic industry's operating and financial performance had deteriorated toward the end of the period of investigation as subject import volume and market share rapidly increased. Between the first half of 1998 and the first half of 1999, domestic industry sales volumes and values had declined significantly, cash flow had become negative, gross profits had declined 96 percent, and operating income had decreased from \$97.4 million to negative \$63.6 million. Domestic industry employment, hours worked, wages, and capital expenditures had declined over the period of investigation, particularly in the first half of 1999. The Commission concluded that subject imports had caused present material injury to the domestic industry based on the correlation of these adverse domestic industry trends to the increase in subject import volume and market share and the decline in subject import AUVs.¹⁸⁹

In the first five-year reviews, the Commission found that following imposition of the orders, subject imports declined, and the domestic industry gained market share. Domestic producers' production, U.S. shipments, and net sales declined through 2001, then generally recovered in 2002 and 2003, and showed dramatic improvement in 2004, while the industry improved its efficiency and productivity. Despite these improvements, the Commission noted that the industry lost money during most of the period of review, particularly in 2003. Based on the industry's most recent financial performance, the Commission did not find that the industry was currently vulnerable to injury by virtue of being in a weakened state. However, it also found that the conditions that enabled the industry to realize profits at the end of the period of review were not likely to continue into the reasonably foreseeable future. It found that any growth in U.S. consumption would not be sufficient to absorb the likely significant increase in

¹⁸⁸ In its expedited reviews of the countervailing duty orders, Commerce determined that revocation of the orders would result in the continuation or recurrence of countervailable subsidies, with estimated margins at 12.82 percent for India, ranging from 15.90 to 47.71 percent for Indonesia, and ranging from 1.99 to 2.02 percent for South Korea. *Certain Cut-to-Length Carbon-Quality Steel Plate from India, Indonesia, and the Republic of Korea: Final Results of Expedited Fourth Sunset Reviews of Countervailing Duty Orders*, 88 Fed. Reg. 37856 (June 9, 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 margins ranging up to 42.39 percent for India, 52.42 percent for Indonesia, and 6.09 percent for South Korea. *Certain Cut-to-Length Carbon-Quality Steel Plate from India, Indonesia, and the Republic of Korea: Final Results of the Expedited Fourth Sunset Reviews of the Antidumping Duty Orders*, 88 Fed. Reg. 36530 (June 5, 2023).

¹⁸⁹ *Original Investigations*, USITC Pub. 3273 at 25-26.

subject imports if the orders were revoked, and the volume and price effects of subject imports would necessarily have a significant adverse impact on the production, shipments, sales, market share, and revenues of the domestic industry, which would have a direct adverse impact on the industry's profitability and its ability to raise capital and make and maintain necessary capital investments. Accordingly, the Commission concluded that if the orders were revoked, subject imports would be likely to have a significant adverse impact on the domestic industry within a reasonably foreseeable time.¹⁹⁰

In the second five-year reviews, the Commission found that the domestic industry was not vulnerable to the continuation or recurrence of material injury because it had undergone significant consolidation since the original investigations, making the industry far more productive and profitable. The Commission noted that the domestic industry's capacity increased much more than its production during the period of review, resulting in declines in capacity utilization, while U.S. shipments, the domestic industry's financial performance, U.S. demand, and prices of the domestic like product increased with the recovering economy. Nevertheless, the Commission found that the industry was not in such a strong condition, nor were the likely demand conditions sufficiently favorable, that the industry could withstand significantly increased low-priced subject imports upon revocation of the orders without likely sustaining significant adverse effects. Thus, the Commission concluded that any lost sales or revenue experienced by the domestic industry due to the subject imports would likely lead to a significant adverse impact on the domestic industry within a reasonably foreseeable time.¹⁹¹

In the third five-year reviews, the Commission found that most of the performance indicators of the domestic industry, including production, capacity utilization, net sales, shipments, revenues, and employment indicators, declined over the period of review, as did the industry's profitability and market share. Based on the industry's declining performance, the Commission concluded that the domestic industry was in a vulnerable condition. The Commission found that if the orders were revoked, the significant volume of cumulated subject imports, coupled with their significant adverse price effects, would likely have a significant impact on the domestic industry within a reasonably foreseeable time. Additionally, the Commission noted that there was no indication that the presence of nonsubject imports would prevent cumulated subject imports from significantly increasing their presence in the U.S. market after revocation and an appreciable share of these subject imports would likely come at the expense of the domestic industry.¹⁹²

¹⁹⁰ *First Reviews*, USITC Pub. 3816 at 33-34.

¹⁹¹ *Second Reviews*, USITC Pub. 4296 at 34-38.

¹⁹² *Third Reviews*, USITC Pub. 4764 at 37-40.

2. The Current Reviews

The record in these expedited reviews contains limited information concerning the domestic industry's performance since the last reviews.

The domestic industry's capacity, production, and capacity utilization were all lower in 2022 than in prior periods. In 2022, the domestic industry's capacity was *** short tons, its production was *** short tons, and its capacity utilization ratio was *** percent.¹⁹³ The industry's U.S. shipments were lower in 2022 than in prior periods, and its market share was lower in 2022 than in all prior periods but the original investigations. Its U.S. shipments were *** short tons in 2022, equivalent to *** percent of apparent U.S. consumption that year.¹⁹⁴ However, the industry's net sales value, operating income, and operating income as a share of net sales were all higher in 2022 than in prior periods. The industry's net sales were \$***, its operating income was \$***, and its ratio of operating income to net sales was *** percent in 2022.¹⁹⁵ This limited information is insufficient for us to make a finding as to whether the domestic industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of the orders.

Based on the information available on the record, 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, causing the domestic industry to lose sales and market share and/or significantly depressing or suppressing prices for the domestic like product. The likely significant volume of low-priced cumulated subject imports and their adverse price effects would likely have a significant adverse impact on the production, shipments, sales, market share, and revenues of the domestic industry, which, in turn, would have a direct adverse impact on the industry's profitability and employment, as well as its ability to raise

¹⁹³ CR/PR at Table I-5. By comparison, the domestic industry's capacity was 12.2 million short tons in 2016, 9.6 million short tons in 2010, 11.0 million short tons in 2004, and 11.2 million short tons in 1998; its production was 7.3 million short tons in 2016, 6.1 million short tons in 2010, 7.5 million short tons in 2004, and 7.9 million short tons in 1998; and its capacity utilization ratio was 59.3 percent in 2016, 63.1 percent in 2010, 68.1 percent in 2004, and 71.0 percent in 1998. *Id.*

¹⁹⁴ CR/PR at Tables I-5, I-7. By comparison, the domestic industry's U.S. shipments were 6.4 million short tons in 2016, 5.4 million short tons in 2010, 7.0 million short tons in 2004, and 7.6 million short tons in 1998. *Id.* at Table I-5. Its market share was 85.4 percent in 2016, 90.7 percent in 2010, 90.6 percent in 2004, and 77.9 percent in 1998. *Id.* at Table I-7.

¹⁹⁵ CR/PR at Table I-5. By comparison, the domestic industry's net sales were \$3.6 billion in 2016, \$4.3 billion in 2010, \$3.6 billion in 2004, and \$3.4 billion in 1998; its operating income was \$20.4 million in 2016, \$65.5 million in 2010, \$782.8 million in 2004, and \$135.7 million in 1998; and its operating income to net sales ratio was 0.6 percent in 2016, 1.5 percent in 2010, 21.6 percent in 2004, and 4.0 percent in 1998. *Id.*

capital and make and maintain necessary capital investments. We conclude that, if the orders were revoked, cumulated subject imports from India, Indonesia, and South Korea would be likely to have a significant impact on the domestic industry within a reasonably foreseeable time.

We have also considered the role of factors other than cumulated subject imports, including the presence of nonsubject imports. Nonsubject imports have maintained their presence in the U.S. market since the last reviews, accounting for *** percent of apparent U.S. consumption in 2022.¹⁹⁶ The record provides no indication, however, that the presence of nonsubject imports would prevent cumulated subject imports from entering the U.S. market in significant quantities after revocation of the orders, particularly in light of the large size of the subject industries, their substantial volume of exports, and the relative attractiveness of the U.S. market. Given the domestic industry's *** percent share of apparent U.S. consumption in 2022, the increase in low-priced cumulated subject imports that is likely after revocation would likely come, at least in part, at the expense of the domestic industry.¹⁹⁷ For these reasons, we find that any effects of nonsubject imports would be distinct from the likely effects attributable to the cumulated subject imports.

We recognize that apparent U.S. consumption was *** percent lower in 2022 than in 2016.¹⁹⁸ The Domestic Interested Parties attribute the lower level of apparent U.S. consumption in 2022 to a decline in demand in certain end uses of CTL plate and anticipate continued weak demand due to the lingering effects of the COVID-19 pandemic, Russia's invasion of Ukraine, rising interest rates, and the possibility of a recession.¹⁹⁹ To the extent that demand remains weak or declines, the significant volume of low-priced cumulated subject imports that is likely after revocation would exacerbate the effects of weak or declining demand on the domestic industry.

In sum, we conclude that if the antidumping and countervailing duty orders on CTL plate from India, Indonesia, and South Korea were revoked, cumulated subject imports would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

¹⁹⁶ CR/PR at Table I-7. Nonsubject imports' market share was *** percent in 2016, *** percent in 2010, *** percent in 2004, and 10.4 percent in 1998. *Id.*

¹⁹⁷ CR/PR at Table I-7.

¹⁹⁸ See CR/PR at Table I-7. As previously noted in Section IV.B.1, apparent U.S. consumption for 2022 may be overstated relative to that in 2017 due to the possible inclusion of out-of-scope products in the official import statistics used to calculate apparent U.S. consumption in these reviews. *Id.* at Table I-7, Note.

¹⁹⁹ See Cleveland-Cliffs Response at 11-12; SSAB and Nucor Response at 37-38.

V. Conclusion

For the foregoing reasons, we determine that revocation of the antidumping and countervailing duty orders on CTL plate from India, Indonesia, and South Korea 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 February 1, 2023, the U.S. International Trade Commission (“Commission”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),¹ that it had instituted reviews to determine whether revocation of the countervailing duty orders and antidumping duty orders on cut-to-length carbon-quality steel plate (“CTL plate”) from India, Indonesia, and South Korea would be likely to lead to continuation or recurrence of material injury.² All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.^{3 4} Table I-1 presents information relating to the background and schedule of this proceeding:

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

Effective date	Action
February 1, 2023	Notice of initiation by Commerce (88 FR 6700, February 1, 2023)
February 1, 2023	Notice of institution by Commission (88 FR 6781, February 1, 2023)
May 8, 2023	Commission’s vote on adequacy
June 5, 2023	Commerce’s results of its expedited reviews
August 23, 2023	Commission’s determinations and views

¹ 19 U.S.C. 1675(c).

² 88 FR 6781, February 1, 2023. In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. 88 FR 6700, February 1, 2023. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission’s website (www.usitc.gov).

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

⁴ Interested parties were also requested to provide a list of three to five leading purchasers in the U.S. market for the domestic like product and the subject merchandise. 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 two submissions in response to its notice of institution in the subject reviews. They were filed on behalf of three U.S. producers of CTL plate (collectively referred to herein as “domestic interested parties”):

1. Cleveland-Cliffs Inc. (“Cleveland-Cliffs”), a domestic producer of CTL plate, and
2. SSAB Enterprises, LLC (“SSAB”) and Nucor Corporation (“Nucor”), domestic producers of CTL plate.

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

Table I-2

CTL plate: Summary of responses to the Commission’s notice of institution

Interested party	Type	Number of firms	Coverage
U.S. producers	Domestic	3	***%

Note: The U.S. producer coverage figure is the estimated share of total U.S. production of CTL plate in 2022 accounted for by responding firms. The estimate was calculated as the aggregate quantity of reported production for the three firms (*** short tons), divided by the total U.S. production (*** short tons) as reported by the ***, provided by ***.***. Cleveland-Cliffs’ response to the notice of institution, March 3, 2023, exh. 11. SSAB and Nucor’s response to the notice of institution, March 3, 2023, p. 36, and SSAB and Nucor’s supplemental response to the notice of institution, March 22, 2023, exh. 1.

Party comments on adequacy

The Commission received party comments on the adequacy of responses to the notice of institution and whether the Commission should conduct expedited or full reviews from the domestic interested parties. The domestic interested parties request that the Commission conduct expedited reviews of the antidumping and countervailing duty orders on CTL plate.⁵

⁵ Cleveland-Cliffs’ comments on adequacy, April 13, 2023, p. 2, and SSAB and Nucor’s comments on adequacy, April 13, 2023, p. 3.

The original investigations

The original investigations resulted from petitions filed on February 16, 1999 with Commerce and the Commission by Bethlehem Steel Corp./Lukens (Bethlehem, Pennsylvania); U.S. Steel Group (Pittsburgh, Pennsylvania); Gulf States Steel, Inc. (Gadsden, Alabama); IPSCO Steel, Inc. (Muscatine, Iowa); Tuscaloosa Steel Co. (Tuscaloosa, Alabama); and the United Steelworkers of America (Pittsburgh, Pennsylvania).⁶ On December 29, 1999, Commerce determined that imports of CTL plate from France, India, Indonesia, Italy, Japan, and South Korea were being sold at less than fair value (“LTFV”),⁷ and that imports of CTL plate were being subsidized by the governments of France, India, Indonesia, Italy, and South Korea.⁸ The Commission determined on February 2, 2000, that the domestic industry was materially injured by reason of LTFV imports of CTL plate from France, India, Indonesia, Italy, Japan, and South Korea, and by imports of CTL plate found by Commerce to be subsidized by the governments of France, India, Indonesia, Italy, and South Korea.⁹ On February 10, 2000, Commerce issued its antidumping and countervailing duty orders with final weighted-average dumping margins of 10.41 percent for France, 72.49 percent for India, ranging from 50.80 to 52.42 percent for Indonesia, 7.85 percent for Italy, from 10.78 to 59.12 percent for Japan, and 2.98 percent for South Korea. The final net subsidy rates ranged from 5.56 to 6.86 percent for France, 12.82

⁶ Certain Cut-to-Length Steel Plate from France, India, Indonesia, Italy, Japan, and Korea, Inv. Nos. 701-TA-387-391 and 731-TA-816-821 (Final), USITC Publication 3273, January 2000 (“Original publication”), p. I-1.

⁷ 64 FR 73143, 64 FR 73126, 64 FR 73164, 64 FR 73234, 64 FR 73215, and 64 FR 73196, December 29, 1999.

⁸ 64 FR 73277, 64 FR 73131, 64 FR 73155, 64 FR 73244 and 64 FR 73176, December 29, 1999.

⁹ 65 FR 6624, February 10, 2000. The Commission found that critical circumstances did not exist with regard to Japan.

percent for India, from 15.90 to 47.71 percent for Indonesia, 26.12 percent for Italy, and 3.26 percent for South Korea.^{10 11 12 13}

The first five-year reviews

On April 8, 2005, the Commission determined that it would conduct full reviews of the antidumping duty orders on CTL plate from France, India, Indonesia, Italy, Japan, and South Korea, and countervailing duty orders on CTL plate from India, Indonesia, Italy, and South Korea.^{14 15} On August 8, 2005, Commerce determined that revocation of the antidumping duty order on CTL plate from France, India, Indonesia, Italy, Japan, and South Korea would be likely to lead to continuation or recurrence of dumping, and that revocation of the countervailing duty order on CTL plate from India, Indonesia, Italy, and South Korea would be likely to lead to continuation or recurrence of subsidization.¹⁶ On November 21, 2005, the Commission determined that revocation of the antidumping and countervailing duty orders on CTL plate from India, Indonesia, Italy, and Korea, and the antidumping duty order on CTL plate from Japan

¹⁰ 65 FR 6585 and 65 FR 6587, February 10, 2000. In response to timely allegations of ministerial errors in its margin calculations for certain respondents, Commerce amended its final antidumping duty determinations for France, Indonesia, and Italy, resulting in amended dumping margins for certain imports from these countries, and amended the net subsidy rate for certain imports from India and South Korea. Korean producer/exporter Pohang Iron & Steel Co., Ltd. ("POSCO") and Italian foreign producer ILVA S.p.A. were excluded from the antidumping duty orders as a result of receiving *de minimis* margins in the final determinations. POSCO, Indonesian steel producers P.T. Gunawan Steel and P.T. Jaya Pari, and Italian steel producer Palini and Bertoli S.p.A were excluded from the countervailing duty orders as a result of receiving *de minimis* net subsidy rates in the final determinations. 65 FR 6585 and 65 FR 6587, February 10, 2000. Following a final ruling by the United States Court of International Trade ("CIT"), Commerce amended its final antidumping duty determination with regard to France, and revoked the order with regard to GTA Industries S.A., for all entries from July 26, 1999 through November 7, 2003. 69 FR 57266, September 24, 2004.

¹¹ Effective February 7, 2003, and in accordance with section 129 of the Uruguay Round Agreements Act, Commerce issued a second determination and weighted-average dumping margin of 42.39 percent for India. 68 FR 7967, February 19, 2003.

¹² Effective March 3, 2003, Commerce revoked, in part, the antidumping duty order on Japan, with respect to certain particular abrasion-resistant steel products. 68 FR 9975, March 3, 2003.

¹³ Effective April 16, 2004, Commerce amended its final countervailing duty determination for Italy, with ILVA/ILT receiving a net subsidy rate of 3.44 percent for the period January 1, 2004 through April 15, 2004, and 2.45 percent for the period following April 16, 2004. 70 FR 51013, August 29, 2005.

¹⁴ 70 FR 20173, April 18, 2005.

¹⁵ Effective November 7, 2003, Commerce revoked the countervailing duty order on imports of CTL plate from France, following implementation of section 129 of the Uruguay Round Agreements. 68 FR 64858, November 17, 2003.

¹⁶ 70 FR 45655, 70 FR 45691, 70 FR 45692, 70 FR 45694, and 70 FR 45689, August 8, 2005.

would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time, and that revocation of the antidumping duty order on CTL plate from France would not be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.¹⁷ Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective December 6, 2005, Commerce issued a continuation of the antidumping duty orders on imports of CTL plate from India, Indonesia, Italy, Japan, and South Korea, and countervailing duty orders on imports of CTL plate from India, Indonesia, Italy, and South Korea.¹⁸ On December 7, 2005, Commerce published a notice revoking the antidumping duty order on imports of CTL plate from France, effective February 10, 2005.¹⁹

The second five-year reviews

On February 4, 2011, the Commission determined that it would conduct full reviews of the antidumping duty orders on CTL plate from India, Indonesia, Italy, Japan, and South Korea, and of the countervailing duty orders on CTL plate from India, Indonesia, Italy, and South Korea.²⁰ On March 1, 2011, Commerce determined that revocation of the antidumping duty orders on CTL plate from India, Indonesia, Italy, Japan, and South Korea would be likely to lead to continuation or recurrence of dumping.²¹ On March 8, 2011, Commerce determined that revocation of the countervailing duty orders on CTL plate from India, Indonesia, Italy, and South Korea would be likely to lead to continuation or recurrence of subsidization.²² On December 20, 2011, the Commission determined that revocation of the countervailing and antidumping duty orders on CTL plate from India, Indonesia, and South Korea would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time. The Commission also determined that revocation of the countervailing and antidumping duty orders on CTL plate from Italy, and the antidumping duty order on CTL plate from Japan, would not be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.²³ Following affirmative determinations in the five-year reviews by Commerce and the

¹⁷ 70 FR 71331, November 28, 2005.

¹⁸ 70 FR 72607, December 6, 2005.

¹⁹ 70 FR 72787, December 7, 2005.

²⁰ 76 FR 8772, February 15, 2011.

²¹ 76 FR 12322, March 7, 2011.

²² 76 FR 12702, March 8, 2011.

²³ 76 FR 80963, December 27, 2011.

Commission, effective January 4, 2012, Commerce issued a continuation of the antidumping and countervailing duty orders on imports of CTL plate from India, Indonesia, and South Korea.²⁴ Following negative determinations in the five-year reviews by the Commission, effective January 4, 2012, Commerce revoked the antidumping duty orders on CTL plate from Italy and Japan and the countervailing duty order on CTL plate from Italy.²⁵

The third five-year reviews

On March 6, 2017, the Commission determined that it would conduct full reviews of the antidumping and countervailing duty orders on CTL plate from India, Indonesia, and South Korea.²⁶ On April 6, 2017, Commerce determined that revocation of the countervailing duty orders on CTL plate from India, Indonesia, and South Korea would be likely to lead to continuation or recurrence of subsidization.²⁷ On April 24, 2017, Commerce determined that revocation of the antidumping duty orders on CTL plate from India, Indonesia, and South Korea would be likely to lead to continuation or recurrence of dumping.²⁸ On February 26, 2018, the Commission determined that revocation of the countervailing and antidumping duty orders on CTL plate from India, Indonesia, and South Korea would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.²⁹ Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective March 12, 2018, Commerce issued a continuation of the antidumping and countervailing duty orders on imports of CTL plate from India, Indonesia, and South Korea.³⁰

Previous and related investigations

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

²⁴ 77 FR 264, January 4, 2012.

²⁵ 77 FR 263, January 4, 2012.

²⁶ 82 FR 14030, March 16, 2017.

²⁷ 82 FR 16790, April 6, 2017.

²⁸ 82 FR 18895, April 24, 2017.

²⁹ 83 FR 9027, March 2, 2018.

³⁰ 83 FR 10672, March 12, 2018.

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

Date	Number	Country	ITC Original Determination	Current Status of Order
1978	AA1921-179	Japan	Affirmative	Order revoked: effective October 1, 1984
1979	AA1921-197	Taiwan	Affirmative	Order revoked: effective December 15, 2005
1980	AA1921-203	Poland	Negative	N/A
1980	731-TA-18	Belgium	Affirmative	Petition withdrawn: October 1, 1980
1980	731-TA-19	Germany (West)	Affirmative	Petition withdrawn: October 1, 1980
1980	731-TA-20	France	Affirmative	Petition withdrawn: October 1, 1980
1980	731-TA-21	Italy	Affirmative	Petition withdrawn: October 1, 1980
1980	731-TA-22	Luxembourg	Affirmative	Petition withdrawn: October 1, 1980
1980	731-TA-23	Netherlands	Affirmative	Petition withdrawn: October 1, 1980
1981	731-TA-24	United Kingdom	Affirmative	Petition withdrawn: October 1, 1980
1981	701-TA-83	Belgium	Affirmative	Incorporated into 701-TA-86
1982	701-TA-84	Brazil	Affirmative	Incorporated into 701-TA-87
1982	731-TA-51	Romania	Affirmative	Incorporated into 701-TA-58
1982	701-TA-86	Belgium	Affirmative	Investigation terminated: October 21, 1982
1982	701-TA-87	Brazil	Affirmative	Investigation terminated: effective September 7, 1982
1982	701-TA-88	France	Negative	N/A
1982	701-TA-89	Italy	Negative	N/A
1982	701-TA-90	Luxembourg	Negative	N/A
1982	701-TA-91	Netherlands	Negative	N/A

Table continued.

Table I-3 Continued

CTL plate: Previous and related Commission proceedings and status of orders

Date	Number	Country	ITC Original Determination	Current Status of Order
1982	701-TA-92	United Kingdom	Affirmative	Investigation terminated: effective October 21, 1982
1982	701-TA-93	Germany (West)	Affirmative	Investigation terminated: effective October 21, 1982
1982	701-TA-155	Spain	Affirmative	Order revoked: effective October 1, 1984
1982	701-TA-170	South Korea	Affirmative	Order revoked: effective October 1, 1984
1982	731-TA-53	Belgium	Affirmative	Investigation terminated: effective October 29, 1982
1982	731-TA-54	France	Negative	N/A
1982	731-TA-55	Italy	Negative	N/A
1982	731-TA-56	Luxembourg	Negative	N/A
1982	731-TA-57	Netherlands	Negative	N/A
1982	731-TA-58	Romania	Affirmative	Investigation terminated: effective July 19, 1985
1982	731-TA-59	United Kingdom	Affirmative	Investigation terminated: effective October 21, 1982
1982	731-TA-60	Germany (West)	Affirmative	Investigation terminated: effective October 21, 1982
1983	701-TA-204	Brazil	Affirmative	Order revoked: effective October 1, 1984
1983	731-TA-123	Brazil	Affirmative	Order revoked: effective October 1, 1984
1983	731-TA-146	Belgium	Affirmative	Investigation terminated: effective 1984

Table continued.

