Tin Mill Products from Canada, China, Germany, and South Korea

Investigation Nos. 701-TA-685 and 731-TA-1599-1601 and 1603 (Final)

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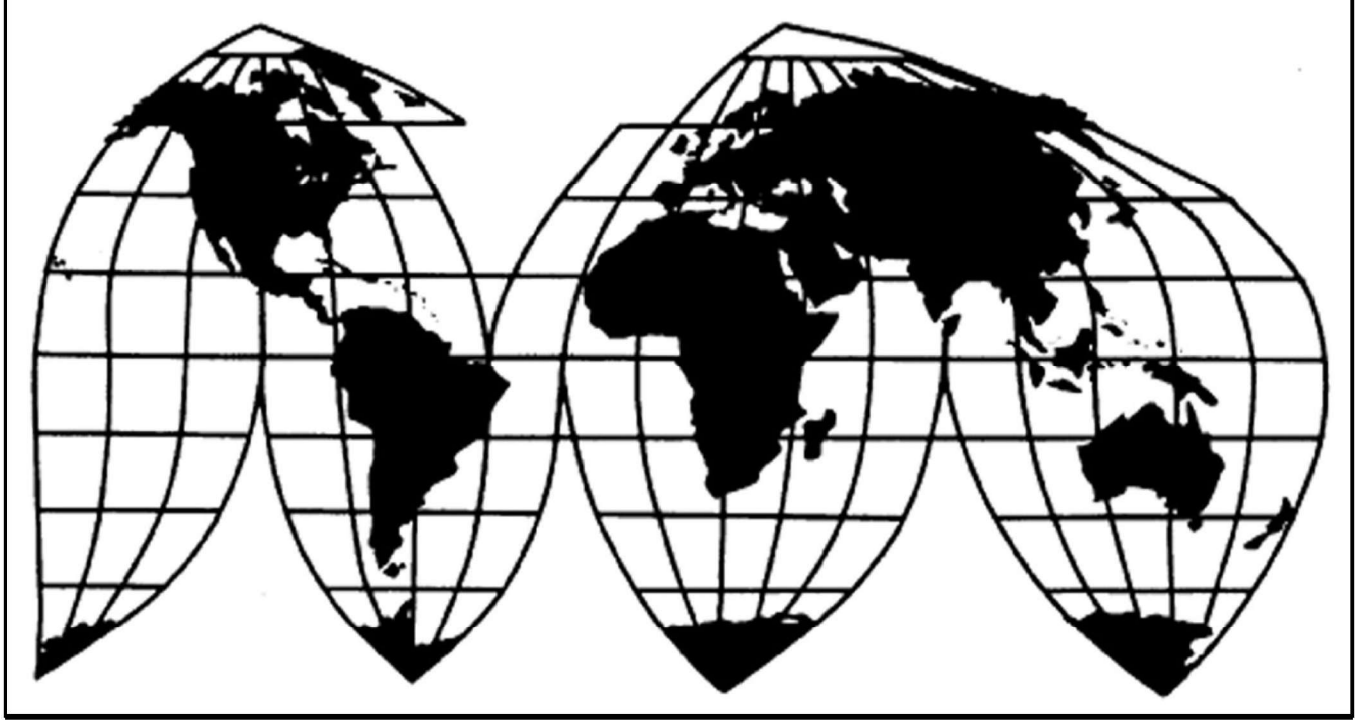
U.S. International Trade Commission



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U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual concerns may not be published.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

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-685 and 731-TA-1599-1601 and 1603 (Final)

Tin Mill Products from Canada, China, Germany, and South Korea

DETERMINATIONS

On the basis of the record[1] developed in the subject investigations, the United States International Trade Commission ("Commission") determines, pursuant to the Tariff Act of 1930 ("the Act"), that an industry in the United States is not materially injured or threatened with material injury, and the establishment of an industry in the United States is not materially retarded by reason of imports of tin mill products from Canada, China, and Germany, provided for in subheadings 7210.11.00, 7210.12.00, 7210.50.00, 7212.10.00, 7212.50.00, 7225.99.00, and 7226.99.01 of the Harmonized Tariff Schedule of the United States, that have been found by the U.S. Department of Commerce ("Commerce") to be sold in the United States at less than fair value ("LTFV"), and imports of the subject merchandise from China that have been found to be subsidized by the government of China.[2] The Commission further finds that imports of these products from South Korea that Commerce has determined are sold in the United States at LTFV are negligible and terminates the antidumping duty investigation concerning South Korea.

BACKGROUND

The Commission instituted these investigations effective January 18, 2023, following receipt of petitions filed with the Commission and Commerce by Cleveland-Cliffs Inc. ("Cleveland-Cliffs"), Cleveland, Ohio, and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union ("USW"), Pittsburgh, Pennsylvania. The final phase of the investigations was scheduled by the Commission following notification of preliminary determinations by Commerce that imports of tin mill products from China were subsidized within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)) and imports from Canada, China, and Germany, were sold at LTFV within the meaning of 733(b) of the Act (19 U.S.C. 1673b(b)).[3] Notice of the scheduling of the final

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

[2] 89 FR 1542, 89 FR 1538, 89 FR 1529, 89 FR 1545, 89 FR 1532 (January 10, 2024).

[3] Commerce published notice in the Federal Register of an affirmative final determination in

phase of the Commission's investigations and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* (88 FR 60484, September 1, 2023, revised 88 FR 65194, September 21, 2023). The Commission conducted its hearing on January 4, 2024. All persons who requested the opportunity were permitted to participate.

connection with the investigation concerning tin mill products from South Korea (89 FR 1545, January 10, 2024) and negative final determinations in connection with the investigations concerning tin mill products from the Netherlands, Taiwan, Turkey, and the United Kingdom (89 FR 1524, 89 FR 1526, 89 FR 1520, 89 FR 1535, January 10, 2024). Accordingly, effective January 10, 2024, the Commission terminated its antidumping duty investigations concerning tin mill products from the Netherlands, Taiwan, Turkey, and the United Kingdom (89 FR 3694, January 19, 2024).

Views of the Commission

Based on the record in the final phase of these investigations, we determine that an industry in the United States is not materially injured or threatened with material injury by reason of imports of tin mill products ("TMPs") from Canada, China, and Germany found by the U.S. Department of Commerce ("Commerce") to be sold in the United States at less than fair value ("LTFV") and to be subsidized by the government of China. We find that imports of TMPs from South Korea found by Commerce to be sold in the United States at LTFV are negligible and therefore terminate that investigation.

I. Background

These investigations resulted from antidumping and countervailing duty petitions on TMPs from Canada, China, Germany, and South Korea filed on January 18, 2023 by Cleveland-Cliffs, Inc. ("Cleveland-Cliffs"), a domestic producer of TMPs, and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC ("USW"), a union representing workers at domestic TMP production facilities, (collectively, "Petitioners").[1] Petitioners appeared at the hearing accompanied by counsel and submitted joint prehearing and posthearing briefs and separate final comments.[2]

The following eight respondent entities participated in these investigations:

- The Can Manufacturers Institute ("CMI") Importers Coalition, a trade association of U.S. purchasers of subject merchandise and importers of

[1] Petitioners originally filed antidumping duty petitions also covering TMPs imported from the Netherlands, Taiwan, Turkey, and the United Kingdom, but Commerce issued final negative antidumping duty determinations with respect to those countries. *Tin Mill Products From the Netherlands: Final Negative Determination of Sales at LTFV*, 89 Fed. Reg. 1524 (Jan. 10, 2024); *Tin Mill Products From Taiwan: Final Negative Determination of Sales at LTFV and Final Negative Determination of Critical Circumstances*, 89 Fed. Reg. 1526 (Jan. 10, 2024); *Tin Mill Products From Turkey: Final Negative Determination of Sales at LTFV*, 89 Fed. Reg. 1520 (Jan. 10, 2024); *Tin Mill Products From the United Kingdom: Final Negative Determination of Sales at LTFV*, 89 Fed. Reg. 1535 (Jan. 10, 2024). Consequently, the Commission terminated the antidumping duty investigations concerning TMPs from the Netherlands, Taiwan, Turkey, and the United Kingdom. *Tin Mill Products from the Netherlands, Taiwan, Turkey, and the United Kingdom: Termination of Investigations*, 89 Fed. Reg. 3694 (Jan. 19, 2024).

[2] Petitioners' Prehearing Brief, EDIS Doc. 810767 (Dec. 19, 2023), Petitioners' Confidential Prehearing Brief, EDIS Doc. 810629 (Dec. 19, 2023) ("Petitioners' Prehearing Br."); Petitioners' Posthearing Brief, EDIS Doc. 811877 (Jan. 11, 2024); Petitioners' Confidential Posthearing Brief, EDIS Doc. 811953 (Jan. 12, 2024) ("Petitioners' Posthearing Br."); Cleveland-Cliffs' Final Comments, EDIS Doc. 813331 (Feb. 5, 2024) ("Cleveland-Cliffs' Final Comments"); United Steelworkers' Final Comments, EDIS Doc. 813332 (Feb. 5, 2024) ("USW's Final Comments").

subject merchandise from Canada, appeared at the hearing accompanied by counsel and submitted prehearing and posthearing briefs and final comments;[3]

- Duferco Steel, LLC ("Duferco"), a U.S. importer of subject merchandise, appeared at the hearing accompanied by counsel;

- ArcelorMittal Dofasco G.P. ("Dofasco"), a producer and exporter of subject merchandise in Canada, appeared at the hearing accompanied by counsel and submitted prehearing and posthearing briefs and final comments;[4]

- Baoshan Iron & Steel Co., Ltd.; Shanghai Meishan Iron & Steel Co., Ltd.; WISCO-Nippon Steel Tinplate Co., Ltd.; Baosteel America, Inc.; Shougang Jingtang United Iron & Steel Co., Ltd.; China Shougang International Trade & Engineering Corporation; Shougang Holding Trade (Hong Kong), Ltd.; Handan Jintai Packing Material Co., Ltd.; and China Iron and Steel Association Tin Mill Flat-Rolled Products Subcommittee (collectively, "Chinese Respondents"), producers and exporters of subject merchandise in China (and an association thereof), appeared at the hearing accompanied by counsel and submitted joint prehearing and posthearing briefs and final comments;[5]

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[3] CMI's Prehearing Brief, EDIS Doc. 810789 (Dec. 20, 2023), CMI's Confidential Prehearing Brief, EDIS Doc. 810678 (Dec. 19, 2023) ("CMI's Prehearing Br."); CMI's Confidential Posthearing Brief, EDIS Doc. 811987 (Jan. 12, 2024), CMI's Posthearing Brief, EDIS Doc.811986 (Jan. 12, 2024) ("CMI's Posthearing Br."); CMI's Final Comments, EDIS Doc. 813361 (Feb. 5, 2024) ("CMI's Final Comments").

Industry witnesses from the following CMI members appeared at the hearing: Can Corporation of America, Inc. ("Can Corp."); Crown Cork & Seal USA, Inc. ("Crown"); Independent Can Company ("ICC"); Silgan Containers Manufacturing Corporation ("Silgan"); Sonoco Metal Packaging, LLC ("Sonoco"); and Trivium Packaging USA, Inc. ("Trivium"). *See* Staff Hearing Transcript ("Tr.") at 4-5. Additionally, industry witnesses from ION Economics, LLC ("ION Economics") appeared at the hearing on behalf of CMI. *See id.* Silgan also appeared at the hearing accompanied by counsel. *See id.*

[4] Dofasco's Prehearing Brief, EDIS Doc. 810731 (Dec. 20, 2023), Dofasco's Confidential Prehearing Brief, EDIS Doc. 810637 (Dec. 19, 2023) ("Dofasco's Prehearing Br."); Dofasco's Posthearing Brief, EDIS Doc. 811922 (Jan. 12, 2024), Dofasco's Confidential Posthearing Brief, EDIS Doc. 811873 (Jan. 11, 2024) ("Dofasco's Posthearing Br."); Dofasco's Final Comments, EDIS Doc. 813231 (Feb. 2, 2024) ("Dofasco's Final Comments").

[5] Chinese Respondents' Prehearing Brief, EDIS Doc. 810769 (Dec. 20, 2023), Chinese Respondents' Confidential Prehearing Brief, EDIS Doc. 810648 (Dec. 19, 2023) ("Chinese Respondents' Prehearing Br."); Chinese Respondents' Posthearing Brief, EDIS Doc. 811951 (Jan. 12, 2024), Chinese Respondents' Confidential Posthearing Brief, EDIS Doc. 811884 (Jan. 11, 2024) ("Chinese Respondents' (Continued...)

- ThyssenKrupp Rasselstein GmbH and ThyssenKrupp Steel North America, Inc. (collectively, "ThyssenKrupp"), a producer of subject merchandise in Germany and an importer of subject merchandise from Germany, respectively, appeared at the hearing accompanied by counsel and submitted joint prehearing and posthearing briefs and final comments;[6]

- KG Dongbu Steel Co., Ltd. and KG Steel USA, Inc. (collectively, "KG Dongbu"), a producer of subject merchandise in South Korea and an importer of subject merchandise from South Korea, respectively, submitted a joint prehearing brief;[7]

- Tata Steel Ijmuiden BV ("TSIJ") and Tata Steel UK, Ltd. ("TSUK") (collectively, "Tata Steel"), a producer and exporter of subject merchandise in the Netherlands and a producer and exporter of subject merchandise in the United Kingdom, respectively, appeared at the hearing and submitted separate prehearing briefs;[8]

- TCC Steel Corp. ("TCC Steel"), a producer and exporter of subject merchandise in South Korea, submitted a posthearing brief and final comments.[9]

Posthearing Br."); Chinese Respondents' Final Comments, EDIS Doc. 813319 (Feb. 5, 2024) ("Chinese Respondents' Final Comments"). Industry witnesses from EP Steel America, Inc. ("EP Steel"), an importer of subject merchandise from China, also appeared at the hearing. *See* Tr. at 6.

[6] ThyssenKrupp's Prehearing Brief, EDIS Doc. 810799 (Dec. 20, 2023), ThyssenKrupp's Confidential Prehearing Brief, EDIS Doc. 810636 (Dec. 19, 2023) ("ThyssenKrupp's Prehearing Br."); ThyssenKrupp's Posthearing Brief, EDIS Doc. 811983 (Jan. 12, 2024), ThyssenKrupp's Confidential Posthearing Brief, EDIS Doc. 811896 (Jan. 11, 2024) ("ThyssenKrupp's Posthearing Br."); ThyssenKrupp's Final Comments, EDIS Doc. 813341 (Feb. 5, 2024) ("ThyssenKrupp's Final Comments").

[7] KG Dongbu's Prehearing Brief, EDIS Doc. 810748 (Dec. 20, 2023), KG Dongbu's Confidential Prehearing Brief, EDIS Doc. 810624 (Dec. 19, 2023). KG Dongbu subsequently received a *de minimis* margin from Commerce. *Tin Mill Products from the Republic of Korea: Final Affirmative Determination of Sales at Less than Fair Value*, 89 Fed. Reg. 1545 (Jan. 10, 2024); CR/PR at I-10, VII-33.

[8] TSIJ's Prehearing Brief, EDIS Doc. 810754 (Dec. 20, 2023), TSIJ's Confidential Prehearing Brief, EDIS Doc. 810632 (Dec. 19, 2023); TSUK's Prehearing Brief, EDIS Doc. 810756 (Dec. 20, 2023), TSUK's Confidential Prehearing Brief, EDIS Doc. 810633 (Dec. 19, 2023).

[9] TCC Steel's Posthearing Brief, EDIS Doc. 811967 (Jan. 12, 2024), TCC Steel's Confidential Posthearing Brief, EDIS Doc. 811890 (Jan. 11, 2024) ("TCC Steel's Posthearing Br."); TCC Steel's Final Comments, EDIS Doc. 813199 (Feb. 2, 2024) ("TCC Steel's Final Comments").

Additionally, the Government of Canada ("GOC") appeared at the hearing accompanied by counsel and submitted a prehearing brief.[10] Bush Brothers & Company ("Bush Brothers"), an industrial user of subject merchandise, appeared at the hearing accompanied by counsel and submitted prehearing and posthearing briefs.[11] A representative from Consumer Brands Association ("Consumer Brands"), a trade association of tin can purchasers, and an industry witness on behalf of Consumer Brands, McCall Farms, Inc. ("McCall Farms"), appeared at the hearing accompanied by counsel and submitted a prehearing statement.[12]

United States Steel Corp. ("U.S. Steel"), a domestic producer of TMPs, did not participate in the hearing but submitted a response to the Commission's posthearing questions.[13]

Data Coverage. U.S. industry data are based on questionnaire responses of three domestic producers that accounted for virtually all U.S. production of TMPs during 2022.[14] U.S. import data are based on the questionnaire responses of 24 U.S. importers that, in 2022, accounted for the majority of subject imports from each subject source.[15] Purchases of TMPs reported by the 27 responding purchasers accounted for the vast majority (*** percent) of

[10] GOC's Prehearing Brief, EDIS Doc. 810621 (Dec. 19, 2023), GOC's Confidential Prehearing Br., EDIS Doc. 810620 (Dec. 19, 2023) ("GOC's Prehearing Br.").

[11] As an industrial user, Bush Brothers is not an "interested party" under 19 U.S.C. § 1677(9). Commission rule 201.11, 19 C.F.R. § 201.11, provides that an industrial user can participate as a "party" in an investigation. While rule 207.23 says that "each party who is an interested party shall submit to the Commission . . . a prehearing brief," any person can file a brief written statement. 19 C.F.R. § 207.23. Following Bush Brothers' submission of their prehearing brief, the Secretary's office contacted Bush Brothers to advise it that its submission was accepted as a "brief written statement." Although we recognize this technical distinction, we refer to Bush Brothers' written statement as its prehearing brief below. *See* Bush Brothers' Prehearing Brief, EDIS Doc. 810666 (Dec. 19, 2023), Bush Brothers' Confidential Prehearing Brief, EDIS Doc. 810644 (Dec. 19, 2023) ("Bush Brothers' Prehearing Br."); Bush Brothers' Posthearing Brief, EDIS Doc. 811876 (Jan. 11, 2024), Bush Brothers' Confidential Posthearing Brief, EDIS Doc. 811874 (Jan. 11, 2024) ("Bush Brothers' Posthearing Br.").

[12] Consumer Brands' Prehearing Statement, EDIS Doc. 810652 (Dec. 19, 2023) ("Consumer Brands' Prehearing Statement").

[13] U.S. Steel's Response to Posthearing Questions, EDIS Doc. 811871 (Jan. 11, 2024), U.S. Steel's Confidential Response to Posthearing Questions, EDIS Doc. 811868 (Jan. 11, 2024) ("U.S. Steel's Posthearing Response"). U.S. Steel, which accounts for *** percent of domestic TMP production, ***. *See* CR/PR at Table III-1.

[14] Confidential Report, INV-WW-009 (January 25, 2024) ("CR") at I-5, III-1; Public Report, *Tin Mill Products from Canada, China, Germany, and South Korea*, Inv. Nos. 701-TA-685 and 731-TA-1599-1601, 1603 (Final), USITC Pub. 5492 (Feb. 2024) ("PR") at I-5, III-1.

[15] CR/PR at I-5, IV-1. The responses represented *** percent of U.S. imports from Canada, *** percent of imports from China, *** imports from Germany, *** percent of subject imports from South Korea, and the *** of imports from nonsubject sources. *Id.* at IV-1, IV-2 n.7 (calculated from official Commerce statistics).

apparent U.S. consumption from January 2020 to June 2023.[16] Foreign industry data are based on the questionnaire responses of one producer of TMPs in Canada that accounted for *** percent of total exports of subject merchandise from Canada to the United States in 2022,[17] six producers of TMPs in China that accounted for *** percent of total exports of subject merchandise from China to the United States in 2022,[18] one producer of TMPs in Germany that accounted for *** percent of total exports of subject merchandise from Germany to the United States in 2022,[19] and one producer of TMPs in South Korea that accounted for *** percent of total exports of subject merchandise from South Korea to the United States in 2022.[20]

II. Domestic Like Product

A. In General

In determining whether an industry in the United States is materially injured or threatened with material injury by reason of imports of subject merchandise, the Commission first defines the "domestic like product" and the "industry."[21] Section 771(4)(A) of the Tariff Act of 1930, as amended ("the Tariff Act"), defines the relevant domestic industry as the "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."[22] In turn, the Tariff Act defines "domestic like product" as "a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation."[23]

By statute, the Commission's "domestic like product" analysis begins with the "article subject to an investigation," *i.e.*, the subject merchandise as determined by Commerce.[24] Therefore, Commerce's determination as to the scope of the imported merchandise that is

[16] *Calculated from* Purchaser's Questionnaire Responses at II-1.
[17] CR/PR at Table VII-1.
[18] CR/PR at Table VII-8.
[19] CR/PR at Table VII-15.
[20] CR/PR at Table VII-23.
[21] 19 U.S.C. § 1677(4)(A).
[22] 19 U.S.C. § 1677(4)(A).
[23] 19 U.S.C. § 1677(10).
[24] 19 U.S.C. § 1677(10). The Commission must accept Commerce's determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See*, *e.g.*, *USEC, Inc. v. United States*, 34 Fed. App'x 725, 730 (Fed. Cir. 2002) ("The ITC may not modify the class or kind of imported merchandise examined by Commerce."); *Algoma Steel Corp. v. United States,* 688 F. Supp. 639, 644 (Ct. Int'l Trade 1988), *aff'd*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

subsidized and/or sold at less than fair value is "necessarily the starting point of the Commission's like product analysis."[25] The Commission then defines the domestic like product in light of the imported articles Commerce has identified.[26] The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of "like" or "most similar in characteristics and uses" on a case-by-case basis.[27] No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.[28] The Commission looks for clear dividing lines among possible like products and disregards minor variations.[29]

B. Product Description

Commerce defined the scope of the imported merchandise under investigation as follows:

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[25] Cleo Inc. v. United States, 501 F.3d 1291, 1298 (Fed. Cir. 2007); see also Hitachi Metals, Ltd. v. *United States*, Case No. 19-1289, slip op. at 8-9 (Fed. Circ. Feb. 7, 2020) (the statute requires the Commission to start with Commerce's subject merchandise in reaching its own like product determination).

[26] *Cleo*, 501 F.3d at 1298 n.1 ("Commerce's {scope} finding does not control the Commission's {like product} determination."); *Hosiden Corp. v. Advanced Display Mfrs.,* 85 F.3d 1561, 1568 (Fed. Cir. 1996) (the Commission may find a single like product corresponding to several different classes or kind defined by Commerce); *Torrington Co. v. United States*, 747 F. Supp. 744, 748–52 (Ct. Int'l Trade 1990), *aff'd*, 938 F.2d 1278 (Fed. Cir. 1991) (affirming the Commission's determination defining six like products in investigations where Commerce found five classes or kinds).