Table I-3 Continued

CTL plate: Previous and related Commission proceedings and status of orders

Date	Number	Country	ITC Original Determination	Current Status of Order
1983	731-TA-147	Germany (West)	Affirmative	Investigation terminated: effective November 29, 1984
1983	731-TA-151	South Korea	Affirmative	Order revoked: effective October 1, 1984
1984	701-TA-225	Sweden	Negative	N/A
1984	701-TA-226	Venezuela	Affirmative	Order revoked: effective July 19, 1985
1984	731-TA-169	Finland	Affirmative	Investigation terminated: January 22, 1985
1984	731-TA-170	South Africa	Affirmative	Investigation terminated: May 10, 1984
1984	731-TA-171	Spain	Affirmative	Investigation terminated: effective January 22, 1985
1984	731-TA-213	Czechoslovakia	Affirmative	Petition withdrawn (1985)
1984	731-TA-214	Germany (East)	Affirmative	Petition withdrawn (1985)
1984	731-TA-215	Hungary	Affirmative	Petition withdrawn (1985)
1984	731-TA-216	Poland	Affirmative	Petition withdrawn (1985)
1984	731-TA-217	Venezuela	Affirmative	Investigation terminated: effective July 19, 1985
1992	701-TA-319	Belgium	Affirmative	Order revoked: effective December 15, 2005
1992	701-TA-320	Brazil	Affirmative	Order revoked: effective December 15, 2005
1992	701-TA-321	France	Negative	N/A

Table continued.

Table I-3 Continued

CTL plate: Previous and related Commission proceedings and status of orders

Date	Number	Country	ITC Original Determination	Current Status of Order
1992	701-TA-322	Germany	Affirmative	Order revoked: effective April 1, 2004
1992	701-TA-323	Italy	Negative	N/A
1992	701-TA-324	Korea	Negative	N/A
1992	701-TA-325	Mexico	Affirmative	Order revoked: effective December 15, 2005
1992	701-TA-326	Spain	Affirmative	Order revoked: effective December 15, 2005
1992	701-TA-327	Sweden	Affirmative	Order revoked: effective December 15, 2005
1992	701-TA-328	United Kingdom	Affirmative	Order revoked: effective December 15, 2005
1992	731-TA-573	Belgium	Affirmative	Order revoked: effective December 15, 2005
1992	731-TA-574	Brazil	Affirmative	Order revoked: effective December 15, 2005
1992	731-TA-575	Canada	Affirmative	Order revoked: effective January 1, 2000
1992	731-TA-576	Finland	Affirmative	Order revoked: effective December 15, 2005
1992	731-TA-577	France	Negative	N/A
1992	731-TA-578	Germany	Affirmative	Order revoked: effective December 15, 2005
1992	731-TA-579	Italy	Negative	N/A
1992	731-TA-580	Japan	Negative	N/A
1992	731-TA-581	Korea	Negative	N/A
1992	731-TA-582	Mexico	Affirmative	Order revoked: effective December 15, 2005

Table continued.

Table I-3 Continued

CTL plate: Previous and related Commission proceedings and status of orders

Date	Number	Country	ITC Original Determination	Current Status of Order
1992	731-TA-583	Poland	Affirmative	Order revoked: effective December 15, 2005
1992	731-TA-584	Romania	Affirmative	Order revoked: effective December 15, 2005
1992	731-TA-585	Spain	Affirmative	Order revoked: effective December 15, 2005
1992	731-TA-586	Sweden	Affirmative	Order revoked: effective December 15, 2005
1992	731-TA-587	United Kingdom	Affirmative	Order revoked: effective December 15, 2005
1996	731-TA-753	China	Affirmative	Order continued: July 1, 2021
1996	731-TA-754	Russia	Affirmative ³	Suspension agreement continued: July 1, 2021
1996	731-TA-755	South Africa	Affirmative	Order revoked: effective October 24, 2002
1996	731-TA-756	Ukraine	Affirmative ³	Suspension agreement continued: July 1, 2021
1999	731-TA-815	Czech Republic	Negative	N/A
1999	731-TA-816	France	Affirmative	Order revoked: effective February 10, 2005
1999	731-TA-817	India	Affirmative	Ongoing fourth review
1999	731-TA-818	Indonesia	Affirmative	Ongoing fourth review
1999	731-TA-819	Italy	Affirmative	Order revoked: effective January 4, 2012

Table continued.

Table I-3 Continued

CTL plate: Previous and related Commission proceedings and status of orders

Date	Number	Country	ITC Original Determination	Current Status of Order
1999	731-TA-820	Japan	Affirmative	Order revoked: effective January 4, 2012
1999	731-TA-821	Korea	Affirmative	Ongoing fourth review
1999	731-TA-822	Macedonia	Negative	N/A
1999	701-TA-388	India	Affirmative	Ongoing fourth review
1999	701-TA-389	Indonesia	Affirmative	Ongoing fourth review
1999	701-TA-390	Italy	Affirmative	Order revoked: effective January 4, 2012
1999	701-TA-391	Korea	Affirmative	Ongoing fourth review
2016	701-TA-559	Brazil	Negative	N/A
2016	701-TA-560	China	Affirmative	Order continued: February 15, 2023
2016	701-TA-561	South Korea	Affirmative	Order continued: February 15, 2023
2016	731-TA-1317	Austria	Affirmative	Order continued: February 10, 2022
2016	731-TA-1318	Belgium	Affirmative	Order continued: February 10, 2022
2016	731-TA-1319	Brazil	Affirmative	Order revoked: effective February 1, 2022
2016	731-TA-1320	China	Affirmative	Order continued: February 10, 2022
2016	731-TA-1321	France	Affirmative	Order continued: February 10, 2022
2016	731-TA-1322	Germany	Affirmative	Order continued: February 10, 2022
2016	731-TA-1323	Italy	Affirmative	Order continued: February 10, 2022
2016	731-TA-1324	Japan	Affirmative	Order continued: February 10, 2022
2016	731-TA-1325	South Korea	Affirmative	Order continued: February 10, 2022

Table continued.

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

Date	Number	Country	ITC Original Determination	Current Status of Order
2016	731-TA-1326	South Africa	Affirmative	Order continued: February 10, 2022
2016	731-TA-1327	Taiwan	Affirmative	Order continued: February 10, 2022
2016	731-TA-1328	Turkey	Affirmative	Order continued: February 10, 2022

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

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

Safeguard Investigations

In 1984, the Commission determined that carbon and alloy steel (including CTL plate) was being imported into the United States in such increased quantities as to be a substantial cause of serious injury to the domestic industry producing such articles, and recommended quantitative restrictions of imports for a period of five years. President Ronald Reagan determined that import relief under section 201 of the Trade Act of 1974 was not in the national interest. At the President’s direction, quantitative limitations under voluntary restraint agreements (“VRAs”) for a five-year period ending September 30, 1989, were negotiated. In July 1989, the VRAs were extended for two and one-half years until March 31, 1992.

In 2001, the Commission determined that certain carbon and alloy steel, including CTL plate, was being imported into the United States in such increased quantities as to be a substantial cause of serious injury to the domestic industry producing such articles, and recommended additional duties on imports for a period of four years.³¹ On March 5, 2002, President George W. Bush announced the implementation of steel safeguard measures. Import relief relating to CTL plate consisted of an additional tariff for a period of three years and one day (30 percent ad valorem on imports in the first year, 24 percent in the second year, and 18 percent in the third year).³² Following receipt of the Commission’s mid-term monitoring report in September 2003, and after seeking information from the U.S. Secretary of Commerce and U.S. Secretary of Labor, President Bush determined that the effectiveness of the action taken

³¹ 66 FR 67304, December 28, 2001.

³² 67 FR 10553, March 7, 2002.

had been impaired by changed circumstances. Therefore, he terminated the U.S. measure with respect to increased tariffs on December 4, 2003.³³

Commerce's five-year reviews

Commerce announced that it would conduct expedited reviews with respect to the orders on imports of CTL plate from India, Indonesia, and South Korea with the intent of issuing the final results of these reviews based on the facts available not later than June 1, 2023.³⁴ Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at <https://access.trade.gov/public/FRNoticesListLayout.aspx>. Issues and Decision Memoranda contain complete and up-to-date information regarding the background and history of the orders, including scope rulings, duty absorption, changed circumstances reviews, and anticircumvention, as well as any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping and countervailing duty orders on imports of CTL plate from India, Indonesia, and South Korea 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 the orders are certain hot-rolled carbon-quality steel: (1) Universal mill plates (i.e., flat-rolled products rolled on four faces or in a closed box pass, of a width exceeding 150 mm but not exceeding 1250 mm, and of a nominal or actual thickness of not less than 4 mm, which are cut-to length (not in coils) and without patterns in relief), of iron or non-alloy quality steel; and (2) flat-rolled products, hot-rolled, of a nominal or actual thickness of 4.75 mm or more and of a width which exceeds 150 mm and measures at least twice the thickness, and which are cut-to-length (not in coils). Steel products included in the scope of the

³³ 68 FR 68483, December 8, 2003.

³⁴ Letter from Eric Greynolds, Director, Office IV, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, March 23, 2023.

order are of rectangular, square, circular, or other shape and of rectangular or non-rectangular cross section where such non-rectangular cross-section is achieved subsequent to the rolling process (i.e., products which have been “worked after rolling”)—for example, products which have been beveled or rounded at the edges. Steel products that meet the noted physical characteristics that are painted, varnished, or coated with plastic or other non-metallic substances are included within the scope. Also, specifically included in the scope of the orders are high strength, low alloy (HSLA) steels. HSLA steels are recognized as steels with micro-alloying levels of elements such as chromium, copper, niobium, titanium, vanadium, and molybdenum.

Steel products included in the scope, regardless of Harmonized Tariff Schedule of the United States (HTSUS) definitions, are products in which: (1) Iron predominates, by weight, over each of the other contained elements, (2) the carbon content is two percent or less, by weight, and (3) none of the elements listed below is equal to or exceeds the quantity, by weight, respectively indicated: 1.80 percent of manganese, or 1.50 percent of silicon, or 1.00 percent of copper, or 0.50 percent of aluminum, or 1.25 percent of chromium, or 0.30 percent of cobalt, or 0.40 percent of lead, or 1.25 percent of nickel, or 0.30 percent of tungsten, or 0.10 percent of molybdenum, or 0.10 percent of niobium, or 0.41 percent of titanium, or 0.15 percent of vanadium, or 0.15 percent zirconium. All products that meet the written physical description, and in which the chemistry quantities do not equal or exceed any one of the levels listed above, are within the scope of the orders unless otherwise specifically excluded.

The following products are specifically excluded from the orders: (1) Products clad, plated, or coated with metal, whether or not painted, varnished or coated with plastic or other non-metallic substances; (2) SAE grades (formerly AISI grades) of series 2300 and above; (3) products made to ASTM A710 and A736 or their proprietary equivalents; (4) abrasion-resistant steels (i.e., USS AR 400, USS AR 500); (5) products made to ASTM A202, A225, A514 grade S, A517 grade S, or their proprietary equivalents;

*(6) ball bearing steels; (7) tool steels; and (8) silicon manganese steel or silicon electric steel.*³⁵

U.S. tariff treatment

CTL plate is currently imported under Harmonized Tariff Schedule of the United States (“HTSUS” or “HTS”) statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7208.53.0000, 7208.90.0000, 7210.70.3000, 7210.90.9000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7211.90.0000, 7212.40.1000, 7212.40.5000, and 7212.50.0000.³⁶ The general rate of duty is “Free” for HTS subheadings 7208.40.30, 7208.51.00, 7208.52.00, 7208.53.00, 7208.90.90, 7210.70.30, 7210.90.90, 7211.13.00, 7211.14.00, 7211.90.00, 7212.40.10, 7212.40.50, and 7212.50.00.³⁷ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection (“CBP”).

Effective March 23, 2018, CTL plate originating in India and Indonesia are subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended. CTL plate originating in South Korea is currently exempt from section 232 duties but

³⁵ 83 FR 10672, March 12, 2018.

³⁶ Commerce’s scope also identifies HTS provisions for alloy steel, specifically HTS statistical reporting numbers 7225.40.3050, 7225.40.7000, 7225.50.6000, 7225.99.0090, 7226.91.5000, 7226.91.7000, 7226.91.8000, and 7226.99.0180. These provisions are applicable to certain micro-alloy steel CTL plate but are also applicable to alloy steel products that are not included in Commerce’s scope. The general rate of duty for HTS subheadings 7225.40.70, 7225.50.60, 7225.99.00, 7226.91.50, 7226.91.70, 7226.91.80, and 7226.99.01 is “Free.” USITC, HTSUS (2023) Revision 2, Publication 5421, March 2023, pp. 72-2, 72-40 – 72-42, 72-47.

Commerce’s notice of continuation of the AD and CVD orders includes HTS statistical reporting number 7226.99.0000 in the scope of the orders. HTS subheading 7226.99.00 was redesignated as subheading 7226.99.01 and was annotated by HTS statistical reporting numbers 7226.99.0110, 7226.99.0130, and 7226.99.0180, effective February 3, 2007. 83 FR 10672, March 12, 2018; USITC, HTSUS (2007) Basic, Publication 3902, January 2007, Change Record, p. 57.

³⁷ USITC, HTSUS (2023) Revision 2, Publication 5421, March 2023, pp. 72-15, 72-17 – 72-19, 72-47.

is instead subject to an absolute import quota of 223,252 short tons per year, effective June 1, 2018. The import quota covers CTL plate and out-of-scope products.^{38 39}

Effective September 1, 2019, nonsubject CTL plate originating in China was subject to an additional 10 percent ad valorem duty under section 301 of the Trade Act of 1974. This tariff was subsequently raised to 15 percent ad valorem, with the same effective date of September

³⁸ Imports of steel articles, including CTL plate, originating in South Korea were initially exempted from the section 232 tariffs, effective March 23, 2018 (83 FR 13361, March 28, 2018); but the duty exemptions were continued subject to annual absolute quotas, effective June 1, 2018 (83 FR 20683, May 7, 2018).

The 2023 annual absolute quota quantity from South Korea by quota category (including the HTS statistical reporting numbers for carbon steel and alloy steel CTL plate) is Quota ID No. 9903.80.11: Plate in cut lengths (HTS 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.3050, 7225.50.6000, 7226.91.5000)— 202,530,628 kilograms (223,252 short tons).

CTL plate is also imported under HTS statistical reporting numbers in several other quota categories, with much broader product coverage, including Quota ID No. 9903.80.05: Hot-rolled sheet, Quota ID No. 9903.80.06: Hot-rolled strip, Quota ID No. 9903.80.08: Cold-rolled sheet and other products, Quota ID No. 9903.80.09: Cold-rolled strip and other products, and Quota ID No. 9903.80.13: Flat products, coated.

For a full list of product groups as well as their specified quotas and HTS definitions, see: CBP, “First Quarter Absolute Quota for Steel Mill Articles of Argentina, Brazil and South Korea,” Quota Bulletin No. QB 23-601 2023, December 12, 2022, <https://www.cbp.gov/trade/quota/bulletins/qb-23-601-2023>. Quota ID numbers are used by CBP to track the pertinent imports and are cited in the Quota Bulletins. The ID numbers also match HTS subheadings that may be used for more than one country or purpose. Thus, Quota ID numbers included in this section should not be directly compared with the matching HTS subheadings.

83 FR 11625, March 15, 2018. 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, HTSUS (2023) Revision 2, Publication 5421, March 2023, pp. 72-47, 99-III-5–99-III-8, 99-III-267, 99-III-268, 99-III-274

³⁹ CTL plate from other sources is also subject to different tariff treatment under section 232. Section 232 import duties on steel articles currently cover all countries of origin except Argentina, Australia, Brazil, Canada, Mexico, and South Korea. Imports from Australia, Canada, and Mexico are exempt from section 232 duties and quotas on steel articles, while imports originating in Argentina, Brazil, and South Korea are exempt from duties but are instead subject to absolute quotas (effective June 1, 2018). 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 23421, May 21, 2019; 84 FR 23987, May 23, 2019; 87 FR 11, January 3, 2022; 87 FR 19351, April 1, 2022; 87 FR 33407, June 2, 2022; 87 FR 33591, June 3, 2022.

1, 2019, and was more recently reduced to 7.5 percent ad valorem, effective February 14, 2020.⁴⁰

Description and uses⁴¹

Steel is generally defined as a metallic alloy of iron and carbon that is usefully malleable when first cast, and in which iron predominates, by weight, over each of any other contained elements and the carbon content is 2 percent or less, by weight.⁴² CTL plate is a flat-rolled carbon steel product, and of thickness of 4.75 mm (0.187 inch) or more,⁴³ commonly produced to meet the requirements of ASTM International Standard A36 (for carbon structural steel). Plate for shipbuilding purposes may be produced to meet the requirements of ASTM A131 (the standard specification for structural steel for ships), which are similar to American Bureau of Shipping (“ABS”) specifications for steel for hull construction. Both the ASTM and the ABS specifications cover ordinary-strength hull steel, which is similar in properties to common structural steel, and higher strength structural steel, which contains grain-refining elements and is processed to meet higher strength levels. The definition of non-alloy steel adopted in the scope of these reviews includes the steel grades considered non-alloy steel by the steel industry. Certain high strength low alloy (“HSLA”) steel grades, considered alloy steel using the definition in the HTSUS, are included.

End uses for CTL plate include the production of welded, load-bearing and structural applications, such as bridgework; machine components (e.g., the body or frame of the machine); transmission towers and lighting poles; buildings; mobile equipment (e.g., cranes, bulldozers, scrapers, and other tracked or self-propelled machinery); certain welded tubular products, such as large diameter line pipe; and heavy transportation equipment, such as railway rolling stock (especially for tank cars), barges, and oceangoing vessels. End users concerned about “coil set memory” (such as those that burn out parts from plate) may prefer

⁴⁰ 84 FR 43304, August 20, 2019; 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, HTSUS (2023) Revision 2, Publication 5421, March 2023, pp. 72-47, 99-III-87–99-III-88, 99-III-97–99-III-98, 99-III-298, 99-III-300–99-III-303.

⁴¹ Unless otherwise noted, this information is based on Cut-to-Length Carbon-Quality Steel Plate from India, Indonesia, and Korea, Investigation Nos. 701-TA-388, 389, and 391 and 731-TA-817, 818, and 821 (Third Review), USITC Publication 4764, February 2018 (“Third review publication”), pp. I-23 – I-24.

⁴² HTS Chapter 72, Note 1(d), Steel: Ferrous materials other than those of heading 7203 which (with the exception of certain types produced in the form of castings) are usefully malleable and which contain by weight 2 percent or less of carbon. However, chromium steels may contain higher proportions of carbon. USITC, HTSUS (2023) Revision 2, Publication 5421, March 2023, p. 72-1.

⁴³ Universal mill plate is of 4 mm (0.157 inch) or more in thickness.

plate from a reversing mill (described below), since the edges of plate cut from coils may curl on heating.

Manufacturing process⁴⁴

The manufacturing processes for CTL plate are summarized below. In general, there are three distinct and successive stages that include: (1) melting and refining steel, (2) casting steel into semifinished forms, and (3) hot rolling semi-finished forms into hot-rolled, flat-rolled steel mill products.

Melt stage

Steel is produced by either the integrated or the non-integrated process. In the integrated process, a blast furnace smelts iron ore with coke to produce molten iron, which is subsequently poured into a steelmaking furnace, generally a basic oxygen furnace, together with a small amount of ferrous scrap metal. The molten metal is processed into steel by blowing oxygen into the metal bath. In the non-integrated process, an electric arc furnace melts ferrous scrap along with primary iron products such as pig iron or direct-reduced iron⁴⁵ to produce molten steel.

Whether produced by the integrated or the non-integrated process, molten steel is poured or “tapped” from the furnace into a ladle to be transported to a secondary steelmaking (also called “ladle metallurgy”) station (an optional step) and then to casting. Secondary steelmaking refines molten steel into extra-clean or low-carbon steel satisfying stringent Industry surface or internal requirements or micro-cleanliness quality and mechanical properties.⁴⁶ During secondary steelmaking, adjustments may be made to the chemical content by adding alloying elements or by lowering the carbon content (decarburization), and the temperature of the steel is adjusted for optimum casting. The essential characteristics of the steel are established prior to the casting stage.

⁴⁴ Unless otherwise noted, this information is based on the third review publication, pp. I-24 – I-27.

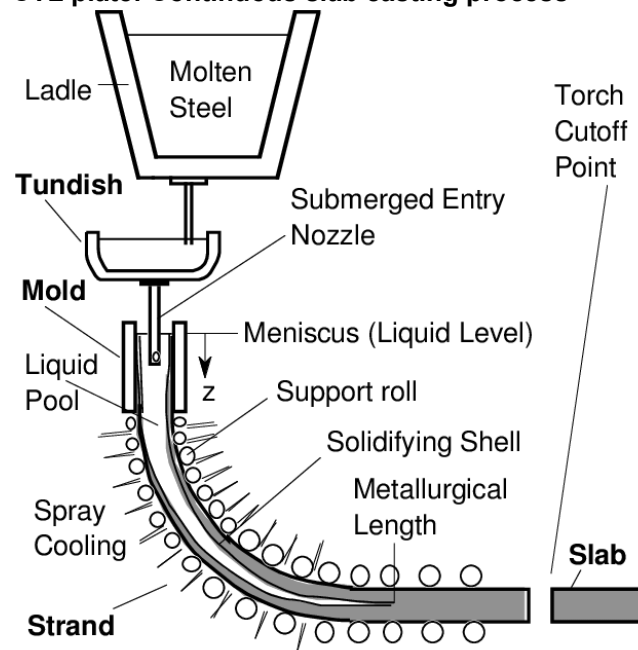
⁴⁵ Cold pig iron and direct-reduced iron, which includes hot-briquetted iron, are sometimes considered as scrap substitutes because they can be replacements for some ferrous scrap in an electric arc furnace that would otherwise be charged only with ferrous scrap as its source of iron. Reasons for relying on scrap substitutes may include the nonavailability of scrap in sufficient quantities, the relative prices of scrap versus scrap substitutes, as well as technical reasons related to the lack of residual metallic elements in scrap substitutes.

⁴⁶ The goals of secondary steelmaking include controlling gases (e.g., decreasing the concentration of oxygen, hydrogen, and nitrogen, referred to as “degassing”); reducing sulfur; removing undesirable nonmetallic inclusions such as oxides and sulfides; changing the composition, shape, or both of the oxides and sulfides that cannot be completely removed; and improving the mechanical properties of the finished steel.

Slab casting stage

Following the production of molten steel with the desired properties, the steel is cast into a form that can enter the rolling process, either by ingot teeming or by continuous casting. Continuous slab casting (figure I-1)⁴⁷ is the preferred, low-cost method and is normally used to produce plates up to approximately 101.6 mm (4 inches) in thickness. Ingots casting (figure I-2) is for producing thicker plates, because continuous casting cannot produce slabs of sufficient thickness.⁴⁸

Figure I-1
CTL plate: Continuous slab casting process

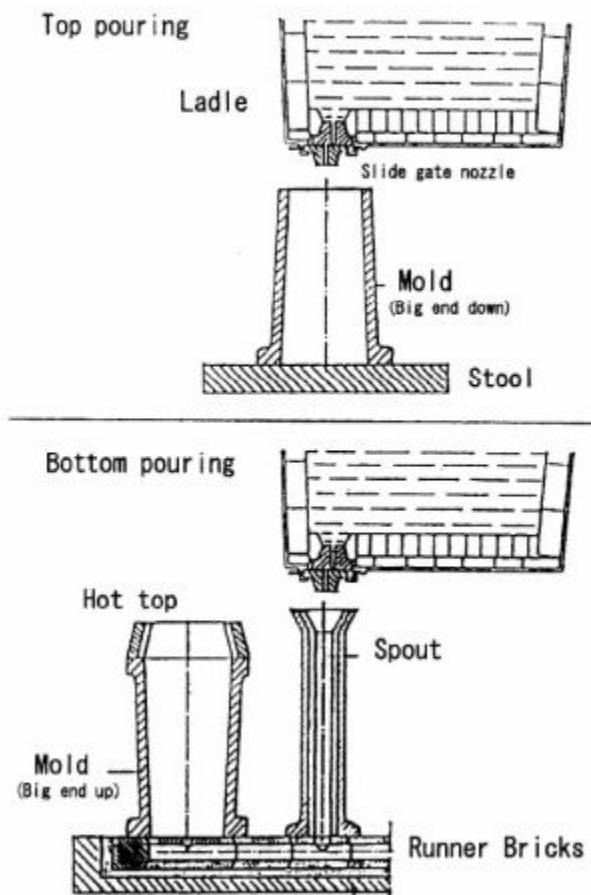


Source: Thomas, Brian G., Figure 1: Schematic of steel continuous casting process, "Continuous Casting of Steel," *Modeling for Casting and Solidification Processing*, New York: Marcel Dekker, 2001, p. 39, http://ccc.illinois.edu/PDF%20Files/Publications/01_Yu_Chap_15_final.pdf.