[27] See, e.g., Cleo Inc. v. United States, 501 F.3d 1291, 1299 (Fed. Cir. 2007); NEC Corp. v. Department of Commerce, 36 F. Supp. 2d 380, 383 (Ct. Int'l Trade 1998); Nippon Steel Corp. v. United States, 19 CIT 450, 455 (1995); Torrington Co. v. United States, 747 F. Supp. 744, 749 n.3 (Ct. Int'l Trade 1990), aff'd, 938 F.2d 1278 (Fed. Cir. 1991) ("every like product determination 'must be made on the particular record at issue' and the 'unique facts of each case'"). The Commission generally considers a number of factors, including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. See Nippon, 19 CIT at 455 n.4; Timken Co. v. United States, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996).

[28] *See*, *e.g.*, S. Rep. No. 96-249 at 90-91 (1979).

[29] *Nippon*, 19 CIT at 455; *Torrington*, 747 F. Supp. at 748-49; *see also* S. Rep. No. 96-249 at 90-91 (Congress has indicated that the like product standard should not be interpreted in "such a narrow fashion as to permit minor differences in physical characteristics or uses to lead to the conclusion that the product and article are not 'like' each other, nor should the definition of 'like product' be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.").

The products within the scope of the investigation are tin mill flat-rolled products that are coated or plated with tin, chromium, or chromium oxides. Flat-rolled steel products coated with tin are known as tinplate. Flat-rolled steel products coated with chromium or chromium oxides are known as tin-free steel or electrolytic chromium-coated steel. The scope includes all the noted tin mill products regardless of thickness, width, form (in coils or cut sheets), coating type (electrolytic or otherwise), edge (trimmed, untrimmed or further processed, such as scroll cut), coating thickness, surface finish, temper, coating metal (tin, chromium, chromium oxide), reduction (single- or double- reduced), and whether or not coated with a plastic material.

All products that meet the written physical description are within the scope of the investigation unless specifically excluded. The following products are outside and/or specifically excluded from the scope of the investigation:

- Single reduced electrolytically chromium coated steel with a thickness 0.238 mm (85 pound base box) (± 10%) or 0.251 mm (90 pound base box) (± 10%) or 0.255 mm (± 10%) with 770 mm (minimum width) (± 1.588 mm) by 900 mm (maximum length if sheared) sheet size or 30.6875 inches (minimum width) (± 1/16 inch) and 35.4 inches (maximum length if sheared) sheet size; with type MR or higher (per ASTM) A623 steel chemistry; batch annealed at T2 ½ anneal temper, with a yield strength of 31 to 42 kpsi (214 to 290 Mpa); with a tensile strength of 43 to 58 kpsi (296 to 400 Mpa); with a chrome coating restricted to 32 to 150 mg/m2; with a chrome oxide coating restricted to 6 to 25 mg/m2 with a modified 7B ground roll finish or blasted roll finish; with roughness average (Ra) 0.10 to 0.35 micrometers, measured with a stylus instrument with a stylus radius of 2 to 5 microns, a trace length of 5.6 mm, and a cutoff of 0.8 mm, and the measurement traces shall be made perpendicular to the rolling direction; with an oil level of 0.17 to 0.37 grams/base box as type BSO, or 2.5 to 5.5 mg/m2 as type DOS, or 3.5 to 6.5 mg/m2 as type ATBC; with electrical conductivity of static probe voltage drop of 0.46

volts drop maximum, and with electrical conductivity degradation to 0.70 volts drop maximum after stoving (heating to 400 degrees F for 100 minutes followed by a cool to room temperature).

- Single reduced electrolytically chromium- or tin-coated steel in the gauges of 0.0040 inch nominal, 0.0045 inch nominal, 0.0050 inch nominal, 0.0061 inch nominal (55 pound base box weight), 0.0066 inch nominal (60 pound base box weight), and 0.0072 inch nominal (65 pound base box weight), regardless of width, temper, finish, coating or other properties.

- Single reduced electrolytically chromium coated steel in the gauge of 0.024 inch, with widths of 27.0 inches or 31.5 inches, and with T-1 temper properties.

- Single reduced electrolytically chromium coated steel, with a chemical composition of 0.005% max carbon, 0.030% max silicon, 0.25% max manganese, 0.025% max metallic chromium layer of 70-130 mg/m2, with a chromium oxide layer of 5-30 mg/m2, with a tensile strength of 260-440 N/mm2, with an elongation of 28-48%, with a hardness (HR-30T) of 40-58, with a surface roughness of 0.5-1.5 microns Ra, with magnetic properties of Bm (kg) 10.0 minimum, Br (kg) 8.0 minimum, Hc (Oe) 2.5- 3.8, and MU 1400 minimum, as measured with a Riken Denshi DC magnetic characteristic measuring machine, Model BHU-60.

- Bright finish tin-coated sheet with a thickness equal to or exceeding 0.0299 inch, coated to thickness of ¾ pound (0.000045 inch) and 1 pound (0.00006 inch).

- Electrolytically chromium coated steel having ultra flat shape defined as oil can maximum depth of 5/64 inch (2.0 mm) and edge wave maximum of 5/64 inch (2.0 mm) and no wave to penetrate more than 2.0 inches (51.0 mm) from the strip edge and coilset or curling requirements of average maximum of 5/64 inch (2.0 mm) (based on

six readings, three across each cut edge of a 24 inches (61 cm) long sample with no single reading exceeding 4/32 inch (3.2 mm) and no more than two readings at 4/32 inch (3.2 mm)) and (for 85 pound base box item only: crossbuckle maximums of 0.001 inch (0.0025 mm) average having no reading above 0.005 inch (0.127 mm)), with a camber maximum of ¼ inch (6.3 mm) per 20 feet (6.1 meters), capable of being bent 120 degrees on a 0.002 inch radius without cracking, with a chromium coating weight of metallic chromium at 100 mg/m2 and chromium oxide of 10 mg/m2, with a chemistry of 0.13% maximum carbon, 0.60% maximum manganese, 0.15% maximum silicon, 0.20% maximum copper, 0.04% maximum phosphorous, 0.05% maximum sulfur, and 0.20% maximum aluminum, with a surface finish of Stone Finish 7C, with a DOS-A oil at an aim level of 2 mg/square meter, with not more than 15 inclusions/foreign matter in 15 feet (4.6 meters) (with inclusions not to exceed 1/32 inch (0.8 mm) in width and 3/64 inch (1.2 mm) in length), with thickness/temper combinations of either 60 pound base box (0.0066 inch) double reduced CADR8 temper in widths of 25.00 inches, 27.00 inches, 27.50 inches, 28.00 inches, 28.25 inches, 28.50 inches, 29.50 inches, 29.75 inches, 30.25 inches, 31.00 inches, 32.75 inches, 33.75 inches, 35.75 inches, 36.25 inches, 39.00 inches, or 43.00 inches, or 85 pound base box (0.0094 inch) single reduced CAT4 temper in widths of 25.00 inches, 27.00 inches, 28.00 inches, 30.00 inches, 33.00 inches, 33.75 inches, 35.75 inches, 36.25 inches, or 43.00 inches, with width tolerance of 1/8 inch, with a thickness tolerance of 0.0005 inch, with a maximum coil weight of 20,000 pounds (9071.0 kg), with a minimum coil weight of 18,000 pounds (8164.8 kg), with a coil inside diameter of 16 inches (40.64 cm) with a steel core, with a coil maximum outside diameter of 59.5 inches (151.13 cm), with a maximum of one weld (identified with a paper flag) per coil, with a surface free of scratches, holes, and rust.

- Electrolytically tin coated steel having differential coating with 1.00 pound/base box equivalent on the heavy side, with varied coating equivalents in the lighter side (detailed below), with a continuous cast

steel chemistry of type MR, with a surface finish of type 7B or 7C, with a surface passivation of 0.7 mg/square foot of chromium applied as a cathodic dichromate treatment, with coil form having restricted oil film weights of 0.3-0.4 grams/base box of type DOS-A oil, coil inside diameter ranging from 15.5 to 17 inches, coil outside diameter of a maximum 64 inches, with a maximum coil weight of 25,000 pounds, and with temper/coating/dimension combinations of: (1) CAT4 temper, 1.00/.050 pound/base box coating, 70 pound/base box (0.0077 inch) thickness, and 33.1875 inch ordered width; or (2) CAT5 temper, 1.00/0.50 pound/base box coating, 75 pound/base box (0.0082 inch) thickness, and 34.9375 inch or 34.1875 inch ordered width; or (3) CAT5 temper, 1.00/0.50 pound/base box coating, 107 pound/base box (0.0118 inch) thickness, and 30.5625 inch or 35.5625 inch ordered width; or (4) CADR8 temper, 1.00/0.50 pound/base box coating, 85 pound/base box (0.0093 inch) thickness, and 35.5625 inch ordered width; or (5) CADR8 temper, 1.00/0.25 pound/base box coating, 60 pound/base box (0.0066 inch) thickness, and 35.9375 inch ordered width; or (6) CADR8 temper, 1.00/0.25 pound/base box coating, 70 pound/base box (0.0077 inch) thickness, and 32.9375 inch, 33.125 inch, or 35.1875 inch ordered width.

- Electrolytically tin coated steel having differential coating with 1.00 pound/base box equivalent on the heavy side, with varied coating equivalents on the lighter side (detailed below), with a continuous cast steel chemistry of type MR, with a surface finish of type 7B or 7C, with a surface passivation of 0.5 mg/square foot of chromium applied as a cathodic dichromate treatment, with ultra flat scroll cut sheet form, with CAT5 temper with 1.00/0.10 pound/base box coating, with a lithograph logo printed in a uniform pattern on the 0.10 pound coating side with a clear protective coat, with both sides waxed to a level of 15-20 mg/216 sq. inch, with ordered dimension combinations of (1) 75 pound/base box (0.0082 inch) thickness and 34.9375 inch x 31.748 inch scroll cut dimensions; or (2) 75 pound/base box (0.0082 inch) thickness and 34.1875 inch x 29.076 inch scroll cut dimensions;

or (3) 107 pound/base box (0.0118 inch) thickness and 30.5625 inch x 34.125 inch scroll cut dimension.

- Tin-free steel coated with a metallic chromium layer between 100-200 mg/m2 and a chromium oxide layer between 5-30 mg/m2; chemical composition of 0.05% maximum carbon, 0.03% maximum silicon, 0.60% maximum manganese, 0.02% maximum phosphorous, and 0.02% maximum sulfur; magnetic flux density (Br) of 10 kg minimum and a coercive force (Hc) of 3.8 Oe minimum.

- Tin-free steel laminated on one or both sides of the surface with a polyester film, consisting of two layers (an amorphous layer and an outer crystal layer), that contains no more than the indicated amounts of the following environmental hormones: 1 mg/kg BADGE (BisPhenol – A Di-glycidyl Ether), 1 mg/kg BFDGE (BisPhenol – F Di-glycidyl Ether), and 3 mg/kg BPA (BisPhenol – A).

The merchandise subject to the investigation is currently classified in the Harmonized Tariff Schedule of the United States (HTSUS), under HTSUS subheadings 7210.11.0000, 7210.12.0000, 7210.50.0020, 7210.50.0090, 7212.10.0000, and 7212.50.0000 if of non-alloy steel and under HTSUS subheadings 7225.99.0090, and 7226.99.0180 if of alloy steel. Although the subheadings are provided for convenience and customs purposes, the written description of the scope of the investigation is dispositive.[30]

[30] Tin Mill Products from Canada: Final Affirmative Determination of Sales at Less than Fair Value and Final Negative Determination of Critical Circumstances, 89 Fed. Reg. 1542 (Jan. 10, 2024); Tin Mill Products from the People's Republic of China: Final Affirmative Countervailing Duty Determination and Final Affirmative Critical Circumstances Determination, in Part, 89 Fed. Reg. 1532 (Jan. 10, 2024); Tin Mill Products from the People's Republic of China: Final Affirmative Determination of Sales at Less than Fair Value and Final Affirmative Determination of Critical Circumstances, 89 Fed. Reg. 1538 (Jan. 10, 2024); Tin Mill Products from Germany: Final Affirmative Determination of Sales at Less than Fair Value and Final Negative Determination of Critical Circumstances, 89 Fed. Reg. 1529 (Jan. 10, 2024); Tin Mill Products from the Republic of Korea: Final Affirmative Determination of Sales at Less than Fair Value, 89 Fed. Reg. 1545 (Jan. 10, 2024).

The scope[31] in these investigations defines TMPs as comprising both tin-coated steel sheet, known as tinplate, and chromium-coated steel sheet, known as tin-free steel ("TFS"). Both tinplate and TFS are produced from black plate, an uncoated flat-rolled steel product. To produce tinplate, black plate is coated on both sides with commercially pure tin. To produce TFS, black plate is coated on both sides with chromium metal and chromium oxide.[32]

Tinplate is commonly manufactured to ASTM standard specifications A623, A624, and A626. It is primarily used to make two- or three-piece metal cans – *e.g.*, food, aerosol, and paint cans. A specific type of tinplate – drawn and walled ironed ("D&I") tinplate – is used to make two-piece cans.[33] D&I tinplate is often sold in wider coils than tinplate used in other applications.[34] The five basic tinplate surface finishes available for general can-making operations are bright, light stone, stone, matte, and silver.[35]

TFS is manufactured to ASTM Standard Specification A657. It is primarily used to make certain two-piece metal cans and ends for food cans. It is also used to make caps and closures for glass containers.[36]

C. Domestic Like Product Analysis

In the preliminary phase of the investigations, the Commission found that application of the traditional six domestic like product factors supported defining a single domestic like product consisting of all TMPs (tinplate and TFS), coextensive with Commerce's scope definition. It found that tinplate and TFS share the same basic physical characteristics, as both are produced from black plate, and both are used to make cans. While they are ultimately

[31] The scope of these investigations is identical to the scope of the previous antidumping duty investigation of tin- and chromium-coated steel sheet from Japan and to the scope of the resulting antidumping duty order that remains in place. *See Tin- and Chromium-Coated Steel Sheet from Japan*, Inv. No. 731-TA-860 (Preliminary), USITC Pub. 3264 (Dec. 1999); *Tin- and Chromium-Coated Steel Sheet from Japan*, Inv. No. 731-TA-860 (Final), USITC Pub. 3337 (Aug. 2000); *Certain Tin Mill Products from Japan: Continuation of Antidumping Duty Order*, 83 Fed. Reg. 32074 (July 11, 2018). A full five-year review is currently being conducted to determine whether revocation of this antidumping duty order would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time. *Tin- and Chromium-Coated Steel Sheet from Japan; Scheduling of a Full Five-Year Review*, 88 Fed. Reg. 74209 (Oct. 30, 2023).

[32] CR/PR at I-17 – I-18.

[33] A two-piece can is manufactured by taking a flat piece of tinplate and pushing it through progressively smaller rings (drawing and ironing) to form the base and body of the can out of one piece of steel. CR/PR at I-19. D&I tinplate is also referred to as "DWI" tinplate. *Id.*

[34] *See e.g.,* Hearing Tr. at 215 (Biele), 228 (Hughes), 234 (Dietrich).

[35] CR/PR at I-17 – I-19.

[36] CR/PR at I-18 – I-20.

coated with different materials, the Commission found that the processes used in their production are otherwise the same, and they are produced in the same manufacturing facilities by the same employees. It also found that they share identical channels of distribution and are theoretically interchangeable in the same applications. Finally, the Commission noted that producers and customers viewed them as a single product category, and quarterly pricing data indicated that they overlapped in price.[37]

In the final phase of these investigations, there is no new information on the record that would warrant the Commission's reconsideration of its finding in the preliminary determinations that all TMPs comprise a single domestic like product, and no party has argued to the contrary.[38] Accordingly, we again define a single domestic like product consisting of all TMPs, coextensive with Commerce's scope.

III. Domestic Industry

The domestic industry is defined 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."[39] In defining the domestic industry, the Commission's general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

In its preliminary determinations, the Commission defined the domestic industry as all U.S. producers of TMPs after finding that appropriate circumstances did not exist to exclude one U.S. producer, ***, under the related parties provision. The Commission found that *** may be subject to possible exclusion from the domestic industry under the related parties provision because it was potentially controlled by ***, an exporter of subject merchandise in ***, and related to ***, an importer of subject merchandise from ***, potentially through common control.[40]

As noted above and discussed below in Section IV, we find subject imports from South Korea to be negligible and therefore terminate the investigation with respect to such imports.

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[37] *Tin Mill Products from Canada, China, Germany, Netherlands, South Korea, Taiwan, Turkey, and United Kingdom*, Inv. Nos. 701-TA-685 and 731-TA-1599-1606 (Preliminary), USITC Pub. 5413 (Mar. 2023) ("Preliminary Determinations") at 12-14.

[38] *See* Petitioners' Prehearing Br. at 12-13; Dofasco's Prehearing Br. at 12; ThyssenKrupp's Prehearing Br. at 3.

[39] 19 U.S.C. § 1677(4)(A).

[40] *Preliminary Determinations*, USITC Pub. 5413 at 15-16.

Consequently, *** is no longer subject to possible exclusion pursuant to the related parties provision. There are no other related party or other domestic industry issues in the final phase of these investigations. Accordingly, consistent with our definition of the domestic like product, we define the domestic industry to include all U.S. producers of TMPs.

IV. Negligible Imports

Section 771(24) of the Tariff Act, which defines "negligibility," provides that imports for a subject investigation that are less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or self-initiation, as the case may be, shall be deemed negligible.[41] The statute further provides that subject imports from a single country for an investigation which comprise less than 3 percent of total such imports of the product may not be considered negligible if there are several countries subject to investigation with negligible imports and the sum of such imports from all those countries collectively accounts for more than 7 percent of the volume of all such merchandise imported into the United States.[42]

Additionally, even if subject imports are found to be negligible for purposes of present material injury, they shall not be treated as negligible for purposes of a threat analysis should the Commission determine that there is a potential that subject imports from the country concerned will imminently account for more than 3 percent of all such merchandise imported into the United States.[43] To assess the potential for imports imminently to surpass the negligibility threshold for purposes of a threat analysis, the Commission typically has examined the share of total imports, especially toward the latter portion of the negligibility period, production capacity, capacity utilization, and inventories.[44]

[41] 19 U.S.C. § 1677(24)(A)(i).

[42] 19 U.S.C. § 1677(24)(A)(ii).

[43] 19 U.S.C. § 1677(24)(A)(iv).

[44] See Certain Steel Concrete Reinforcing Bars from Belarus, China, Korea, Latvia, and Moldova, Inv. Nos. 731-873-874 and 877-879 (Final), USITC Pub. 3440 (July 2001); Certain Stainless Steel Butt-Weld Pipe Fittings from Germany, Inv. No. 731-TA-864 (Final), USITC Pub. 3372 (November 2000); Certain Cold-Rolled Steel Products from Argentina, Brazil, China, Indonesia, Japan, Russia, Slovakia, South Africa, Taiwan, Thailand, Turkey, and Venezuela, Inv. Nos. 701-TA-33-396 and 731-TA-829-840 (Prelim), USITC Pub. 3214 (July 1999).

A. Arguments of the Parties

Petitioners' Arguments. Petitioners acknowledge that ***.[45] Nonetheless, they argue that if an antidumping duty order is not issued on South Korean subject imports, subject producers in South Korea will increase their U.S. exports rapidly, resulting in such imports rising above the negligibility threshold in the imminent future.[46]

Respondents' Arguments. Chinese Respondents argue that the volume of South Korean subject imports over the POI was ***.[47]

TCC Steel argues that on the basis of negligibility, the Commission should terminate the investigation as to South Korea.[48] It observes that subject imports from South Korea were below the 3-percent negligibility threshold in the 12-month period preceding the filing of the petition and are therefore negligible for purposes of present material injury.[49] It also asserts that subject imports from South Korea are not likely to surpass the negligibility threshold in the imminent future because they are currently *** the threshold and are not projected to increase substantially.[50]

B. Analysis

Subject imports from Canada, China, and Germany are above the statutory negligibility threshold. During the most recent 12-month period preceding the filing of the petitions (January 2022 through December 2022), subject imports from Canada accounted for *** percent of total TMP imports, subject imports from China accounted for *** percent of total imports, and subject imports from Germany accounted for *** percent of total imports.[51] Because subject imports from Canada, China, and Germany are above the 3-percent negligibility threshold, we find that imports from Canada, China, and Germany subject to the antidumping duty investigations and imports from China subject to the countervailing duty investigation are not negligible.

During the most recent 12-month period preceding the filing of the petitions (January 2022 through December 2022), subject imports from South Korea accounted for *** percent of

[45] Cleveland-Cliffs' Final Comments at 1 n.2; USW's Final Comments at 12 n.56.
[46] USW's Final Comments at 12 n.56.
[47] Chinese Respondents' Final Comments at 2.
[48] TCC Steel's Posthearing Br. at 4-7; TCC Steel's Final Comments at 1-4.
[49] TCC Steel's Posthearing Br. at 4-6; TCC Steel's Final Comments at 1-4, 7.
[50] TCC Steel's Posthearing Br. at 6-7; TCC Steel's Final Comments at 3.
[51] CR/PR at Table IV-4. The volume of imports from China subject to the antidumping and countervailing duty investigations is the same. *Id.* at Table IV-2.

total imports.[52] Because subject imports from South Korea were below the 3-percent negligibility threshold, we find that imports from South Korea subject to the antidumping duty investigation are negligible for purposes of present material injury.

We next consider whether subject imports from South Korea have the potential to imminently exceed the 3-percent negligibility threshold for purposes of determining threat of material injury. Subject imports from South Korea declined as a share of total imports over the POI, staying *** below the negligibility threshold throughout the period. Subject imports from South Korea as a share of total imports declined from *** percent in 2020 to *** percent in 2021 and 2022; they were *** percent in interim 2023, as compared to *** percent in interim 2022.[53] Based on rolling 12-month average import data from January 2021 through August 2023, subject imports from South Korea never exceeded the 3-percent negligibility threshold, reaching a high of *** percent of total imports in the 12-month period ending in January 2021 before *** as a share of total imports for the rest of the POI.[54] Furthermore, the volume of subject imports from South Korea did not increase consistently over these 12-month periods, ranging from a high of *** short tons in the 12-month period ending in January 2021 to a low of *** short tons in the 12-month period ending in November 2022.[55] Individual monthly import data also do not show consistently increasing subject imports from South Korea.[56] The import data, therefore, do not suggest that subject imports from South Korea have the potential to imminently exceed the negligibility threshold.