⁴⁷ All figures in this section are from Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey, Investigation Nos. 701-TA-560-561 and 731-TA-1317-1328 (Review), USITC Publication 5399, January 2023 ("Review publication"), pp. I-54 – I-60.

⁴⁸ Plate of a thickness that requires the use of ingots in the manufacturing process is a relatively small part of the plate market.

Figure I-2
CTL plate: Top and bottom pouring ingot casting



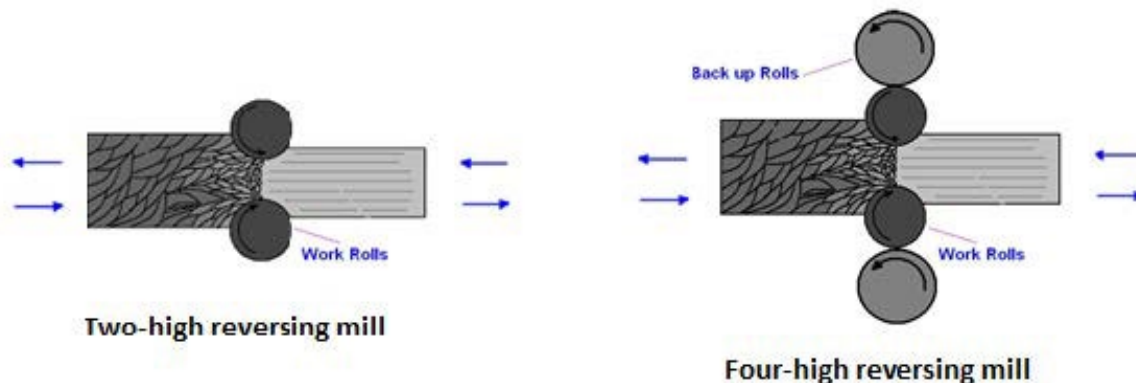
Source: Steel Data, "Non-Metallic Inclusions in Steel: Top pouring and bottom pouring for conventional ingot casting," ©2018, <http://www.steeldata.info/inclusions/demo/help/ingot.html>, retrieved April 5, 2023.

Rolling stage

Most CTL plate is hot rolled on a reversing plate mill (also called a "sheared plate mill") consisting of one or two reversing hot-rolling mill stands and associated equipment. If there are two stands, the first is called the "roughing mill" and the second is called the "finishing mill." The roughing mill in a two-stand mill or the single stand is equipped with special tables in front of and behind the mill to rotate the plate one-quarter turn between rolling passes to allow cross-rolling, increasing the width rather than the length of the plate as the thickness is reduced. After the desired finished width is reached, the plate is again rotated one-quarter turn

and rolled straightaway to finished thickness.⁴⁹ Reversing mills for plate are either two or four parallel rolls high (figure I-3). The flat rolls in contact with the plate are work rolls in both two-high and four-high reversing mills. Producing thicker plates require additional backup rolls to provide rigidity to the work rolls in a four-high reversing mill.⁵⁰

Figure I-3
CTL plate: Two-high and four-high reversing mills



Source: *Mechanical Engineering*, "Types of Rolling Mills" web page, no date, <http://engineeringhut.blogspot.com/2010/10/types-of-rolling-mills.html>, retrieved April 5, 2023.

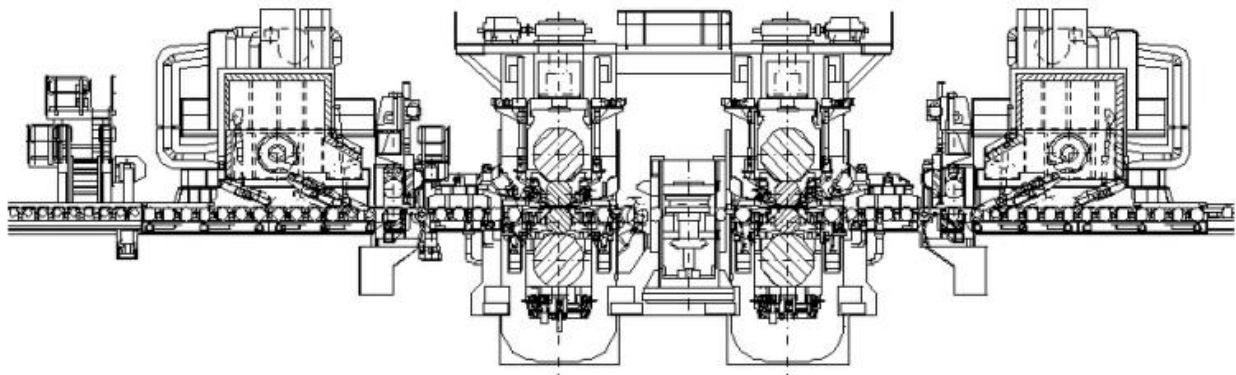
Some reversing plate mills (called "Steckel mills") are equipped on each side of the finishing mill with coilers that operate inside small heating furnaces, keeping the steel hot and allowing the production of much longer or thinner plates (figure I-4). Plate can be rolled on a Steckel mill without using the heated coilers, in which case the mill operates like a conventional

⁴⁹ Controlled rolling and accelerated cooling are alternative ways to achieve a combination of high strength and high toughness. Together, these processes are known as "Thermo-Mechanical Controlled Processing (TMCP)." Controlled rolling involves a substantial amount of hot work at near the recrystallization temperature. A slab might be partially hot rolled, then held until it reached a specific temperature, and then finish-rolled. This practice could also involve a second hold for a controlled finishing temperature. Accelerated cooling involves rolling without interruption, then cooling the plate rapidly with water sprays to a specific temperature. Controlled rolling involves holding steel on the tables of the plate mill, and therefore results in lower productivity. Accelerated cooling should not result in the same penalty in productivity but does require additional equipment. Typical products for which controlled rolling is used include ASTM A656 Grade 80 (HSLA structural steel with improved formability for truck frames, brackets, crane booms, rail cars, and similar applications); ASTM A572 Grades 60 and 65 (HSLA structural steel for bridges, buildings, and other structures where notch-toughness is a requirement); American petroleum Institute ("API") Specification 2W (Steel plates for offshore structures, produced by TMCP); and API Specification 5L (Line Pipe) Grades X42 and higher.

⁵⁰ Reversing mills in the United States generally produce plate ranging from 0.187 to 20 inches (4.75 to 508 mm) thick and from 48 to 154 inches (1,219 to 3,912 mm) wide. Review publication, pp. I-56 – I-57.

reversing plate mill. Because they have the capability to produce long pieces, Steckel mills are equipped with coilers to produce coiled plate as well as in-line shearing facilities to produce discrete plate.

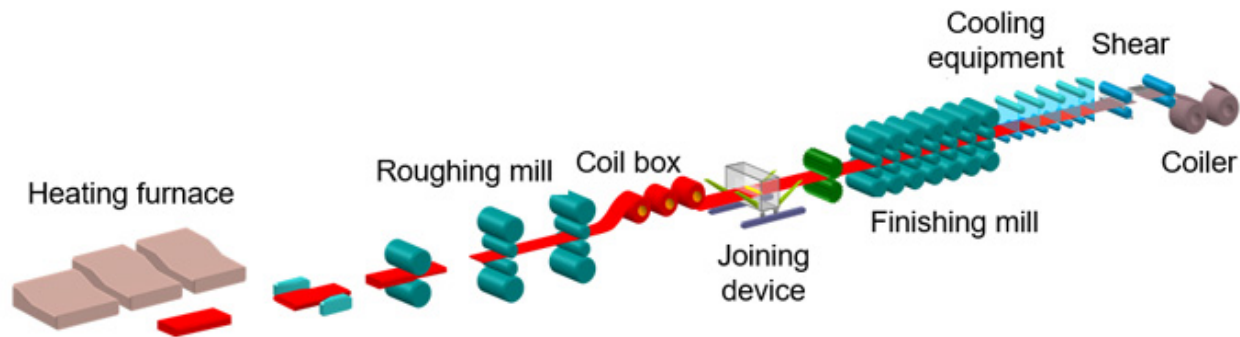
Figure I-4
CTL plate: Steckel mill



Source: China Advanced Steel Technologies and Engineering (“CASTE”) Consulting, “Steckel Mill Consulting,” 2016, <http://www.castellc.com/Steckel-Mill-Consulting.html>.

Coiled plate also may be rolled on a continuous hot-strip mill (figure I-5). Such a mill has either a reversing rougher or a number (four or five) of non-reversing roughing mills followed by a finishing section comprised of a series of mill stands, usually six, spaced close together so that the steel is rolled continuously in a single pass in one direction. The finished plate is coiled, discharged from the mill, allowed to cool, then uncoiled, flattened, and cut to length on a separate processing line.

Figure I-5
CTL plate: Continuous hot-strip mill



Source: JFE Steel Corp., “JFE Steel Develops Hot-continuous Rolling Process for HITEN,” May 6, 2021, <https://www.jfe-steel.co.jp/en/release/2021/210506.html>.

Coiled plate is converted into CTL plate by the process of uncoiling, flattening, and cutting to length, which may be done on a single continuous processing line by either the firm that rolled the coiled plate, or, more commonly, by an independent processing firm or service center. Mills and service centers that purchase coiled plate and cut it in the United States are considered to be producers of CTL plate. Hot-strip mills produce mostly hot-rolled sheet, i.e., product less than 4.75 mm thick (0.187 inch), and are usually limited to product no wider than 1,829 mm (72 inches). Steckel plate mills also produce hot-rolled sheet, however, for CTL plate up to 1,829 mm (72 inches) in width, hot-strip mill rolling followed by cutting to length is normally the most economical method of production.

Because of its capability to cross roll, a sheared plate mill is somewhat flexible with regard to the slab width used to produce a given plate width. A Steckel mill or continuous hot-strip mill must have a slab slightly wider than the width of the plate to be produced and has the advantage of being able to roll longer, heavier slabs than could be used on a sheared plate mill.

Reversing and Steckel mills can produce wider and thicker plate than a hot-strip mill. Plate produced on reversing mills in the United States ranges from 4.75 to 508 mm (0.187 to 20 inches) in thickness and up to 4,953 mm (195 inches) in width, while plate produced on Steckel mills typically ranges from 4.75 to 19.1 mm (0.187 to 0.750 inch) in thickness and 1,219 to 2,438 mm (48 to 96 inches) in width.

Most CTL plate is smooth on both sides. However, steel with patterns in relief is included within the scope of these reviews. Floor plate, which has a non-skid pattern of raised figures at regular intervals on one surface, is the main example of steel with patterns in relief. Floor plate is usually produced on a continuous hot-strip mill, using an embossed roll in the final hot rolling stand. It can also be produced on a Steckel mill by holding the hot plate on one of

the Steckel furnaces at the mill after completing all but the final rolling pass. One roll is then changed, and the final rolling is completed. Using this method, the roll is again changed to roll the next plate. Floor plate is also produced on two-stand reversing mills, with an embossed roll in the finishing stand.

Although most CTL plate is at least 48 inches in width, a product line known as hot-rolled flat bar includes some product that is within the scope of these reviews.⁵¹ Hot-rolled flat bar is produced on a different type of rolling mill in widths from about 1½ inches to as wide as 15 inches and in thicknesses from about ¼ inch to 3 inches. Only product that is at least 6 inches in width is within the scope of this proceeding. Mills producing the subject flat bar also produce other bar products, such as nonsubject flat bar, round bar, and small angle.

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 29 firms, which accounted for approximately 86 percent of production of CTL plate in the United States during 1998.⁵² During the first five-year reviews, the Commission received U.S. producer questionnaires from 24 firms, which accounted for approximately 98.4 percent of production of CTL plate in the United States during 2004.⁵³ During the second five-year reviews, the Commission received U.S. producer questionnaires from 13 firms (nine mills and four usable processor responses), which accounted for a substantial portion of production of CTL plate in the United States during 2010.⁵⁴ During the third five-year reviews, the Commission received U.S. producer questionnaires from 16 firms,

⁵¹ A universal mill is a mill capable of simultaneously rolling between both horizontal and vertical rolls. Universal mill plate is defined in HTS Chapter 72, Additional U.S. Note 1(b) as: Flat-rolled products rolled on four faces or in a closed box pass, of a width exceeding 150 mm but not exceeding 1,250 mm and of thickness of not less than 4 mm, not in coils and without patterns in relief. USITC, HTSUS (2023) Revision 2, Publication 5421, March 2023, p. 72-5.

⁵² Original publication, p. III-1.

⁵³ Cut-to-Length Carbon-Quality Steel Plate from France, India, Indonesia, Italy, Japan, and Korea, Investigation Nos. 701-TA-388-391 and 731-TA-816-821 (Review), USITC Publication 3816, November 2005 (“First review publication”), p. III-1.

⁵⁴ Cut-to-Length Carbon-Quality Steel Plate from India, Indonesia, Italy, Japan, and Korea, Investigation Nos. 701-TA-388-391 and 731-TA-817-821 (Second Review), USITC Publication 4296, December 2011 (“Second review publication”), p. I-16.

which accounted for the substantial majority of production of CTL plate in the United States during 2016.⁵⁵

In response to the Commission’s notice of institution in these current reviews, domestic interested parties provided a list of 21 known and currently operating U.S. producers of CTL plate. Three firms providing U.S. industry data in response to the Commission’s notice of institution accounted for approximately *** percent of production of CTL plate in the United States during 2022.⁵⁶

Recent developments

Table I-4 presents developments in the U.S. industry since the Commission’s last five-year reviews.⁵⁷

Table I-4
CTL plate: Developments in the U.S. industry

Item	Firm	Event
Idling	ArcelorMittal	September 2017— ArcelorMittal announced that it would consolidate plate operations by idling its rolling mill in Conshohocken, Pennsylvania.
Expansion	JSW Steel	March 2018— JSW Steel USA Inc. announced that it would be investing \$500 million into the expansion of its plate and pipe facility in Baytown, Texas.
Disruption	Nucor	August 2018— The 25-short tons electric-arc furnace damaged by a minor fire at the end of July is undergoing repairs while the other 25-short tons EAF resumed operations at Nucor’s plate facility in Longview, Texas.
Expansion	SSAB	October 2018— SSAB Americas (“SSAB”) announced capital investments totaling \$110 million to increase the annual production capacity for quenched-and-tempered (“Q&T”) steels and other steel types at its Axis (Mobile), Alabama mill. Specific upgrades are to remove production bottlenecks from formatting, blasting and painting, and shipping operations to boost Q&T steel capacity. Annual production capacity will expand from 300,000 metric tons (330,693 short tons) to 400,000 metric tons (440,935 short tons). Another upgrade is installation of an accelerated cooling system on the rolling mill which is anticipated to reduce the need for alloys in steel production.
Upgrades	Nucor	February 2019— Nucor contracted with Primetals Technologies Ltd. to upgrade the plate production equipment at its facility in Tuscaloosa, Alabama, with installation to be completed in first-quarter 2020. The new down coiler is capable of handling 1.25-inch thick, low-carbon grade and 1-inch thick, line-pipe grade steel plates up to 102 inches

⁵⁵ Third review publication, p. III-1.

⁵⁶ Cleveland-Cliffs’ response to the notice of institution, March 3, 2023, exh. 8. SSAB and Nucor’s response to the notice of institution, March 3, 2023, exh. 1.

⁵⁷ For recent developments, if any, in tariff treatment, please see “U.S. tariff treatment” section.

Item	Firm	Event
		wide. This project also includes new runout tables; a new coil handling area; an inspection line with shear, hydraulics, banders, markers; and an upgrade to a Level 1 automation system.
Disruption	Finkl Steel	April 2019— A blast in a slag pit at A. Finkl & Sons Co.'s. ("Finkl Steel's") facility in Chicago, Illinois, sent hot slag flying skyward. The burning debris damaged the near-by Naylor Pipe Co. facility and burned down a neighboring private residence.
Upgrades	ArcelorMittal	May 2019— ArcelorMittal announced equipment upgrades totaling \$163.4 million over the next few years to its facility in Burns Harbor, Indiana. These investments include \$57.9 million for new finishing equipment at the mill's pickle lines, \$54.1 million for a new in-line temper mill to the hot-rolling mill, and \$51.4 million for a new basic oxygen furnace vessel, for producing higher strength and heavier gauge hot-rolled plate products.
New products	SSAB	December 2019— SSAB announced its corporate goal to produce fossil fuel-free steel by 2026. To start, the facilities in both Mobile, Alabama, and Montpelier, Iowa, will substitute directly reduced iron ("DRI") sponge for some of the ferrous scrap in their electric-arc furnaces. The fossil fuel-free DRI sponge will be sourced from the Swedish-based Hybrit joint project led by parent firm SSAB Enterprises LLC with mining firm LKAB and energy firm Vattenfall.
Layoffs	Evrz NA	June 2020— Evraz North America Inc. ("Evrz NA") announced layoffs of 65 employees at its plate mill in Portland, Oregon, starting on June 8.
Construction	Nucor	October 2020— Nucor began construction of a \$1.7-billion plate mill in Brandenburg, Kentucky, with annual production capacity of 1.2 million short tons. This project was anticipated to be completed in the first quarter of 2022.
Acquisition	Cleveland-Cliffs	December 2020— Cleveland-Cliffs acquired ArcelorMittal USA and its subsidiaries, with the exception of the AM/NS Calvert (a joint-venture with Nippon Steel ("NS") Corp.) steel processing facility in Calvert, Alabama, with an annual production capacity of 5.3 million metric tons (5.8 million short tons). The hot-strip mill at this facility rolls steel slabs down to a thickness range of 0.059"–1.000" (1.5–25.4 mm).
Expansion and upgrades	SSAB	July 2021— SSAB is investing \$69 million to expand and upgrade its facility its Mobile, Alabama, with new equipment to increase production capacity and efficiencies for quenched and tempered steels. The firm also anticipated expanding its current workforce of more than 600 employees by hiring 31 additional employees over the next three years.
Acquisition	Cleveland-Cliffs	November 2021— Cleveland-Cliffs completed its acquisition of Ferrous Processing and Trading Co. ("PTC"), a leading U.S. prime ferrous scrap processor, that processes about 3 million short tons of ferrous scrap annually, of which about one-half is prime-grade ferrous scrap.
Expansion	JSW Steel	November 2021— JSW Steel commenced the phase II upgrades to its plate mill in Baytown, Texas. Installing a four-high finishing mill, pre-leveler, accelerated cooling system/direct quench, cooling beds, and new roll shop were anticipated to be completed by 2023. These upgrades are part of the \$260 million investments to improve the mill's product quality, productivity, yields, and overall cost-effectiveness.
Expansion	Nucor	November 2021— Nucor announced the addition of a blast and prime line (to remove mill scale from steel surfaces) with an annual production

Item	Firm	Event
		capacity of 120,000 short tons per year, at its plate mill in Brandenburg, Kentucky.
Divestiture	Evraz NA	August 2022— Evraz NA's Russian parent firm Evraz plc is registered in London but is sanctioned by the United Kingdom ("UK"). To pull back from its worldwide operations and to reduce its corporate debt load, Evraz plc announced its solicitation of buyers for its Canadian and U.S. steel facilities, including the steel plate mill in Portland, Oregon.
New labor contract	Cleveland-Cliffs	August 2022— Cleveland-Cliffs announced a new four-year labor agreement concluded with the United Steel Workers ("USW"), effective September 2022. This tentative agreement covers the 12,000 USW-represented employees at the firm's steel facilities, including those that produce CTL plate at Burns Harbor, Indiana; and at Coatesville, Conshohocken, and Steelton, Pennsylvania.
Divestiture	Evraz NA	September 2022— U.S. Steel Corp. and Nucor Corp. are reportedly the most likely bidders for Evraz NA. However, Evraz NA's Russian parent firm Evraz plc is considering soliciting separate buyers for its Canadian versus its U.S. steel facilities, due to the Canadian sanctions imposed against a major Russian shareholder, who reportedly owns 28 percent of Evraz plc.
Completion	Nucor	September 2022— Construction of Nucor's new plate mill in Brandenburg, Kentucky, reportedly was anticipated to be completed by the end of the year.
Certification	Nucor	September 2022— Nucor announced the public registration to attain the U.S. Green Building Council's LEED v4 Building and Design environmental sustainability certification for its new plate mill in Brandenburg, Kentucky.
Plant opening	Nucor	December 2022— Nucor's new plate mill in Brandenburg, Kentucky, rolled its first batch of steel plate at the end of the month. Final commissioning of the mill and its first shipments to customers were scheduled for first-quarter 2023. This facility, with 400 employees, is the only one in the United States capable of rolling the heavy-gauge plate suitable for the monopile foundations of offshore wind turbine towers.
Expansion and upgrades	CMC	February 2023— Commercial Metals Co. ("CMC") reportedly will expend \$67.75 million to expand and update the production capabilities of its facility in Birmingham, Alabama. This facility produces flat-bar products within the dimensions specified for universal mill plate in Commerce's scope.

Source: Justin Heinze, "Arcelor Mittal Plant Closes in Conshohocken, Hundreds Laid Off: Union," September 26, 2017, <https://patch.com/pennsylvania/norristown/arcelor-mittal-plant-shuts-down-conshohocken-200-plus-jobs-lost>;

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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.⁵⁸ Table I-5 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigations and subsequent five-year reviews.

⁵⁸ Individual company trade and financial data are presented in app. B.

Table I-5**CTL plate: Trade and financial data submitted by U.S. producers, by period**

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

Item	Measure	1998	2004	2010	2016	2022
Capacity	Quantity	11,191,586	11,041,815	9,624,269	12,239,304	***
Production	Quantity	7,948,996	7,520,671	6,075,718	7,262,460	***
Capacity utilization	Ratio	71.0	68.1	63.1	59.3	***
U.S. shipments	Quantity	7,647,308	7,028,510	5,378,921	6,427,735	***
U.S. shipments	Value	3,377,079	4,456,089	3,961,873	3,824,172	***
U.S. shipments	Unit value	442	634	737	595	***
Net sales	Value	3,382,607	3,628,077	4,255,177	3,635,284	***
COGS	Value	3,103,191	2,752,869	4,063,711	3,428,873	***
COGS to net sales	Ratio	91.7	75.9	95.5	94.3	***
Gross profit or (loss)	Value	279,416	875,208	191,466	206,411	***
SG&A expenses	Value	143,738	92,452	125,933	186,029	***
Operating income or (loss)	Value	135,678	782,756	65,533	20,382	***
Operating income or (loss) to net sales	Ratio	4.0	21.6	1.5	0.6	***

Source: For the years 1998-2016, data are compiled using data submitted in the Commission's original investigations and subsequent five-year reviews. For the year 2022, data are compiled using data submitted by domestic interested parties. Cleveland-Cliffs' supplemental response to the notice of institution, March 25, 2023, exh. 1. SSAB and Nucor's supplemental response to the notice of institution, March 22, 2023, pp. 11-12.

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 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.⁵⁹

⁵⁹ Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

In its original determinations and full first, second, and third five-year review determinations, the Commission defined the domestic like product as all domestically produced CTL plate coextensive with Commerce's scope description, including grade X-70 plate, micro-alloy steel plate, and plate cut from coils. In its original determinations and full first, second, and third five-year review determinations, the Commission defined the domestic industry as all producers of CTL plate, including processors.^{60 61}

U.S. importers

During the final phase of the original investigations, the Commission received U.S. importer questionnaires from 53 firms, which accounted for over 50 percent of total U.S. imports of CTL plate from India and Indonesia and between 65 to 75 percent of such imports from South Korea during the period January 1996 to June 1999.⁶² Import data presented in the original investigations are based on official Commerce statistics and data submitted in response to Commission questionnaires.