Other evidence in the record also indicates that subject imports from South Korea do not have the potential to exceed the 3-percent negligibility threshold in the imminent future. TCC Steel's exports of subject merchandise to the United States decreased by *** percent over the POI, from *** short tons in 2020 to *** short tons in 2021 and *** short tons in 2022, and they were relatively stable across the interim periods at *** short tons in interim 2022 and *** short tons in interim 2023.[57] TCC Steel's exports to the United States as a share of its total shipments remained relatively low throughout the POI, increasing from *** percent in 2020

[52] CR/PR at Table IV-4. Commerce reached an affirmative determination only for TCC Steel and "all others," while KG Dongbu received a *de minimis* margin from Commerce, as discussed above. *Tin Mill Products from the Republic of Korea: Final Affirmative Determination of Sales at Less than Fair Value*, 89 Fed. Reg. 1545 (Jan. 10, 2024); CR/PR at I-10, VII-33. Consequently, only imports from TCC Steel are relevant for our analysis as it was the only other identified subject producer in South Korea and accounted for *** reported exports in 2022. CR/PR at VII-33.

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

[54] CR/PR at Table IV-5.

[55] CR/PR at Table IV-5.

[56] CR/PR at Table IV-15.

[57] CR/PR at Table VII-25.

and 2021 to only *** percent in 2022 and remaining at *** percent during the interim periods.[58] In 2022, subject imports from South Korea would have needed to be *** percent higher to have accounted for 3 percent of total imports of TMPs.[59] As discussed below, the record indicates that subject imports from South Korea are not likely to imminently increase to that degree.

Information on arranged imports does not indicate that subject imports from South Korea will imminently exceed the negligibility threshold. Arranged imports of subject imports from South Korea account for only *** percent of total arranged imports of TMPs reported for July through December 2023 and *** percent of total arranged imports for January through June 2024.[60]

We have also considered TCC Steel's capacity, production, and inventories. TCC Steel's production capacity remained constant during the POI at *** short tons from 2020 to 2022 and *** short tons in the interim periods.[61] Its production decreased by *** percent over the POI, from *** short tons in 2020 to *** short tons in 2022 and was *** short tons in interim 2023 compared to *** short tons in interim 2022.[62] TCC Steel's capacity utilization decreased from *** percent in 2020 to *** percent in 2021 and *** percent in 2022; it was *** percent in interim 2023, compared with *** percent in interim 2022.[63] TCC Steel's end-of-period inventories increased irregularly by *** percent, from *** short tons in 2020 to *** short tons in 2022 and were *** short tons in interim 2023 compared with *** short tons in interim 2022.[64] TCC Steel claims that this increase was "inventory earmarked for a specific customer," rather than a build-up of extra inventory for sale to any purchaser.[65] Although TCC Steel had increasing excess capacity and end-of-period inventories during the POI, exports of subject merchandise from South Korea to the United States declined and subject imports from South Korea remained well below the negligibility threshold throughout the period, as discussed

[58] CR/PR at Table VII-25.

[59] *Calculated from* CR/PR at Table IV-4 (3 percent of *** short tons).

[60] CR/PR at VII-35. U.S. importers reported arranged subject imports from South Korea totaling *** short tons in July to September 2023, which would account for *** percent of total arranged imports for that period. *Calculated from* CR/PR at Table VII-31. U.S. importers reported arranged subject imports from South Korea totaling *** short tons in January to June 2024, which would account for *** percent of total arranged imports for that period. *Calculated from id.*

[61] CR/PR at Table VII-24.

[62] CR/PR at Table VII-25.

[63] CR/PR at Table VII-24.

[64] CR/PR at Table VII-25.

[65] TCC Steel's Posthearing Br. at 14.

above. There is no evidence on the record that these trends will change in the imminent future.[66]

Given that subject imports from South Korea consistently remained *** below the negligibility threshold during the POI, as well as the absence of evidence that such imports will imminently increase to the degree necessary to exceed the threshold, we find that there is no potential for imports from South Korea subject to the antidumping duty investigation to imminently exceed the 3-percent negligibility threshold.

V. Cumulation

For purposes of evaluating the volume and effects for a determination of material injury by reason of subject imports, section 771(7)(G)(i) of the Tariff Act requires the Commission to cumulate subject imports from all countries as to which petitions were filed and/or investigations self-initiated by Commerce on the same day, if such imports compete with each other and with the domestic like product in the U.S. market. In assessing whether subject imports compete with each other and with the domestic like product, the Commission generally has considered four factors:

(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 geographic markets of subject 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 the subject imports are simultaneously present in the market.[67]

[66] TCC Steel projects that its capacity utilization and inventories will remain at around 2022 levels in 2023 and 2024 and that its exports to the United States will increase slightly in 2023 and 2024 relative to 2022 but will remain lower than in 2020. CR/PR at Table VII-25.

[67] *See Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-280 (Final), USITC Pub. 1845 (May 1986), *aff'd*, *Fundicao Tupy, S.A. v. United States*, 678 F. Supp. 898 (Ct. Int'l Trade 1988), *aff'd*, 859 F.2d 915 (Fed. Cir. 1988).

While no single factor is necessarily determinative, and the list of factors is not exclusive, these factors are intended to provide the Commission with a framework for determining whether the subject imports compete with each other and with the domestic like product.[68] Only a "reasonable overlap" of competition is required.[69]

A. Arguments of the Parties

Petitioners' Arguments. Petitioners argue that the Commission should cumulate subject imports from Canada, China, and Germany, as it did in the preliminary phase of the investigations, because the petitions were filed on the same day, and there is a reasonable overlap of competition between and among the domestic like product and subject imports from Canada, China, and Germany.[70] Specifically, they contend that subject imports from Canada, China, and Germany and the domestic like product are fungible, share common channels of distribution, are sold in overlapping geographic regions, and were simultaneously present in the U.S. market throughout the POI.[71]

Respondents' Arguments. GOC argues that the Commission should not cumulate subject imports from Canada with subject imports from China and Germany.[72] GOC argues that subject imports from Canada and subject imports from China and Germany are concentrated in different types of products, were sold in different geographic locations, and exhibit different volume trends.[73]

GOC acknowledges that there was overlap with respect to channels of distribution and simultaneous presence, namely all three sources shipped primarily to can makers and were present in the U.S. market in every month of the POI.[74] However, it argues that the Commission should attach less weight to these factors because all suppliers of TMPs sell

[68] *See*, *e.g.*, *Wieland Werke, AG v. United State*s, 718 F. Supp. 50 (Ct. Int'l Trade 1989).

[69] The SAA to the URAA expressly states that "the new section will not affect current Commission practice under which the statutory requirement is satisfied if there is a reasonable overlap of competition." H.R. Rep. No. 103-316, Vol. I at 848 (1994) (*citing Fundicao Tupy, S.A. v. United States*, 678 F. Supp. at 902; *see Goss Graphic Sys., Inc. v. United States*, 33 F. Supp. 2d 1082, 1087 (Ct. Int'l Trade 1998) ("cumulation does not require two products to be highly fungible"); *Wieland Werke, AG*, 718 F. Supp. at 52 ("Completely overlapping markets are not required.").

[70] Petitioners' Prehearing Br. at 15; Cleveland-Cliffs' Final Comments at 5 n.35.

[71] Petitioners' Prehearing Br. at 15-17; Petitioners' Posthearing Br. at 5 n.23.

[72] GOC's Prehearing Br. at 7.

[73] GOC's Prehearing Br. at 8-10.

[74] GOC's Prehearing Br. at 11.

directly to can makers, and most sales volume is through annual contracts that specify monthly shipments.[75]

B. Analysis

We consider subject imports from Canada, China, and Germany on a cumulated basis because the statutory criteria for cumulation are satisfied.[76] As an initial matter, Petitioners filed the antidumping and countervailing duty petitions on the same day, January 18, 2023.[77] We also find a reasonable overlap of competition between imports from subject countries, and between subject imports from each source and the domestic like product, for reasons discussed below.

Fungibility. The record in the final phase of these investigations indicates that there is a substantial degree of fungibility between and among domestically produced TMPs and imports from each subject country. All TMPs are commonly manufactured to ASTM standard specifications, namely A623, A624, and A626 for tinplate and A657 for TFS.[78] Responding domestic producers reported that TMPs from all sources are always interchangeable.[79] A majority of U.S. importers and purchasers reported that the domestic like product and imports from all three subject sources are frequently or sometimes interchangeable.[80] When asked about the comparability of the domestic like product with imports from each subject source, most purchasers reported that the domestic like product was comparable to imports from Canada and China across the majority of 18 purchasing factors, while responses comparing the domestic like product and subject imports from Germany were more mixed.[81]

The record also shows that U.S. shipments of subject imports from Canada, China, and Germany and the domestic like product overlapped with respect to various product attributes.[82] Specifically, with respect to coating type, U.S. shipments of the domestic product and imports from all three subject sources were reported for ***.[83] With respect to product width, U.S. shipments of the domestic product and imports from all three subject sources were

[75] GOC's Prehearing Br. at 11-14.
[76] None of the statutory exceptions to cumulation apply.
[77] CR/PR at I-1.
[78] CR/PR at I-17-20.
[79] CR/PR at II-63.
[80] CR/PR at Tables II-28, II-29.
[81] *See* CR/PR at Table II-25.
[82] *See* CR/PR at Tables IV-10-13.
[83] CR/PR at Table IV-10. The *** that did not have overlap with shipments from each source was ***. *Id.*

reported for products less than 39 inches and products greater than or equal to 41 inches and less than 45 inches, which were the *** product categories by volume.[84] With respect to base weight, U.S. shipments of the domestic product and imports from all three subject sources were reported for products with base weights ***.[85] With respect to finish types, U.S. shipments of the domestic product and imports from all three subject sources were reported for products with *** finish types.[86] In addition to the overlap in terms of the preceding product attributes, there was also an overlap in terms of reported sales of the pricing products. Sales of pricing product 1 were reported by responding domestic producers and U.S. importers of TMPs from each subject source, while sales of pricing products 2 through 4 were reported by responding domestic producers and U.S. importers of TMPs from Canada and China.[87] Consequently, although not all sources reported shipments in all product types and sales for all pricing products, the record indicates that there was a substantial degree of fungibility between and among subject imports from Canada, China, and Germany and the domestic like product.[88]

[84] CR/PR at Table IV-11.

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

[86] CR/PR at Table IV-13.

[87] CR/PR at Tables V-5-8.

[88] We are unpersuaded by GOC's argument that there is an insufficient degree of fungibility between subject imports from Canada, on the one hand, and subject imports from China and Germany, on the other, to support finding a reasonable overlap of competition. First, GOC is largely incorrect in asserting that importers reported that subject imports from Canada were only sometimes interchangeable with imports from China and Germany. To the contrary, in comparing TMPs from Canada and China, one importer reported such products to be always interchangeable and two each reported them to be frequently and sometimes interchangeable. CR/PR at Table II-28. Similarly, in comparing TMPs from Canada and Germany, one importer reported such products to be always interchangeable, three reported them to be frequently interchangeable, and two reported them to be sometimes interchangeable. Id. Notably, no importer reported that TMPs from Canada and TMPs from China or Germany were never interchangeable. Id.

Additionally, contrary to the GOC's arguments, the record indicates that subject imports from Canada, China, and Germany overlapped in terms of finish, coatings, and sales of pricing products, despite differences in the volumes of such TMPs shipped from each subject source. The record shows that U.S. shipments of imports from all three subject sources, as well as the domestic like product, consisted of TMPs with both *** finish types, and both coating types (***). CR/PR at Tables IV-10, IV-13. Additionally, although there were differences in reported sales volumes, the pricing data show sales of subject imports from Canada and China, as well as the domestic like product, for all four pricing products, and sales of TMPs from all sources, including Germany, for pricing product 1. CR/PR at Tables V-5-8. Thus, the record indicates that there was sufficient overlap in the types of TMPs from Canada, China, and Germany, as well as the domestic like product, to establish fungibility for purposes of cumulation.

Channels of Distribution. During the POI, the domestic like product and imports from each subject country were sold in overlapping channels of distribution.[89] The domestic like product and subject imports from Canada and China were sold to ***, while subject imports from Germany were sold to ***.[90] Although only the domestic like product was sold in appreciable quantities through all three channels, the *** of U.S. shipments of the domestic like product and subject imports from each subject country were to ***.[91]

Geographic Overlap. The domestic like product and TMP imports from each subject source were reportedly sold in the Northeast, Midwest, and Southeast areas of the United States.[92] Sales of the domestic like product and TMP imports from Canada and China also overlapped in the Mountains and Pacific Coast areas of the United States, while sales of the domestic like product and TMPs imported from Canada and Germany overlapped in the Central Southwest.[93]

Simultaneous Presence in Market. Domestically produced TMPs and imports from each subject country were present in the U.S. market in every month of the POI.[94]

Conclusion. Subject imports from Canada, China, and Germany are sufficiently fungible with the domestic like product and each other for purposes of cumulation. Further, subject imports from Canada, China, and Germany and the domestic like product are sold in overlapping channels of distribution and geographic markets, and the domestic like product and subject imports from Canada, China, and Germany were simultaneously present in the U.S. market throughout the POI. Because there was a reasonable overlap of competition between and among the domestic like product and imports from Canada, China, and Germany, we cumulate subject imports from Canada, China, and Germany for purposes of the material injury analysis.

[89] CR/PR at Table II-6.

[90] CR/PR at Table II-6.

[91] CR/PR at Table II-6.

[92] CR/PR at Table II-7.

[93] CR/PR at Table II-7. Subject imports from China reportedly were not sold in the Central Southwest, and subject imports from Germany reportedly were not sold in the Mountain and Pacific Coast geographic areas. *Id.*

[94] *See* CR/PR at Table IV-15 (monthly imports showing subject imports from Canada, China, and Germany in each month of the POI), Tables V-5-8 (showing the domestic like product sales in each quarter of the POI).

VI. No Material Injury by Reason of Subject Imports

Based on the record in the final phase of these investigations, we find that an industry in the United States is not materially injured by reason of imports of TMPs from Canada, China, and Germany found by Commerce to be sold in the United States at LTFV and imports of TMPs from China found by Commerce to be subsidized by the government of China.

A. Legal Standards

In the final phase of antidumping and countervailing duty investigations, the Commission determines whether an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.[95] In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.[96] The statute defines "material injury" as "harm which is not inconsequential, immaterial, or unimportant."[97] In assessing whether the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.[98] No single factor is dispositive, and all relevant factors are considered "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[99]

Although the statute requires the Commission to determine whether the domestic industry is "materially injured or threatened with material injury by reason of" unfairly traded imports,[100] it does not define the phrase "by reason of," indicating that this aspect of the injury analysis is left to the Commission's reasonable exercise of its discretion.[101] In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price

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[95] 19 U.S.C. §§ 1671d(b), 1673d(b).

[96] 19 U.S.C. § 1677(7)(B). The Commission "may consider such other economic factors as are relevant to the determination" but shall "identify each {such} factor ... and explain in full its relevance to the determination." 19 U.S.C. § 1677(7)(B).

[97] 19 U.S.C. § 1677(7)(A).

[98] 19 U.S.C. § 1677(7)(C)(iii).

[99] 19 U.S.C. § 1677(7)(C)(iii).

[100] 19 U.S.C. §§ 1671d(b), 1673d(b).

[101] *Angus Chemical Co. v. United States*, 140 F.3d 1478, 1484-85 (Fed. Cir. 1998) ("{T}he statute does not 'compel the commissioners' to employ {a particular methodology}."), *aff'g,* 944 F. Supp. 943, 951 (Ct. Int'l Trade 1996).

effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the "by reason of" standard must ensure that subject imports are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.[102]

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.[103] In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.[104] Nor does

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[102] The Federal Circuit, in addressing the causation standard of the statute, observed that "{a}s long as its effects are not merely incidental, tangential, or trivial, the foreign product sold at less than fair value meets the causation requirement." *Nippon Steel Corp. v. USITC*, 345 F.3d 1379, 1384 (Fed. Cir. 2003). This was further ratified in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), where the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that "this court requires evidence in the record 'to show that the harm occurred "by reason of" the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.'" *See also Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass'n v. USITC*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

[103] SAA at 851-52 ("{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports."); S. Rep. 96-249 at 75 (1979) (the Commission "will consider information which indicates that harm is caused by factors other than less-than-fair-value imports."); H.R. Rep. 96-317 at 47 (1979) ("in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the petitioner to the subsidized or dumped imports is attributable to such other factors;" those factors include "the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry"); *accord Mittal Steel*, 542 F.3d at 877.

[104] SAA at 851-52 ("{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports."); *Taiwan Semiconductor Industry Ass'n,* 266 F.3d at 1345 ("{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports ... . Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports." (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int'l Trade 2002) ("{t}he Commission is not required to isolate the effects of subject imports from other factors contributing to injury" or make "bright-line distinctions" between the effects of subject imports and other causes.); *see also Softwood*

(Continued...)

the "by reason of" standard require that unfairly traded imports be the "principal" cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.[105] It is clear that the existence of injury caused by other factors does not compel a negative determination.[106]

Assessment of whether material injury to the domestic industry is "by reason of" subject imports "does not require the Commission to address the causation issue in any particular way" as long as "the injury to the domestic industry can reasonably be attributed to the subject imports."[107] The Commission ensures that it has "evidence in the record" to "show that the harm occurred 'by reason of' the LTFV imports," and that it is "not attributing injury from other sources to the subject imports." [108] The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed "rigid adherence to a specific formula."[109]

The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial

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Lumber from Canada, Inv. Nos. 701-TA-414 and 731-TA-928 (Remand), USITC Pub. 3658 at 100-01 (Dec. 2003) (Commission recognized that "{i}f an alleged other factor is found not to have or threaten to have injurious effects to the domestic industry, *i.e*., it is not an 'other causal factor,' then there is nothing to further examine regarding attribution to injury"), *citing Gerald Metals,* 132 F.3d at 722 (the statute "does not suggest that an importer of LTFV goods can escape countervailing duties by finding some tangential or minor cause unrelated to the LTFV goods that contributed to the harmful effects on domestic market prices.").

[105] S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

[106] *See Nippon Steel Corp*., 345 F.3d at 1381 ("an affirmative material-injury determination under the statute requires no more than a substantial-factor showing. That is, the 'dumping' need not be the sole or principal cause of injury.").

[107] *Mittal Steel*, 542 F.3d at 876 &78; *see also id.* at 873 ("While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured 'by reason of' subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.") *citing United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swiff-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission's causation analysis as comporting with the Court's guidance in *Mittal*.

[108] *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 877-79. We note that one relevant "other factor" may involve the presence of significant volumes of price-competitive nonsubject imports in the U.S. market, particularly when a commodity product is at issue. In appropriate cases, the Commission collects information regarding nonsubject imports and producers in nonsubject countries in order to conduct its analysis.

[109] *Nucor Corp. v. United States*, 414 F.3d 1331, 1336, 1341 (Fed. Cir. 2005); *see also Mittal Steel*, 542 F.3d at 879 ("*Bratsk* did not read into the antidumping statute a Procrustean formula for determining whether a domestic injury was 'by reason' of subject imports.").

evidence standard.[110] Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.[111]

B. Conditions of Competition and the Business Cycle

The following conditions of competition inform our analysis of whether there is material injury by reason of subject imports.

1. Demand Considerations

Demand for TMPs derives from the demand for the products in which they are used, including food, aerosol spray, and paint cans.[112] Demand for TMPs reportedly increased at the beginning of the POI because consumers bought more canned food goods and aerosol spray cleaning products due to the COVID-19 pandemic.[113] Most market participants reported that demand for TMPs in the U.S. market steadily increased or fluctuated up during 2020 through 2021.[114] From 2022 through January-June 2023 ("interim 2023"), however, demand fluctuated down or steadily decreased, according to most market participants.[115]

Demand for TMPs in the U.S. market encompasses a wide variety of products. Such TMPs are sold in varying widths, ranging from below 39 inches to over 45 inches. During the period of investigation, TMPs below 39 inches accounted for the largest share of U.S. purchasers' purchases and imports,[116] followed by TMPs with widths greater than 45 inches, TMPs in widths greater than or equal to 41 and below 45 inches, and then TMPs greater than or equal to 39 inches and below 41 inches.[117] Different types of TMPs sold in the U.S. market

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[110] We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

[111] *Mittal Steel*, 542 F.3d at 873; *Nippon Steel Corp*., 458 F.3d at 1350, *citing U.S. Steel Group*, 96 F.3d at 1357; S. Rep. 96-249 at 75 ("The determination of the ITC with respect to causation is ... complex and difficult, and is a matter for the judgment of the ITC.").

[112] CR/PR at II-1.

[113] CR/PR at II-40 – II-41.

[114] CR/PR at Table II-15.

[115] CR/PR at Table II-15.

[116] We note that although data collected from purchasers pertained to both purchases and imports, imports accounted for only *** percent of that reported data over the period of investigation, and as discussed above, responding purchasers' purchases, not including imports, were equivalent to *** percent of apparent U.S. consumption over the period of investigation. *Calculated from* Purchaser's Questionnaire Responses at II-1.

[117] CR/PR at Table II-2. During the period of investigation, the respective shares of reported purchases and imports of the different widths were as follows: TMPs below 39 inches accounted for *** (Continued...)

include electrolytic tinplate ("ETP"), both D&I and not D&I, and TFS, both laminated and not laminated, as well as TMPs that qualify for the production of easy-open and easy-peel cans.[118] During the period of investigation, non-D&I ETP accounted for the largest share of U.S. purchasers' purchases and imports, followed by D&I ETP, non-laminated TFS, and then laminated TFS.[119] A small number of purchasers reported purchasing TMPs for the production of easy-open and easy-peel cans, which generally accounted for relatively small shares of their total purchases.[120] One of three U.S. producers and 7 of 24 responding importers reported changes to the product mix or marketing of TMPs since January 1, 2020. Specifically, *** reported increased customer demand for wider D&I and laminated TMPs and some importers also reported increased demand for D&I products.[121] Purchasers' data show that, as a share of U.S. purchasers' total purchases and imports, D&I TMPs *** over the period of investigation.[122]

U.S. producers ***, a minority of responding importers (eight out of 20), and a minority of responding purchasers (nine out of 25) reported that there were substitutes for TMPs, including Tetra Paks, plastic, and aluminum.[123] U.S. producers generally reported that changes in prices of substitutes have not affected the price for TMPs.[124] Respondents contend that the availability of substitute products contributed to the decline in demand for TMPs during the period of investigation.[125] One responding importer reported that the relatively lower cost of substitute products compared to TMPs reduced demand for TMPs.[126]

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percent in 2020, *** percent in 2021, *** percent in 2022, and *** percent in interim 2023; TMPs above 45 inches accounted for *** percent in 2020, *** percent in 2021, *** percent in 2022, and *** percent in interim 2023; TMPs greater or equal to 41 inches but less than 45 inches accounted for *** percent in 2020, *** percent in 2021, *** percent in 2022, and *** percent in interim 2023; and TMPs greater than or equal to 39 inches but below 41 inches accounted for *** percent in 2020, *** percent in 2021, *** percent in 2022, and *** percent in interim 2023. *Id.*

[118] CR/PR at II-4, Table II-1.

[119] CR/PR at Table II-1. During the period of investigation, the respective shares of purchasers' reported purchases and imports of the different types were as follows: non-D&I ETP accounted for *** percent in 2020, *** percent in 2021, *** percent in 2022, and *** percent in interim 2023; D&I ETP accounted for *** percent in 2020, *** percent in 2021, *** percent in 2022, and *** percent in interim 2023; non-laminated TFS accounted for *** percent in 2020, *** percent in 2021, *** percent in 2022, and *** percent in interim 2023; and laminated TFS accounted for *** percent in 2020, *** percent in 2021, *** percent in 2022, and *** percent in interim 2023. *Id.*

[120] CR/PR at II-4.

[121] CR/PR at II-2.

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

[123] CR/PR at II-43.

[124] CR/PR at II-43.

[125] *See, e.g.*, CMI Prehearing Br. at 4-6; ThyssenKrupp Prehearing Br. at 4-5; Chinese Respondents' Posthearing Br. at 5, Responses to Commission Questions at 6.

[126] CR/PR at II-43.

During the period of investigation, apparent U.S. consumption of TMPs was *** short tons in 2020, *** short tons in 2021, and *** short tons in 2022, a level *** percent lower than in 2020; it was lower at *** short tons in interim 2023 than in interim 2022, when it was *** short tons.[127]

2. Supply Considerations

The domestic industry, comprising of U.S. Steel, Cleveland-Cliffs, and Ohio Coatings, was the largest supplier of TMPs to the U.S. market during the period of investigation, accounting for *** percent of apparent U.S. consumption in 2022, and underwent several changes during the period.

U.S. Steel was the largest domestic supplier of TMPs to the U.S. market during the period of investigation, accounting for *** percent of U.S. production of TMPs in 2022.[128] In March 2020, U.S. Steel acquired the USS-POSCO Industries, Inc. ("UPI") steel mill in Pittsburg, California, which produced TMPs.[129] During the period of investigation, there were certain types of TMPs that were only available domestically from U.S. Steel, in particular certain D&I TMPs and all types of TMPs with a width of more than ***.[130] In March 2022, U.S. Steel permanently idled its TMPs production at its East Chicago, Indiana facility, which had been idled on an indefinite basis since the fourth quarter of 2019.[131] Additionally, in January 2022, it was reported that U.S. Steel would cease production at UPI, and in August 2022, U.S. Steel made a formal announcement to that effect.[132] In December 2022, U.S. Steel indefinitely idled most of its TMPs operations at its Gary, Indiana facility.[133] Accordingly, by the end of the period of investigation, U.S. Steel had idled two of its four TMPs production facilities and announced the closure of a third to occur in 2023. Coinciding with U.S. Steel's idling and announced closures of

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

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

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

[130] *See, e.g.,* Hearing Tr. at 44 (Aranoff), 187 (Hughes), 190 (Dietrich), Haynes (193-94), 227-28 (Smith) U.S. Steel Domestic Producer Questionnaire at II-11a, II-12; Cleveland-Cliffs Domestic Producer Questionnaire at II-11a, II-12; CR/PR at Table E-4. In 2022, U.S. Steel reported that it shipped the following quantities of ***. U.S. Steel Domestic Producer Questionnaire at II-11a, II-12. Cleveland-Cliffs reported that in 2022 it shipped ***. Cleveland-Cliffs Domestic Producer Questionnaire at II-11a, II-12. Ohio Coatings reported that in 2022 it shipped ***. Ohio Coatings Domestic Producer Questionnaire at II-11a, II-12.

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

[132] CR/PR at Table III-3; ThyssenKrupp Prehearing Br., Exhibit 7 (Abby Verret, "US Steel to close UPI, sell property in 2023," *Fastmarkets*, January 18, 2022). It was reported that the UPI facility would cease production at the facility in 2023. CR/PR at Table III-3.

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

certain facilities in 2022, purchases of domestic D&I TMPs, particularly wider products, declined considerably.[134] Purchasers reported that their purchases of domestically produced D&I TMPs with widths greater than or equal to 41 inches and less than 45 inches declined from *** short tons in 2021 to *** short tons in 2022, while their reported purchases of domestically produced D&I with widths greater than 45 inches declined from *** short tons in 2021 to *** short tons in 2022.[135]

Petitioner Cleveland-Cliffs was the second largest domestic supplier of TMPs to the U.S. market, accounting for *** percent of U.S. TMPs production in 2022.[136] Cleveland-Cliffs produces TMPs at its facility in Weirton, West Virginia, which it acquired from ArcelorMittal USA LLC in December 2020.[137] During the period of investigation, Cleveland-Cliffs produced ***.[138]

Ohio Coatings was the smallest domestic supplier of TMPs to the U.S. market, accounting for *** percent of U.S. TMPs production in 2022.[139] As the only non-integrated domestic producer, Ohio Coatings produces TMPs using black plate acquired from outside suppliers. During the period of investigation, Ohio Coatings produced ***.[140]

The domestic industry's practical TMPs capacity declined from *** short tons in 2020 to *** short tons in 2021 and *** short tons in 2022; it was lower at *** short tons in interim 2023 than in interim 2022, when it was *** short tons.[141]

During the period of investigation, U.S. Steel reported that it experienced *** and Cleveland-Cliffs ***.[142] Ohio Coatings, the only non-integrated domestic producer, reported that ***.[143] Purchasers reported delays, refusals, and allocation limits from domestic TMPs

[134] CR/PR at Table E-4.

[135] CR/PR at Table E-4.

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

[137] CR/PR at Table III-3. Cleveland-Cliffs provided data for the Weirton, West Virginia facility dating back through the beginning of 2020, prior to its acquisition of the facility in December 2020. *Id.*

[138] Cleveland-Cliffs' U.S. Producer Questionnaire at II-12.

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

[140] Ohio Coatings' U.S. Producer Questionnaire at II-12.

[141] CR/PR at Table III-5. U.S. Steel's production decreased irregularly from 2020 to 2022, increasing from *** short tons in 2020 to *** short tons in 2021 before decreasing to *** short tons in 2022, for an overall decrease of *** percent during that time. CR/PR at Table III-7. Cleveland-Cliffs' production increased irregularly from 2020 to 2022, decreasing from *** short tons in 2020 to *** short tons in 2021 before increasing to *** short tons in 2022, for an overall increase of *** percent during that time. *Id.* Ohio Coatings' production decreased steadily from 2020 to 2022, from *** short tons in 2020 to *** short tons in 2021 to *** short tons in 2022, for an overall decrease of *** percent. *Id.*

[142] CR/PR at II-22.

[143] CR/PR at II-22 – II-23.

producers, primarily in 2020 and 2021 but also in 2022.[144] When asked to name the firms with whom they had experienced supply constraints with respect to TMPs, twelve purchasers cited Cleveland-Cliffs, seven cited U.S. Steel, and three cited Ohio Coatings.[145]

While accounting for the largest share of apparent U.S. consumption during the period of investigation, the domestic industry's market share declined during the period. The domestic industry's share of apparent U.S. consumption declined from *** percent in 2020 to *** percent in 2021 and *** percent in 2022; it was lower at *** percent in interim 2023 than in interim 2022, when it was *** percent.[146]

Subject imports were the second largest supplier of TMPs to the U.S. market in 2020 and interim 2023, but the smallest supplier in 2021, 2022, and interim 2022. Subject imports increased as a share of apparent U.S. consumption from *** percent in 2020, to *** percent in 2021, and *** percent in 2022; subject import market share was higher at *** percent in interim 2023 than in interim 2022, when it was *** percent.[147]

Nonsubject imports were the second largest supplier of TMPs to the U.S. market in 2021, 2022, and interim 2022, but the smallest supplier in 2020 and interim 2023. Nonsubject imports increased as a share of apparent consumption from *** percent in 2020, to *** percent in 2021, and *** percent in 2022; nonsubject import market share was higher at *** percent in interim 2023 than in interim 2022, when it was *** percent.[148] The largest sources of nonsubject imports were the Netherlands, the United Kingdom, and South Korea.[149]

Importers reported experiencing supply constraints during the period of investigation, including but not limited to constraints related to Section 232 measures as well as supply chain disruptions.[150] When asked to identify firms with which they had experienced supply constraints, only one purchaser cited an importer, Duferco.[151]

[144] CR/PR at II-23 – II-24 & n.19.

[145] CR/PR at II-23 – II-24 & n.19. One purchaser cited Cleveland-Cliffs' (Weirton) as a firm with which it had experienced supply constraints; as Cleveland Cliffs operates only one TMPs facility, we have attributed this report to Cleveland Cliffs. *Id.*

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

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

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

[149] CR/PR at II-22.

[150] CR/PR at II-23.

[151] CR/PR at II-23.

3. Substitutability and Other Conditions

We find that there is a moderate degree of substitutability between the domestic like product and cumulated subject imports, although substitutability is higher for TMPs of the same specification and quality.[152] As discussed in Section IV above, TMPs, regardless of source, are commonly produced to ASTM standards, and the record indicates that the domestic like product and cumulated subject imports overlap in terms of width, product type, base weights, and finishes, although as discussed below, there was limited availability of certain products (particularly D&I and wider products) from domestic producers over the period of investigation. All responding domestic producers reported that TMPs from all sources are always interchangeable, while a majority of U.S. importers and purchasers reported that the domestic like product and imports from all three subject sources are frequently or sometimes interchangeable.[153] When asked about the comparability of the domestic like product with imports from each subject source, most purchasers reported that the domestic like product was comparable to subject imports from Canada and China across the majority of 18 purchasing factors, while responses comparing the domestic like product and subject imports from Germany were more mixed.[154] Purchasers reporting that the domestic like product was inferior to subject imports did so primarily with respect to availability, availability of certain types and wider TMPs products, and quality exceeding industry standards.[155] A majority of purchasers

[152] CR/PR at II-44.

[153] CR/PR at II-63, Tables II-28, II-29. Three importers reported that domestic product was frequently interchangeable with subject imports from Canada, and three reported that domestic product was sometimes interchangeable with subject imports from Canada; three importers reported that domestic product was always or frequently interchangeable with subject imports from China, whereas six reported that domestic product was sometimes interchangeable with subject imports from China; and two importers reported that domestic product was frequently interchangeable with subject imports from Germany , whereas four reported that domestic product was sometimes interchangeable with subject imports from Germany. *Id.* at Table II-28. Three purchasers reported that domestic product was always interchangeable with product from Canada, six reported frequently interchangeable, and four reported sometimes interchangeable. *Id.* at Table II-29. Five purchasers reported that domestic product was always interchangeable with product from China, three reported frequently interchangeable, and five reported sometimes interchangeable. *Id.* One purchaser reported that domestic product was always interchangeable with product from Germany, five reported frequently interchangeable, and six reported sometimes interchangeable. *Id.*

[154] CR/PR at Table II-25.

[155] *See* CR/PR at Table II-25. In comparing the domestic like product with subject imports from Canada, more purchasers rated the domestic like product to be inferior with respect to availability – product >39 inches, availability – product >45 inches, and reliability of supply, while an equal number of purchasers rated the domestic like product to be comparable or inferior to subject imports from Canada (Continued...)

reported that they at least sometimes made purchasing decisions based on the producer of the product, with purchasers noting quality, qualification status, contracts, and availability of certain specifications as reasons for purchasing from specific producers.[156] Most responding purchasers (14 of 17) also reported that certain types of products were only available from one source.[157]

The record also shows that that price is an important factor in TMPs purchasing decisions, although other factors, such as quality and availability, were reportedly more important. Purchasers ranked quality as their top purchasing factor and as among their top three purchasing factors more than any other factor.[158] Certain market participants noted that quality is particularly important to them because small flaws in TMP can compromise food safety.[159] Availability was the next most frequently reported top purchasing factor and the second most frequently ranked as among the top three purchasing factors, after quality.[160] Price was the third most frequently identified factor among purchasers' top three purchasing

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with respect to availability – drawn & ironed product. In comparing the domestic like product with subject imports from China, more purchasers rated the domestic like product to be inferior with respect to availability – product >39 inches, availability – product >45 inches, price, and quality exceeds industry standards, while an equal number of purchasers rated the domestic like product to be comparable and inferior to subject imports from China with respect to availability – drawn & ironed product and an equal number of purchasers reported the domestic like product to superior or comparable to subject imports from China with respect to technical support/service and U.S. transportation costs. In comparing the domestic like product with subject imports from Germany, more purchasers rated the domestic like product to be inferior with respect to availability – drawn & ironed product, availability – product >39 inches, availability – product >45 inches, product consistency, product range, quality exceeds industry standards, and reliability of supply, while an equal number of purchasers rated the domestic like product to be superior, comparable, or inferior to subject imports from Germany with respect to delivery time, an equal number reported that the domestic like product was comparable or inferior to subject imports from Germany in terms of price and technical support/service, and a plurality of purchasers reported the domestic like product to comparable to subject imports from German with respect to payment terms and U.S. transportation costs. *Id.*

[156] CR/PR at II-44 and Table II-16 (showing seven purchasers reported that they always make decisions based on the producer, three reported that they usually did, six reported that they sometimes did, and nine reported that they never did) *See also* Section VI.B.2, *supra*, discussing limited domestic supply of certain D&I TMPs and wider TMPs, and note 221, *infra*, discussing efficiency losses if narrower TMPs used in equipment designed for wider TMPs.

[157] CR/PR at II-61. Although the question asked purchasers to report the source from which the products were available, not all purchasers did so. Similarly, it appears not all products may be limited to a single source, with some responses simply indicating that certain products were not available domestically or were available from multiple foreign countries. *Id.*

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

[159] CR/PR at I-24 n.59; Hearing Tr. 200-201 (Madrecki), 202 (Swink), 204 (Williams). *See also* Hearing Tr. 108 (O'Neill) ("{T}his is for food safety"); ***.

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

factors, although it was most frequently reported as their third most important factor.[161] Purchasers also most frequently identified quality meets industry standards and reliability of supply as very important factors in their purchasing decisions, followed by availability, product consistency, delivery time, price, and other factors.[162] In reporting the significance of differences other than price in comparing domestically produced TMPs with subject imports, U.S. producers reported that such differences were only sometimes or never significant.[163] Most importers and purchasers, however, reported that differences other than price were always or frequently significant.[164]

Eighteen of 26 responding purchasers reported that they require their suppliers to become certified or qualified to sell TMPs to their firm.[165] Among responding purchasers reporting suppliers that had failed in their attempt to qualify TMPs since 2020, four reported that Cleveland-Cliffs had failed to qualify, three reported that U.S. Steel had failed to qualify, and one reported that a subject producer in China had initially failed to qualify but subsequently was able to qualify.[166] Ten purchasers reported that U.S. producers usually met minimum quality specifications, with six reporting that they always did and six reporting that they sometimes did.[167] All purchasers reported that subject imports from Canada and Germany always or usually met minimum quality specifications, and almost all purchasers reported that subject imports from China always or usually met minimum specifications, with one purchaser reporting that subject imports from China rarely or never did.[168]

Purchasers reported purchasing numerous specifications, with some reporting over a hundred different specifications.[169] Some purchasers, such as ***, reported purchasing every specification for which there was a qualified source.[170] Other purchasers reported purchasing fewer specifications than the number for which suppliers had qualified.[171] In the TMPs market, qualification pertains to specific products from specific producers, rather than applying

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[161] CR/PR at Table II-17. Twenty three out of 26 purchasers identified quality, availability, product line/capability to produce quantity or specifications, or other factors as more important than price. *Id.*

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

[163] CR/PR at Table II-30.

[164] CR/PR at Table II-31.

[165] CR/PR at II-47.

[166] CR/PR at II-47. In addition, seven nonsubject producers reportedly failed certification. CR/PR at II-47 – II-48.

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

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

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

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

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

generally to a producer or manufacturing location as a whole, so that a particular producer is often qualified to produce some but not all specifications purchased by a particular purchaser.[172] For example, out of 20 responding purchasers, thirteen reported that domestic producers were either unqualified to supply any of their specifications (four) or qualified to supply only a subset of their specifications (nine), while seven reported that domestic producers were exclusively qualified to supply their specifications (two) or qualified to supply all of their specifications (five).[173] With regard to subject imports, out of 20 responding purchasers, eleven reported that suppliers of subject product were either unqualified to supply any of their specifications (two) or qualified to supply only a subset of their specifications (nine), while eight reported that suppliers of subject product were exclusively qualified to supply their specifications (four) or qualified to supply all of their specifications (four).[174]

U.S. producers predominantly sold TMPs through annual contracts with a smaller portion of sales on the spot market. In 2022, U.S. producers reported that *** percent of their commercial U.S. shipments were sold pursuant to annual contracts, while *** percent were sold as spot sales.[175] U.S. producers reported that contracts are generally negotiated in the fall of the preceding year, and they set prices that are not re-negotiable or indexed to raw material prices.[176] Quantities in the contracts may be expressed as a range, setting out the minimum and maximum volumes to be purchased under the contract, and purchasers are expected to purchase volumes that may vary by some percentage above or below these set amounts, such as 5 or 10 percent, although ***.[177] Subject imports also were sold mostly through annual contracts, and to a lesser extent by sales on the spot market and short-term contracts. In 2022, importers reported that *** percent of their commercial U.S. shipments were sold pursuant to annual contracts, while *** percent were sold as spot sales and *** percent were sold through short-term contacts.[178]

Purchasers reported that in 2020 and 2021 they sought to purchase a greater volume of TMPs than had been contracted for, but they reported seeking lower volumes than had been

[172] CR/PR at II-48.

[173] CR/PR at Table II-19. Similarly, most purchasers reported that subject and nonsubject suppliers were not qualified to provide some or all of their specifications. *Id.*

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

[175] CR/PR at Table V-3.

[176] CR/PR at V-5.

[177] CR/PR at V-5; *** U.S. Producer Questionnaire Response at IV-7. Petitioners characterized the contract volumes as "annual sales targets" rather than establishing minimum quantities that purchasers must take. *See* Petitioners' Posthearing Br., Exhibit 1 at 15.

[178] CR/PR at Table V-3.

contracted for in 2022 and interim 2023.[179] Several purchasers also reported difficulty in obtaining the quantities of TMPs sought from domestic producers.[180]

Steel coil is the main raw material input for TMPs.[181] Prices for cold-rolled steel coil ("CRC"), and in particular black plate, and hot-rolled steel coil ("HRC"), which is used by integrated TMPs producers to make black plate, decreased from January 2020 through August 2020, by *** percent and *** percent, respectively. Between August 2020 and September 2021, however, both CRC and HRC prices increased significantly, by *** percent and *** percent, respectively. From September 2021 to October 2023, CRC prices decreased irregularly by *** percent and HRC prices decreased irregularly by *** percent.[182] Two of three U.S. producers and 15 out of 22 responding importers reported that raw material prices had fluctuated since January 2020 but were higher at the end of the period of investigation.[183]

TMPs imported from China became subject to an additional 25 percent *ad valorem* duty pursuant to section 232 of the Trade Expansion Act of 1962 ("Section 232"), effective March 2018.[184] TMPs imported from Germany were subject to an additional 25 percent *ad valorem* duty pursuant to Section 232, effective March 23, 2018, but became subject to annual tariff-rate quotas ("TRQs") , effective January 2022, with the in-quota volume exempt from additional duties and any over-quota volume subject to the 25 percent duty.[185] TMPs imported from Canada are exempt from any Section 232 measures.[186] Importers reported seeking 969 product-specific exclusions from the Section 232 measures on imports of TMPs and receiving approval for 558 of those requests.[187] Purchasers reported seeking 896 product-specific exclusions from the Section 232 measures on imports of TMPs and receiving approval for 694 of those requests.[188]

TMPs from China became subject to an additional 7.5 percent *ad valorem* duty pursuant to Section 301 of the Trade Act of 1974, as amended ("Section 301"), effective September 2019.[189]

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

[180] *See* CMI Prehearing Br., Attachments A, B, C, D, E; *see also* CR/PR at Appendix F.

[181] CR/PR at V-1.

[182] CR/PR at V-1, Figure V-1, Table V-1.

[183] CR/PR at V-1.

[184] CR/PR at I-16.

[185] CR/PR at I-115 – I-16. For 2022, the TRQ applicable to TMPs imported from Germany was 151,183 short tons. CR/PR at Table I-9.

[186] CR/PR at I-15.

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

[188] CR/PR at Table II-5.

[189] CR/PR at I-14.

C. Volume of Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the "Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant."[190]

The volume of cumulated subject imports initially decreased from *** short tons in 2020 to *** short tons in 2021 and then increased to *** short tons in 2022, a level *** percent higher than in 2020.[191] Cumulated subject import volume was lower in interim 2023, at *** short tons, than in interim 2022, at *** short tons.[192]

Cumulated subject imports increased as a share of apparent U.S. consumption during the period of investigation. As a share of apparent consumption by volume, cumulated subject import market share increased from *** percent in 2020 to *** percent in 2021 and *** percent in 2022; it was higher in interim 2023 at *** percent than in interim 2022, when it was *** percent.[193]

We find that the volume of cumulated subject imports and the increase in that volume were significant in absolute terms and relative to apparent U.S. consumption. However, for the reasons discussed below, we find that cumulated subject imports did not have either significant price effects or a significant impact on the domestic industry.

D. Price Effects of the Subject Imports

Section 771(7)(C)(ii) of the Tariff Act provides that, in evaluating the price effects of the subject imports, the Commission shall consider whether:

> (I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and
>
> (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.[194]

[190] 19 U.S.C. § 1677(7)(C)(i).

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

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

[193] CR/PR at Table IV-16. U.S. shipments of cumulated subject imports increased from *** short tons in 2020 to *** short tons in 2021 and *** short tons in 2022; they were higher in interim 2023 at *** short tons than in interim 2022, when they were *** short tons. *Id.* at Table IV-16.

[194] 19 U.S.C. § 1677(7)(C)(ii).

As discussed above in Section V.B.3, we have found that there is a moderate degree of substitutability between the domestic like product and cumulated subject imports, although substitutability is higher for TMPs of the same specification and quality, and that price is an important purchasing factor in TMPs purchasing decisions, although other factors, such as quality and availability, are reportedly more important.

We have examined several sources of information in our underselling analysis, including pricing data, lost sales and lost revenue information, and additional documentary evidence provided by the parties.