During the first five-year reviews, the Commission received U.S. importer questionnaires from 25 firms, which accounted for a substantial share of total U.S. imports of CTL plate from South Korea during the period January 1999 through March 2005.⁶³ Import data presented in the first five-year reviews are based on official Commerce statistics and data submitted in response to Commission questionnaires.

During the second five-year reviews, the Commission received U.S. importer questionnaires from 18 firms, which accounted for *** percent of imports from South Korea during the period January 2005 to June 2011.⁶⁴ Import data presented in the second five-year reviews are based on adjusted official Commerce statistics for CTL plate.

During the third five-year reviews, the Commission received U.S. importer questionnaires from 46 firms, which accounted for *** percent of total U.S. imports of CTL

⁶⁰ 88 FR 6781, February 1, 2023.

⁶¹ There were no domestic interested party responses to the notice of institution from processors of CTL plate in these current reviews.

⁶² Original publication, p. IV-1.

⁶³ The Commission received limited responses from firms importing CTL plate from India and Indonesia. First review publication, p. IV-1.

⁶⁴ No responding importer reported CTL plate imports from India and Indonesia during January 2005-June 2011. Second review confidential report, p. IV-1.

plate from India and *** percent of subject imports from South Korea in 2016.⁶⁵ Import data presented in the third five-year reviews are based on official Commerce statistics and data submitted in response to Commission questionnaires.

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 63 potential U.S. importers of CTL plate.⁶⁶

U.S. imports

Table I-6 presents the quantity, value, and unit value of U.S. imports from India, Indonesia, and South Korea as well as the other top sources of U.S. imports (shown in descending order of 2022 imports by quantity).

⁶⁵ There were no reported imports of the subject product from Indonesia during 2016. Investigation Nos. 701-TA-388, 389, and 391 and 731-TA-817, 818, and 821 (Third Review): Cut-to-Length Carbon-Quality Steel Plate from India, Indonesia, and Korea, Confidential Report, INV-QQ-014, January 30, 2018, (“Third review confidential report”), p. IV-1.

⁶⁶ Cleveland-Cliffs’ response to the notice of institution, March 3, 2023, exh. 9. SSAB and Nucor’s response to the notice of institution, March 3, 2023, exh. 1.

Table I-6
CTL plate: U.S. imports, by source and period

Quantity in short tons; value in 1,000 dollars

U.S. imports from	Measure	2017	2018	2019	2020	2021	2022
South Korea	Quantity	280,286	278,334	269,948	124,489	270,780	276,387
India	Quantity	1,781	784	757	1,156	1,668	3,241
Indonesia	Quantity	---	---	69	6	3	---
Subject sources	Quantity	282,067	279,118	270,774	125,651	272,451	279,628
Canada	Quantity	224,460	208,195	184,080	224,469	284,936	238,124
United Kingdom	Quantity	65,584	87,628	60,588	64,976	82,744	73,245
Mexico	Quantity	108,428	68,405	36,671	27,208	22,810	49,481
All other sources	Quantity	445,392	330,022	267,311	171,230	208,769	196,045
Nonsubject sources	Quantity	843,863	694,250	548,649	487,884	599,259	556,895
All import sources	Quantity	1,125,930	973,368	819,423	613,535	871,710	836,523
South Korea	Value	180,936	223,936	239,602	97,050	270,290	406,753
India	Value	3,035	1,234	1,634	2,444	3,693	9,747
Indonesia	Value	---	---	86	6	8	---
Subject sources	Value	183,971	225,170	241,321	99,499	273,991	416,500
Canada	Value	167,488	190,856	159,528	157,295	362,398	381,452
United Kingdom	Value	76,381	113,677	82,173	82,015	111,721	166,093
Mexico	Value	66,036	53,554	38,207	27,761	33,355	74,036
All other sources	Value	470,642	449,770	373,051	283,342	367,878	446,641
Nonsubject sources	Value	780,547	807,857	652,959	550,414	875,353	1,068,223
All import sources	Value	964,518	1,033,027	894,280	649,913	1,149,345	1,484,723

Table continued.

Table I-6 Continued
CTL plate: U.S. imports, by source and period

Unit value in dollars per short ton

U.S. imports from	Measure	2017	2018	2019	2020	2021	2022
South Korea	Unit value	646	805	888	780	998	1,472
India	Unit value	1,704	1,574	2,158	2,114	2,214	3,008
Indonesia	Unit value	---	---	1,243	894	2,391	---
Subject sources	Unit value	652	807	891	792	1,006	1,489
Canada	Unit value	746	917	867	701	1,272	1,602
United Kingdom	Unit value	1,165	1,297	1,356	1,262	1,350	2,268
Mexico	Unit value	609	783	1,042	1,020	1,462	1,496
All other sources	Unit value	1,057	1,363	1,396	1,655	1,762	2,278
Nonsubject sources	Unit value	925	1,164	1,190	1,128	1,461	1,918
All import sources	Unit value	857	1,061	1,091	1,059	1,318	1,775

Source: Compiled from official Commerce statistics for HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7208.53.0000, 7208.90.0000, 7210.70.3000, 7210.90.9000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7211.90.0000, 7212.40.1000, 7212.40.5000, 7212.50.0000, 7225.40.3050, 7225.40.7000, 7225.50.6000, 7225.99.0090, 7226.91.5000, 7226.91.7000, 7226.91.8000, 7226.99.0180, accessed March 27, 2023. These data may be overstated as HTS statistical reporting numbers 7225.40.3050, 7225.40.7000, 7225.50.6000, 7225.99.0090, 7226.91.5000, 7226.91.7000, 7226.91.8000, 7226.99.0180 may contain products outside the scope of these reviews.

Note: In the third reviews, the Commission collected data for U.S. imports of micro-alloy steel CTL plate provided for in HTSUS headings 7225 and 7226 through questionnaires. Third review publication, p. IV-1. In these current five-year reviews, staff does not have access to questionnaire response data and has used official Commerce statistics for the following HTSUS statistical reporting numbers. Imports under the above HTS statistical reporting numbers in headings 7225 and 7226 comprised 30.3 percent of total CTL plate imports by quantity from all sources in 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Because of rounding, figure may not add to total shown.

Note: POSCO, a manufacturer in South Korea, was excluded from the original antidumping and countervailing duty orders for South Korea. Imports from South Korea are not distinguished between subject and nonsubject sources in these reviews. Therefore, data for imports from subject sources may be overstated, while data for imports from nonsubject sources may be correspondingly understated. During the third five-year reviews, *** percent of U.S. imports from South Korea, by quantity, were from nonsubject sources in 2016. Third review confidential report, table IV-1.

Cumulation considerations⁶⁷

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.⁶⁸

There were no reported U.S. imports of CTL plate from Indonesia during 2017, 2018, and 2022, and imports from Indonesia were reported in one month in each year of 2019, 2020, and 2021. Imports from India were reported in 69 of the 72 months between 2017 and 2022. Imports from South Korea were reported in every month between 2017 and 2022.

Imports from South Korea entered through each border of entry in all years from 2017 through 2022. Imports from Indonesia entered only through the southern borders of entry for all years in which imports from Indonesia were reported. Imports from India entered through each border of entry in years 2018 and 2022, through the eastern, northern, and southern borders of entry for years 2019 and 2021, and through the eastern and northern borders of entry for years 2017 and 2020.

Apparent U.S. consumption and market shares

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

⁶⁷ Source: Compiled from official Commerce statistics for HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7208.53.0000, 7208.90.0000, 7210.70.3000, 7210.90.9000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7211.90.0000, 7212.40.1000, 7212.40.5000, 7212.50.0000, 7225.40.3050, 7225.40.7000, 7225.50.6000, 7225.99.0090, 7226.91.5000, 7226.91.7000, 7226.91.8000, 7226.99.0180, accessed March 27, 2023. These data may be overstated as HTS statistical reporting numbers 7225.40.3050, 7225.40.7000, 7225.50.6000, 7225.99.0090, 7226.91.5000, 7226.91.7000, 7226.91.8000, 7226.99.0180 may contain products outside the scope of these reviews.

⁶⁸ In addition, available information concerning subject country producers and the global market is presented in the next section of this report.

Table I-7**CTL plate: Apparent U.S. consumption and market shares, by source and period**

Quantity in short tons; value in 1,000 dollars

Source	Measure	1998	2004	2010	2016	2022
U.S. producers	Quantity	7,647,308	7,028,510	5,378,921	6,427,735	***
India	Quantity	137,735	1,585	32	***	3,241
Indonesia	Quantity	168,098	627	---	***	---
South Korea	Quantity	352,056	***	***	***	276,387
France	Quantity	123,083	***	NA	NA	NA
Italy	Quantity	80,766	29,130	718	NA	NA
Japan	Quantity	288,398	***	***	NA	NA
Subject sources	Quantity	1,150,135	82,011	***	***	279,628
Nonsubject sources	Quantity	1,016,753	***	***	***	556,895
All import sources	Quantity	2,166,888	730,918	551,029	1,103,098	836,523
Apparent U.S. consumption	Quantity	9,814,196	7,759,428	5,929,950	7,530,833	***
U.S. producers	Value	3,377,079	4,458,089	3,961,873	3,824,172	***
India	Value	50,298	1,731	55	***	9,747
Indonesia	Value	57,763	457	---	***	---
South Korea	Value	130,914	***	***	***	406,753
France	Value	63,678	827	NA	NA	NA
Italy	Value	32,792	19,279	2,369	NA	NA
Japan	Value	131,070	***	***	NA	NA
Subject sources	Value	466,515	61,810	***	***	416,500
Nonsubject sources	Value	449,154	***	***	***	1,068,223
All import sources	Value	915,669	451,051	482,282	768,723	1,484,723
Apparent U.S. consumption	Value	4,292,748	4,907,140	4,444,155	4,592,895	***

Table continued.

Table I-7 Continued**CTL plate: Apparent U.S. consumption and market shares, by source and period**

Share in percent

Source	Measure	1998	2004	2010	2016	2022
U.S. producers	Share of quantity	77.9	90.6	90.7	85.4	***
India	Share of quantity	1.4	0.0	0.0	***	***
Indonesia	Share of quantity	1.7	0.0	0.0	***	***
South Korea	Share of quantity	3.6	***	***	***	***
France	Share of quantity	1.3	0.0	NA	NA	NA
Italy	Share of quantity	0.8	0.4	0.0	NA	NA
Japan	Share of quantity	2.9	0.2	0.0	NA	NA
Subject sources	Share of quantity	11.7	1.1	***	***	***
Nonsubject sources	Share of quantity	10.4	***	***	***	***
All import sources	Share of quantity	22.1	9.4	9.3	14.6	***
U.S. producers	Share of value	78.7	90.8	89.1	83.3	***
India	Share of value	1.2	0.0	0.0	***	***
Indonesia	Share of value	1.3	0.0	0.0	***	***
South Korea	Share of value	3.0	***	***	***	***
France	Share of value	1.5	0.0	NA	NA	NA
Italy	Share of value	0.8	0.4	0.1	NA	NA
Japan	Share of value	3.1	0.3	0.0	NA	NA
Subject sources	Share of value	10.9	1.3	***	***	***
Nonsubject sources	Share of value	10.5	***	***	***	***
All import sources	Share of value	21.3	9.2	10.9	16.7	***

Source: For the years 1998-2016, data are compiled using data submitted in the Commission's original investigations and subsequent five-year reviews. For the year 2022, 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 numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7208.53.0000, 7208.90.0000, 7210.70.3000, 7210.90.9000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7211.90.0000, 7212.40.1000, 7212.40.5000, 7212.50.0000, 7225.40.3050, 7225.40.7000, 7225.50.6000, 7225.99.0090, 7226.91.5000, 7226.91.7000, 7226.91.8000, 7226.99.0180, accessed March 27, 2023. These data may be overstated as HTS statistical reporting numbers 7225.40.3050, 7225.40.7000, 7225.50.6000, 7225.99.0090, 7226.91.5000, 7226.91.7000, 7226.91.8000, 7226.99.0180 may contain products outside the scope of these reviews.

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.

Note: 1998, 2004, and 2010 data include imports from France, Italy, and Japan for years in which each country remained subject to the orders. France received a negative determination by the Commission in the first reviews, and is treated as nonsubject in subsequent reviews for years 2010, 2016, and 2022. Italy and Japan received negative determinations from the Commission in the second full reviews, and are treated as nonsubject in subsequent reviews for years 2016 and 2022.

Note: For 2004, 2010, and 2016, imports from South Korea cover all CTL plate imported from South Korea, except CTL plate imported from nonsubject producer POSCO. For 1998 and 2022, import data includes nonsubject South Korean producer POSCO and thus may be overstated.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Because of rounding, figure may not add to total shown. "NA" refers to data that is not applicable. Because of rounding, figure may not add to total shown.

The industry in India

Producers in India

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from one firm, which accounted for approximately *** percent of production of CTL plate in India during 1998, and approximately *** percent of CTL plate exports from India to the United States during 1998.⁶⁹

Although the Commission did not receive responses containing usable data from any respondent interested parties in its first five-year reviews, the domestic interested parties provided a list of five possible producers of CTL plate in India in that proceeding.⁷⁰

Although the Commission did not receive responses from any respondent interested parties in its second five-year reviews, the domestic interested parties provided a list of six possible producers of CTL plate in India in that proceeding.⁷¹

The Commission did not receive responses from any respondent interested parties in its third five-year reviews.⁷²

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 17 possible producers of CTL plate in India.⁷³

⁶⁹ Original confidential report, p. VII-5.

⁷⁰ First review publication, p. IV-18.

⁷¹ Second review publication, p. IV-10.

⁷² Third review publication, p. IV-11.

⁷³ Staff eliminated duplicate firms contained in the two lists of possible Indian producers provided by domestic interested parties. Cleveland-Cliffs' response to the notice of institution, March, 3, 2023, exh. 10. SSAB and Nucor's response to the notice of institution, March 3, 2023, exh. 1.

Recent developments

Table I-8 presents developments in the Indian industry since the Commission's last five-year reviews.

Table I-8**CTL plate: Developments in the Indian industry**

Item	Firm	Event
Acquisition	AM/NS India	December 2019— ArcelorMittal completed its acquisition of Essar Steel India Ltd. (“ESIL”) and formed a 60-40 joint venture with Nippon Steel Corp., Arcelor Mittal Nippon Steel India Ltd.” (“AM/NS India”) to manage the former ESIL steel facilities, including the plate facility at Hariza. AM/NS India describes the Hariza facility as “...India’s widest modern steel plate mill,” capable of producing CTL plates up to 4,900 mm (193 inches) wide, up to 150 mm (5.9 inches) thick, and up to 25,000 mm (984 inches) in length. This facility’s annual production capacity is 1.5 million metric tons (1.7 million short tons).
Acquisition	JSW Steel	March 2021— JSW Steel Ltd. completed its \$2.7-billion purchase of bankrupt BPSL after receiving creditor approval. JSW Steel previously outbid two rivals— India-based Tata Steel Ltd. and the United Kingdom-based Liberty House Group— and received buy-out approval of National Company Law Tribunal back in September 2019.
New plant	JSW Steel	March 2021— JSW Steel Ltd. started producing hot-rolled plate on the new hot-strip mill at its facility in Dolvi. The firm also is reportedly in the process of doubling the annual steelmaking capacity of this integrated facility from the current 5 million metric tons per year (5.5 million short tons) to 10 million metric tons (6.1 million short tons).
Acquisition	JSW Steel	April 2021— JSW Steel completed its acquisitions of Welspun Corp’s. steel plate and steel pipe business lines.
Acquisition	JSW Steel	June 2021— JSW Steel subsequently completed its acquisitions of Welspun’s high-grade steel plate and steel coils business lines.
Expansion	JSP	July 2021— Jindal Steel and Power Ltd. (“JSP”) received Odisha State approval for its January 2021 “Vision 2030” plan to expand the annual steelmaking capacity at its facility at Angul. The plate mill, with annual production capacity of 1.2 million metric tons (1.3 million short tons) is capable of rolling the widest plates in India, up to 5-meters (197-inches wide). Current plans are a basic oxygen furnace (“BOF”) with annual steelmaking capacity of 3.3 million metric tons (3.6 million short tons) by 2023–24 and another electric-arc furnace (“EAF”) with annual steelmaking capacity of 3.0 million metric tons (3.3 million short tons) by 2024–25. These additions will double the facility’s current steelmaking capacity from 8.6 million metric tons (9.5 million short tons) to 15.9 million metric tons (17.5 million short tons). The ultimate steelmaking capacity is planned to reach 25.2 million metric tons (27.8 million short tons) by 2030.
Acquisition	TATA	November 2021— Tata Steel Ltd. (“TATA”) completed its acquisition of bankrupt Bhushan Steel Ltd. (“BSL”) when the Board of Directors of Tata Steel BSL approved the merger. TATA acquired a controlling interest from the creditors of bankrupt BSL in May 2018 and provided further payments to the creditors through May 2019.
Acquisition	AM/NS India	November 2022— AM/NS India completed a follow-up acquisition of the indebted Essar Group’s two ports and two electric-power generating infrastructure assets from the creditor banks. More specifically, the 515-megawatt, gas-fired power plant and the 16 million metric tons (17.6 million short tons) per year, all-weather, deep-draft bulk terminal are adjacent to the previously acquired steel plate facility at Hariza. According to the chief executive officer of AM/NS India, these strategically located infrastructure assets supported the corporate

Item	Firm	Event
		decision to undertake the capital investment to expand the annual production capacity at the Hariza facility from 9 million metric tons (9.9 million short tons) to 15 metric tons (16.5 million short tons).
Expansion	SAIL	December 2022— As part of parastatal Steel Authority of India Ltd's. ("SAIL") goal to expand its firm-wide annual steelmaking capacity by 2030, installed annual capacity at its facility in Bokaro will be expanded from 4.6 million metric tons (5.1 million short tons) to 8.6 million metric tons (9.5 million short tons). The Bokaro Steel Plant produces flat-rolled steel including plate in cut lengths.
Production records	SAIL	January 2023— SAIL announced that the monthly outputs of Blast Furnace No. 8, Steel Melting Shop No. 3 and the plate mill at its facility in Bhilai exceeded their prior respective monthly records. Steel plate production reached 116,834 metric tons (128,787 short tons), exceeding the prior record of 116,030 metric tons (127,901 short tons) set back in January 2021.

Source: ArcelorMittal, "ArcelorMittal and Nippon Steel Complete Acquisition of Essar Steel," press release, December 20, 2019, <https://corporate.arcelormittal.com/media/press-releases/arcelormittal-and-nippon-steel-complete-acquisition>;

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Exports

Table I-9 presents export data for CTL plate, a category that includes out-of-scope products, from India (by export destination in descending order of quantity for 2022).

Table I-9
CTL plate: Quantity of exports from India, by destination and period

Quantity in short tons

Destination market	2017	2018	2019	2020	2021	2022
Belgium	201,203	89,413	73,060	48,524	135,472	225,555
Italy	213,807	95,335	38,582	127,226	213,353	179,257
United Arab Emirates	55,992	38,524	37,645	104,905	178,110	152,195
Spain	243,176	178,761	56,275	84,907	135,583	144,582
Denmark	26,655	23,040	9,253	31,349	48,333	64,386
Portugal	47,531	24,541	19,126	25,533	81,123	57,349
Egypt	9,157	65	7	59	81,246	53,887
Saudi Arabia	19,182	53,552	53,316	54,783	41,902	44,949
Bangladesh	10,118	23,395	19,696	36,929	24,397	38,065
Romania	27,977	10,477	29,742	38,572	62,789	37,251
All other markets	399,334	274,313	279,969	385,856	501,570	338,713
All markets	1,254,131	811,415	616,673	938,643	1,503,878	1,336,190

Source: S&P Global Market Intelligence, Global Trade Atlas Suite, HTS subheadings 7208.40, 7208.51, 7208.52, 7208.53, 7208.90, 7210.70, 7210.90, 7211.13, 7211.14, 7211.90, 7212.40, 7212.50, 7225.40, 7225.50, 7225.99, 7226.91, and 7226.99, accessed March 27, 2023. These data may be overstated as HTS subheadings 7208.53, 7208.90, 7210.70, 7210.90, 7211.13, 7211.14, 7211.90, 7212.40, 7212.50, 7225.40, 7225.50, 7225.99, 7226.91, and 7226.99 may contain products outside the scope of these reviews.

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

The industry in Indonesia

Producers in Indonesia

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from three firms, which accounted for virtually all production of CTL plate in Indonesia, and virtually all exports from Indonesia to the United States during 1998.⁷⁴

Although the Commission did not receive responses from any respondent interested parties in its first five-year reviews, the domestic interested parties provided a list of three possible producers of CTL plate in Indonesia in that proceeding.⁷⁵

During the second five-year reviews, the Commission received an incomplete foreign producer/exporter questionnaire response from one firm.⁷⁶

During the third five-year reviews, the Commission received foreign producer/exporter questionnaires from two firms.⁷⁷

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 CTL plate in Indonesia.⁷⁸

Recent developments

Table I-10 presents developments in the Indonesian industry since the Commission's last five-year reviews.

⁷⁴ Original publication, p. VII-3.

⁷⁵ First review publication, p. IV-20.

⁷⁶ Second review publication, p. IV-11.

⁷⁷ Third review publication, p. IV-14. No exports of CTL plate from Indonesia to the United States were reported in 2016. Third review publication, p. IV-16.

⁷⁸ Staff eliminated duplicate firms contained in the two lists of possible Indonesian producers provided by domestic interested parties. Cleveland-Cliffs' response to the notice of institution, March, 3, 2023, exh. 10. SSAB and Nucor's response to the notice of institution, March 3, 2023, exh. 1.

Table I-10**CTL plate: Developments in the Indonesian industry**

Item	Firm	Event
Acquisition	Gunawan	October 2018—PT Gunawan Dianjaya Steel Tbk (“Gunawan”) acquired PT Jaya Pari Steel Tbk (“JPRS”).
New products	Dexin	June 2021— Dexin Steel Indonesia (“Dexin”), a joint venture between Shanghai Delong Steel Group Co. Ltd. (China), Tsingshan Holding Group Co. Ltd. (China), Indonesia Morowali Industrial Park (“IMIP”), and Hanwa Co. Ltd. (Japan), commenced producing steel slabs for subsequent hot rolling into flat-rolled steel mill products.
Expansion	KRAS	September 2021— parastatal PT Krakatau Steel Tbk (“KRAS”) launched a second hot-rolled coil mill at its facility in Cilegon. This \$521 million mill has an annual production capacity of 1.5 million metric tons (1.7 million short tons). The firm plans to expand its hot-rolled coil production capacity to 4 million metric tons (4.4 million short tons). CTL plate matching the dimensions specified in Commerce’s scope is sheared from coiled plate.
New plant	Dexin	October 2021— Dexin plans to construct a hot-rolling line at its facility in Morowali. This new line will have an annual production capacity of 4.5 million metric tons (5.0 million short tons) of hot-rolled carbon steel and stainless-steel coils, up to 1,780 mm (70 inches) wide.
Construction delayed	Gunawan	March 2022— Gunawan announced postponing the schedule date to commence operating the Plate Mill II at its facility in Surabaya from the end of 2022 until the end of 2023 due to lack of bank financing.
Expansion	KRAS and POSCO	July 2022— KRAS and South Korean-based Pohang Iron and Steel Co. Ltd. (“POSCO”) announced plans to expend \$3.5 billion over the next five years to construct a second blast furnace at their PT Krakatau-POSCO (“PTKP”) joint-venture facility located in Cilegon. The second blast furnace is anticipated to provide additional molten metal to double this facility’s annual production capacity from 3 million metric tons (3.3 million short tons) to 6 million metric tons (6.6 million short tons) of steel mill products, including steel slabs, plates in cut lengths, hot-rolled coils, cast iron, and pig iron.
Construction resumed	Gunawan	October 2022— Gunawan resumed constructing Plate Mill II at its facility in Surabaya, with completion anticipated by the end of 2023. Plate Mill II will have an annual production capacity of 1.0 million metric tons (1.1 million short tons). The existing Plate Mill I has installed production capacity of 400,000 metric tons (440,924 short tons) and additional annual production capacity of 60,000 metric tons (66,139 short tons).
Acquisition	KRAS	November 2022— KRAS invested \$308.16 million to construct a new hot-strip line at the PTKP facility in Cilegon. This investment raised KRAS’s ownership share from 30 percent to 50 percent of this joint venture.