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of four pricing products that were sold to unrelated U.S. customers during January 2020 through June 2023.[195] Three U.S. producers and six importers provided usable data for sales of the requested pricing products, although not all firms reported pricing data for all products for all quarters.[196] Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' commercial U.S. shipments of TMPs in 2022, *** percent of commercial U.S. shipments of subject imports from Canada, *** percent of commercial U.S. shipments of subject imports from China, and *** percent of commercial U.S. shipments of subject imports from Germany.[197]

The quarterly price comparisons show predominant overselling by subject imports. Subject imports oversold the domestic like product in 91 out of 112 quarterly comparisons (81.3 percent of comparisons), with subject import sales of *** short tons in the quarters with overselling (87.4 percent of reported subject imports by volume).[198] Margins of overselling

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[195] CR/PR at V-8. The four pricing products are as follows:

Product 1.—Single reduced electrolytic tinplate with base box weights of 75-95 lbs. inclusive and less than 41 inches in width, in coils.

Product 2.—Double reduced electrolytic tinplate with base box weights of 55-65 lbs. inclusive and less than 41 inches in width, in coils.

Product 3.—Single reduced electrolytic chromium-coated steel with base box weights of 65-80 lbs. inclusive and less than 41 inches in width, in coils.

Product 4.—Double reduced electrolytic chromium-coated steel with base box weights of 55-65 lbs. inclusive and less than 41 inches in width, in coils.

CR/PR at V-8.

[196] CR/PR at V-8. *** provided usable pricing data for subject imports from Canada, *** provided usable pricing data for subject imports from China, and *** provided usable pricing data for subject imports from Germany. *Id.* Additionally, eight importers reported pricing data for imports from nonsubject sources, including the Netherlands, South Korea, Taiwan, Turkey, and the United Kingdom. CR/PR at G-3.

[197] CR/PR at V-8.

[198] CR/PR at V-18, Tables V-5 – V-8, V-10 – V-12.

ranged from 0.1 to 47.9 percent, with an average margin of 13.5 percent.[199] Subject imports undersold the domestic like product in the remaining 21 quarterly comparisons (19.7 percent of comparisons), corresponding to reported subject import sales of *** short tons (12.6 percent of reported subject imports by volume).[200] Margins of underselling ranged from 0.03 to 27.4 percent, with an average margin of 8.4 percent.[201] Thus, 84.7 percent of the total volume of subject imports reported for the pricing products was in quarters with overselling.

Consistent with the pricing data, information regarding lost sales does not show that subject imports were predominantly lower priced than domestically produced TMPs or that subject imports gained substantial sales from U.S. producers based on price. The Commission obtained purchaser questionnaire responses from 27 purchasers whose reported purchases were equivalent to the vast majority (*** percent) of apparent U.S. consumption during that time.[202] Out of 25 responding purchasers, 11 reported that they purchased subject imports instead of the domestic like product while 14 reported that they did not purchase subject imports instead of the domestic like product.[203] Seven out of 15 responding purchasers reported that subject imports were priced lower than the domestic like product while eight reported that they were not.[204] Only two responding purchasers reported that they purchased subject imports instead of the domestic like product for price reasons, although both also cited non-price reasons for purchasing subject imports, including availability and quality.[205] The total of these purchases was only *** short ton, an exceedingly small portion (less than *** percent) of purchasers' total reported purchases of subject imports over the period of investigation.[206] Other firms reported various non-price factors as their reasons for purchasing subject imports instead of the domestic like product, including product availability, on-time delivery, quality, and reliability, and some purchasers reported purchasing imported TMPs at higher prices than domestic TMPs.[207]

We recognize that some purchasers also reported that the domestic like product was inferior to subject imports from China and Germany with respect to price (*i.e.*, higher priced).[208]

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[199] CR/PR at V-18, Tables V-5 – V-8, V-10 – V-12.
[200] CR/PR at V-18, Tables V-5 – V-8, V-10 – V-12.
[201] CR/PR at V-18, Tables V-5 – V-8, V-10 – V-12.
[202] *Calculated from* Purchaser's Questionnaire Responses at II-1.
[203] CR/PR at Table V-16.
[204] CR/PR at Table V-16.
[205] CR/PR at Table V-16.
[206] CR/PR at Table V-16.
[207] CR/PR at Table V-16.
[208] CR/PR at Table II-25. All responding purchasers reported that the domestic like product was either comparable or superior to subject imports from Canada with respect to price. *Id.*

However, this evidence does not outweigh the other evidence on the record, discussed above, indicating that subject imports were predominantly priced higher than the comparable domestic like product and that purchasers generally purchased subject imports for non-price reasons. Notably, questionnaire responses from the three largest purchasers accounting for most reported purchases of TMPs in the U.S. market, *** which together accounted for nearly two-thirds of purchases and imports of TMPs in the U.S. market,[209] indicate that *** of their purchases of subject imports were for non-price reasons.[210] Given this, the lost sales information discussed above, including the *** small volume of confirmed lost sales due to price, and the pricing product data showing predominant overselling in terms of both quarterly comparisons and reported subject import sales volume, we find that subject imports did not undersell the domestic like product to a significant degree.

We are not persuaded by Petitioners' arguments to the contrary. First, Petitioners argue that we should find subject import underselling to be significant because there was more underselling and less overselling in 2022 than in 2020, in terms of both quarterly comparisons and reported subject import sales volume.[211] However, the record is clear that subject imports predominantly oversold the domestic like product in every full year of the 2020-2022 period and in interim 2023, in terms of both quarterly comparisons and reported subject import sales

[209] CR/PR at II-3 and Table V-13; Petitioner's Prehearing Br. at 26.

[210] *** Purchaser Questionnaire at II-4, *** Purchaser Questionnaire at II-4; *** Purchaser Questionnaire at II-4. Of the three, only *** indicated that it purchased subject imports due to their lower prices and the volume associated with those purchases accounted for only *** percent of its *** short tons in total purchases during the period of investigation and approximately *** of apparent U.S. consumption. CR/PR at Table V-16; *** Purchaser Questionnaire at II-1, II-4 (also reporting that subject imports from Canada and Germany were not priced lower than the domestic like product). These three purchasers' responses to questions asking about the comparability of domestic product and subject imports are consistent with their reported lost sales data. Of the three, only *** reported that the domestic like product was inferior to any subject imports with respect to price, and only with respect to subject imports from China. *** Purchaser Questionnaire at IV-3. It also reported, however, that subject imports from China were inferior to the domestic product in terms of several non-price factors, including the availability of certain types of products and product consistency. *Id.* *** also reported that the domestic like product was inferior to subject imports from Canada with respect to several factors, including the availability of certain types of products and reliability of supply, and to be inferior to subject imports from Germany with respect to 13 of the 18 enumerated purchasing factors. *Id.* *** reported that the domestic like product was inferior to subject imports from Canada and Germany in terms of several non-price factors, including availability, availability of certain types of products, product consistency, and reliability of supply. *** Purchaser Questionnaire at IV-3. *** reported that the domestic like product was inferior to subject imports from Canada, China and Germany in terms of several non-price factors, including availability of certain types of products, quality, and reliability of supply. *** Purchaser Questionnaire at IV-3.

[211] USW's Final Comments at 4-5; Petitioners' Posthearing Br. at 12-13.

volume.[212] Even in 2022, the year stressed by Petitioners, subject imports oversold the domestic like product in *** out of *** quarterly comparisons, and 74.5 percent of the reported subject import volume was in quarters with overselling.[213] Thus, even though there was some shift between overselling and underselling from 2020 to 2022, this does not outweigh the fact that subject imports predominantly oversold the domestic like product throughout the period of investigation, particularly when most responding purchasers reported purchasing subject imports for non-price reasons.

We likewise find unpersuasive Petitioners' assertions that we should find significant underselling by subject imports by relying on pricing data that they allege cover TMPs 41 inches and greater in width.[214] Petitioners argue for two alternative approaches to analyzing pricing. First, they argue that the Commission should add to the properly reported pricing data for pricing product 1 data that were mistakenly reported by *** in the final phase of these investigations but subsequently withdrawn because they did not meet the pricing product definition, which is limited to TMPs less than 41 inches in width.[215] Second, Petitioners argue

[212] CR/PR at Table V-12. In 2020, subject imports oversold the domestic like product in *** of *** quarterly comparisons (*** percent of comparisons), corresponding to reported subject import sales of *** short tons (*** percent of reported subject imports by volume), whereas subject imports undersold the domestic like product in the remaining *** quarterly comparisons (*** percent of comparisons), corresponding to reported subject import sales of *** short tons (*** percent of reported subject imports by volume). *Id.* In 2021, subject imports oversold the domestic like product in *** of *** quarterly comparisons (*** percent of comparisons), corresponding to reported subject import sales of *** short tons (*** percent of reported subject imports by volume), whereas subject imports undersold the domestic like product in the remaining *** quarterly comparisons (16.1 percent of comparisons), corresponding to reported subject import sales of *** short tons (*** percent of reported subject imports by volume). In 2022, subject imports oversold the domestic like product in *** of *** quarterly comparisons (65.7 percent of comparisons), corresponding to reported subject import sales of *** short tons (*** percent of reported subject imports by volume), whereas subject imports undersold the domestic like product in the remaining *** quarterly comparisons (34.3 percent of comparisons), corresponding to reported subject import sales of *** short tons (*** percent of reported subject imports by volume). Finally, in interim 2023, subject imports oversold the domestic like product in *** of *** quarterly comparisons (86.7 percent of comparisons), corresponding to reported subject import sales of *** short tons (*** percent of reported subject imports by volume), whereas subject imports undersold the domestic like product in the remaining *** quarterly comparisons (13.3 percent of comparisons), corresponding to reported subject import sales of *** short tons (*** percent of reported subject imports by volume). Notably, Petitioners' argument does not square with the relative decrease in subject import underselling in interim 2023. *Id.*

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

[214] Petitioners' Prehearing Br. at 32-38, Exhibit 10; Petitioners' Posthearing Br. at 3, 13-14, Exhibit 3, USW's Final Comments at 4-5.

[215] Petitioners' Prehearing Br. at 32-38, Exhibit 10; Petitioners' Posthearing Br. at 13-14; USW's Final Comments at 4-5.

that the Commission should derive pricing comparison data for wider TMPs products by subtracting the pricing data reported in the preliminary phase of these investigations, which did not include a width restriction, from the pricing data reported in the final phase of these investigations, which included the width restriction.[216] Petitioners allege that subtracting the pricing data obtained in the final phase of these investigations from the broader pricing data reported in the preliminary phase purportedly yields pricing data for wider widths of pricing product 1.[217]

With respect to Petitioners' first approach, pricing products are defined with specificity to enable "apples-to-apples" price comparisons and, after issuing the draft questionnaires to interested parties for comment, the Commission adopted respondents' suggestions that pricing products be limited to less than 41 inches in width to enable such comparisons.[218] As discussed below, wider TMPs are generally not interchangeable with narrower TMPs. Moreover, because narrower TMPs account for the large majority of the U.S. market, by Petitioners' own admission,[219] the pricing product data collected in the final phase of these investigations cover a substantial share of U.S. shipments of the domestic like product and cumulated subject imports and permit substantial and meaningful comparisons.

We find unpersuasive Petitioners' assertions that we should include the misreported data for wider product in our pricing comparisons for pricing product 1. While Petitioners argue that wider TMPs are interchangeable with and directly compete with narrow TMPs,[220] the record does not support this allegation. As several purchasers explained, although it might be technically possible to use narrower TMPs on production lines designed to run wider TMPs, doing so is highly inefficient, extremely costly, and potentially hazardous, such that it would generally only be done on a limited or emergency basis.[221] Petitioners also claim that

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[216] Petitioners' Posthearing Br. at 3, 14, Exhibit 3.

[217] Petitioners' Posthearing Br. at 3, 14, Exhibit 3. Petitioners do not assert that any other data for wider versions of the pricing product are on the record in the final phase of these investigations. *See generally* Petitioners' Prehearing Br.; Petitioners' Posthearing Br.

[218] CMI Comments on Draft Questionnaires at 8-9 (May 23, 2023); Dofasco's Comments on Draft Questionnaires at 2-3 (May 23, 2023).

[219] *See* CR/PR at Table E-7 (showing that the large majority of U.S. purchasers' purchases and imports consisted of TMPs below 41 inches); *see also* Petitioners Posthearing Br. at 8 (describing wider TMPs as representing a "*** percentage of the of the U.S. market"), Exhibit 1 at 18.

[220] Petitioners' Prehearing Br. at 38-39; USW Final Comments at 6-7.

[221] *See* CMI Posthearing Br., Responses to Commission Questions at 7, Attachment A, Trivium declaration (explaining that substituting narrow product would lead to a reduction of *** cans per year and increase in operating costs of $***; Attachment D, Crown declaration (estimating that running ***; Attachment E, Sonoco declaration (explaining that *** and that, when Sonoco undertook a trial run with (Continued...)

purchasers could use wider TMPs on production lines designed to run narrower TMPs by having TMPs slit.[222] We find, however, that the record does not show that this regularly occurs, and the evidence purportedly supporting their contention does not establish the practicality or cost-effectiveness of potentially doing so.

With respect to Petitioners' second proposed approach, even accepting *arguendo* Petitioners' data comparing derived prices for subject import wider product to their derived prices for domestic industry of such products, these data do not show significant underselling by subject imports.[223] In the price comparisons constructed by Petitioners, the domestic industry sold substantial commercial quantities of wider TMPs in only *** quarters in Petitioners' constructed comparisons. These sales were only by U.S. Steel; starting in the third quarter of 2021, they dropped off dramatically, consistent with the expected winding down of production of such products in view of the plant closures that occurred or were announced in 2022.[224] Out of those *** quarters, subject imports undersold the domestic like product in 2 quarters, corresponding to only 33.3 percent of total reported subject import sales in those quarters of Petitioners' constructed comparisons.[225] Thus, even Petitioners' preferred pricing data show predominant overselling by subject imports of wide TMPs (and thus these data do not show that significant underselling by subject imports can explain U.S. Steel's decision to curtail production).[226]

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narrower TMPs, it resulted in a "massive spike in maintenance and repair costs" and posed a safety risk to its employees); Hearing Tr. at 271-72 (Dietrich, Hughes, Huffman).

[222] Petitioners' Posthearing Br., Exhibits 7, 8, 10, Attachment E; *** Purchaser Questionnaire at III-16 (c).

[223] As described above, Petitioners derive such data by subtracting the pricing data reported in the final phase of these investigations from pricing product reported in the preliminary phase of these investigations. *** was the only U.S. producer reporting sales of such wider product. Petitioners' Posthearing Br., Exhibit 3.

[224] *See* Petitioners' Posthearing Br., Exhibit 3. The sales volume in Petitioners' data ranges between *** and *** short tons between the first quarter of 2020 and the first quarter of 2021, it then falls to *** short tons in the second quarter of 2021, then to *** short tons in the third quarter of 2021, then ranges between *** short tons and *** short tons for the remaining four quarters of data. *Id.* The preliminary phase investigation period covered January 2019 to September 2022 so the available data do not correspond to the full period of investigation in the final phase of these investigations.

[225] *See* Petitioners' Posthearing Br., Exhibit 3. Further, we note that Petitioners' constructed wider TMPs pricing data indicate that domestically produced wider TMPs tend to be lower priced than domestically produced narrower TMPs, which belies Petitioners' assertions that there is no ***. *Compare* CR/PR at Table V-5 *with* Petitioners' Posthearing Br. at Exhibit 3; *see also* Petitioners' Prehearing Br. at 37.

[226] Petitioners' analysis of these data concludes that subject imports *** undersold the domestic like product during the period of investigation and that this underselling resulted in subject imports (Continued...)

Finally, we note that no party requested that the Commission collect pricing data for wider TMPs in the final phase of these investigations. The final questionnaires in these investigations were issued on August 31, 2023,[227] and Petitioners should have raised any concerns about or objections to the pricing product definitions adopted at least at that time, but did not.[228] Rather, Petitioners provided the constructed pricing data in their posthearing brief, providing the Commission and respondents limited opportunity to verify and analyze the data.[229]

We have also examined the available data on price trends. Prices for the domestic like product and subject imports increased substantially during the period of investigation, increasing sharply in the first two quarters of 2022, and remaining elevated through the second quarter of 2023 despite declining demand.[230] Between the first quarter of 2020 and the second

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from Germany gaining market share. Petitioners' Posthearing Br., Exhibit 1 at 59-61. As noted above, Petitioners' constructed pricing analysis shows ***. Petitioners' Posthearing Br., Exhibit 3. Consequently, in order to analyze whether subject import underselling likely caused the ***, we focused our analysis on the quarters with *** volumes of domestic sales, and these quarters show that subject imports predominantly oversold the domestic like product.

[227] *See* Questionnaire Transmittal Letter, EDIS Doc. 803594.

[228] The draft questionnaires were provided to interested parties on April 18, 2023. *See* Draft Questionnaire Comment Letter (Apr. 18, 2023), EDIS Doc. 794523. Respondents' comments on the draft questionnaires were submitted on May 23, 2023. CMI Comments on Draft Questionnaires at 8-9 (May 23, 2023); Dofasco's Comments on Draft Questionnaires at 2-3 (May 23, 2023). Although Petitioners are correct that Commission rules do not specifically provide for parties to respond to the comments on questionnaires filed by other parties, 19 C.F.R. § 201.12 provides generally that any party to an investigation may request that the Commission take particular action with respect to that investigation. That Petitioners did not raise any concerns or objections to the pricing product definitions until after the data were reported does not provide a compelling reason to disregard those specific definitions. In the same vein, we do not adopt Petitioners' proposal that we separate Cleveland-Cliffs' pricing data into "prime" and "secondary" pricing data and exclude the latter from its pricing data. Petitioners Prehearing Br. at 39-40 n.152. Petitioners did not propose such a distinction in their comments on the draft questionnaires, nor is there any evidence on the record that other firms made such a distinction in their pricing data such that it would provide for appropriate pricing comparisons.

[229] *See* Petitioners' Posthearing Br. at Exhibit 3. Because ThyssenKrupp's pricing data concerning TMPs over 41 inches in width did not satisfy any pricing product definition (and therefore were not included in the data set for price comparisons), Commission staff did not seek to have certain anomalies in those prices explained or corrected, leaving in question the reliability of the data that Petitioners seek to incorporate. For example, wide price swings of more than 30 percent are frequent from quarter to quarter for the subtractive pricing data derived by Petitioners to reflect quarterly prices of imports from Germany that were at least 41 inches and otherwise met the specifications of Product 1. Petitioners' Posthearing Br. at Exhibit 3. Such fluctuations seem anomalous in a market where the majority of sales are via annual contracts, and where similar fluctuations are not apparent in the properly reported pricing data for products meeting the specifications of Product 1 (*i.e.*, less than 41 inches). CR/PR at Table V-5.

[230] CR/PR at V-17.

quarter of 2023, domestic prices increased *** percent for product 1, *** percent for product 2, *** percent for product 3, and *** percent for product 4.[231] [232] Over the same period, subject import prices increased by *** percent for product 1, *** percent for product 2, *** percent for product 3, and *** percent for product 4, depending on the subject country.[233]

Consistent with these pricing data showing large price increases during the period of investigation, no responding purchasers reported that U.S. producers had reduced their prices in order to compete with subject imports during the period of investigation.[234] Petitioners submitted limited documentary evidence purporting to show that Cleveland-Cliffs reduced its prices in response to lower-priced imports. However, this evidence does not specify that the referenced imports are from subject sources,[235] and the pricing data show more underselling by nonsubject imports than by subject imports.[236] Thus, any alleged pricing pressure from "imports" would not necessarily be from subject imports. Accordingly, we do not find that subject imports depressed domestic prices to a significant degree.

We have also considered whether subject imports prevented price increases which would otherwise have occurred to a significant degree. The domestic industry's cost of goods sold ("COGS") to net sales ratio decreased during the POI, from *** percent in 2020 to *** percent in 2021 and *** percent in 2022, although it was higher, at *** percent, in interim

[231] CR/PR at Table V-9.

[232] The record does not support Petitioners' claims that price increases in 2022 were due to a "tightening" of the supply of subject imports. Petitioners' Prehearing Br. at 52-53; Petitioners' Posthearing Br. at 6. As discussed above, contracts are negotiated in the fall of the preceding year, and the monthly volume of cumulated subject imports did not decline in the months leading up the fall of 2021. CR/PR at Table IV-15. We observe that U.S. Steel reported in 2021, "***." U.S. Steel's Posthearing Br. at 4. Indeed, as discussed above, between August 2020 and September 2021, both CRC and HRC prices increased significantly, by *** percent and *** percent, respectively, while from September 2021 to October 2023, CRC and HRC prices decreased irregularly by *** percent and *** percent, respectively. CR/PR at V-1, Figure V-1, Table V-1.

[233] CR/PR at Table V-9.

[234] CR/PR at V-25.

[235] Petitioners' Prehearing Br., Exhibit 12, Attachments F, G, and H; Petitioners' Posthearing Br., Exhibit 7, Attachments C, D, E, F, G (although Attachment G refers to ***). We note that one of the emails provided corroborates that pricing does not always drive purchasing decisions. *See* Posthearing Br., Exhibit 7, Attachment C (reflecting ***).

[236] *Compare* CR/PR at V-18, Tables V-5 – V-8, V-10 – V-12 (showing subject imports oversold the domestic like product in *** percent of the available quarterly comparisons and undersold the domestic like product in *** percent of the available quarterly comparisons) with CR/PR at Table G-5 (showing that nonsubject imports oversold the domestic like product in *** percent of the available quarterly comparisons and undersold the domestic like product in *** percent of the available quarterly comparisons).

2023 compared to interim 2022, when it was *** percent.[237] While the domestic industry's unit COGS increased by *** percent from 2020 to 2022, its unit net sales value increased by *** percent during that time.[238] Thus, despite declining demand during the full years of the POI, the domestic industry was able to increase its prices by more than the increase in its costs. Although the domestic industry's unit COGS was *** percent higher in interim 2023 compared to interim 2022, while its unit net sales value was *** percent lower, these trends were driven by higher unit other factory costs as apparent U.S. consumption declined *** percent between the interim periods.[239] There is no evidence that lower-priced subject imports could have accounted for these trends between interim periods, given that the pricing data show predominant overselling in interim 2023 (when 93.5 percent of reported subject import volume was in quarters of overselling).[240] Accordingly, we do not find that subject imports prevented domestic price increases, which otherwise would have occurred, to a significant degree.

As explained in our discussion regarding the impact of subject imports in Section VI.E below, we find that subject import pricing cannot explain the shift in market share from domestic product to subject imports. As discussed above, the record shows predominant overselling by subject imports throughout the period of investigation, and the largest shift in market share, that between the interim periods, was accompanied by a very high incidence of overselling (93.5 percent by volume). Moreover, other factors explain the shift in market share from domestic producers to subject imports, as discussed in Section VI.E. below.

In sum, we find that subject imports did not significantly undersell the domestic like product or depress or suppress prices for the domestic like product to a significant degree. Accordingly, we find that subject imports did not have significant price effects.