Source: IndoPremier, “PT Gunawan Dianjaya Steel Will Soon Merge JPRS,” October 2, 2018, https://www.indopremier.com/ipotnews/newsDetail.php?jdl=PT_Gunawan_Dianjaya_Steel_Segera_Merger_JPRS&news_id=343971&group_news=RESEARCHNEWS&news_date=&taging_subtype=HUKUM&ame=&search=y_general&q=Hukum,%20&halaman=1;

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PT Krakatau-POSCO, "About Us, Our Product" web page, ©2019, <https://www.krakatau-posco.co.id/>, retrieved March 31, 2023;

Bernadette Christina Munthe, Gayatri Suroyo, and Joyce Lee, "Indonesia's Krakatau Steel, S. Korea's POSCO Plan \$3.5 Bln Investment," Reuters, July 28, 2022, <https://www.reuters.com/markets/commodities/indonesia-says-krakatau-steel-skoreas-posco-plan-35-bln-investment-2022-07-28/>;

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Note: Commerce excluded Gunawan from the countervailing duty orders as a result of receiving a *de minimis* net subsidy rate in the final determinations. 65 FR 6587, February 10, 2000.

Exports

Table I-11 presents export data for CTL plate, a category that includes out-of-scope products, from Indonesia (by export destination in descending order of quantity for 2022).

Table I-11
CTL plate: Quantity of exports from Indonesia, by destination and period

Quantity in short tons

Destination market	2017	2018	2019	2020	2021	2022
Belgium	---	17,676	17,195	0.0	36,318	175,216
Spain	21,539	52,294	104,916	78,342	102,158	158,671
Vietnam	24,360	21,717	86,481	17,042	64,373	122,751
Malaysia	65,935	128,980	107,069	87,175	98,686	69,573
Italy	47,215	22,241	15,768	11,745	22,708	48,841
Netherlands	35,109	5,997	23,680	4,526	19,499	29,082
Thailand	83,433	82,011	63,837	45,339	60,312	22,300
India	93,992	144,276	183,785	69,149	41,998	19,986
Singapore	56,484	49,840	47,362	47,254	58,592	17,192
Australia	2,270	6,881	17,344	1,623	12,602	16,433
All other markets	136,913	140,031	208,075	711,538	523,364	54,243
All markets	567,251	671,944	875,510	1,073,733	1,040,611	734,288

Source: S&P Global Market Intelligence, Global Trade Atlas Suite, HS subheadings 7208.40, 7208.51, 7208.52, 7208.53, 7208.90, 7210.70, 7210.90, 7211.13, 7211.14, 7211.90, 7212.40, 7212.50, 7225.40, 7225.50, 7225.99, 7226.91, and 7226.99, accessed March 27, 2023. These data may be overstated as HS subheadings 7208.53, 7208.90, 7210.70, 7210.90, 7211.13, 7211.14, 7211.90, 7212.40, 7212.50, 7225.40, 7225.50, 7225.99, 7226.91, and 7226.99 may contain products outside the scope of these reviews.

Note: "---" = No reported exports.

Note: "0.0" = Quantity less than 0.5 short ton.

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

Note: Exports reported by Indonesia cover all CTL plate exported from Indonesia, including CTL plate exported from Gunawan.

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 two firms, which accounted for virtually all production of CTL plate in South Korea during 1998, and virtually all CTL plate exports from South Korea to the United States during 1998.⁷⁹

Although the Commission did not receive responses from any respondent interested parties in its first five-year reviews, the domestic interested parties provided a list of three possible producers of CTL plate in South Korea in that proceeding.⁸⁰

During the second five-year reviews, the Commission received foreign producer/exporter questionnaires from one firm, which accounted for a substantial portion of subject production of CTL plate in South Korea during 2010.⁸¹

Although the Commission did not receive responses from any respondent interested parties in its third five-year reviews, the domestic interested parties provided a list of 13 possible producers of CTL plate in South Korea in that proceeding.⁸²

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 CTL plate in South Korea.⁸³

Recent developments

Table I-12 presents developments in the South Korean industry since the Commission's last five-year reviews.

⁷⁹ Original publication, p. VII-6.

⁸⁰ First review publication, p. IV-25.

⁸¹ Subject production of CTL plate includes all South Korean producers except POSCO, which received *de minimis* margins in the original investigation and is not subject to the orders. Second review publication, p. IV-20.

⁸² Third review publication, p. IV-19.

⁸³ Staff eliminated duplicate firms contained in the two lists of possible South Korean producers provided by domestic interested parties. Cleveland-Cliffs' response to the notice of institution, March, 3, 2023, exh. 10. SSAB and Nucor's response to the notice of institution, March 3, 2023, exh. 1.

Table I-12**CTL plate: Developments in the South Korean industry**

Item	Firm	Event
Source	Dongkuk	March 2017— Dongkuk Steel Mill Co. Ltd. (“Dongkuk”) received the first slabs cast by its integrated steelmaking joint-venture located in Pecém, Brazil. Companhia Siderúrgica do Pecém (“CSP”) is jointly owned by Dongkuk (with a 30 percent ownership share), Pohang Iron and Steel Co. Ltd. (“POSCO,” 20 percent), and Brazilian mining firm Vale S.A. (50 percent). Dongkuk secured 160,000 metric tons (176,370 short tons) of CSP’s annual output of 3 million metric tons (3.3 million short tons) for its facility at Dangjin.
Acquisition	KG Dongbu	September 2019— After prior attempts dating back to 2014 failed to sell-off heavily indebted Dongbu Steel Co. Ltd. (Dongbu), KG Group acquired controlling interest in the firm and renamed it as “KG Dongbu Steel Co. Ltd.” (“KG Dongbu”). KG Group purchased \$173.2 million in new equity shares issued by Dongbu to acquire a 40 percent ownership share. The South Korea Development Bank owns a 13.28 percent and other creditors hold the remaining stakes in the new firm.
Expansion	Dongkuk	July 2020— Dongkuk Steel Mill Co. Ltd. (“Dongkuk”) plans to expend \$20.8 million by second-half 2021 to install a color (coated) steel plate line at its facility in Busan with annual production capacity of 70,000 metric tons (77,162 short tons). This additional line will expand Dongkuk’s total annual production capacity for color steel plate from 760,000 metric tons (837,757 short tons) across eight lines to 850,000 tons (936,965 short tons) across nine lines. Dongkuk’s Busan facility recorded producing 850,000 metric tons (936,965 short tons) of color steel plate in 2021 to become the largest production site in the world.
Mill sale	Dongkuk	Early 2021— The sale of Dongkuk’s heavy plate mill with annual production capacity of 2 million metric tons (2.2 million short tons) was successfully sold in its entirety by Hilco Industrial Acquisitions to undisclosed buyers.
Shutdown	POSCO	Early-September 2022— Flooding from the Hinnamnor typhoon, that struck the southeast coast of South Korea, forced POSCO to shut down all three blast furnaces and other operations at its integrated steel facility in Pohang for the first time since the firm began operating in 1973.
Restarts	POSCO	Mid-September 2022— POSCO restarted all three blast furnace operations at its facility in Pohang. Only steel slabs will be produced at this facility until rolling operations resume. The slabs will be sent for rolling by the facility at Gwangyang which was not disrupted by the typhoon.
New product	Hyundai	Mid-late September 2022— Hyundai Steel Co. (“Hyundai”) announced the successful test production of low carbon-content 1.0 GPa-class high-grade plates from steel melted in an electric-arc furnace (rather than in a basic oxygen converter) for the first time in the world.
Labor str	Hyundai	Late-September 2022— Selected operations at Hyundai’s facility at Dangjin were disrupted by labor strikes over unresolved corporate profits-sharing demands. The strike action spread from the plate mills to other operations at this facility. Hyundai reportedly considered exporting slabs, as the steelmaking operations continued unaffected by the ongoing strike at this facility.
Certification	POSCO	November 2022— POSCO received Det Norske Veritas (“DNV”), the world’s leading certification authority in the energy sector, approval of

Item	Firm	Event
		the eco-friendly “Greenable” heavy plate produced by its facility in Gwangyang as a certified component for wind turbine towers. This plate meets EN-S355 standards and has uniform yield strength reduces the amount of steel needed for wind turbine towers.
Shutdown	POSCO	December 2022— POSCO anticipates 15 of the 18 rolling mills at its facility in Pohang will be restored to full operation by the end of the year. The firm decided not to continue operating the older No. 1 heavy plate mill, with annual production capacity of 600,000 metric tons (661,387 short tons). Two newer plate mills at this facility are larger and more efficient: the No. 2 heavy plate mill with 2.7 metric tons (3.0 short tons) and the No. 3 heavy plate mill with 1.2 metric tons (1.3 short tons) of annual production capacities.
Restarts	POSCO	January 2023— POSCO reported resuming operations of all 17 rolling mills at its facility in Pohang, including the No. 2 and No. 3 heavy plate mills.

Source: Michael Herh, “Dongkuk Steel Mill Secures Slabs from Its Own Blast Furnace,” Business Korea, March 23, 2017, <http://www.businesskorea.co.kr/news/articleView.html?idxno=17619>;

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Note: Commerce excluded POSCO from the antidumping and countervailing duty orders as a result of receiving de minimis margin and net subsidy rates in the final determinations. 65 FR 6585 and 65 FR 6587, February 10, 2000.

Exports

Table I-13 presents export data for CTL plate, a category that includes out-of-scope products, from South Korea (by export destination in descending order of quantity for 2022).

Table I-13
CTL plate: Quantity of exports from South Korea, by destination and period

Quantity in short tons

Destination market	2017	2018	2019	2020	2021	2022
China	793,915	984,950	1,213,195	1,409,822	868,162	839,562
Japan	762,048	543,788	558,865	586,102	544,828	404,345
India	617,638	443,209	448,293	442,248	408,556	386,121
United States	373,593	379,598	355,474	245,072	430,798	376,008
Turkey	130,211	129,545	119,058	189,145	280,784	314,720
Mexico	284,031	326,059	364,651	309,611	394,335	303,341
Vietnam	276,772	285,401	382,470	414,693	312,352	298,063
Belgium	194,920	173,747	146,130	114,351	153,446	201,887
Thailand	322,959	301,582	288,005	278,167	271,767	158,641
Canada	62,447	100,322	83,046	86,431	169,702	154,411
All other markets	2,161,532	1,783,559	1,849,696	1,805,623	1,573,719	1,588,721
All markets	5,980,067	5,451,760	5,808,886	5,881,266	5,408,448	5,025,819

Source: S&P Global Market Intelligence, Global Trade Atlas Suite, HS subheadings 7208.40, 7208.51, 7208.52, 7208.53, 7208.90, 7210.70, 7210.90, 7211.13, 7211.14, 7211.90, 7212.40, 7212.50, 7225.40, 7225.50, 7225.99, 7226.91, and 7226.99, accessed March 27, 2023. These data may be overstated as HS subheadings 7208.53, 7208.90, 7210.70, 7210.90, 7211.13, 7211.14, 7211.90, 7212.40, 7212.50, 7225.40, 7225.50, 7225.99, 7226.91, and 7226.99 may contain products outside the scope of these reviews.

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

Note: Exports reported by South Korea cover all CTL plate exported from South Korea, including CTL plate exported by POSCO.

Third-country trade actions

As summarized in table I-14, there have been several antidumping duty (“AD”), countervailing duty (“CVD”), and safeguard duty actions in third-country markets on steel plate products, including CTL plate, originating in India, Indonesia, and South Korea.

Table I-14

Plate products: Import relief proceedings/actions on exports from India, Indonesia, and South Korea into third-country markets

Authority	Subject countries	Action, subject products, and effective date
Armenia, Belarus, Kazakhstan, Kyrgyz Republic, and Russia	All countries (including South Korea), except Moldova, Tajikistan, Uzbekistan, and trade-preference beneficiary countries (and India and Indonesia)	December 2019— The Eurasian Economic Union (“EEU”) member countries imposed one-year safeguard tariff rate quotas (“TRQs”) on imports of certain hot-rolled, carbon and alloy steel sheets and plates, in coils and in cut lengths. Imports exceeding these quotas are subject to an additional 20 percent ad valorem tariff.
Australia	Indonesia and South Korea	December 2018— AD duty orders expired on hot-rolled steel plates in cut lengths. No applications for continuation were received. Final AD duties were: <ul style="list-style-type: none"> Indonesia: <ul style="list-style-type: none"> 8.6–11.3 percent ad valorem for specific respondents and 19.3 percent ad valorem for all others. South Korea: <ul style="list-style-type: none"> 18.4 percent ad valorem for specific respondents and 20.6 percent ad valorem for all others.
Brazil	South Korea	October 2019— AD duty orders extended on heavy steel plates in cut lengths. The AD duty rate is \$135.84 per metric ton (\$123.23 per short ton) ad valorem.
Canada	Indonesia and South Korea	March 2020— AD duty orders extended on steel plates in cut lengths. The final AD duties were: <ul style="list-style-type: none"> Indonesia: 59.7 percent ad valorem for all others; and South Korea: <ul style="list-style-type: none"> 1.9–20.9 percent ad valorem for certain respondents, and 59.7 percent ad valorem for all others.
European Union (“EU”)	All countries (including India, Indonesia, and South Korea), with certain product exceptions for certain developing countries	June 2021— The European Commission (“EC”) extended three-year safeguard TRQs on certain steel products, including plates in cut lengths, for another three years to June 2024. Imports exceeding these quotas are subject to an additional 25 percent ad valorem tariff. December 2022— The EC initiated a review of whether to end this extension one year earlier through June 2023.
India	Indonesia and South Korea	December 2021— AD duty orders terminated on hot-rolled iron or nonalloy steel flat products, including plates, in coils and cut lengths. May 2017— AD duty orders imposed on hot-rolled iron or nonalloy steel flat products, including plates, in cut

		lengths, with a final rate of \$561 per metric ton (509 per short ton).
India	South Korea	December 2021— AD duty orders terminated on cold-rolled or cold-reduced iron or nonalloy steel flat products, including plates in cut lengths. May 2017— Final AD duty orders imposed on cold-rolled or cold-reduced iron or nonalloy steel flat products, including plates in cut lengths, with final duty rates up to \$576 per metric ton (\$522 per short ton).
India	All countries (including South Korea), except certain developing countries (and Indonesia)	November 2016— Safeguard duties imposed for three years on hot-rolled steel sheets and plates in cut lengths through May 2019, with rates of: <ul style="list-style-type: none"> • 10 percent ad valorem, effective November 23, 2017, to November 22, 2018; • 8 percent ad valorem, effective November 23, 2018, to November 22, 2019; and • 6 percent ad valorem, effective November 23, 201, to May 22, 2019.
Malaysia	All countries (including India), except certain developing countries (and Indonesia and South Korea)	July 2015— Safeguard duties imposed for three years on hot-rolled steel plates, with rates of: <ul style="list-style-type: none"> • 17.40 percent ad valorem, effective July 2, 2015, to July 1, 2016; • 13.90 percent ad valorem, effective July 2, 2016, to July 1, 2017; and • 10.40 percent ad valorem, effective July 2, 2017, to July 1, 2018.
Mexico	All countries, except Canada and the United States	November 2021— Announced a temporary import duty of 15 percent ad valorem on certain iron and steel products, effective November 23, 2021, through June 29, 2022. Certain other iron and steel products will be subject to an import duty, with rates of: <ul style="list-style-type: none"> • 10 percent ad valorem, effective June 30, 2022; • 5 percent, effective September 23, 2022; and • revoked, effective October 1, 2024.
Morocco	All countries, except for certain developing countries	June 2020 — Safeguard duties imposed for three years on hot-rolled steel sheets and plates, including in cut lengths, with rates of: <ul style="list-style-type: none"> • 25 percent ad valorem, effective June 19, 2020, to June 18, 2021; • 24 percent ad valorem, effective June 19, 2021, to June 18, 2022; and • 23 percent ad valorem, effective June 19, 2022, to June 18, 2023. December 2020— India became subject to these safeguard duties, being removed from the list of exempted developing countries. January 2023— Review initiated for extending these safeguard duties.
Taiwan	India, Indonesia, and South Korea	August 2021— Review initiated for extending the AD duty orders on carbon steel plate in cut lengths, with rates of: <ul style="list-style-type: none"> • India: <ul style="list-style-type: none"> ○ 25.85 percent ad valorem, effective August 22, 2016; and ○ 32.82 percent ad valorem, effective November 25, 2016. • Indonesia:

		<ul style="list-style-type: none"> ○ 46.84 percent ad valorem, effective August 22, 2016; and ○ 42.91 percent ad valorem, effective November 25, 2016. • South Korea: <ul style="list-style-type: none"> ○ 70.25 percent ad valorem, effective August 22, 2016; and ○ 77.30 percent ad valorem, effective November 25, 2016.
Thailand	India, Indonesia, and South Korea	<p>June 2021— AD duty orders extended for five years on hot-rolled flat steel, including plates, in coils and in cut lengths, with rates of:</p> <ul style="list-style-type: none"> • India: 20.02–31.92 percent ad valorem, • Indonesia: 24.48 percent ad valorem, and • South Korea: 2.81–58.85 percent ad valorem, effective June 9, 2021, through June 8, 2026.
Thailand	All countries (including India and South Korea), except certain developing countries (and Indonesia)	<p>February 2016— Safeguard duties extended for three years on hot-rolled, alloy steel flat products, with rates of:</p> <ul style="list-style-type: none"> • 41.67 percent ad valorem, effective June 27, 2016, to June 26, 2017; • 40.42 percent ad valorem, effective June 27, 2017, to June 26, 2018; and • 39.21 percent ad valorem, effective June 27, 2018, to June 26, 2019. <p>February 2019— Review terminated these safeguard duties.</p>
Thailand	All countries (including India and South Korea), except certain developing countries (and Indonesia)	<p>June 2017— Safeguard duties extended for three years on hot-rolled flat steel products, including plates, in coils and not in coils, with rates of:</p> <ul style="list-style-type: none"> • 21.00 percent ad valorem, effective June 7, 2017, to June 6, 2018; • 20.87 percent ad valorem, effective June 7, 2018, to June 6, 2019; and • 20.74 percent ad valorem, effective June 7, 2019, to June 6, 2020. <p>June 2020— Review terminated these safeguard duties.</p>
Turkey	South Korea	<p>July 2022— AD duty orders imposed of hot-rolled flat steel products, including plates, with rates of:</p> <ul style="list-style-type: none"> • 14.08–14.62 percent ad valorem for specific respondents and • 8.95 percent ad valorem for all others.
Turkey	All countries (including South Korea), except certain developing countries (and India and Indonesia)	<p>April 2018— Safeguard duty investigations initiated on flat, long, and tubular carbon and alloy steel products; steel rails and track accessories; and flat-rolled, stainless-steel products.</p> <p>May 2019— Safeguard duty investigations terminated without imposition of safeguard duties on these steel products.</p>
United Kingdom	All countries (including India and South Korea), except certain developing countries (and Indonesia)	<p>July 2021— Safeguard TRQs were imposed on certain steel products, including plates, by tariff categories:</p> <ul style="list-style-type: none"> • For three years: non-alloy and other alloy hot-rolled sheets and strips, including plates (tariff category No. 1); and non-alloy and other alloy cold-rolled sheets and strips, including plates (tariff category No. 2), effective July 1, 2021, through June 30, 2024; and

		<ul style="list-style-type: none"> For one year: non-alloy and other alloy quarto plates (tariff category No. 1), effective July 1, 2021, through June 30, 2022: Imports exceeding these quotas are subject to an additional 25 percent ad valorem tariff. October 2021— Adjustments to tariff category classifications and corrections for 2017–19 annual average imports by source countries revealed India's share exceeded the threshold to retain its initial exception from the safeguard measures.
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The global market

Table I-15 presents global export data for CTL plate, a category that includes out-of-scope products (by source in descending order of quantity for 2022). Leading exporters China and Japan accounted for over one-third (33.4 percent) of global exports of CTL plate and out-of-scope products by quantity in 2022. By contrast, combined exports reported by the three subject countries accounted for 12.3 percent of global exports of in-scope and out-of-scope products in that year. Global exports of CTL plate and out-of-scope products decreased by 7.1 percent from 2017 to 2022.

Table I-15
CTL plate: Quantity of global exports by country and period

Quantity in short tons

Exporting country	2017	2018	2019	2020	2021	2022
China	13,134,983	13,035,409	13,921,193	11,866,278	12,124,951	13,348,293
Japan	4,901,808	5,727,841	5,301,212	4,712,213	5,652,462	5,982,296
South Korea	5,980,067	5,451,760	5,808,886	5,881,266	5,408,448	5,025,819
Germany	3,343,111	3,321,460	3,421,426	3,118,383	3,342,231	3,205,853
Belgium	3,303,316	3,448,560	3,131,999	2,923,474	3,075,264	3,110,855
Italy	2,546,611	2,442,183	2,485,871	2,271,326	2,591,422	2,607,400
Netherlands	1,959,013	2,079,191	1,914,223	1,741,208	2,045,844	2,074,392
France	2,563,484	2,588,389	2,324,452	1,792,328	2,175,088	2,048,814
Austria	2,085,369	1,876,634	1,682,516	1,498,553	1,748,112	1,791,418
United States	1,727,192	1,507,272	1,366,431	1,333,102	1,733,656	1,709,938
India	1,254,131	811,415	616,673	938,643	1,503,878	1,336,190
Indonesia	567,251	671,944	875,510	1,073,733	1,040,611	734,288
All other exporters	18,891,062	19,144,282	18,127,399	16,402,556	18,435,246	14,890,609
All exporters	62,257,399	62,106,340	60,977,792	55,553,062	60,877,213	57,866,165

Source: S&P Global Market Intelligence, Global Trade Atlas Suite, HS subheadings 7208.40, 7208.51, 7208.52, 7208.53, 7208.90, 7210.70, 7210.90, 7211.13, 7211.14, 7211.90, 7212.40, 7212.50, 7225.40, 7225.50, 7225.99, 7226.91, and 7226.99, accessed March 27, 2023. These data may be overstated as HS subheadings 7208.53, 7208.90, 7210.70, 7210.90, 7211.13, 7211.14, 7211.90, 7212.40, 7212.50, 7225.40, 7225.50, 7225.99, 7226.91, and 7226.99 may contain products outside the scope of these reviews.

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

Note: Export data from Russia and certain other exporting countries was not available for 2022.

Note: Exports reported by South Korea cover all CTL plate exported from South Korea, including CTL plate exported by POSCO.

Note: Exports reported by Indonesia cover all CTL plate exported from Indonesia, including CTL plate exported by Gunawan.