E. Impact of the Subject Imports[241]

Section 771(7)(C)(iii) of the Tariff Act provides that examining the impact of subject imports, the Commission "shall evaluate all relevant economic factors which have a bearing on

[237] CR/PR at Table C-1.
[238] CR/PR at Table C-1.
[239] CR/PR at Table C-1.
[240] CR/PR at Table V-11.
[241] The statute instructs the Commission to consider the "magnitude of the dumping margin" in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determinations, Commerce found dumping margins of 5.27 percent for TMPs from Canada, 122.52 percent for TMPs from China, and 6.88 percent for TMPs from Germany. *Tin Mill Products from Canada: Final Affirmative Determination of Sales at Less than Fair Value and Final Negative Determination of Critical Circumstances*, 89 Fed. Reg. 1542 (Jan. 10, 2024*); Tin Mill Products*
(Continued...)

the state of the industry."[242] These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debts, research and development, and factors affecting domestic prices. No single factor is dispositive and all relevant factors are considered "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[243]

Although many of the domestic industry's performance indicia declined during the period of investigation, the industry's financial performance improved from 2020 to 2022 as prices increased by more than costs, despite declining apparent U.S. consumption. Although the industry's financial performance weakened in interim 2023 compared to interim 2022, as apparent U.S. consumption was sharply lower, it remained stronger than in 2020.

The domestic industry's capacity declined by *** percent, from *** short tons in 2020 to *** short tons in 2021 and *** short tons in 2022; it was *** short tons in interim 2023, as compared to *** short tons in interim 2022.[244] The industry's production declined by *** percent, from *** short tons in 2020 and 2021 to *** short tons in 2022; it was *** short tons in interim 2023, as compared to *** short tons in interim 2022.[245] Consequently, the domestic industry's capacity utilization irregularly declined by ***, increasing from *** percent in 2020 to *** percent in 2021 before declining to *** percent in 2022; it was *** percent in interim 2023, as compared to *** percent in interim 2022.[246]

The domestic industry's U.S. shipments declined by *** percent, from *** short tons in 2020 to *** short tons in 2021 and *** short tons in 2022; they were *** short tons in interim

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from the People's Republic of China: Final Affirmative Determination of Sales at Less-than-Fair Value and Final Affirmative Determination of Critical Circumstances, 89 Fed. Reg. 1538 (Jan. 10, 2024); *Tin Mill Products from Germany: Final Affirmative Determination of Sales at Less than Fair Value and Final Negative Determination of Critical Circumstances*, 89 Fed. Reg. 1529 (Jan. 10, 2024). In addition to this consideration, our impact analysis has considered other factors affecting domestic prices. Our analysis of the subject imports' comparative prices and any effect they may have had on the domestic industry, described in both the price effects discussion and below, is particularly probative to an assessment of the impact of the subject imports.

[242] 19 U.S.C. § 1677(7)(C)(iii); *see also* SAA at 851 and 885 ("In material injury determinations, 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 also may demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.").

[243] 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act of 2015, Pub. L. 114-27.

[244] CR/PR at Tables III-5, C-1.

[245] CR/PR at Tables III-5, C-1.

[246] CR/PR at Tables III-5, C-1.

2023, as compared to *** short tons in interim 2022.[247] The industry's end-of-period inventories increased by *** percent, from *** short tons in 2010 to *** short tons in 2021 and *** short tons in 2022; they were *** short tons in interim 2023, as compared to *** short tons in interim 2022.[248] The industry's overall market share declined by *** percentage points, from *** percent in 2020 to *** percent in 2021 and *** percent in 2022; it was *** percent in interim 2023, as compared to *** percent in interim 2022.[249]

The domestic industry's employment indicia were mixed during the period of investigation: the number of production-related workers ("PRWs") in 2022 was *** percent lower than in 2020,[250] and productivity declined by *** percent.[251] Total hours worked irregularly increased by *** percent during this period,[252] wages paid increased by *** percent,[253] unit labor costs increased by *** percent,[254] and hourly wages increased by *** percent.[255]

The domestic industry's financial performance improved from 2020 to 2022 by every measure but weakened in interim 2023 compared to interim 2022. The domestic industry's net sales value increased by *** percent from 2020 to 2022, increasing from $*** in 2020 to $*** in 2021 and $*** in 2022; it was $*** in interim 2023, as compared to $*** in interim 2022.[256] The domestic industry's gross profits increased over the POI from negative $*** in 2020 to $*** in 2021 and $*** in 2022; they were lower, at $***, in interim 2023, as compared to $***

[247] CR/PR at Tables III-8, C-1.

[248] CR/PR at Tables III-9, C-1.

[249] CR/PR at Tables IV-16, C-1.

[250] PRWs irregularly declined during the POI, declining from *** in 2020 to *** in 2021 and increasing to *** in 2022; they were *** in interim 2023, as compared to *** in interim 2022. CR/PR at Tables III-11, C-1.

[251] Productivity irregularly declined during the POI, increasing from *** short tons per 1,000 hours in 2020 to *** short tons per 1,000 hours in 2021, before decreasing to *** short tons per 1,000 hours in 2022; it was *** short tons per 1,000 hours in interim 2023, as compared to *** short tons per 1,000 hours in interim 2022. CR/PR at Tables III-11, C-1.

[252] Total hours worked by PRWs irregularly increased, declining from *** hours in 2020 to *** hours in 2021, before increasing to *** hours in 2022; they were *** hours in interim 2023, as compared to *** hours in interim 2022. CR/PR at Tables III-11, C-1.

[253] Total wages paid to PRWs increased from $*** in 2020 to $*** in 2021 and $*** in 2022; they were $*** in interim 2023, as compared to $*** in interim 2022. CR/PR at Tables III-11, C-1.

[254] Unit labor costs increased from $*** per short ton in 2020 to $*** per short ton in 2021 and $*** per short ton in 2022; they were $*** per short ton in interim 2023, as compared to $*** per short ton in interim 2022. CR/PR at Tables III-11, C-1.

[255] Hourly wages increased from $*** per hour in 2020 to $*** per hour in 2021 and $*** per hour in 2022; they were $*** per hour in interim 2023, as compared to $*** per hour in interim 2022. CR/PR at Tables III-11, C-1.

[256] CR/CR at Tables VI-1, C-1.

in interim 2022.[257] The domestic industry's operating income increased from negative $*** in 2020 to negative $*** in 2021 and $*** in 2022; it was $*** in interim 2023, as compared to $*** in interim 2022.[258] Similarly, the domestic industry's operating income margin improved from negative *** percent in 2020 to negative *** percent in 2021 and *** percent in 2022; it was *** percent in interim 2023, as compared to *** percent in interim 2022.[259] The domestic industry's net income increased from negative $*** in 2020 to negative $*** in 2021 and $*** in 2022; it was $*** in interim 2023, as compared to $*** in interim 2022. Similarly, the domestic industry's net income margin improved from negative *** percent in 2020 to negative *** percent in 2021 and *** percent in 2022; it was *** percent in interim 2023, as compared to *** percent in interim 2022.[260] The industry's average operating return on assets increased from negative *** percent in 2020 to negative *** percent in 2021 and *** percent in 2022.[261]

The domestic industry's capital expenditures increased from $*** in 2020 to $*** in 2021 and $*** in 2022, a level *** percent higher than in 2020; they were $*** in interim 2023, as compared to $*** in interim 2022.[262] Additionally, *** reported negative effects on investment, growth, and development purportedly due to subject imports.[263] Research and development expenses, which averaged less than *** dollars during the POI, increased throughout the POI from $*** in 2020 to $*** in 2021 and $*** in 2022; they were $*** in interim 2023, as compared to $*** in interim 2022.[264]

We find that the record in the final phase of these investigations does not show a causal nexus between cumulated subject imports' pricing and any declines in the domestic industry's performance during the period of investigation. Notwithstanding that the volume and market share of cumulated subject imports was significant and increasing during the period of investigation, the record shows that subject imports' gains in sales and market share were due to factors other than price. Indeed, the record shows that cumulated subject imports predominantly oversold the domestic like product throughout the period, and that purchases of cumulated subject imports were primarily driven by non-price factors, including quality and availability. We have also found that cumulated subject imports neither depressed nor suppressed prices for the domestic like product. As discussed below, we find that factors other

[257] CR/PR at Tables VI-1, C-1.
[258] CR/PR at Tables VI-1, C-1.
[259] CR/PR at Tables VI-1, C-1.
[260] CR/PR at Tables VI-1, C-1.
[261] CR/PR at Table VI-9.
[262] CR/PR at Tables VI-4, C-1.
[263] CR/PR at Table VI-12.
[264] CR/PR at Tables VI-6, C-1.

than low-priced subject import competition explain declines in the domestic industry's performance during the period of investigation.

Although we have examined the domestic industry as a whole, we observe that most of the market share lost by the domestic industry was lost by U.S. Steel.[265] Cleveland-Cliffs' market share fluctuated within a relatively narrow range during the period of investigation, even increasing from 2021 to 2022, as apparent U.S. consumption declined.[266] Consequently, notwithstanding Cleveland-Cliffs' assertions that its order books collapsed in the latter part of 2022 and early 2023, with purchasers purchasing 8.5 percent less than its contracted quantities, it was able to maintain its market share and did not lose market share to cumulated subject imports.[267]

As to U.S. Steel, as discussed above, in 2022, U.S. Steel permanently idled TMPs production at its East Chicago, Indiana, facility, which had been idled on an indefinite basis since the fourth quarter of 2019; it also announced in 2022 that UPI would cease production in 2023; and it indefinitely idled most TMPs operations at its Gary, Indiana facility in 2022.[268] Consistent with these actions, U.S. Steel's production volumes declined from *** short tons in 2020 to *** short tons in 2022 and were lower in interim 2023, at *** short tons, than in interim 2022, at *** short tons.[269] Further, U.S. Steel's shipments of TMPs 41 inches and greater dropped sharply and precipitously between the second and third quarter of 2021, consistent with respondents' statements that U.S. Steel ceased production of those products in 2021.[270] Because U.S. Steel was the only domestic source for certain types of TMPs during the period of investigation, including D&I TMPs and wider TMPs,[271] purchasers had to rely on imports of these products after U.S. Steel curtailed production of TMPs. Of particular significance is the fact that the Commission specifically requested that U.S. Steel elaborate on the reasons for its decisions to idle TMPs production at its East Chicago and Gary Works facilities, and to close its UPI mill, including any role that subject imports from Canada, China,

[265] CR/PR at Table IV-17.

[266] CR/PR at Table IV-16.

[267] Petitioners' Prehearing Br. at 52-53; Petitioners' Posthearing Br. at 6; CR/PR at Table C-1.

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

[269] CR/PR at Table III-7.

[270] *See* Petitioners Posthearing Br., Exh. 3; U.S. Steel Questionnaire at II-a (produced *** short tons of D&I product greater than or equal to 41 inches wide in 2022); Hearing Tr. at 190 (Dietrich), 193 (Haynes), at 227-28 (Smith), at 262-63 (Klacik).

[271] *See, e.g.,* Hearing Tr. 44 (Aranoff), 187 (Hughes), 190 (Dietrich), Haynes (193-94), 227-28 (Smith); U.S. Steel Domestic Producer Questionnaire at II-11a, II-12; Cleveland-Cliffs Domestic Producer Questionnaire at II-11a, II-12; CR/PR at Table E-4.

and Germany may have had in those decisions. U.S. Steel declined to do so.[272] Instead, in explaining its decisions, U.S. Steel ***. It cited "market conditions," including generally declining demand for TMPs and "increased competition from imports," but, it provided no explanation or evidence, such as an affidavit or hearing testimony, that attributed the closures to subject imports from Canada, China, and Germany specifically.[273] As discussed in section VI.B.1 above, apparent U.S. consumption declined *** percent from 2020 to 2022 and was *** percent lower in interim 2023 compared to interim 2022. Furthermore, as discussed in section VI.B.2 above, nonsubject imports had a substantial and increasing presence in the U.S. market during the period of investigation, accounting for the second largest source of supply, after the domestic industry, in 2022; nonsubject imports gained more market share than cumulated subject imports,[274] and undersold the domestic like product more than subject imports, as discussed above.[275] [276] Moreover, as discussed above, even considering Petitioners' proffered derived pricing data for wide versions of pricing product 1, the data do not show significant underselling during the period of time in which U.S. Steel was selling substantial commercial volumes of such wide product. Given this, as well as the record evidence showing that cumulated subject imports predominantly oversold the domestic like product during the period of investigation, and U.S. Steel's response to the Commission's posthearing questions, we cannot conclude that cumulated subject import pricing played a causal role in U.S. Steel's decisions to curtail production and idle its TMPs facilities.

In addition to U.S. Steel's decision to idle the noted TMPs facilities, discussed above, we observe that purchasers reported widespread availability issues with domestic producers throughout the period of investigation. As already noted, purchasers had to rely on imports when U.S. Steel, the only domestic producer of certain D&I and wider TMPs, curtailed

[272] *See generally* U.S. Steel's Posthearing Br.

[273] U.S. Steel's Posthearing Br. at 1.

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

[275] The prominent role that nonsubject imports played in the U.S. market is particularly noteworthy because, to the extent that domestic producers claim to be experiencing injurious effects, they often refer to imports generally, rather than subject imports specifically. *See, e.g.*, CR/PR at Table VI-12; U.S. Steel's Posthearing Br. at 1; Petitioners' Prehearing Br., Exhibit 12, Attachments F, G, and H; Petitioners' Posthearing Br., Exhibit 7, Attachments C, D, E, F, G.

[276] Although Petitioners highlight the domestic industry's market share loss and declining sales volume in different product categories (e.g., TMPs with a width of less than 39 inches, and TMPs with a width of more than 39 inches) there is no information on the record as to individual countries with respect to these product categories. See Petitioners' Posthearing Br., Exhibit 1 at 18-19; CR/PR at Appendix E (showing market shares of different size products on a cumulated basis for "investigated" imports, which included the eight countries originally named in the petitions, including the four countries with respect to which Commerce reached negative determinations).

production of these products.[277] Although Cleveland-Cliffs asserts that it was capable of supplying these products to the U.S. market despite not having produced them during the period of investigation,[278] the record indicates that Cleveland-Cliffs turned down requests from purchasers to bid on wider products, noting that certain requests were beyond its capabilities.[279] Cleveland Cliffs only made the investments necessary to produce wider TMPs, as well as D&I, after the filing of the petitions.[280] Furthermore, the record indicates that Cleveland-Cliffs as well as U.S. Steel persistently failed to supply the full volume of TMPs required in their contracts or repeatedly turned down additional volumes sought by purchasers,[281] with Cleveland-Cliffs even explaining that in order to increase its sales to *** by 6,000 short tons it would have had to reduce its sales to other customers.[282] This evidence calls into question whether Cleveland-Cliffs could have increased its production of TMPs significantly during the period of investigation, or increased its sales further, despite reporting excess capacity during the period.[283]

As discussed above in Section VI.B.2., even with respect to products that were generally available from all U.S. producers, purchasers reported delays, refusals, and allocation limits from domestic TMPs producers, primarily in 2020 and 2021 but also in 2022. Eleven purchasers specifically cited Cleveland-Cliffs, seven cited U.S. Steel, and three cited Ohio Coatings, as suppliers from whom they experienced supply constraints during the period of investigation.[284] Several U.S. purchasers reported that when they attempted to purchase domestically produced TMPs, they were turned away or supplied with less than the quantities sought.[285] Consistent with purchaser reports of domestic supply constraints, Ohio Coatings reported that ***.[286]

The record also indicates that many purchasers experienced widespread and persistent problems with domestic producers failing to obtain the necessary qualifications to supply certain TMPs specifications. As discussed in Section VI.B.3 above, purchasers do not provide

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[277] *See, e.g.,* Hearing Tr. 44 (Aranoff), 187 (Hughes), 190 (Dietrich), 193-94 (Haynes), 227-28 (Smith).

[278] Cleveland-Cliffs Domestic Producer Questionnaire at II-11a, II-12.

[279] *See* CMI Prehearing Br., Attachments E, E-10; CMI Posthearing Br., Attachments F, F-5.

[280] *See* Petitioners' Prehearing Br. at 56-57; Petitioners' Posthearing Br. at Responses to Commission Questions at 18-21, 44-48, Exhibit 8 at paras. 7-10.

[281] *See* CMI Prehearing Br., Attachments A, B, C, D, E; *see also* CR/PR at Appendix F.

[282] *See* Petitioners Prehearing Br., Exhibit 12.

[283] In another example of Cleveland-Cliffs turning down additional sales volume, in *** Cleveland-Cliffs explained to the purchaser that it ***. CMI Posthearing Br., Attachments C, C-3.

[284] CR/PR at II-23 – II-24 & n.19; Appendix F.

[285] *See, e.g.*, CMI Prehearing Br. at 25-26, Attachments C, D, E; Purchaser Questionnaire Responses of ***.

[286] CR/PR at II-22 – II-23; *see also* Hearing Tr. at 86 (Goncalves).

blanket qualifications for TMPs suppliers or facilities, but rather require suppliers to qualify for each needed specification separately.[287] Additionally, as noted above, certain market participants emphasized that quality is particularly important to them, including because small flaws in TMPs can compromise food safety. Among responding purchasers, four reported that Cleveland-Cliffs had failed to qualify for any of their specifications, and three reported that U.S. Steel had failed to qualify.[288] Indeed, several purchasers described ongoing difficulties in qualifying U.S. producers for certain specifications throughout the period of investigation.[289] Further, as discussed above, purchasers and importers reported seeking and obtaining a considerable number of Section 232 exclusions for types of TMPs they were allegedly unable to procure domestically.[290] Notably, one such purchaser, ***, specifically contacted U.S. producer *** in advance of seeking certain Section 232 exclusions to explain its experiences with that producer's inability to supply the products requested.[291] The domestic industry also experienced higher rejection rates and lower on-time and in-full delivery rates than importers.[292]

In sum, we find that factors other than price explain the domestic industry's loss of market share and sales to cumulated subject imports during the period of investigation.[293] As

[287] CR/PR at II-48.

[288] CR/PR at II-47.

[289] *See, e.g.,* CMI Prehearing Br. at 31-32, Attachments D, E; Purchaser Questionnaire Responses of ***. We find unpersuasive Petitioners' contention that the circumstances regarding the contract process show that ***. Petitioners' Posthearing Br., Responses to Commission Questions at 11-14. By Cleveland-Cliffs' own admission, it failed to comply with the contractual requirement ***. *Id.* at 13-14.

[290] CR/PR at Table II-5.

[291] CMI Prehearing Br. at Attachment E, Exhibits 14, 15.

[292] CR/PR at Tables II-9, II-22. Notwithstanding Petitioners' assertions that these rates improved over the period of investigation, they still remained generally worse than those of importers. *Id.*

[293] Again, while we have considered the domestic industry as a whole, we note that Cleveland-Cliffs' market share fluctuated within a relatively narrow range during the period of investigation, even increasing in from 2021 to 2022, as apparent U.S. consumption declined. CR/PR at Table IV-16. Consequently, notwithstanding Cleveland-Cliffs' assertions that its "order books" collapsed in the latter part of 2022 and early 2023, with purchasers purchasing 8.5 percent less than their contracted quantities, it was able to maintain its market share. Petitioners' Prehearing Br. at 52-53; Petitioners' Posthearing Br., Exhibit 7 at 6. We also observe that an 8.5 percent reduction in purchases by purchasers would be consistent with the 10 percent tolerances reflected in Cleveland-Cliffs' contracts covering 2022, and the take-or-pay clauses in its contracts at that time. *See, e.g.*, Cleveland-Cliffs Prehearing Br. at Exhibit 7, Attachment B. Purchasers explained that they based the contracted quantities of TMPs on demand projections and purchased less than the contracted amounts when their demand projections failed to materialize. CMI Prehearing Brief Attachments D-3 Part 2, E at para. 40-41. The *** percent decline in apparent U.S. consumption in interim 2023 compared to interim 2022 would have contributed to these lower than anticipated purchases, as well as the domestic industry's weaker (Continued...)

discussed in Section VI.D. above, we have found that subject imports neither significantly undersold the domestic like product nor depressed or suppressed prices for the domestic like product. Rather, non-price factors, including but not limited to U.S. Steel's curtailment of TMPs production and the domestic industry's supply constraints and other issues, drove purchasers' increased purchases of cumulated subject imports, causing cumulated subject imports to gain market share at the expense of the domestic industry.

For the foregoing reasons, we find that cumulated subject imports did not have a significant impact on the domestic industry. Accordingly, we find that the domestic industry is not materially injured by reason of subject imports of TMPs from Canada, China, and Germany that were found by Commerce to be sold in the United States at LTFV and subsidized by the government of China.

VII. No Threat of Material Injury by Reason of Subject Imports

A. Legal Standard

Section 771(7)(F) of the Tariff Act directs the Commission to determine whether the U.S. industry is threatened with material injury by reason of the subject imports by analyzing whether "further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted."[294] The Commission may not make such a determination "on the basis of mere conjecture or supposition," and considers the threat factors "as a whole" in making its determination whether dumped or subsidized imports are imminent and whether material injury by reason of subject imports would occur unless an order is issued.[295] In making our determination, we consider all statutory threat factors that are relevant to these investigations.[296]

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financial performance and lower level of PRWs in interim 2023 compared to interim 2022. Given the predominant overselling by subject imports shown by the pricing data, and purchasers' non-price reasons for increased purchases of subject imports, we do not find that these trends were caused by low-priced subject import competition.

[294] 19 U.S.C. § 1677(7)(F)(ii).

[295] 19 U.S.C. § 1677(7)(F)(ii).

[296] These factors are as follows:

(I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement) and whether imports of the subject merchandise are likely to increase,

(Continued...)

B. Cumulation for Threat

Under section 771(7)(H) of the Tariff Act, the Commission may "to the extent practicable" cumulatively assess the volume and price effects of subject imports from all countries as to which petitions were filed on the same day if the requirements for cumulation in the material injury context are satisfied.[297]

As discussed in Section V.B. above, we have found that there was a reasonable overlap of competition between and among the domestic like product and imports from Canada, China, and Germany during the period of investigation. We recognize that TMPs from each subject source exhibit some differences in terms of volume trends,[298] pricing data,[299] and product

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(II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,

(III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,

(IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices and are likely to increase demand for further imports,

(V) inventories of the subject merchandise,

(VI) 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,

…

(VIII) the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and

(IX) any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).

19 U.S.C. § 1677(7)(F)(i). To organize our analysis, we discuss the applicable statutory threat factors using the same volume/price/impact framework that applies to our material injury analysis. Statutory threat factors (I), (II), (III), (V), and (VI) are discussed in the analysis of subject import volume. Statutory threat factor (IV) is discussed in the analysis of subject import price effects. Statutory factors (VIII) and (IX) are discussed in the analysis of impact. Statutory factor (VII) concerning agricultural products is inapplicable to this investigation.