APPENDIX A
FEDERAL REGISTER NOTICES

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

Citation	Title	Link
88 FR 6700 February 1, 2023	<i>Initiation of Five-Year (Sunset) Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2023-02-01/pdf/2023-02083.pdf
88 FR 6781 February 1, 2023	<i>Cut-to-Length Carbon-Quality Steel Plate (CTL plate) From India, Indonesia, and South Korea; Institution of Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2023-02-01/pdf/2023-02080.pdf

APPENDIX B
COMPANY-SPECIFIC DATA

* * * * *

APPENDIX C

SUMMARY DATA COMPILED IN PRIOR PROCEEDINGS

Table C-1a

CTL plate: Summary data concerning the U.S. market (method A), 1996-98, January-June 1998, and January-June 1999

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

Item	Reported data					Period changes			
	1996	1997	1998	Jan.-June		1996-98	1996-97	1997-98	Jan.-June 1998-99
				1998	1999				
U.S. consumption quantity:									
Amount	8,385,326	7,956,975	9,814,196	4,882,884	3,907,835	17.0	-5.1	23.3	-20.0
Producers' share (1):									
U.S. mills	61.9	65.0	62.2	67.0	62.7	0.3	3.1	-2.8	-4.2
U.S. processors	15.0	17.2	15.7	16.5	20.8	0.7	2.2	-1.5	4.3
Total	76.9	82.2	77.9	83.5	83.6	1.0	5.3	-4.3	0.1
Importers' share (1):									
France	1.8	2.1	1.3	1.3	3.3	-0.6	0.3	-0.8	2.0
India	0.5	1.6	1.4	1.8	0.2	0.9	1.2	-0.2	-1.6
Indonesia	0.2	0.8	1.7	1.3	1.0	1.5	0.6	1.0	-0.3
Italy	0.2	1.1	0.8	0.5	0.3	0.6	0.9	-0.3	-0.2
Japan	0.3	0.2	2.9	1.2	1.6	2.6	-0.1	2.7	0.4
Korea	0.3	0.3	3.6	1.6	2.7	3.2	-0.0	3.3	1.1
Subtotal (subject)	3.3	6.1	11.7	7.8	9.1	8.4	2.8	5.6	1.3
Other sources	19.8	11.7	10.4	8.7	7.3	-9.5	-8.1	-1.3	-1.4
Total imports	23.1	17.8	22.1	16.5	16.4	-1.0	-5.3	4.3	-0.1
U.S. consumption value:									
Amount	3,673,034	3,497,520	4,292,748	2,170,435	1,539,134	16.9	-4.8	22.7	-29.1
Producers' share (1):									
U.S. mills	65.0	67.4	64.7	68.9	63.0	-0.3	2.4	-2.7	-6.0
U.S. processors	14.0	15.8	13.9	14.6	19.5	-0.0	1.8	-1.8	4.9
Total	79.0	83.2	78.7	83.5	82.5	-0.3	4.2	-4.5	-1.0
Importers' share (1):									
France	2.1	2.3	1.5	1.5	4.2	-0.6	0.3	-0.8	2.7
India	0.3	1.3	1.2	1.5	0.1	0.8	0.9	-0.1	-1.3
Indonesia	0.1	0.6	1.3	1.0	0.7	1.2	0.5	0.7	-0.3
Italy	0.2	1.0	0.8	0.4	0.2	0.6	0.8	-0.3	-0.2
Japan	0.5	0.4	3.1	1.4	1.9	2.6	-0.1	2.7	0.6
Korea	0.3	0.3	3.0	1.4	2.1	2.7	-0.0	2.8	0.7
Subtotal (subject)	3.6	5.9	10.9	7.2	9.2	7.3	2.4	4.9	2.0
Other sources	17.5	10.9	10.5	9.3	8.3	-7.0	-6.6	-0.4	-1.0
Total imports	21.0	16.8	21.3	16.5	17.5	0.3	-4.2	4.5	1.0
U.S. imports from--									
France:									
Quantity	153,375	165,713	123,083	64,663	128,882	-19.8	8.0	-25.7	99.3
Value	76,334	81,559	63,678	33,037	64,674	-16.6	6.8	-21.9	95.8
Unit value	\$497.69	\$492.17	\$517.36	\$510.91	\$501.81	4.0	-1.1	5.1	-1.8
Ending inventory quantity	0	0	0	0	0	0.0	0.0	0.0	0.0
India:									
Quantity	38,081	130,846	137,735	88,284	6,353	261.7	243.6	5.3	-92.8
Value	12,833	45,098	50,298	32,118	2,022	291.9	251.4	11.5	-93.7
Unit value	\$337.00	\$344.66	\$365.18	\$363.80	\$318.32	8.4	2.3	6.0	-12.5
Ending inventory quantity	1,569	7,747	13,407	0	0	754.5	393.8	73.1	0.0
Indonesia:									
Quantity	13,667	59,837	168,098	64,103	39,514	1,130.0	337.8	180.9	-38.4
Value	4,354	21,716	57,763	22,554	10,746	1,226.5	398.7	166.0	-52.4
Unit value	\$318.61	\$362.92	\$343.63	\$351.84	\$271.95	7.9	13.9	-5.3	-22.7
Ending inventory quantity	0	2,773	7,411	200	5,500	(2)	(2)	167.3	2,650
Italy:									
Quantity	17,003	85,576	80,766	23,159	10,051	375.0	403.3	-5.6	-56.6
Value	7,661	35,743	32,792	9,615	3,549	328.0	366.5	-8.3	-63.1
Unit value	\$450.57	\$417.67	\$406.02	\$415.17	\$353.12	-9.9	-7.3	-2.8	-14.9
Ending inventory quantity	0	0	4,918	0	2,587	(2)	0.0	(2)	(2)
Japan:									
Quantity	24,238	18,327	288,398	59,623	63,876	1,089.9	-24.4	1,473.6	7.1
Value	17,028	13,462	131,070	29,367	29,331	669.7	-20.9	873.6	-0.1
Unit value	\$702.54	\$734.54	\$454.48	\$492.54	\$459.18	-35.3	4.6	-38.1	-6.8
Ending inventory quantity	0	0	19,487	0	0	(2)	0.0	(2)	0.0
Korea:									
Quantity	28,495	25,432	352,056	80,087	106,955	1,135.5	-10.7	1,284.3	33.5
Value	12,391	10,287	130,914	29,875	31,960	956.5	-17.0	1,172.6	7.0
Unit value	\$434.87	\$404.48	\$371.86	\$373.03	\$298.82	-14.5	-7.0	-8.1	-19.9
Ending inventory quantity	0	0	2,353	0	0	(2)	0.0	(2)	0.0

Table continued on next page.

Table C-1a--Continued

CTL plate: Summary data concerning the U.S. market (method A), 1996-98, January-June 1998, and January-June 1999

(Quantity=short tons, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per short ton; period changes=percent, except where noted)									
Item	Reported data					Period changes			
	1996	1997	1998	Jan.-June		1996-98	1996-97	1997-98	Jan.-June 1998-99
				1998	1999				
U.S. imports from--									
Subtotal (subject):									
Quantity	274,859	485,732	1,150,135	379,919	355,630	318.4	76.7	136.8	-6.4
Value	130,602	207,864	466,515	156,565	142,282	257.2	59.2	124.4	-9.1
Unit value	\$475.16	\$427.94	\$405.62	\$412.10	\$400.08	-14.6	-9.9	-5.2	-2.9
Ending inventory quantity	1,569	10,520	47,576	200	8,087	2,932.2	570.5	352.2	3,943.5
Other sources:									
Quantity	1,661,428	929,205	1,016,753	426,386	286,736	-38.8	-44.1	9.4	-32.8
Value	641,034	380,670	449,154	201,571	127,746	-29.9	-40.6	18.0	-36.6
Unit value	\$385.83	\$409.67	\$441.75	\$472.74	\$445.52	14.5	6.2	7.8	-5.8
Ending inventory quantity	43,821	16,896	92,275	27,182	48,829	110.6	-61.4	446.1	79.6
All sources:									
Quantity	1,936,286	1,414,937	2,166,888	806,305	642,366	11.9	-26.9	53.1	-20.3
Value	771,636	588,535	915,669	358,136	270,029	18.7	-23.7	55.6	-24.6
Unit value	\$398.51	\$415.94	\$422.57	\$444.17	\$420.37	6.0	4.4	1.6	-5.4
Ending inventory quantity	45,390	27,416	139,851	27,382	56,916	208.1	-39.6	410.1	107.9
U.S. producers:									
Average capacity quantity	8,721,762	9,252,017	11,191,586	5,911,115	6,296,044	28.3	6.1	21.0	6.5
Production quantity	6,560,861	6,782,408	7,948,996	4,273,890	3,269,247	21.2	3.4	17.2	-23.5
Capacity utilization (1)	75.2	73.3	71.0	72.3	51.9	-4.2	-1.9	-2.3	-20.4
U.S. shipments:									
Quantity	6,449,040	6,542,038	7,647,308	4,076,579	3,265,469	18.6	1.4	16.9	-19.9
Value	2,901,398	2,908,985	3,377,079	1,812,299	1,269,105	16.4	0.3	16.1	-30.0
Unit value	\$449.90	\$444.66	\$441.60	\$444.56	\$388.64	-1.8	-1.2	-0.7	-12.6
Export shipments:									
Quantity	75,389	182,888	232,848	144,541	91,703	208.9	142.6	27.3	-36.6
Value	39,795	82,666	106,132	65,329	40,880	166.7	107.7	28.4	-37.4
Unit value	\$527.86	\$452.00	\$455.80	\$451.98	\$445.79	-13.7	-14.4	0.8	-1.4
Ending inventory quantity	445,500	522,069	568,799	547,054	484,727	27.7	17.2	9.0	-11.4
Inventories/total shipments (1)	6.8	7.8	7.2	6.5	7.2	0.4	0.9	-0.5	0.7
Production workers	7,680	8,186	8,547	8,666	6,646	11.3	6.6	4.4	-23.3
Hours worked (1,000s)	17,314	18,028	18,896	9,913	7,222	9.1	4.1	4.8	-27.1
Wages paid (\$1,000s)	363,854	389,980	414,722	216,849	156,923	14.0	7.2	6.3	-27.6
Hourly wages	\$21.01	\$21.63	\$21.95	\$21.88	\$21.73	4.4	2.9	1.5	-0.7
Productivity (tons per 1,000 hours) ..	359.8	357.3	401.0	412.2	426.7	11.4	-0.7	12.2	3.5
Unit labor costs	\$58.40	\$60.54	\$54.73	\$53.07	\$50.92	-6.3	3.7	-9.6	-4.0
Net sales:									
Quantity	6,293,586	6,372,451	7,627,176	4,054,433	3,117,674	21.2	1.3	19.7	-23.1
Value	2,851,617	2,852,624	3,382,607	1,815,495	1,219,988	18.6	0.0	18.6	-32.8
Unit value	\$453.10	\$447.65	\$443.49	\$447.78	\$391.31	-2.1	-1.2	-0.9	-12.6
COGS	2,604,902	2,645,867	3,103,191	1,648,874	1,214,052	19.1	1.6	17.3	-26.4
Gross profit or (loss)	246,715	206,757	279,416	166,621	5,936	13.3	-16.2	35.1	-96.4
SG&A expenses	107,025	121,779	143,738	69,200	69,560	34.3	13.8	18.0	0.5
Operating income or (loss)	139,690	84,978	135,678	97,421	(63,624)	-2.9	-39.2	59.7	(3)
Capital expenditures	622,988	250,457	221,676	147,768	71,839	-64.4	-59.8	-11.5	-51.4
Unit COGS	\$413.90	\$415.20	\$406.86	\$406.68	\$389.41	-1.7	0.3	-2.0	-4.2
Unit SG&A expenses	\$17.01	\$19.11	\$18.85	\$17.07	\$22.31	10.8	12.4	-1.4	30.7
Unit operating income or (loss)	\$22.20	\$13.34	\$17.79	\$24.03	(\$20.41)	-19.9	-39.9	33.4	(3)
COGS/sales (1)	91.3	92.8	91.7	90.8	99.5	0.4	1.4	-1.0	8.7
Operating income or (loss)/ sales (1)	4.9	3.0	4.0	5.4	-5.2	-0.9	-1.9	1.0	-10.6

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

(2) Not available/applicable.

(3) Undefined.

Note.--Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis.

Source: Compiled from Commission questionnaires and official statistics of Commerce.

Table C-1b

CTL plate: Summary data concerning the U.S. market (method B), 1996-98, January-June 1998, and January-June 1999

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Table C-2

CTL plate: Summary data concerning U.S. mills, 1996-98, January-June 1998, and January-June 1999

(Quantity=short tons, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per short ton; period changes=percent, except where noted)									
Item	Reported data					Period changes			
	1996	1997	1998	Jan.-June		1996-98	1996-97	1997-98	Jan.-June 1998-99
				1998	1999				
Average capacity quantity	6,353,369	6,735,260	8,639,765	4,475,580	4,665,980	36.0	6.0	28.3	4.3
Production quantity	5,281,438	5,399,219	6,413,271	3,478,174	2,467,642	21.4	2.2	18.8	-29.1
Capacity utilization (1)	83.1	80.2	74.2	77.7	52.9	-8.9	-3.0	-5.9	-24.8
U.S. shipments:									
Quantity	5,192,482	5,175,139	6,108,843	3,270,844	2,451,886	17.6	-0.3	18.0	-25.0
Value	2,388,092	2,357,516	2,778,644	1,495,665	969,010	16.4	-1.3	17.9	-35.2
Unit value	\$459.91	\$455.55	\$454.86	\$457.27	\$395.21	-1.1	-0.9	-0.2	-13.6
Export shipments:									
Quantity	75,389	171,328	224,108	140,171	89,828	197.3	127.3	30.8	-35.9
Value	39,795	78,272	102,782	63,004	40,280	158.3	96.7	31.3	-36.1
Unit value	\$527.86	\$456.85	\$458.63	\$449.48	\$448.41	-13.1	-13.5	0.4	-0.2
Ending inventory quantity	287,414	340,166	420,488	407,325	338,348	46.3	18.4	23.6	-16.9
Inventories/total shipments (1)	5.5	6.4	6.6	6.0	6.7	1.2	0.9	0.3	0.7
Production workers	6,960	7,443	7,738	7,958	5,961	11.2	6.9	4.0	-25.1
Hours worked (1,000s)	16,121	16,750	17,469	9,064	6,410	8.4	3.9	4.3	-29.3
Wages paid (\$1,000s)	348,117	372,673	395,314	205,338	145,329	13.6	7.1	6.1	-29.2
Hourly wages	\$21.59	\$22.25	\$22.63	\$22.65	\$22.67	4.8	3.0	1.7	0.1
Productivity (tons per 1,000 hours) ..	327.6	322.3	367.1	383.7	385.0	12.1	-1.6	13.9	0.3
Unit labor costs	\$65.91	\$69.02	\$61.64	\$59.04	\$58.89	-6.5	4.7	-10.7	-0.2
Net sales:									
Quantity	5,285,537	5,250,049	6,446,523	3,411,131	2,541,783	22.0	-0.7	22.8	-25.5
Value	2,438,700	2,402,613	2,926,247	1,558,668	1,009,289	20.0	-1.5	21.8	-35.2
Unit value	\$461.39	\$457.64	\$453.93	\$456.94	\$397.08	-1.6	-0.8	-0.8	-13.1
COGS	2,241,688	2,244,723	2,706,443	1,426,689	1,033,073	20.7	0.1	20.6	-27.6
Gross profit or (loss)	197,012	157,890	219,804	131,979	(23,784)	11.6	-19.9	39.2	(2)
SG&A expenses	81,565	94,628	115,242	53,802	54,846	41.3	16.0	21.8	1.9
Operating income or (loss)	115,447	63,262	104,562	78,177	(78,630)	-9.4	-45.2	65.3	(2)
Capital expenditures	612,271	245,399	209,541	145,811	51,239	-65.8	-59.9	-14.6	-64.9
Unit COGS	\$424.12	\$427.56	\$419.83	\$418.25	\$406.44	-1.0	0.8	-1.8	-2.8
Unit SG&A expenses	\$15.43	\$18.02	\$17.88	\$15.77	\$21.58	15.8	16.8	-0.8	36.8
Unit operating income or (loss)	\$21.84	\$12.05	\$16.22	\$22.92	(\$30.93)	-25.7	-44.8	34.6	(2)
COGS/sales (1)	91.9	93.4	92.5	91.5	102.4	0.6	1.5	-0.9	10.8
Operating income or (loss)/ sales (1)	4.7	2.6	3.6	5.0	-7.8	-1.2	-2.1	0.9	-12.8

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

(2) Undefined.

Note.--Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis.

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

Table C-3

CTL plate: Summary data concerning U.S. non-toll processors, 1996-98, January-June 1998, and January-June 1999

(Quantity=short tons, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per short ton; period changes=percent, except where noted)									
Item	Reported data					Period changes			
	1996	1997	1998	Jan.-June 1998	1999	1996-98	1996-97	1997-98	Jan.-June 1998-99
Average capacity quantity	2,368,393	2,516,757	2,551,821	1,435,535	1,630,064	7.7	6.3	1.4	13.6
Production quantity	1,279,423	1,383,189	1,535,725	795,716	801,605	20.0	8.1	11.0	0.7
Capacity utilization (1)	54.0	55.0	60.2	55.4	49.2	6.2	0.9	5.2	-6.3
U.S. shipments:									
Quantity	1,256,558	1,366,899	1,538,465	805,735	813,583	22.4	8.8	12.6	1.0
Value	\$13,306	\$51,469	\$98,435	\$16,634	\$300,095	16.6	7.4	8.5	-5.2
Unit value	\$408.50	\$403.45	\$388.98	\$392.98	\$368.86	-4.8	-1.2	-3.6	-6.1
Export shipments:									
Quantity	0	11,560	8,740	4,370	1,875	(2)	(2)	-24.4	-57.1
Value	0	4,394	3,350	2,325	600	(2)	(2)	-23.8	-74.2
Unit value	(2)	\$380.10	\$383.30	\$532.04	\$320.00	(2)	(2)	0.8	-39.9
Ending inventory quantity	158,086	181,903	148,311	139,729	146,379	-6.2	15.1	-18.5	4.8
Inventories/total shipments (1)	12.6	13.2	9.6	8.6	9.0	-3.0	0.6	-3.6	0.4
Production workers	584	599	654	553	532	12.1	2.6	9.2	-3.8
Hours worked (1,000s)	953	1,033	1,160	713	683	21.7	8.4	12.3	-4.2
Wages paid (\$1,000s)	12,896	14,306	15,862	9,769	9,952	23.0	10.9	10.9	1.9
Hourly wages	\$13.53	\$13.85	\$13.67	\$13.70	\$14.57	1.0	2.3	-1.3	6.4
Productivity (tons per 1,000 hours) ..	995.7	1,009.0	1,003.6	852.1	898.9	0.8	1.3	-0.5	5.5
Unit labor costs	\$13.59	\$13.73	\$13.63	\$16.08	\$16.21	0.2	1.0	-0.7	0.8
Net sales:									
Quantity	1,008,049	1,122,402	1,180,653	643,302	575,891	17.1	11.3	5.2	-10.5
Value	412,917	450,011	456,360	256,827	210,699	10.5	9.0	1.4	-18.0
Unit value	\$409.62	\$400.94	\$386.53	\$399.23	\$365.87	-5.6	-2.1	-3.6	-8.4
COGS	368,001	405,826	403,589	225,901	184,065	9.7	10.3	-0.6	-18.5
Gross profit or (loss)	44,916	44,185	52,771	30,926	26,634	17.5	-1.6	19.4	-13.9
SG&A expenses	22,900	24,218	24,842	13,324	13,149	8.5	5.8	2.6	-1.3
Operating income or (loss)	22,016	19,967	27,929	17,602	13,485	26.9	-9.3	39.9	-23.4
Capital expenditures	10,717	5,058	12,135	1,957	20,600	13.2	-52.8	139.9	952.6
Unit COGS	\$365.06	\$361.57	\$341.84	\$351.16	\$319.62	-6.4	-1.0	-5.5	-9.0
Unit SG&A expenses	\$22.72	\$21.58	\$21.04	\$20.71	\$22.83	-7.4	-5.0	-2.5	10.2
Unit operating income or (loss)	\$21.84	\$17.79	\$23.66	\$27.36	\$23.42	8.3	-18.5	33.0	-14.4
COGS/sales (1)	89.1	90.2	88.4	88.0	87.4	-0.7	1.1	-1.7	-0.6
Operating income or (loss)/sales (1)	5.3	4.4	6.1	6.9	6.4	0.8	-0.9	1.7	-0.5

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

(2) Not available/applicable.

Note.--Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis.

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

Table C-4

CTL plate: Summary data concerning U.S. toll processors, 1996-98, January-June 1998, and January-June 1999

(Quantity=short tons, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per short ton; period changes=percent, except where noted)									
Item	Reported data					Period changes			
	1996	1997	1998	Jan.-June		1996-98	1996-97	1997-98	Jan.-June 1998-99
				1998	1999				
Average capacity quantity	1,369,272	1,401,272	1,401,272	700,636	738,476	2.3	2.3	0.0	5.4
Production quantity	592,212	623,158	689,645	363,001	307,651	16.5	5.2	10.7	-15.2
Capacity utilization (1)	43.3	44.5	49.2	51.8	41.7	6.0	1.2	4.7	-10.1
Conversion of coiled plate to CTL for--									
U.S. mills:									
Quantity	237,165	254,507	296,102	157,874	124,950	24.9	7.3	16.3	-20.9
Value	627	898	1,985	1,157	624	216.6	43.2	121.1	-46.1
Unit value	\$33.42	\$30.69	\$27.44	\$26.64	\$30.46	-17.9	-8.2	-10.6	14.3
U.S. service centers:									
Quantity	75,073	77,769	90,654	46,204	42,676	20.8	3.6	16.6	-7.6
Value	2,136	2,263	2,659	1,350	1,390	24.5	5.9	17.5	3.0
Unit value	\$28.45	\$29.10	\$29.33	\$29.22	\$32.57	3.1	2.3	0.8	11.5
Other U.S. customers:									
Quantity	128,266	131,354	138,565	73,137	62,185	8.0	2.4	5.5	-15.0
Value	1,954	1,959	2,842	1,454	887	45.4	0.3	45.1	-39.0
Unit value	\$20.43	\$20.05	\$27.03	\$25.95	\$20.27	32.3	-1.9	34.8	-21.9
Production workers	136	144	155	155	153	14.0	5.9	7.6	-1.3
Hours worked (1,000s)	241	245	268	136	130	11.3	1.9	9.3	-4.2
Wages paid (\$1,000s)	2,841	3,001	3,546	1,742	1,643	24.8	5.6	18.2	-5.7
Hourly wages	\$11.81	\$12.24	\$13.24	\$12.85	\$12.65	12.1	3.7	8.1	-1.5
Productivity (tons per 1,000 hours) ..	1,455.3	1,497.3	1,552.7	1,619.6	1,425.0	6.7	2.9	3.7	-12.0
Unit labor costs	\$8.11	\$8.17	\$8.52	\$7.94	\$8.88	5.1	0.7	4.3	11.9
Net sales:									
Quantity	434,212	456,858	519,245	274,404	208,116	19.6	5.2	13.7	-24.2
Value	11,543	11,831	15,319	8,328	6,716	32.7	2.5	29.5	-19.4
Unit value	\$26.58	\$25.90	\$29.50	\$30.35	\$32.27	11.0	-2.6	13.9	6.3
COGS	6,756	7,149	8,478	4,612	3,630	25.5	5.8	18.6	-21.3
Gross profit or (loss)	4,787	4,682	6,841	3,716	3,086	42.9	-2.2	46.1	-17.0
SG&A expenses	2,560	2,933	3,654	2,074	1,565	42.7	14.6	24.6	-24.5
Operating income or (loss)	2,227	1,749	3,187	1,642	1,521	43.1	-21.5	82.2	-7.4
Capital expenditures	73	900	80	(2)	(2)	9.6	1,132.9	-91.1	(2)
Unit COGS	\$15.56	\$15.65	\$16.33	\$16.81	\$17.44	4.9	0.6	4.3	3.8
Unit SG&A expenses	\$5.90	\$6.42	\$7.04	\$7.56	\$7.52	19.4	8.9	9.6	-0.5
Unit operating income or (loss)	\$5.13	\$3.83	\$6.14	\$5.98	\$7.31	19.7	-25.4	60.3	22.1
COGS/sales (1)	58.5	60.4	55.3	55.4	54.1	-3.2	1.9	-5.1	-1.3
Operating income or (loss)/									
sales (1)	19.3	14.8	20.8	19.7	22.6	1.5	-4.5	6.0	2.9

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

(2) Not available/applicable.

Note.--Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis.