[297] 19 U.S.C. § 1677(7)(H).

[298] With respect to volume trends, subject imports from Canada decreased in volume quantities, U.S. shipments, and market share, while subject imports from China and Germany increased in volume, U.S. shipments, and market share during the period of investigation. CR/PR at Tables IV-2, C-1.

[299] Pricing data for subject imports from Germany were only reported for pricing product 1, while pricing data for subject imports from Canada and China were reported for all four pricing products, although data for subject imports from China were not reported in all quarterly comparisons. CR/PR at Tables V-5 – V-8.

mix.[300] These differences are not of such a magnitude, however, as to suggest that the reasonable overlap that we have found will change in the imminent future.

Nor are these differences sufficient to indicate that subject imports from different sources are likely to compete under difference conditions of competition in the imminent future, so as to justify the consideration of subject imports from any country or countries separately for purposes of our threat analysis. During the period of investigation, subject imports from each source were significant in terms of volume, were available in overlapping specifications, and oversold the domestic like product in the vast majority of quarterly comparisons, corresponding to the vast majority of reported subject import sales.[301]

Based on the likely reasonable overlap of competition between subject imports and the domestic like product, and the absence of any likely differences in the conditions of competition between imports from different subject countries in the imminent future, we exercise our discretion to cumulate subject imports from Canada, China, and Germany for purposes of our threat analysis.

C. Analysis

1. Likely Volume

As discussed above in Section VI.C, we have found that the volume and the increase in volume of cumulated subject imports were significant in absolute terms and relative to apparent U.S. consumption.[302] As explained in section VI.D, however, subject imports neither significantly undersold the domestic like product nor depressed or suppressed prices for the domestic like product. Based on this absence of price effects by cumulated subject imports, and our finding that the domestic industry's adverse trends during the period of investigation resulted from factors other than low-priced subject import competition, we concluded in section VI.E that cumulated subject imports had no significant impact on the domestic industry during the period of investigation.

There is no evidence on the record that these key conditions – predominant overselling by subject imports, the lack of significant price effects, and the domestic industry's condition being affected by factors other than cumulated subject imports – will change in the imminent

[300] For example, subject imports from Germany accounted for the only shipments of laminated TFS TMPs in 2022. CR/PR at Table IV-10. There were no reported shipments of subject imports from China that were greater than or equal to 39 inches but less than 41 inches or that were greater than 45 inches in 2022. CR/PR at Table IV-11.

[301] CR/PR at Tables IV-2, IV-10, IV-11, IV-12, IV-13, V-11.

[302] CR/PR at Table IV-16.

future so as to render injurious the significant volume and market share of cumulated subject imports that is likely. Cumulated subject producers reported substantial capacity throughout the period of investigation, which is projected to increase in 2023 and 2024.[303] Reported cumulated TMP production in the subject countries decreased irregularly during the period of investigation, but is projected to increase in 2023 and 2024, albeit to a lesser degree than capacity.[304] Consequently, while the cumulated subject industries operated at high levels of capacity utilization during the period of investigation, their capacity utilization is projected to decline in 2023 before increasing in 2024 to a level still below that in 2022.[305] Cumulated subject producers' excess capacity is projected to increase from 2022 to 2023 before decreasing in 2024.[306] Subject producers possessed significant excess capacity during the period of investigation and are likely to possess somewhat greater excess capacity in the imminent future. As explained below, however, there is no indication that subject producers are likely to use aggressive pricing to increase shipments to the United States in the imminent future. Indeed, despite subject producers maintaining excess capacity throughout the period of investigation, subject imports predominantly oversold the domestic like product.

Cumulated subject producers' end-of-period inventories increased over the period of investigation.[307] Their inventories are projected to decrease to *** short tons in 2023 and *** short tons in 2024.[308] Importers' inventories of cumulated subject imports fluctuated during

[303] CR/PR at Table VII-29. Subject producers' capacity was reported as *** short tons in 2020, 2021, and 2022, *** short tons in interim 2022, and *** short tons in interim 2023; their capacity is reported to increase to *** short tons in 2023 and 2024. *Id.*

[304] CR/PR at Table Vii-29. Subject producers' production was reported to be *** short tons in 2020, *** short tons in 2021, *** short tons in 2022, *** short tons in interim 2022, and *** short tons in interim 2023; their reported production is projected to be *** short tons in 2023 and *** short tons in 2024. *Id.*

[305] CR/PR at Table VII-29. Subject producers' capacity utilization rate was *** percent in 2020, *** percent in 2021, *** percent in 2022, *** percent in interim 2022, and *** percent in interim 2023; it is projected to be *** percent in 2023 and *** percent in 2024. *Id.*

[306] CR/PR at Tables VII-29, C-1. Cumulated subject producers' excess capacity is projected to increase from *** short tons in 2022 (equivalent to *** percent of apparent U.S. consumption that year) to *** short tons in 2023 (equivalent to *** percent of apparent U.S. consumption in 2022), before declining to *** short tons in 2024 (equivalent to *** percent of apparent U.S. consumption in 2022). *Id.*

[307] CR/PR at Tables VII-29, C-1. Cumulated subject producers' end-of-period inventories increased over the period of investigation, from *** short tons in 2020 to *** short tons in 2021 and *** short tons in 2022, equivalent to *** percent of apparent U.S. consumption that year, and were *** short tons in interim 2022 and *** short tons in interim 2023. *Id.*

[308] CR/PR at Table VII-29.

the period of investigation.[309] Importers' reported arranged subject imports were *** short tons for third quarter 2023, *** short tons for fourth quarter 2023, *** short tons for first quarter 2024, and *** short tons for second quarter 2024.[310] Some subject producers produced products other than TMPs on the same equipment that they use to produce subject merchandise, indicating some potential to shift from the production of out-of-scope products to TMPs.[311]

The record also indicates that cumulated subject producers are export-oriented and exported considerable quantities of TMPs during the period of investigation. The cumulated subject producers' total export shipments initially decreased from *** short tons in 2020 to *** short tons in 2021 before increasing to *** short tons in 2022; they were *** short tons in interim 2022 and interim 2023.[312] Their exports are projected to decline to *** short tons in 2023 before increasing to *** short tons in 2024.[313] Their export shipments to the United States increased from *** short tons in 2020 to *** short tons in 2021 and *** short tons in 2022; they were *** short tons in interim 2022 and *** short tons in interim 2023.[314] Their export shipments to the United States are projected to decline to *** short tons in 2023 and *** short tons in 2024.[315] As a share of total shipments, cumulated subject producers' total exports and exports to the United States increased during the period of investigation, but are projected to decrease in the imminent future. Their exports as a share of total shipments increased from *** percent in 2020 to *** percent in 2021 and *** percent in 2022; they were *** percent in interim 2022 and *** percent in interim 2023.[316] Their exports as a share of total imports are projected to decrease to *** percent in 2023 before increasing to *** percent in 2024.[317] Cumulated subject producers' exports to the United States as a share of total shipments increased from *** percent in 2020 to *** percent in 2021, and *** percent in 2021; they were *** percent in interim 2022 and *** percent in interim 2023.[318] Their exports to the United States as a share of total shipments are projected to decrease to *** percent in 2023

[309] CR/PR at Table C-1. Importers' inventories of cumulated subject imports fluctuated during the period of investigation, initially decreasing from *** short tons in 2020 to *** in 2021 before increasing to *** short tons in 2022; they were lower, at *** short tons, in interim 2023 than in interim 2022, when they were *** short tons. *Id.*

[310] CR/PR at Table VII-31.

[311] CR/PR at VII-5, VII-26.

[312] CR/PR at Table VII-29.

[313] CR/PR at Table VII-29.

[314] CR/PR at Table VII-29.

[315] CR/PR at Table VII-29.

[316] CR/PR at Table VII-29.

[317] CR/PR at Table VII-29.

[318] CR/PR at Table VII-29.

and *** percent in 2024.[319] Thus, subject producers were export oriented during the period of investigation and are likely to remain so in the imminent future.

The record indicates that TMPs from Canada, China, and Germany will remain subject to a variety of trade measures in third country markets, which make the U.S. market relatively more attractive to subject producers.[320]

Based on the foregoing, we find that the volume and market share of cumulated subject imports is likely to remain significant in the imminent future. Cumulated subject producers are export oriented and possessed substantial excess capacity and inventories at the end of the period of investigation, as well as some ability to product shift.[321] Nevertheless, the substantial excess capacity and inventories possessed by cumulated subject producers throughout the period of investigation, and their export orientation and ability to product shift, did not result in cumulated subject imports having significant price effects or a significant adverse impact on the domestic industry. There is no evidence on the record that subject producers used aggressive pricing to increase their sales and market share during the period, with only 12.6 percent of reported subject import sales volumes in quarters of underselling (with the figure being only 6.5 percent at the end of the period of investigation, in interim 2023).[322] Rather, as discussed in sections VI.D and E, purchasers increased their purchases of cumulated subject imports primarily for reasons other than price, including U.S. Steel's decision to curtail TMPs production and domestic supply constraints. There is no evidence on the record that these conditions will

[319] CR/PR at Table VII-29.

[320] CR/PR at VII-50-53, Table VII-32.

[321] In our analysis, we have considered the nature of the subsidies Commerce has found to be countervailable, particularly whether the countervailable subsidies are ones described in Articles 3 or 6.1 of the WTO Agreement on Subsidies and Countervailing Measures, and whether imports of the subject merchandise are likely to increase. 19 U.S.C. § 1677(7)(F)(i)(I). We observe that, in its final countervailing duty determination concerning TMPs from China, Commerce found the following subsidy programs to be countervailable: income tax reductions for high and new technology enterprises; income tax deductions for research and development expenses under the Enterprise Income Tax Law of the People's Republic of China; import tariff and value added tax ("VAT") exemptions on imported equipment in encouraged industries; provision of coking coal for less than adequate remuneration ("LTAR"); provision of iron ore for LTAR; export buyer's credit; capital injections and other payments from the state capital operating budget; other subsidies reported by Jingtang Iron; other subsidies reported by Beijing Shougang Co., Ltd.; other subsidies reported by Shougang Casey Steel Co., Ltd.; provision of electricity for LTAR; provision of land in the Caofeidian Industrial Zone for LTAR; and policy loans to the TMP industry. *Tin Mill Products From the People's Republic of China: Final Affirmative Countervailing Duty Determination and Final Affirmative Critical Circumstances Determination, in Part*, 89 Fed. Reg. 1532 (Jan. 10, 2024) and accompanying Issues and Decisions Memorandum. We have taken these subsidy findings into account in our analysis of likely subject import volume.

[322] CR/PR at Table V-10.

change in the imminent future. Consequently, we find that the significant volume and market share of cumulated subject imports that is likely in the imminent future is not likely to materially injury the domestic industry.

2. Likely Price Effects

As discussed above in Section VI.D, we have found that subject imports predominantly oversold the domestic like product, in terms of both quarterly price comparisons and reported sales volume. The pricing data do not indicate that significant underselling by subject imports is likely in the imminent future. At the end of the period of investigation, subject imports oversold the domestic like product in a majority of quarterly comparisons in 2022 (65.7 percent) and interim 2023 (86.7 percent) and with respect to a majority of reported subject imports sales volume (74.5 percent in 2022 and 93.5 percent in interim 2023).[323]

Furthermore, as discussed in Sections VI.D. and E. above, the record in these investigations indicates that purchasers increased their purchases and imports of cumulated subject imports for reasons other than price. Additionally, consistent with the absence of significant underselling by subject imports, we have found that cumulated subject imports neither depressed nor suppressed priced for the domestic like product during the period of investigation. There is no evidence that the pattern of predominant overselling or the non-price factors driving purchases of cumulated subject imports will change in the imminent future.

Accordingly, we find that cumulated subject imports are not likely to enter at prices that would be likely to have significant depressing or suppressing effects on domestic prices, or that would be likely to increase demand for further subject imports in the imminent future.

3. Likely Impact

In section VI.E. above, we found that cumulated subject imports did not have a significant impact on the domestic industry. Cumulated subject imports gained market share from the domestic industry for reasons other than price, having predominantly oversold the domestic like product, while the domestic industry improved its financial performance from 2020 to 2022 despite declining apparent U.S. consumption, as it was able to raise its net sales value in excess of rising costs, particularly in 2022 and interim 2022 when it registered operating sales margins of *** and *** percent, respectively.[324] The domestic industry's

[323] CR/PR at Table V-12.
[324] CR/PR at Table C-1.

financial condition improved from operating and net income losses in 2020 and 2021 to operating and net income profits in 2022 and 2023.[325] However, the domestic industry experienced reduced financial performance in interim 2023 compared to interim 2022 that coincided with a sharp, *** percent decline in apparent U.S. consumption. The domestic industry's operating income to net sales ratio was *** percent in interim 2023.[326]

We have also considered other indicators the condition of the domestic industry. The domestic industry's output indicators declined according to many measures throughout the period of investigation, and its employment indicators were lower in interim 2023 compared to interim 2022. In particular, Cleveland-Cliffs reported that it expected layoffs in 2023 and USW warned that the Weirton mill is in peril.[327] U.S. Steel has idled several of its mills ***.[328] The third U.S. producer, Ohio Coatings, reported *** throughout the period of investigation alongside ***.[329] In view of the foregoing, on balance, we find that the domestic industry is in a vulnerable condition.

We have found that, although the volume and market share of cumulated subject imports will likely remain significant, cumulated subject imports are not likely to significantly undersell the domestic like product or have significant depressing or suppressing effects on domestic prices. Purchasers increased their purchases of cumulated subject imports for reasons other than price during the period of investigation, and there is no evidence that this will change in the imminent future.

We have also considered whether cumulated subject imports are likely to have an actual or potential negative effect on the domestic industry's existing development and production efforts. Despite an increasing volume of cumulated subject imports in the U.S. market, which entered at relatively high prices, the domestic industry' capital expenditures and R&D spending increased in each year of the period of investigation.[330] Although U.S. Steel curtailed its production of TMPs during the period of investigation, reportedly in part due to general import competition, it *** throughout the period.[331] Thus, the record does not indicate that cumulated subject imports, as opposed to nonsubject imports and other market conditions, have had actual or potential negative effects on the domestic industry's existing development and production efforts.

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[325] CR/PR at Table H-1.
[326] CR/PR at Table C-1.
[327] CR/PR at Table III-3; Hearing Tr. at 70 (Glyptis).
[328] CR/PR at Tables III-4 & H-1.
[329] CR/PR at Tables III-7, H-1.
[330] CR/PR at Tables VI-4, VI-6.
[331] CR/PR at Tables VI-4, VI-6.

For all of these reasons, we find that cumulated subject imports will not likely have a significant impact on the domestic industry in the imminent future.

VIII. Conclusion

For the reasons stated above, we determine that an industry in the United States is not materially injured or threatened with material injury by reason of subject imports of TMPs from Canada, China, and Germany found by Commerce to be sold in the United States at LTFV and subsidized by the government of China. We find that imports of TMPs from South Korea found by Commerce to be sold in the United States at LTFV are negligible and therefore terminate that investigation.

Part I: Introduction

Background

These investigations result from petitions filed with the U.S. Department of Commerce ("Commerce") and the U.S. International Trade Commission ("USITC" or "Commission") by Cleveland-Cliffs Inc. ("Cleveland-Cliffs"), Cleveland, Ohio, and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union ("USW"), Pittsburgh, Pennsylvania, on January 18, 2023, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized imports of tin mill products from China and less-than-fair-value ("LTFV") imports of tin mill products[1] from Canada, China, Germany, and South Korea.[2] Table I-1 presents information relating to the background of these investigations.[3]

[1] See the section entitled "The subject merchandise" in Part I of this report for a complete description of the merchandise subject in this proceeding.

[2] The petitions also alleged an industry in the United States is materially injured and threatened with material injury by reason of LTFV imports of tin mill products from the Netherlands, Taiwan, Turkey and the United Kingdom. On January 10, 2024, Commerce published notices in the Federal Register of its negative final determinations of sales at LTFV with respect to imports from the Netherlands, Taiwan, Turkey, and the United Kingdom, 89 FR 1524, 89 FR 1526, 89 FR 1520, 89 FR 1535, January 10, 2024. Accordingly, the Commission terminated the investigations on the Netherlands, Taiwan, Turkey, and the United Kingdom on January 10, 2024, 89 FR 3694, January 19, 2024.

[3] Pertinent Federal Register notices are referenced in appendix A and may be found at the Commission's website (www.usitc.gov).

Table I-1
Tin mill products: Information relating to the background and schedule of this proceeding

Effective date	Action
January 18, 2023	Petitions filed with Commerce and the Commission; institution of the Commission's investigations (88 FR 4206, January 24, 2023)
February 7, 2023	Commerce's initiation of China CVD investigation (88 FR 9476, February 14, 2023) and Canada, China, Germany, the Netherlands, South Korea, Taiwan, Turkey, and the United Kingdom AD investigations (88 FR 9481, February 14, 2023)
March 6, 2023	Commission's preliminary determination (88 FR 15080, March 10, 2023)
May 31, 2023	Commerce's postponement of preliminary AD determinations for Canada, China, Germany, the Netherlands, South Korea, Taiwan, Turkey, and the United Kingdom (88 FR 34827, May 31, 2023)
March 24, 2023	Commerce's postponement of preliminary CVD determination China (88 FR 17807, March 24, 2023)
June 26, 2023	Commerce's preliminary CVD determination and alignment of final determination with AD determinations (88 FR 41373, June 26, 2023)
July 20, 2023	Partial affirmative critical circumstances CVD determination (88 FR 46738, July 20, 2023)
August 22, 2023	Commerce's preliminary affirmative AD determinations for Canada, Germany, and China, Commerce's preliminary negative AD determinations for the United Kingdom, Turkey, Taiwan, South Korea, and the Netherlands, affirmative critical circumstance determination for China, and postponement of final AD determinations for Germany, Canada, the United Kingdom, Turkey, Taiwan, South Korea, and the Netherlands (88 FR 57078, 88 FR 57081, 88 FR 57084, 88 FR 57087, 88 FR 57090, 88 FR 57093, 88 FR 57096, 88 FR 57099, August 22, 2023)
August 22, 2023	Commission's scheduling of final phase of Commission investigations (88 FR 60484, September 1, 2023, revised 88 FR 65194, September 21, 2023)
September 6, 2023	Commerce's postponement of final AD determination for China (88 FR 34827, September 12, 2023)
January 4, 2024	Commission's hearing
January 10, 2024	Commerce's negative final determinations for the Netherlands, Taiwan, Turkey, and the United Kingdom (89 FR 1524, 89 FR 1526, 89 FR 1520, 89 FR 1535)
January 10, 2024	Commerce's affirmative final AD determinations for Canada, China, Germany, and South Korea (89 FR 1542, 89 FR 1538, 89 FR 1529, FR 1545)
January 10, 2024	Commerce's affirmative final CVD determination for China (89 FR 1532)
January 10, 2024	Commission's termination of the investigations for the Netherlands, Taiwan, Turkey, and the United Kingdom (89 FR 3694, January 19, 2024)
February 6, 2024	Commission's vote
February 26, 2024	Commission's views

Statutory criteria

Section 771(7)(B) of the Tariff Act of 1930 (the "Act") (19 U.S.C. § 1677(7)(B)) provides that in making its determinations of injury to an industry in the United States, the Commission--

> *shall consider (I) the volume of imports of the subject merchandise, (II) the effect of imports of that merchandise on prices in the United States for domestic like products, and (III) the impact of imports of such merchandise on domestic producers of domestic like products, but only in the context of production operations within the United States; and. . . may consider such other economic factors as are relevant to the determination regarding whether there is material injury by reason of imports.*

Section 771(7)(C) of the Act (19 U.S.C. § 1677(7)(C)) further provides that--[4]

> *In evaluating the volume of imports of merchandise, the Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States is significant.. . .In evaluating the effect of imports of such merchandise on prices, the Commission shall consider whether. . .(I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.. . . In examining the impact required to be considered under subparagraph (B)(i)(III), the Commission shall evaluate (within the context of the business cycle and conditions of competition that are distinctive to the affected industry) all relevant economic factors which have a bearing on the state of the industry in the United States, including, but not limited to. . . (I) actual and potential decline in output, sales, market share, gross profits, operating profits, net profits, ability to service debt, productivity, return on investments, return on assets, and utilization of capacity, (II) factors affecting domestic prices, (III) actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, (IV) actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and (V) in {an antidumping investigation}, the magnitude of the margin of dumping.*

[4] Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

In addition, Section 771(7)(J) of the Act (19 U.S.C. § 1677(7)(J)) provides that—[5]

(J) EFFECT OF PROFITABILITY.—The Commission may not determine that there is no material injury or threat of material injury to an industry in the United States merely because that industry is profitable or because the performance of that industry has recently improved.

Organization of report

Part I of this report presents information on the subject merchandise, subsidy/dumping margins, and domestic like product. Part II of this report presents information on conditions of competition and other relevant economic factors. Part III presents information on the condition of the U.S. industry, including data on capacity, production, shipments, inventories, and employment. Parts IV and V present the volume of subject imports and pricing of domestic and imported products, respectively. Part VI presents information on the financial experience of U.S. producers. Part VII presents the statutory requirements and information obtained for use in the Commission's consideration of the question of threat of material injury as well as information regarding nonsubject countries.

Market summary

Tin mill products are primarily used to manufacture welded cans for food, aerosol, paint, and filtration. The leading U.S. producers of tin mill products are ***, while leading producers of tin mill products from subject countries include ***. The leading U.S. importers from subject sources are ***. Leading importers of product from nonsubject countries include ***. U.S. purchasers of tin mill products are primarily firms that produce cans for food storage.

Apparent U.S. consumption of tin mill products totaled approximately *** short tons ($***) in 2022. Currently, three firms are known to produce tin mill products in the United States. U.S. producers' U.S. shipments of tin mill products totaled *** short tons

[5] Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

(***) in 2022 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from subject sources totaled *** short tons (***) in 2022 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from nonsubject sources totaled *** short tons (***) in 2022 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value.

Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, table C-1. Except as noted, U.S. industry data are based on questionnaire responses of three firms that accounted for virtually all of U.S. production of tin mill products during 2022. U.S. imports are based on questionnaire responses from 24 importers and the Commission received purchaser questionnaire responses from 26 firms. The Commission received one foreign producer questionnaire from a tin mill producer in Canada, which accounted for *** percent of production of tin mill products in Canada during 2022. The Commission received six foreign producer questionnaires from tin mill producers in China, which accounted for *** percent of production of tin mill products in China during 2022. The Commission received one foreign producer questionnaire from a tin mill producer in Germany, which accounted for *** percent of production of tin mill products in Germany during 2022. The Commission received foreign producer questionnaires from two tin mill producers in South Korea, only one of which, TCC Steel, is considering subject to this investigation and accounted for *** percent of production of tin mill products in South Korea during 2022.