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

Table C-1A

CTL steel plate: Summary data concerning the U.S. market, 1999-2004, January-June 2004, and January-June 2005

(Quantity=short tons, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per short ton; period changes=percent, except where noted)															
	Reported data							Period changes							
							January-June								Jan.-June
Item	1999	2000	2001	2002	2003	2004	2004	2005	1999-2004	1999-2000	2000-2001	2001-2002	2002-2003	2003-2004	2004-05
U.S. consumption quantity:															
Amount	7,683,631	7,351,192	7,396,843	7,392,172	6,987,726	7,759,428	3,808,857	4,028,898	1.0	-4.3	0.6	-0.1	-5.5	11.0	5.8
Producers' share (1)	86.3	88.1	84.6	89.3	93.1	90.6	91.8	90.0	4.2	1.8	-3.5	4.6	3.8	-2.6	-1.8
Importers' share (1):															
France	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
India	0.1	(4)	(4)	(4)	0.0	(4)	(4)	(4)	-0.1	-0.1	0.0	0.0	0.0	0.0	0.0
Indonesia	0.5	0.0	(4)	0.0	0.0	(4)	0.0	0.1	-0.5	-0.5	0.0	0.0	0.0	0.0	0.1
Italy	0.1	(4)	(4)	(4)	(4)	0.4	0.2	0.2	0.2	-0.1	0.0	0.0	0.0	0.4	-0.0
Japan	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Korea (excluding POSCO)	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Subtotal	5.9	2.4	2.1	1.5	0.3	1.1	0.5	1.9	-4.8	-3.5	-0.2	-0.6	-1.2	0.8	1.4
Korea (POSCO)	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Total imports	13.7	11.9	15.4	10.7	6.9	9.4	8.2	10.0	-4.2	-1.8	3.5	-4.6	-3.8	2.6	1.8
U.S. consumption value:															
Amount	2,903,084	2,778,571	2,651,656	2,667,997	2,595,553	4,907,140	2,051,913	3,036,845	69.0	-4.3	-4.6	0.6	-2.7	89.1	48.0
Producers' share (1)	85.3	87.8	83.6	87.9	91.6	90.8	92.1	89.7	5.6	2.6	-4.3	4.3	3.7	-0.8	-2.3
Importers' share (1):															
France	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
India	0.1	(4)	(4)	(4)	0.0	(4)	(4)	0.1	-0.1	-0.1	0.0	0.0	0.0	0.0	0.1
Indonesia	0.4	0.0	(4)	0.0	0.0	(4)	0.0	0.1	-0.4	-0.4	0.0	0.0	0.0	0.0	0.1
Italy	0.1	0.1	0.1	(4)	(4)	0.4	0.2	0.2	0.2	-0.1	-0.0	-0.1	0.0	0.4	-0.0
Japan	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Korea (excluding POSCO)	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Subtotal	5.9	2.1	2.0	1.6	0.7	1.3	0.7	1.9	-4.7	-3.8	-0.1	-0.4	-0.8	0.5	1.3
Korea (POSCO)	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Total imports	14.7	12.2	16.4	12.1	8.4	9.2	7.9	10.3	-5.6	-2.6	4.3	-4.3	-3.7	0.8	2.3
U.S. imports from:															
France:															
Quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
India:															
Quantity	6,462	1,485	1,262	20	0	1,585	210	1,722	-75.5	-77.0	-15.0	-98.4	-100.0	(3)	721.7
Value	2,057	498	377	12	0	1,731	186	1,837	-15.8	-75.8	-24.4	-96.9	-100.0	(3)	886.0
Unit value	\$318	\$336	\$298	\$584	(3)	\$1,092	\$889	\$1,067	243.1	5.4	-11.1	95.7	-100.0	(3)	20.0
Ending inventory quantity	0	0	0	0	0	0	0	0	(3)	(3)	(3)	(3)	(3)	(3)	(3)
Indonesia:															
Quantity	39,553	0	123	0	0	627	0	2,498	-98.4	-100.0	(3)	-100.0	(3)	(3)	(3)
Value	10,761	0	34	0	0	457	0	1,714	-95.8	-100.0	(3)	-100.0	(3)	(3)	(3)
Unit value	\$272	(3)	\$273	(3)	(3)	\$728	(3)	\$686	167.8	(3)	(3)	-100.0	(3)	(3)	(3)
Ending inventory quantity	0	0	0	0	0	0	0	0	(3)	(3)	(3)	(3)	(3)	(3)	(3)
Italy:															
Quantity	11,396	2,369	1,130	278	666	29,130	9,214	7,781	155.6	-79.2	-52.3	-75.4	139.4	4,270.9	-15.6
Value	4,319	1,509	1,427	850	1,164	19,279	4,836	7,120	346.3	-65.1	-5.5	-40.4	36.9	1,556.8	47.2
Unit value	\$379	\$637	\$1,263	\$3,054	\$1,746	\$662	\$525	\$915	74.6	68.1	98.1	141.9	-42.8	-62.1	74.3
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Japan:															
Quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Korea (excluding POSCO):															
Quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Subtotal:															
Quantity	450,990	174,196	158,311	112,443	21,017	82,011	17,813	74,814	-81.8	-61.4	-9.1	-29.0	-81.3	290.2	320.0
Value	172,359	58,092	52,418	41,604	18,634	61,810	13,400	57,842	-64.1	-66.3	-9.8	-20.6	-55.2	231.7	331.7
Unit value	\$382	\$333	\$331	\$370	\$887	\$754	\$752	\$773	(3)	(3)	(3)	(3)	(3)	(3)	(3)
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Korea (POSCO):															
Quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
All other sources:															
Quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
All sources:															
Quantity	1,049,344	871,136	1,135,502	792,166	479,851	730,918	311,296	401,928	-30.3	-17.0	30.3	-30.2	-39.4	52.3	29.1
Value	428,183	338,111	435,948	322,837	218,133	451,051	162,464	311,530	5.3	-21.0	28.9	-25.9	-32.4	106.8	91.8
Unit value	\$408	\$388	\$384	\$408	\$455	\$617	\$522	\$775	51.2	-4.9	-1.1	6.1	11.5	35.8	48.5
Ending inventory quantity	25,962	19,212	10,620	8,441	2,186	37,673	22,799	25,139	45.1	-26.0	-44.7	-20.5	-74.1	1623.4	10.3

Table continued on next page.

Table C-1A--continued

CTL steel plate: Summary data concerning the U.S. market, 1999-2004, January-June 2004, and January-June 2005

(Quantity=short tons, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per short ton; period changes=percent, except where noted)															
	Reported data						Period changes								
							January-June								Jan.-June
Item	1999	2000	2001	2002	2003	2004	2004	2005	1999-2004	1999-2000	2000-2001	2001-2002	2002-2003	2003-2004	2004-05
U.S. producers' (2):															
Average capacity quantity	10,923,834	10,622,180	11,026,162	11,445,322	11,636,348	11,041,815	5,690,166	5,822,155	1.1	-2.8	3.8	3.8	1.7	-5.1	2.3
Production quantity	6,706,626	6,668,398	6,357,791	6,764,974	6,812,140	7,520,671	3,673,872	3,819,356	12.1	-0.6	-4.7	6.4	0.7	10.4	4.0
Capacity utilization (1)	61.4	62.8	57.7	59.1	58.5	68.1	64.6	65.6	6.7	1.4	-5.1	1.4	-0.6	9.6	1.0
U.S. shipments:															
Quantity	6,634,287	6,480,056	6,261,341	6,600,006	6,507,875	7,028,510	3,497,561	3,626,970	5.9	-2.3	-3.4	5.4	-1.4	8.0	3.7
Value	2,474,901	2,440,460	2,215,708	2,345,160	2,377,420	4,456,089	1,889,449	2,725,315	80.1	-1.4	-9.2	5.8	1.4	87.4	44.2
Unit value	\$374	\$378	\$354	\$355	\$365	\$634	\$540	\$751	69.5	0.9	-6.3	0.4	2.8	73.5	39.1
Export shipments:															
Quantity	161,153	236,598	144,677	195,180	305,067	438,759	219,209	183,249	172.3	46.8	-38.9	34.9	56.3	43.8	-16.4
Value	62,059	88,523	51,238	66,271	107,616	282,506	114,421	144,204	355.2	42.6	-42.1	29.3	62.4	162.5	26.0
Unit value	\$385	\$374	\$354	\$340	\$353	\$666	\$534	\$788	72.9	-2.8	-5.3	-4.1	3.9	88.8	47.5
Ending inventory quantity	664,872	615,678	542,213	533,524	561,018	554,822	508,081	519,555	-16.6	-7.4	-11.9	-1.6	5.2	-1.1	2.3
Inventories/total shipments (1)	9.8	9.2	8.5	7.9	8.2	7.4	6.8	6.8	-2.4	-0.6	-0.7	-0.6	0.4	-0.8	-0.0
Production workers	6,457	6,026	5,670	5,060	4,470	4,125	3,808	4,128	-36.1	-6.7	-5.9	-10.8	-11.7	-7.7	8.4
Hours worked (1,000s)	14,189	13,477	12,586	11,228	9,261	8,728	4,378	4,668	-38.5	-5.0	-6.6	-10.8	-17.5	-5.8	6.6
Wages paid (\$1,000s)	311,741	300,213	291,380	264,262	225,159	222,524	103,730	121,897	-28.6	-3.7	-2.9	-9.3	-14.8	-1.2	17.5
Hourly wages	\$21.97	\$22.28	\$23.16	\$23.54	\$24.32	\$25.49	\$23.69	\$26.11	16.0	1.4	3.9	1.7	3.3	4.8	10.2
Productivity (tons/1,000 hours)	445.3	468.7	479.4	574.9	700.4	817.9	798.2	774.9	83.7	5.2	2.3	19.9	21.8	16.8	-2.9
Unit labor costs	\$49.39	\$47.57	\$48.33	\$40.96	\$34.74	\$31.17	\$29.69	\$33.70	-36.9	-3.7	1.6	-15.3	-15.2	-10.3	13.5
Net sales:															
Quantity	5,054,871	5,031,740	4,898,152	5,271,706	5,459,767	5,846,046	2,936,774	2,928,544	15.7	-0.5	-2.7	7.6	3.6	7.1	-0.3
Value	1,922,593	1,910,118	1,749,895	1,867,048	1,989,141	3,628,077	1,527,077	2,259,700	88.7	-0.6	-8.4	6.7	6.5	82.4	48.0
Unit value	\$380	\$380	\$357	\$354	\$364	\$621	\$520	\$772	63.2	-0.2	-5.9	-0.9	2.9	70.3	48.4
Cost of goods sold (COGS)	1,911,940	1,916,104	1,852,996	1,885,569	1,989,204	2,752,869	1,249,822	1,648,435	44.0	0.2	-3.3	1.8	5.5	38.4	31.9
Gross profit or (loss)	10,653	(5,986)	(103,101)	(18,521)	(63)	875,208	277,255	611,265	8,115.6	(3)	-1622.4	82.0	99.7	(3)	(3)
SG&A expenses	132,658	108,884	104,269	94,815	139,878	92,452	39,726	52,429	-30.3	-17.9	-4.2	-9.1	47.5	-33.9	32.0
Operating income or (loss)	(122,005)	(114,870)	(207,370)	(113,336)	(139,941)	782,756	237,529	558,836	-741.6	(3)	-80.5	45.3	-23.5	(3)	135.3
Capital expenditures	277,433	278,487	135,894	34,403	21,776	30,975	11,262	22,412	-88.8	0.4	-51.2	-74.7	-36.7	42.2	99.0
Unit COGS	\$378	\$381	\$378	\$358	\$364	\$471	\$426	\$563	24.5	0.7	-0.7	-5.5	1.9	29.2	32.3
Unit SG&A expenses	\$26	\$22	\$21	\$18	\$26	\$16	\$14	\$18	-39.7	-17.5	-1.6	-15.5	42.4	-38.3	32.3
Unit operating income or (loss)	(\$24)	(\$23)	(\$42)	(\$21)	(\$26)	\$134	\$81	\$191	-654.7	(3)	-85.4	49.2	-19.2	(3)	135.9
COGS/sales (1)	99.4	100.3	105.9	101.0	100.0	75.9	81.8	72.9	-23.6	0.9	5.6	-4.9	-1.0	-24.1	-8.9
Operating income or (loss)/sales (1)	-6.3	-6.0	-11.9	-6.1	-7.0	21.6	15.6	24.7	27.9	0.3	-5.8	5.8	-1.0	28.6	9.2

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

(2) U.S. mills + U.S. processors.

(3) Undefined.

(4) Value less than 0.05

Note.--Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis. Because of rounding, figures may not add to the totals shown. Unit values and shares are calculated from the unrounded figures.

Source: Compiled from official statistics of the U.S. Department of Commerce and from data submitted in response to Commission questionnaires.

Table C-1B

CTL steel plate: Summary data concerning the U.S. market, 1999-2004, January-June 2004, and January-June 2005

(Quantity=short tons, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per short ton; period changes=percent, except where noted)															
Item	Reported data							Period changes							
	1999	2000	2001	2002	2003	2004	January-June		1999-2004	1999-2000	2000-2001	2001-2002	2002-2003	2003-2004	Jan.-June
							2004	2005							2004-05
U.S. consumption quantity:				*	*	*	*	*	*	*					
U.S. consumption value:				*	*	*	*	*	*	*					
U.S. imports from:				*	*	*	*	*	*	*					
U.S. producers' (2):															
Average capacity quantity	10,923,834	10,622,180	11,026,162	11,445,322	11,636,348	11,041,815	5,690,166	5,822,155	1.1	-2.8	3.8	3.8	1.7	-5.1	2.3
Production quantity	6,706,626	6,668,398	6,357,791	6,764,974	6,812,140	7,520,671	3,673,872	3,819,356	12.1	-0.6	-4.7	6.4	0.7	10.4	4.0
Capacity utilization (1)	61.4	62.8	57.7	59.1	58.5	68.1	64.6	65.6	6.7	1.4	-5.1	1.4	-0.6	9.6	1.0
U.S. shipments:															
Quantity	6,634,287	6,480,056	6,261,341	6,600,006	6,507,875	7,028,510	3,497,561	3,626,970	5.9	-2.3	-3.4	5.4	-1.4	8.0	3.7
Value	2,474,901	2,440,460	2,215,708	2,345,160	2,377,420	4,456,089	1,889,449	2,725,315	80.1	-1.4	-9.2	5.8	1.4	87.4	44.2
Unit value	\$374	\$378	\$354	\$355	\$365	\$634	\$540	\$751	69.5	0.9	-6.3	0.4	2.8	73.5	39.1
Export shipments:															
Quantity	161,153	236,598	144,677	195,180	305,067	438,759	219,209	183,249	172.3	46.8	-38.9	34.9	56.3	43.8	-16.4
Value	62,059	88,523	51,238	66,271	107,616	282,506	114,421	144,204	355.2	42.6	-42.1	29.3	62.4	162.5	26.0
Unit value	\$385	\$374	\$354	\$340	\$353	\$666	\$534	\$788	72.9	-2.8	-5.3	-4.1	3.9	88.8	47.5
Ending inventory quantity	664,872	615,678	542,213	533,524	561,018	554,822	508,081	519,555	-16.6	-7.4	-11.9	-1.6	5.2	-1.1	2.3
Inventories/total shipments (1) .	9.8	9.2	8.5	7.9	8.2	7.4	6.8	6.8	-2.4	-0.6	-0.7	-0.6	0.4	-0.8	-0.0
Production workers	6,457	6,026	5,670	5,060	4,470	4,125	3,808	4,128	-36.1	-6.7	-5.9	-10.8	-11.7	-7.7	8.4
Hours worked (1,000s)	14,189	13,477	12,586	11,228	9,261	8,728	4,378	4,668	-38.5	-5.0	-6.6	-10.8	-17.5	-5.8	6.6
Wages paid (\$1,000s)	311,741	300,213	291,380	264,262	225,159	222,524	103,730	121,897	-28.6	-3.7	-2.9	-9.3	-14.8	-1.2	17.5
Hourly wages	\$21.97	\$22.28	\$23.16	\$23.54	\$24.32	\$25.49	\$23.69	\$26.11	16.0	1.4	3.9	1.7	3.3	4.8	10.2
Productivity (tons/1,000 hours) . .	445.3	468.7	479.4	574.9	700.4	817.9	798.2	774.9	83.7	5.2	2.3	19.9	21.8	16.8	-2.9
Unit labor costs	\$49.39	\$47.57	\$48.33	\$40.96	\$34.74	\$31.17	\$29.69	\$33.70	-36.9	-3.7	1.6	-15.3	-15.2	-10.3	13.5
Net sales:															
Quantity	5,054,871	5,031,740	4,898,152	5,271,706	5,459,767	5,846,046	2,936,774	2,928,544	15.7	-0.5	-2.7	7.6	3.6	7.1	-0.3
Value	1,922,593	1,910,118	1,749,895	1,867,048	1,989,141	3,628,077	1,527,077	2,259,700	88.7	-0.6	-8.4	6.7	6.5	82.4	48.0
Unit value	\$380	\$380	\$357	\$354	\$364	\$621	\$520	\$772	63.2	-0.2	-5.9	-0.9	2.9	70.3	48.4
Cost of goods sold (COGS)	1,911,940	1,916,104	1,852,996	1,885,569	1,989,204	2,752,869	1,249,822	1,648,435	44.0	0.2	-3.3	1.8	5.5	38.4	31.9
Gross profit or (loss)	10,653	(5,986)	(103,101)	(18,521)	(63)	875,208	277,255	611,265	8,115.6	(3)	-1622.4	82.0	99.7	(3)	(3)
SG&A expenses	132,658	108,884	104,269	94,815	139,878	92,452	39,726	52,429	-30.3	-17.9	-4.2	-9.1	47.5	-33.9	32.0
Operating income or (loss)	(122,005)	(114,870)	(207,370)	(113,336)	(139,941)	782,756	237,529	558,836	-741.6	(3)	-80.5	45.3	-23.5	(3)	135.3
Capital expenditures	277,433	278,487	135,894	34,403	21,776	30,975	11,262	22,412	-88.8	0.4	-51.2	-74.7	-36.7	42.2	99.0
Unit COGS	\$378	\$381	\$378	\$358	\$364	\$471	\$426	\$563	24.5	0.7	-0.7	-5.5	1.9	29.2	32.3
Unit SG&A expenses	\$26	\$22	\$21	\$18	\$26	\$16	\$14	\$18	-39.7	-17.5	-1.6	-15.5	42.4	-38.3	32.3
Unit operating income or (loss) . .	(\$24)	(\$23)	(\$42)	(\$21)	(\$26)	\$134	\$81	\$191	-654.7	(3)	-85.4	49.2	-19.2	(3)	135.9
COGS/sales (1)	99.4	100.3	105.9	101.0	100.0	75.9	81.8	72.9	-23.6	0.9	5.6	-4.9	-1.0	-24.1	-8.9
Operating income or (loss)/ sales (1)	-6.3	-6.0	-11.9	-6.1	-7.0	21.6	15.6	24.7	27.9	0.3	-5.8	5.8	-1.0	28.6	9.2

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

(2) U.S. mills + U.S. processors.

(3) Undefined.

(4) Value less than 0.05

Note.--Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis. Because of rounding, figures may not add to the totals shown. Unit values and shares are calculated from the unrounded figures.

Source: Compiled from official statistics of the U.S. Department of Commerce and from data submitted in response to Commission questionnaires.

Table C-2

CTL steel plate: Summary data concerning U.S. mills, 1999-2004, January-June 2004, and January-June 2005

(Quantity=short tons, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per short ton; period changes=percent, except where noted)															
Item	Reported data						Period changes								Jan.-June 2004-05
	1999	2000	2001	2002	2003	2004	January-June		1999-2004	1999-2000	2000-2001	2001-2002	2002-2003	2003-2004	
							2004	2005							
U.S. mills:															
Average capacity quantity	6,369,110	5,526,019	5,670,500	6,188,000	6,764,000	6,156,000	3,078,000	3,185,000	-3.3	-13.2	2.6	9.1	9.3	-9.0	3.5
Production quantity	4,328,379	4,355,751	4,255,207	4,550,672	4,708,710	4,999,976	2,448,268	2,568,067	15.5	0.6	-2.3	6.9	3.5	6.2	4.9
Capacity utilization (1)	68.0	78.8	75.0	73.5	69.6	81.2	79.5	80.6	13.3	10.9	-3.8	-1.5	-3.9	11.6	1.1
U.S. shipments:															
Quantity	4,279,058	4,157,073	4,106,937	4,380,235	4,425,320	4,669,861	2,308,802	2,408,999	9.1	-2.9	-1.2	6.7	1.0	5.5	4.3
Value	1,635,582	1,596,073	1,488,537	1,575,312	1,625,724	2,908,307	1,187,566	1,865,496	77.8	-2.4	-6.7	5.8	3.2	78.9	57.1
Unit value	\$384	\$386	\$362	\$360	\$367	\$623	\$514	\$774	62.2	0.4	-6.0	-0.8	2.1	69.5	50.6
Export shipments:															
Quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Ending inventory quantity	263,229	234,871	220,716	195,777	212,584	169,565	159,711	192,917	-35.6	-10.8	-6.0	-11.3	8.6	-20.2	20.8
Inventories/total shipments (1)	6.0	5.4	5.2	4.3	4.5	3.4	3.2	3.8	-2.6	-0.6	-0.2	-0.9	0.2	-1.2	0.6
Production workers	5,228	4,760	4,516	3,920	3,332	2,632	2,508	2,688	-49.7	-9.0	-5.1	-13.2	-15.0	-21.0	7.2
Hours worked (1,000s)	11,617	10,812	10,098	8,850	7,172	6,048	3,195	3,231	-47.9	-6.9	-6.6	-12.4	-19.0	-15.7	1.1
Wages paid (\$1,000s)	271,056	256,836	251,356	225,588	187,828	179,277	85,026	98,809	-33.9	-5.2	-2.1	-10.3	-16.7	-4.6	16.2
Hourly wages	\$23.33	\$23.75	\$24.89	\$25.49	\$26.19	\$29.64	\$26.61	\$30.58	27.0	1.8	4.8	2.4	2.7	13.2	14.9
Productivity (tons/1,000 hours)	372.6	402.9	421.4	514.2	656.5	826.7	766.3	794.8	121.9	8.1	4.6	22.0	27.7	25.9	3.7
Unit labor costs	\$62.62	\$58.96	\$59.07	\$49.57	\$39.89	\$35.86	\$34.73	\$38.48	-42.7	-5.8	0.2	-16.1	-19.5	-10.1	10.8
Net sales:															
Quantity	4,415,891	4,378,696	4,248,307	4,579,491	4,695,539	5,159,373	2,498,291	2,547,476	16.8	-0.8	-3.0	7.8	2.5	9.9	2.0
Value	1,709,595	1,681,590	1,538,595	1,635,932	1,720,277	3,155,221	1,287,208	1,988,720	84.6	-1.6	-8.5	6.3	5.2	83.4	54.5
Unit value	\$387	\$384	\$362	\$357	\$366	\$612	\$515	\$781	58.0	-0.8	-5.7	-1.4	2.6	66.9	51.5
Cost of goods sold (COGS)	1,723,064	1,707,143	1,650,624	1,672,041	1,735,947	2,352,881	1,064,415	1,390,786	36.6	-0.9	-3.3	1.3	3.8	35.5	30.7
Gross profit or (loss)	(13,469)	(25,553)	(112,029)	(36,109)	(15,670)	802,340	222,793	597,934	(3)	-89.7	-338.4	67.8	56.6	(3)	168.4
SG&A expenses	124,052	100,021	94,737	84,045	129,594	81,381	34,354	47,315	-34.4	-19.4	-5.3	-11.3	54.2	-37.2	37.7
Operating income or (loss)	(137,521)	(125,574)	(206,766)	(120,154)	(145,264)	720,959	188,439	550,619	(3)	8.7	-64.7	41.9	-20.9	(3)	192.2
Capital expenditures	277,078	278,097	135,750	29,974	20,588	30,737	11,192	22,388	-88.9	0.4	-51.2	-77.9	-31.3	49.3	100.0
Unit COGS	\$390	\$390	\$389	\$365	\$370	\$456	\$426	\$546	16.9	-0.1	-0.3	-6.0	1.3	23.4	28.1
Unit SG&A expenses	\$28	\$23	\$22	\$18	\$28	\$16	\$14	\$19	-43.9	-18.7	-2.4	-17.7	50.4	-42.8	35.1
Unit operating income or (loss)	(\$31)	(\$29)	(\$49)	(\$26)	(\$31)	\$140	\$75	\$216	(3)	7.9	-69.7	46.1	-17.9	(3)	186.6
COGS/sales (1)	100.8	101.5	107.3	102.2	100.9	74.6	82.7	69.9	-26.2	0.7	5.8	-5.1	-1.3	-26.3	-12.8
Operating income or (loss)/ sales (1)	-8.0	-7.5	-13.4	-7.3	-8.4	22.8	14.6	27.7	30.9	0.6	-6.0	6.1	-1.1	31.3	13.0

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

Note.--Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis. Because of rounding, figures may not add to the totals shown. Unit values and shares are calculated from the unrounded figures.

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

Table C-3
CTL steel plate: Summary data concerning U.S. processors, 1999-2004, January-June 2004, and January-June 2005

Item	(Quantity=short tons, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per short ton; period changes=percent, except where noted)								Period changes						
	Reported data														
	1999	2000	2001	2002	2003	2004	January-June		1999-2004	1999-2000	2000-2001	2001-2002	2002-2003	2003-2004	Jan.-June 2004-05
							2004	2005							
U.S. processors:															
Average capacity quantity	1,702,734	1,966,921	2,040,922	2,002,082	2,001,108	1,914,575	1,156,546	1,181,535	12.4	15.5	3.8	-1.9	-0.0	-4.3	2.2
Production quantity	803,261	775,512	754,312	776,278	938,152	986,871	514,198	474,932	22.9	-3.5	-2.7	2.9	20.9	5.2	-7.6
Capacity utilization (1)	47.2	39.4	37.0	38.8	46.9	51.5	44.5	40.2	4.4	-7.7	-2.5	1.8	8.1	4.7	-4.3
U.S. shipments:															
Quantity	827,092	805,400	804,880	835,273	890,905	924,798	492,986	444,623	11.8	-2.6	-0.1	3.8	6.7	3.8	-9.8
Value	299,853	298,042	277,742	300,594	320,694	594,035	280,793	312,051	98.1	-0.6	-6.8	8.2	6.7	85.2	11.1
Unit value	\$363	\$370	\$345	\$360	\$360	\$642	\$570	\$702	77.2	2.1	-6.8	4.3	0.0	78.4	23.2
Export shipments:															
Quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Ending inventory quantity	120,171	117,742	114,930	124,590	127,808	151,339	150,934	145,617	25.9	-2.0	-2.4	8.4	2.6	18.4	-3.5
Inventories/total shipments (1)	14.5	14.6	14.3	14.9	14.3	16.3	15.1	16.4	1.8	0.1	-0.3	0.6	-0.6	2.0	1.2
Production workers	484	483	469	458	560	676	671	689	39.7	-0.2	-2.9	-2.3	22.3	20.7	2.7
Hours worked (1,000s)	6,019	6,012	5,982	5,932	5,964	6,173	2,965	3,018	2.5	-0.1	-0.5	-0.8	0.5	3.5	1.8
Wages paid (\$1,000s)	78,824	81,476	83,118	84,866	88,774	90,751	44,510	46,162	15.1	3.4	2.0	2.1	4.6	2.2	3.7
Hourly wages	\$13.10	\$13.56	\$13.90	\$14.31	\$14.89	\$14.70	\$15.01	\$15.30	12.2	3.5	2.5	3.0	4.0	-1.3	1.9
Productivity (tons/1,000 hours)	124.2	124.2	122.2	127.4	152.2	154.9	167.6	153.0	24.7	0.0	-1.7	4.3	19.5	1.7	-8.7
Unit labor costs	\$106.39	\$109.80	\$114.49	\$112.82	\$98.31	\$94.94	\$89.56	\$99.98	-10.8	3.2	4.3	-1.5	-12.9	-3.4	11.6
Net sales:															
Quantity	429,791	489,975	519,269	574,000	622,162	649,532	348,481	311,885	51.1	14.0	6.0	10.5	8.4	4.4	-10.5
Value	150,472	172,202	170,379	187,757	216,360	364,268	190,244	221,550	142.1	14.4	-1.1	10.2	15.2	68.4	16.5
Unit value	\$350	\$351	\$328	\$327	\$348	\$561	\$546	\$710	60.2	0.4	-6.6	-0.3	6.3	61.3	30.1
Cost of goods sold (COGS)	129,379	155,771	162,727	172,588	203,579	299,927	140,082	210,803	131.8	20.4	4.5	6.1	18.0	47.3	50.5
Gross profit or (loss)	21,093	16,431	7,652	15,169	12,781	64,341	50,162	10,747	205.0	-22.1	-53.4	98.2	-15.7	403.4	-78.6
SG&A expenses	7,420	7,627	8,643	9,700	9,282	9,955	4,873	4,725	34.2	2.8	13.3	12.2	-4.3	7.3	-3.0
Operating income or (loss)	13,673	8,804	(991)	5,469	3,499	54,386	45,289	6,022	297.8	-35.6	(3)	(3)	-36.0	1454.3	-86.7
Capital expenditures	277,078	278,097	135,750	29,974	20,588	30,737	11,192	22,388	-88.9	0.4	-51.2	-77.9	-31.3	49.3	100.0
Unit COGS	\$301	\$318	\$313	\$301	\$327	\$462	\$402	\$676	53.4	5.6	-1.4	-4.1	8.8	41.1	68.1
Unit SG&A expenses	\$17	\$16	\$17	\$17	\$15	\$15	\$14	\$15	-11.2	-9.8	6.9	1.5	-11.7	2.7	8.3
Unit operating income or (loss)	\$32	\$18	(\$2)	\$10	\$6	\$84	\$130	\$19	163.2	-43.5	(3)	(3)	-41.0	1388.8	-85.1
COGS/sales (1)	86.0	90.5	95.5	91.9	94.1	82.3	73.6	95.1	-3.6	4.5	5.1	-3.6	2.2	-11.8	21.5
Operating income or (loss)/sales (1)	9.1	5.1	-0.6	2.9	1.6	14.9	23.8	2.7	5.8	-4.0	-5.7	3.5	-1.3	13.3	-21.1

(1) "Reported data" are in percent and "period changes" are in percentage points.
(2) Capital expenditures by U.S. mills and U.S. processors.
(3) Undefined.

Note.--Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis. Because of rounding, figures may not add to the totals shown.
Unit values and shares are calculated from the unrounded figures.

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

Table C-1
CTL plate: Summary data concerning the U.S. market, 2005-10, January-June 2010, and January-June 2011

(Quantity=short tons, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per short ton; period changes=percent, except where noted)																
Item	Reported data								Period changes							
	2005	2006	2007	2008	2009	2010	January-June		2005-10	2005-06	2006-07	2007-08	2008-09	2009-10	Jan.-June	
							2010	2011								2010-11
U.S. consumption quantity:																
Amount	6,845,135	8,378,675	7,963,203	7,988,590	4,367,759	5,929,950	2,951,537	3,496,761	-13.4	22.4	-5.0	0.3	-45.3	35.8		18.5
Producers' share (1)	88.4	84.0	87.1	89.7	91.8	90.7	90.3	90.4	2.3	-4.4	3.1	2.6	2.1	-1.1		0.0
Importers' share (1):																
India	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	-0.1	0.0	-0.1	-0.0	-0.0	-0.0		0.0
Indonesia	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-0.0	-0.0	0.0	-0.0	-0.0	0.0		0.0
Italy	0.1	0.0	0.0	0.0	0.1	0.0	0.0	0.0	-0.1	-0.1	0.0	-0.0	0.1	-0.1		-0.0
Japan	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Korea (subject)	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Subtotal (subject)	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Korea (POSCO)	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
All other sources	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Subtotal (nonsubject)	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Total imports	11.6	16.0	12.9	10.3	8.2	9.3	9.7	9.6	-2.3	4.4	-3.1	-2.6	-2.1	1.1		-0.0
U.S. consumption value:																
Amount	4,945,623	6,236,381	6,154,644	7,964,733	3,042,185	4,444,155	2,145,372	3,181,742	-10.1	26.1	-1.3	29.4	-61.8	46.1		48.3
Producers' share (1)	88.3	85.7	87.6	88.7	88.9	89.1	88.4	89.7	0.9	-2.6	1.9	1.1	0.2	0.2		1.3
Importers' share (1):																
India	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	-0.1	-0.0	-0.1	-0.0	0.0	-0.0		0.0
Indonesia	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-0.0	-0.0	0.0	-0.0	-0.0	0.0		0.0
Italy	0.2	0.0	0.1	0.0	0.2	0.1	0.1	0.0	-0.1	-0.1	0.0	-0.1	0.2	-0.2		-0.0
Japan	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Korea (subject)	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Subtotal (subject)	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Korea (POSCO)	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
All other sources	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Subtotal (nonsubject)	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Total imports	11.7	14.3	12.4	11.3	11.1	10.9	11.6	10.3	-0.9	2.6	-1.9	-1.1	-0.2	-0.2		-1.3
U.S. imports from:																
India:																
Quantity	3,856	6,542	1,167	310	165	32	32	316	-99.2	69.7	-82.2	-73.4	-46.9	-80.8		900.8
Value	3,913	4,358	1,146	466	298	55	55	625	-98.6	11.4	-73.7	-59.3	-36.2	-81.4		1,030.3
Unit value	\$1,015	\$666	\$982	\$1,504	\$1,808	\$1,754	\$1,754	\$1,981	72.9	-34.4	47.5	53.1	20.2	-3.0		12.9
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Indonesia:																
Quantity	2,682	41	1,661	97	0	0	0	0	-100.0	-98.5	3,979.9	-94.2	-100.0	(2)		(2)
Value	1,817	37	985	128	0	0	0	0	-100.0	-98.0	2,557.0	-87.0	-100.0	(2)		(2)
Unit value	\$678	\$910	\$593	\$1,320	(2)	(2)	(2)	(2)	(2)	34.3	-34.9	122.7	(2)	(2)		(2)
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Italy:																
Quantity	9,215	1,212	3,814	337	4,904	718	429	428	-92.2	-86.9	214.7	-91.2	1,354.4	-85.4		-0.1
Value	8,939	2,206	4,395	1,277	6,402	2,369	1,414	1,121	-73.5	-75.3	99.2	-70.9	401.2	-63.0		-20.7
Unit value	\$970	\$1,821	\$1,152	\$3,789	\$1,306	\$3,299	\$3,298	\$2,616	240.1	87.7	-36.7	228.8	-65.5	152.6		-20.7
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Japan:																
Quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Value	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Korea (subject):																
Quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Value	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Subtotal (subject):																
Quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Value	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Korea (POSCO):																
Quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Value	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
All other sources:																
Quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Value	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Subtotal (nonsubject):																
Quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Value	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Unit value	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***
All sources:																
Quantity	795,303	1,341,814	1,026,836	824,357	357,850	551,029	285,027	336,175	-30.7	68.7	-23.5	-19.7	-56.6	54.0		17.9
Value	578,824	894,023	762,476	903,018	337,604	482,282	247,941	326,263	-16.7	54.5	-14.7	18.4	-62.6	42.9		31.6
Unit value	\$728	\$666	\$743	\$1,095	\$943	\$875	\$870	\$971	20.3	-8.5	11.4	47.5	-13.9	-7.2		11.6
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***		***

Table continued on next page.

Table C-1--Continued

CTL plate: Summary data concerning the U.S. market, 2005-10, January-June 2010, and January-June 2011

Item	(Quantity=short tons, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per short ton; period changes=percent, except where noted)															
	Reported data								Period changes							
	2005	2006	2007	2008	2009	2010	January-June		2005-10	2005-06	2006-07	2007-08	2008-09	2009-10	Jan.-June	
							2010	2011							2010-11	
U.S. producers':																
Average capacity quantity	8,352,058	9,078,900	9,102,852	9,539,225	9,597,673	9,624,269	4,776,796	4,860,735	15.2	8.7	0.3	4.8	0.6	0.3	1.8	
Production quantity	6,526,649	7,708,588	7,684,039	7,748,767	4,566,875	6,075,718	3,046,421	3,603,811	-6.9	18.1	-0.3	0.8	-41.1	33.0	18.3	
Capacity utilization (1)	78.1	84.9	84.4	81.2	47.6	63.1	63.8	74.1	-15.0	6.8	-0.5	-3.2	-33.6	15.5	10.4	
U.S. shipments:																
Quantity	6,049,832	7,036,861	6,936,367	7,164,233	4,009,909	5,378,921	2,666,510	3,160,586	-11.1	16.3	-1.4	3.3	-44.0	34.1	18.5	
Value	4,366,799	5,342,358	5,392,168	7,061,715	2,704,581	3,961,873	1,897,431	2,855,479	-9.3	22.3	0.9	31.0	-61.7	46.5	50.5	
Unit value	\$722	\$759	\$777	\$986	\$674	\$737	\$712	\$903	2.0	5.2	2.4	26.8	-31.6	9.2	27.0	
Export shipments:																
Quantity	475,310	592,291	730,366	707,143	555,217	641,408	337,393	353,978	34.9	24.6	23.3	-3.2	-21.5	15.5	4.9	
Value	352,874	444,497	573,188	623,933	357,896	441,022	210,533	307,991	25.0	26.0	29.0	8.9	-42.6	23.2	46.3	
Unit value	\$742	\$750	\$785	\$882	\$645	\$688	\$624	\$870	-7.4	1.1	4.6	12.4	-26.9	6.7	39.4	
Ending inventory quantity	312,040	372,483	400,324	265,647	258,456	324,243	353,993	423,459	3.9	19.4	7.5	-33.6	-2.7	25.5	19.6	
Inventories/total shipments (1)	4.8	4.9	5.2	3.4	5.7	5.4	5.9	6.0	0.6	0.1	0.3	-1.8	2.3	-0.3	0.1	
Production workers	3,647	3,763	3,870	3,958	3,110	3,339	3,300	3,875	-8.4	3.2	2.8	2.3	-21.4	7.4	17.4	
Hours worked (1,000s)	7,451	7,711	7,916	8,020	5,654	6,466	3,374	4,351	-13.2	3.5	2.7	1.3	-29.5	14.4	29.0	
Wages paid (\$1,000s)	218,529	250,913	269,187	290,004	191,575	217,688	103,430	135,108	-0.4	14.8	7.3	7.7	-33.9	13.6	30.6	
Hourly wages	\$29.33	\$32.54	\$34.01	\$36.16	\$33.88	\$33.67	\$30.66	\$31.05	14.8	10.9	4.5	6.3	-6.3	-0.6	1.3	
Productivity (tons/1,000 hours)	792.9	900.8	883.0	882.2	741.0	857.2	825.4	757.5	8.1	13.6	-2.0	-0.1	-16.0	15.7	-8.2	
Unit labor costs	\$36.99	\$36.12	\$38.51	\$40.99	\$45.73	\$39.28	\$37.14	\$40.99	6.2	-2.4	6.6	6.4	11.6	-14.1	10.4	
Net sales:																
Quantity	6,151,120	7,224,223	7,267,293	7,416,533	4,371,914	5,819,533	2,881,800	3,363,750	-5.4	17.4	0.6	2.1	-41.1	33.1	16.7	
Value	4,471,661	5,505,206	5,721,813	7,295,978	2,927,804	4,255,177	2,011,853	3,036,857	-4.8	23.1	3.9	27.5	-59.9	45.3	50.9	
Unit value	\$727	\$762	\$787	\$984	\$670	\$731	\$698	\$903	0.6	4.8	3.3	24.9	-31.9	9.2	29.3	
Cost of goods sold (COGS)	3,310,754	3,949,257	4,320,178	5,635,232	2,996,898	4,063,711	1,956,624	2,638,669	22.7	19.3	9.4	30.4	-46.8	35.6	34.9	
Gross profit or (loss)	1,160,907	1,555,949	1,401,635	1,660,746	(69,094)	191,466	55,229	398,188	-83.5	34.0	-9.9	18.5	(2)	(2)	621.0	
SG&A expenses	122,903	145,640	209,455	169,821	105,503	125,933	59,569	78,930	2.5	18.5	43.8	-18.9	-37.9	19.4	32.5	
Operating income or (loss)	1,038,004	1,410,309	1,192,180	1,490,925	(174,597)	65,533	(4,340)	319,258	-93.7	35.9	-15.5	25.1	(2)	(2)	(2)	
Capital expenditures	82,146	117,180	136,899	99,951	80,851	177,273	84,159	95,442	115.8	42.6	16.8	-27.0	-19.1	119.3	13.4	
Unit COGS	\$538	\$547	\$594	\$760	\$685	\$698	\$679	\$784	29.7	1.6	8.7	27.8	-9.8	1.9	15.5	
Unit SG&A expenses	\$20	\$20	\$29	\$23	\$24	\$22	\$21	\$23	8.3	0.9	43.0	-20.6	5.4	-10.3	13.5	
Unit operating income or (loss)	\$169	\$195	\$164	\$201	(\$40)	\$11	(\$2)	\$95	-93.3	15.7	-16.0	22.5	(2)	(2)	(2)	
COGS/sales (1)	74.0	71.7	75.5	77.2	102.4	95.5	97.3	86.9	21.5	-2.3	3.8	1.7	25.1	-6.9	-10.4	
Operating income or (loss)/sales (1)	23.2	25.6	20.8	20.4	(6.0)	1.5	(0.2)	10.5	-21.7	2.4	-4.8	-0.4	-26.4	7.5	10.7	

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

(2) Not applicable.

Note.--Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis. Because of rounding, figures may not add to totals shown. Unit values and shares are calculated from the unrounded figures.

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

Table C-1

CTL plate: 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. consumption quantity:									
Amount	9,505,488	7,894,256	7,530,833	5,785,451	5,441,858	(20.8)	(17.0)	(4.6)	(5.9)
Producers' share (fn1)	83.2	82.7	85.4	83.9	90.5	2.2	(0.5)	2.6	6.5
Importers' share (fn1):									
India	***	***	***	***	***	***	***	***	***
Indonesia	***	***	***	***	***	***	***	***	***
Korea subject	***	***	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	***	***	***
Korea nonsubject	***	***	***	***	***	***	***	***	***
All other sources	14.4	13.7	9.8	10.7	7.4	(4.7)	(0.7)	(4.0)	(3.3)
Nonsubject sources	***	***	***	***	***	***	***	***	***
All import sources	16.8	17.3	14.6	16.1	9.5	(2.2)	0.5	(2.6)	(6.5)
U.S. consumption value:									
Amount	7,829,705	5,485,737	4,592,895	3,552,727	3,759,205	(41.3)	(29.9)	(16.3)	5.8
Producers' share (fn1)	83.5	81.0	83.3	81.9	89.3	(0.2)	(2.5)	2.3	7.5
Importers' share (fn1):									
India	***	***	***	***	***	***	***	***	***
Indonesia	***	***	***	***	***	***	***	***	***
Korea subject	***	***	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	***	***	***
Korea nonsubject	***	***	***	***	***	***	***	***	***
All other sources	14.4	15.5	11.9	12.7	8.9	(2.5)	1.1	(3.7)	(3.8)
Nonsubject sources	***	***	***	***	***	***	***	***	***
All import sources	16.5	19.0	16.7	18.1	10.7	0.2	2.5	(2.3)	(7.5)
U.S. imports from:									
India:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Indonesia:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Korea subject:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Subject sources:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Korea nonsubject:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
All other sources:									
Quantity	1,370,866	1,084,476	735,378	619,273	403,884	(46.4)	(20.9)	(32.2)	(34.8)
Value	1,130,334	852,501	546,067	451,905	336,186	(51.7)	(24.6)	(35.9)	(25.6)
Unit value	\$825	\$786	\$743	\$730	\$832	(9.9)	(4.7)	(5.5)	14.1
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Nonsubject sources:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
All import sources:									
Quantity	1,596,993	1,362,524	1,103,098	929,339	518,751	(30.9)	(14.7)	(19.0)	(44.2)
Value	1,292,110	1,043,534	768,723	644,035	400,642	(40.5)	(19.2)	(26.3)	(37.8)
Unit value	\$809	\$766	\$697	\$693	\$772	(13.9)	(5.3)	(9.0)	11.4
Ending inventory quantity	85,685	71,242	42,817	61,980	41,440	(50.0)	(16.9)	(39.9)	(33.1)

Table continued on next page.

Table C-1--Continued

CTL plate: 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. producers:									
Average capacity quantity	12,301,432	12,237,465	12,239,304	9,185,777	9,170,109	(0.5)	(0.5)	0.0	(0.2)
Production quantity	8,911,291	7,255,831	7,262,460	5,466,746	5,469,164	(18.5)	(18.6)	0.1	0.0
Capacity utilization (fn1)	72.4	59.3	59.3	59.5	59.6	(13.1)	(13.1)	0.0	0.1
U.S. shipments:									
Quantity	7,908,495	6,531,732	6,427,735	4,856,112	4,923,107	(18.7)	(17.4)	(1.6)	1.4
Value	6,537,595	4,442,203	3,824,172	2,908,692	3,358,563	(41.5)	(32.1)	(13.9)	15.5
Unit value	\$827	\$680	\$595	\$599	\$682	(28.0)	(17.7)	(12.5)	13.9
Export shipments:									
Quantity	780,779	740,460	820,689	605,622	505,485	5.1	(5.2)	10.8	(16.5)
Value	655,670	512,415	486,438	357,372	338,847	(25.8)	(21.8)	(5.1)	(5.2)
Unit value	\$840	\$692	\$593	\$590	\$670	(29.4)	(17.6)	(14.3)	13.6
Ending inventory quantity	811,409	794,778	578,193	727,468	787,545	(28.7)	(2.0)	(27.3)	8.3
Inventories/total shipments (fn1)	9.3	10.9	8.0	10.0	10.9	(1.4)	1.6	(3.0)	0.9
Production workers	4,320	4,003	4,181	3,983	4,084	(3.2)	(7.3)	4.4	2.5
Hours worked (1,000s)	9,661	8,530	8,519	6,251	6,583	(11.8)	(11.7)	(0.1)	5.3
Wages paid (\$1,000)	352,131	303,705	309,305	228,129	239,541	(12.2)	(13.8)	1.8	5.0
Hourly wages (dollars)	\$36.45	\$35.60	\$36.31	\$36.49	\$36.39	(0.4)	(2.3)	2.0	(0.3)
Productivity (short tons per 1,000 hours)	922.4	850.6	852.5	874.5	830.8	(7.6)	(7.8)	0.2	(5.0)
Unit labor costs	\$39.52	\$41.86	\$42.59	\$41.73	\$43.80	7.8	5.9	1.8	5.0
Net sales:									
Quantity	7,553,933	6,337,345	6,171,378	4,608,417	4,580,206	(18.3)	(16.1)	(2.6)	(0.6)
Value	6,395,710	4,469,542	3,635,284	2,708,088	3,195,702	(43.2)	(30.1)	(18.7)	18.0
Unit value	\$847	\$705	\$589	\$588	\$698	(30.4)	(16.7)	(16.5)	18.7
Cost of goods sold (COGS)	5,651,772	4,225,344	3,428,873	2,524,067	2,983,001	(39.3)	(25.2)	(18.8)	18.2
Gross profit or (loss)	743,938	244,198	206,411	184,021	212,701	(72.3)	(67.2)	(15.5)	15.6
SG&A expenses	202,199	198,213	186,029	138,849	151,584	(8.0)	(2.0)	(6.1)	9.2
Operating income or (loss)	541,739	45,985	20,382	45,172	61,117	(96.2)	(91.5)	(55.7)	35.3
Net income or (loss)	***	***	***	***	***	***	***	***	***
Capital expenditures	163,084	111,843	86,518	64,602	59,520	(46.9)	(31.4)	(22.6)	(7.9)
Unit COGS	\$748	\$667	\$556	\$548	\$651	(25.7)	(10.9)	(16.7)	18.9
Unit SG&A expenses	\$27	\$31	\$30	\$30	\$33	12.6	16.8	(3.6)	9.8
Unit operating income or (loss)	\$72	\$7	\$3	\$10	\$13	(95.4)	(89.9)	(54.5)	36.1
Unit net income or (loss)	***	***	***	***	***	***	***	***	***
COGS/sales (fn1)	88.4	94.5	94.3	93.2	93.3	6.0	6.2	(0.2)	0.1
Operating income or (loss)/sales (fn1)	8.5	1.0	0.6	1.7	1.9	(7.9)	(7.4)	(0.5)	0.2
Net income or (loss)/sales (fn1)	***	***	***	***	***	***	***	***	***

Notes:

Note.--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.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics with adjustments based on proprietary Customs records using HTS statistical report numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7208.53.0000, 7208.90.0000, 7210.70.3000, 7210.90.9000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7211.90.0000, 7212.40.1000, 7212.40.5000, and 7212.50.0000, accessed November 16, 2017.

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 eight firms as top purchasers of CTL plate: ***. Purchaser questionnaires were sent to these eight firms and three firms *** provided responses, which are presented below.

1. Have there been any significant changes in the supply and demand conditions for CTL plate that have occurred in the United States or in the market for CTL plate in India, Indonesia, and/or South Korea 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 CTL plate in the United States or in the market for CTL plate in India, Indonesia, and/or South Korea within a reasonably foreseeable time?

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