Previous and related investigations

Tin mill products have been the subject of a prior antidumping duty investigation in the United States. Additionally, there have been countervailing and antidumping duty investigations on hot-rolled and cold-rolled steel, including substrates used in the production of tin mill products. Table I-2 presents information on previous and related Title VII investigations.

Table I-2
Tin mill products: Previous and related Commission proceedings

Date	Number	Product / Country	ITC Original Determination	Current Status of Order
1998	731-TA-808	Hot-rolled steel flat products / Russia	Affirmative	Order continued after fourth review, 12/09/2022
1999	731-TA-860	Tin- and chromium-coated Steel Sheet / Japan	Affirmative	Order continued after third review, 07/11/2018
2015	701-TA-540	Cold-rolled steel flat products / Brazil	Affirmative	Order revoked after first review, 08/25/2022
2015	701-TA-541	Cold-rolled steel flat products / China	Affirmative	Order continued after first review, 08/19/2022
2015	701-TA-542	Cold-rolled steel flat products / India	Affirmative	Order continued after first review, 08/25/2022
2015	701-TA-543	Cold-rolled steel flat products / South Korea	Affirmative	Order continued after first review, 08/19/2022
2015	701-TA-544	Cold-rolled steel flat products / Russia	Negative	---
2015	731-TA-1283	Cold-rolled steel flat products / Brazil	Affirmative	Order revoked after first review, 08/25/2022
2015	731-TA-1284	Cold-rolled steel flat products / China	Affirmative	Order continued after first review, 08/25/2022
2015	731-TA-1285	Cold-rolled steel flat products / India	Affirmative	Order continued after first review, 08/25/2022
2015	731-TA-1286	Cold-rolled steel flat products / Japan	Affirmative	Order continued after first review, 08/25/2022

Table continued.

Table I-2 Continued
Tin mill products: Previous and related Commission proceedings

Date	Number	Product / Country	ITC Original Determination	Current Status of Order
2015	731-TA-1288	Cold-rolled steel flat products / Netherlands	Negative	---
2015	731-TA-1287	Cold-rolled steel flat products / South Korea	Affirmative	Order continued after first review, 08/25/2022
2015	731-TA-1289	Cold-rolled steel flat products / Russia	Negative	---
2015	731-TA-1290	Cold-rolled steel flat products / United Kingdom	Affirmative	Order continued after first review, 08/25/2022
2015	701-TA-545	Hot-rolled steel flat products / Brazil	Affirmative	Order revoked after first review, 12/22/2022
2015	701-TA-546	Hot-rolled steel flat products / South Korea	Affirmative	Order continued after first review, 12/22/2022
2015	731-TA-1291	Hot-rolled steel flat products / Australia	Affirmative	Order continued after first review, 12/22/2022
2015	731-TA-1292	Hot-rolled steel flat products / Brazil	Affirmative	Order revoked after first review, 12/22/2022
2015	731-TA-1293	Hot-rolled steel flat products / Japan	Affirmative	Order continued after first review, 12/22/2022
2015	731-TA-1294	Hot-rolled steel flat products / Netherlands	Affirmative	Order continued after first review, 12/22/2022
2015	731-TA-1295	Hot-rolled steel flat products / South Korea	Affirmative	Order continued after first review, 12/22/2022
2015	731-TA-1296	Hot-rolled steel flat products / Turkey	Affirmative	Order continued after first review, 12/22/2022
2015	731-TA-1297	Hot-rolled steel flat products / United Kingdom	Affirmative	Order continued after first review, 12/22/2022

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

Note: The dates presented in this table refer to the year in which the petitions were filed.

Safeguard investigations

In 2001, the Commission determined that certain carbon and alloy steel, including tin mill products, 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.[6] On March 5, 2002, President George W. Bush announced the implementation of steel safeguard measures. Import relief relating to tin mill products 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).[7] Following receipt of the Commission's mid-term monitoring report in September 2003, and after seeking information from the U.S. Secretary of Commerce and U.S. Secretary of Labor, President Bush determined that the effectiveness of the action taken had been impaired by changed circumstances. Therefore, he terminated the U.S. measure with respect to increased tariffs on December 4, 2003.[8]

Nature and extent of subsidies and sales at LTFV

Subsidies

On January 10, 2024, Commerce published a notice in the Federal Register of its final affirmative determination of countervailable subsidies for producers and exporters of tin mill product from China.[9] Table I-3 presents Commerce's findings of subsidization of tin mill products in China.

[6] 66 FR 67304, December 28, 2001.

[7] 67 FR 10553, March 7, 2002. The President also instructed the Secretaries of Commerce and the Treasury to establish a system of import licensing to facilitate steel import monitoring.

[8] 68 FR 68483, December 8, 2003. Import licensing, however, remained in place through March 21, 2005, and continues in modified form at this time.

[9] 89 FR 89 FR 1532, January 10, 2024.

Table I-3
Tin mill products: Commerce's final subsidy determination with respect to imports from China

Entity	Final countervailable subsidy rate (percent)
Baoshan Iron & Steel Co., Ltd	649.98
Shougang Jingtang United Iron & Steel Co., Ltd	331.88
All others	331.88

Source: 89 FR 89 FR 1532, January 10, 2024.

Note: For further information on programs determined to be countervailable, see Commerce's associated Issues and Decision Memorandum.

Sales at LTFV

On January 10, 2024, Commerce published a notice in the Federal Register of its final affirmative determinations of sales at LTFV with respect to imports from Canada, China, Germany, and South Korea. Tables I-4, I-5, I-6, and I-7 present Commerce's final dumping margins with regarding imports of tin mill products from Canada, China, Germany, and South Korea, respectively.

Table I-4
Tin mill products: Commerce's final weighted-average LTFV margins with respect to imports from Canada

Exporter/producer	Final dumping margin (percent)
ArcelorMittal Dofasco G.P.	5.27
All others	5.27

Source: 89 FR 1542, January 10, 2024.

Table I-5
Tin mill products: Commerce's final weighted-average LTFV margins with respect to imports from China

Exporter/producer	Final dumping margin (percent)
China-wide entity	122.52

Source: 89 FR 1538, January 10, 2024.

Note: The final dumping margin adjusted for export subsidy offset is 111.98 percent.

Table I-6
Tin mill products: Commerce's final weighted-average LTFV margins with respect to imports from Germany

Exporter/producer	Final dumping margin (percent)
thyssenkrupp Rasselstein GmbH	6.88
All others	6.88

Source: 89 FR 1529, January 10, 2024.

Table I-7
Tin mill products: Commerce's final weighted-average LTFV margins with respect to imports from South Korea

Exporter/producer	Final dumping margin (percent)
KG Dongbu Steel Co., Ltd.	0.00
TCC Steel Corp.	2.69
All others	2.69

Source: 89 FR 1545, January 10, 2024.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:[10]

The products within the scope of this investigation are tin mill flat-rolled products that are coated or plated with tin, chromium, or chromium oxides. Flat-rolled steel products coated with tin are known as tinplate. Flat-rolled steel products coated with chromium or chromium oxides are known as tin-free steel or electrolytic chromium-coated steel. The scope includes all the noted tin mill products regardless of thickness, width, form (in coils or cut sheets), coating type (electrolytic or otherwise), edge (trimmed, untrimmed or further processed, such as scroll cut), coating thickness, surface finish, temper, coating metal (tin, chromium, chromium oxide), reduction (single- or double-reduced), and whether or not coated with a plastic material. All products that meet the written physical description are within the scope of this investigation unless specifically excluded. The following products are outside and/or specifically excluded from the scope of this investigation:

- *Single reduced electrolytically chromium coated steel with a thickness 0.238 mm (85 pound base box) (± 10%) or 0.251 mm (90 pound base box) (± 10%) or 0.255 mm (± 10%) with 770 mm (minimum width) (± 1.588 mm) by 900 mm (maximum length if sheared) sheet size or 30.6875 inches (minimum width) (± 1/16 inch) and 35.4 inches (maximum length if sheared) sheet size; with type MR or higher (per ASTM) A623 steel chemistry; batch annealed at T2 1⁄2 anneal temper, with a yield strength of 31 to 42 kpsi (214 to 290 Mpa); with a tensile strength of 43 to 58 kpsi (296 to 400 Mpa); with a chrome coating restricted to 32 to 150 mg/m2; with a chrome oxide coating restricted to 6 to 25 mg/m2 with a modified 7B ground roll finish or blasted roll*

[10] 89 FR 1524, 89 FR 1526, 89 FR 1520, 89 FR 1535, 89 FR 1542, 89 FR 1538, 89 FR 1529, 89 FR 1545, 89 FR 1532, January 10, 2024.

finish; with roughness average (Ra) 0.10 to 0.35 micrometers, measured with a stylus instrument with a stylus radius of 2 to 5 microns, a trace length of 5.6 mm, and a cutoff of 0.8 mm, and the measurement traces shall be made perpendicular to the rolling direction; with an oil level of 0.17 to 0.37 grams/base box as type BSO, or 2.5 to 5.5 mg/ m2 as type DOS, or 3.5 to 6.5 mg/m2 as type ATBC; with electrical conductivity of static probe voltage drop of 0.46 volts drop maximum, and with electrical conductivity degradation to 0.70 volts drop maximum after stoving (heating to 400 degrees F for 100 minutes followed by a cool to room temperature).

- *Single reduced electrolytically chromium- or tin-coated steel in the gauges of 0.0040 inch nominal, 0.0045 inch nominal, 0.0050 inch nominal, 0.0061 inch nominal (55 pound base box weight), 0.0066 inch nominal (60 pound base box weight), and 0.0072 inch nominal (65 pound base box weight), regardless of width, temper, finish, coating or other properties.*
- *Single reduced electrolytically chromium coated steel in the gauge of 0.024 inch, with widths of 27.0 inches or 31.5 inches, and with T–1 temper properties.*
- *Single reduced electrolytically chromium coated steel, with a chemical composition of 0.005% max carbon, 0.030% max silicon, 0.25% max manganese, 0.025% max phosphorous, 0.025% max sulfur 0.070% max aluminum, and the balance iron, with a metallic chromium layer of 70–130 mg/m2, with a chromium oxide layer of 5– 30 mg/m2, with a tensile strength of 260–440 N/mm2, with an elongation of 28–48%, with a hardness (HR–30T) of 40–58, with a surface roughness of 0.5–1.5 microns Ra, with magnetic properties of Bm (kg) 10.0 minimum, Br (kg) 8.0 minimum, Hc (Oe) 2.5– 3.8, and MU 1400 minimum, as measured with a Riken Denshi DC magnetic characteristic measuring machine, Model BHU–60.*
- *Bright finish tin-coated sheet with a thickness equal to or exceeding 0.0299 inch, coated to thickness of 3⁄4 pound (0.000045 inch) and 1 pound (0.00006 inch).*
- *Electrolytically chromium coated steel having ultra flat shape defined as oil can maximum depth of 5/64 inch (2.0 mm) and edge wave maximum of 5/64 inch (2.0 mm) and no wave to penetrate more than 2.0 inches (51.0 mm) from the strip edge and coilset or curling requirements of average maximum of 5/64 inch (2.0 mm) (based on six readings, three across each cut edge of a 24 inches (61 cm) long sample with no single reading exceeding 4/32 inch (3.2 mm) and no more than two readings at 4/32 inch (3.2 mm)) and (for 85 pound base box item only: crossbuckle maximums of 0.001 inch (0.0025 mm) average having no reading above 0.005 inch (0.127 mm)), with a camber maximum of 1⁄4 inch (6.3 mm) per 20 feet (6.1 meters),*

capable of being bent 120 degrees on a 0.002 inch radius without cracking, with a chromium coating weight of metallic chromium at 100 mg/m2 and chromium oxide of 10 mg/m2, with a chemistry of 0.13% maximum carbon, 0.60% maximum manganese, 0.15% maximum silicon, 0.20% maximum copper, 0.04% maximum phosphorous, 0.05% maximum sulfur, and 0.20% maximum aluminum, with a surface finish of Stone Finish 7C, with a DOS–A oil at an aim level of 2 mg/square meter, with not more than 15 inclusions/foreign matter in 15 feet (4.6 meters) (with inclusions not to exceed 1/32 inch (0.8 mm) in width and 3/ 64 inch (1.2 mm) in length), with thickness/ temper combinations of either 60 pound base box (0.0066 inch) double reduced CADR8 temper in widths of 25.00 inches, 27.00 inches, 27.50 inches, 28.00 inches, 28.25 inches, 28.50 inches, 29.50 inches, 29.75 inches, 30.25 inches, 31.00 inches, 32.75 inches, 33.75 inches, 35.75 inches, 36.25 inches, 39.00 inches, or 43.00 inches, or 85 pound base box (0.0094 inch) single reduced CAT4 temper in widths of 25.00 inches, 27.00 inches, 28.00 inches, 30.00 inches, 33.00 inches, 33.75 inches, 35.75 inches, 36.25 inches, or 43.00 inches, with width tolerance of 1⁄8 inch, with a thickness tolerance of 0.0005 inch, with a maximum coil weight of 20,000 pounds (9071.0 kg), with a minimum coil weight of 18,000 pounds (8164.8 kg), with a coil inside diameter of 16 inches (40.64 cm) with a steel core, with a coil maximum outside diameter of 59.5 inches (151.13 cm), with a maximum of one weld (identified with a paper flag) per coil, with a surface free of scratches, holes, and rust.

- *Electrolytically tin coated steel having differential coating with 1.00 pound/base box equivalent on the heavy side, with varied coating equivalents in the lighter side (detailed below), with a continuous cast steel chemistry of type MR, with a surface finish of type 7B or 7C, with a surface passivation of 0.7 mg/square foot of chromium applied as a cathodic dichromate treatment, with coil form having restricted oil film weights of 0.3–0.4 grams/base box of type DOS–A oil, coil inside diameter ranging from 15.5 to 17 inches, coil outside diameter of a maximum 64 inches, with a maximum coil weight of 25,000 pounds, and with temper/coating/ dimension combinations of: (1) CAT4 temper, 1.00/.050 pound/base box coating, 70 pound/base box (0.0077 inch) thickness, and 33.1875 inch ordered width; or (2) CAT5 temper, 1.00/0.50 pound/base box coating, 75 pound/base box (0.0082 inch) thickness, and 34.9375 inch or 34.1875 inch ordered width; or (3) CAT5 temper, 1.00/0.50 pound/base box coating, 107 pound/base box (0.0118 inch) thickness, and 30.5625 inch or 35.5625 inch ordered width; or (4) CADR8 temper, 1.00/0.50 pound/base box coating, 85 pound/ base box (0.0093 inch) thickness, and 35.5625 inch ordered width; or (5) CADR8 temper, 1.00/0.25 pound/base box*

coating, 60 pound/base box (0.0066 inch) thickness, and 35.9375 inch ordered width; or (6) CADR8 temper, 1.00/0.25 pound/base box coating, 70 pound/base box (0.0077 inch) thickness, and 32.9375 inch, 33.125 inch, or 35.1875 inch ordered width.

- *Electrolytically tin coated steel having differential coating with 1.00 pound/base box equivalent on the heavy side, with varied coating equivalents on the lighter side (detailed below), with a continuous cast steel chemistry of type MR, with a surface finish of type 7B or 7C, with a surface passivation of 0.5 mg/square foot of chromium applied as a cathodic dichromate treatment, with ultra flat scroll cut sheet form, with CAT5 temper with 1.00/0.10 pound/base box coating, with a lithograph logo printed in a uniform pattern on the 0.10 pound coating side with a clear protective coat, with both sides waxed to a level of 15–20 mg/216 sq. inch, with ordered dimension combinations of (1) 75 pound/ base box (0.0082 inch) thickness and 34.9375 inch x 31.748 inch scroll cut dimensions; or (2) 75 pound/base box (0.0082 inch) thickness and 34.1875 inch x 29.076 inch scroll cut dimensions; or (3) 107 pound/base box (0.0118 inch) thickness and 30.5625 inch x 34.125 inch scroll cut dimension.*
- *Tin-free steel coated with a metallic chromium layer between 100–200 mg/m2 and a chromium oxide layer between 5–30 mg/ m2; chemical composition of 0.05% maximum carbon, 0.03% maximum silicon, 0.60% maximum manganese, 0.02% maximum phosphorous, and 0.02% maximum sulfur; magnetic flux density (Br) of 10 kg minimum and a coercive force (Hc) of 3.8 Oe minimum.*
- *Tin-free steel laminated on one or both sides of the surface with a polyester film, consisting of two layers (an amorphous layer and an outer crystal layer), that contains no more than the indicated amounts of the following environmental hormones: 1 mg/kg BADGE (BisPhenol—A Di-glycidyl Ether), 1 mg/kg BFDGE (BisPhenol—F Di-glycidyl Ether), and 3 mg/kg BPA (BisPhenol—A).*

Tariff treatment

Based upon the scope set forth by Commerce, information available to the Commission indicates that the merchandise subject to these investigations is imported under the following statistical reporting numbers in the Harmonized Tariff Schedule of the United States ("HTSUS" or "HTS") 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.50.0020, 7210.50.0090, 7212.10.0000, and 7212.50.0000 if of non-alloy steel, and under HTS 7225.99.0090 and

7226.99.0180 if of alloy steel.[11] The 2024 general rate of duty is "Free" for HTS subheadings 7210.11.00, 7210.12.00, 7210.50.00, 7212.10.00, 7212.50.00, 7225.99.00, and 7226.99.01.[12] Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection ("CBP").

Effective September 1, 2019, tin mill products originating in China have been subject to an additional ad valorem duty under section 301 of the Trade Act of 1974, as amended; currently, the rate is 7.5 percent.[13] USTR had not excluded any imported products reported under HTS heading 9903.88.15 from these duties on tin mill products originating in China, as of January 1, 2024.[14] Products of China subject to section 301 tariffs also continue to be subject to all applicable antidumping, countervailing, or other duties and charges, as well as the additional ad valorem rate of duty imposed by the HTS heading.[15]

Effective March 23, 2018, tin mill products were included in the enumeration of iron and steel articles that became subject to the additional 25 percent ad valorem duty under section

[11] Effective July 1, 2021, HTS statistical reporting number 7210.50.0000 was annotated and HTS statistical reporting numbers 7210.50.0020, and 7210.50.0090 were established. USITC, HTSUS (2022) Basic Edition, Publication 5277, January 2022, Change Record (2022), p. 52.

[12] USITC, HTSUS (2024) Basic Edition, Publication 5483, January 2024, pp. 72-17, 72-19, 72-41, 72-42.

[13] Section 301 of the Trade Act, as amended (19 U.S.C. § 2411) authorizes the Office of the United States Trade Representative ("USTR"), at the direction of the President, to take appropriate action to respond to a foreign country's unfair trade practices. Following investigations into "China's acts, policies, and practices related to technology transfer, intellectual property, and innovation" (82 FR 40213, August 24, 2017), USTR published its determination, on April 6, 2018, that the acts, policies, and practices of China under investigation are unreasonable or discriminatory and burden or restrict U.S. commerce and are thus actionable under section 301(b) of the Trade Act (83 FR 14906, April 6, 2018).

Effective September 1, 2019, USTR included tin mill products in its $300 Billion Trade Action (List 4 or Tranche 4, Annex A rather than Annex C) of products originating in China subject to an initial 10 percent ad valorem duty (84 FR 43304, August 20, 2019) which was subsequently raised to 15 percent ad valorem, with the same effective date of September 1, 2019 (84 FR 45821, August 30, 2019), but was more recently reduced to 7.5 percent ad valorem, effective February 14, 2020 (85 FR 3741, January 22, 2020).

See also HTS heading 9903.88.15 and U.S. notes 20(r) and 20(s) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2024) Basic Edition, Publication 5483, January 2024, pp. 72-47, 99-III-87 – 99-III-88, 99-III-97, 99-III-303, 99-III-305 – 99-III-309.

[14] HTS headings 9903.88.67 and 9903.88.68, and U.S. notes 20(ttt)(iv) and 20(uuu)(iv) to subchapter III of chapter 99 and the related tariff provisions for this duty treatment. USITC, HTSUS (2024) Basic Edition, Publication 5483, January 2024, pp. 99-III-225, 99-III-241 – 99-III-244, 99-III-246 – 99-III-247, 99-III-309.

[15] See U.S. note 20(r). USITC, HTSUS (2024) Basic Edition, pp. 99-III-87, 99-III-303.

232 of the Trade Expansion Act of 1962, as amended.[16] As of June 1, 2022, imports of tin mill products originating in Australia, Canada, Mexico, and Ukraine[17] are exempt from section 232 duties or quotas. Tin mill products originating in Argentina, Brazil, and South Korea are exempt from these duties but within annual quotas.[18] Tin mill products originating in the European Union ("EU") member countries (including Germany),[19] Japan, and the United Kingdom ("UK")[20]

[16] Section 232 of the Trade Expansion Act of 1962, as amended (19 U.S.C. §1862), authorizes the President, on advice of the Secretary of Commerce, to adjust the imports of an article and its derivatives that are being imported into the United States in such quantities or under such circumstances as to threaten to impair the national security. Adjusting Imports of Steel Into the United States, Presidential Proclamation 9705, March 8, 2018 (83 FR 11625, March 15, 2018).

[17] See HTS heading 9903.80.01; and U.S. notes 16(a)(i), 16(b), 16(e), 16(f), and 16(g) to subchapter III of chapter 99 and the related tariff provisions for this duty treatment. USITC, HTSUS (2024) Basic Edition, Publication 5483, January 2024, pp. 72-47, 99-III-5 – 99-III-8, 99-III-272.

[18] CBP, "2022 Fourth Quarter Absolute Quota for Steel Articles of Argentina, Brazil and South Korea," Quota Bulletin No. QB 22-604, October 3, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-604-2022.

See also HTS heading 9903.80.01; HTS subheadings 9903.80.14, 9903.80.15, 9903.80.60 – 9903.80.62; and U.S. notes 16(a)(i), 16(b), 16(e), 16(f), and 16(g) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2024) Basic Edition, Publication 5483, January 2024, pp. 72-47, 99-III-5 – 99-III-8, 99-III-272 – 99-III-273, 99-III-279.

[19] CBP, "2022 Fourth Quarter Tariff Rate Quota (TRQ) for Steel Mill Articles of European Union (EU) Countries," Quota Bulletin No. QB 22-614, December 16, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-614-2022; CBP, "EU Sec 232 Steel Tariff Rate Quota (TRQ) 2022 Q1 and Q2," October 16, 2023, https://www.cbp.gov/sites/default/files/assets/documents/2023-Oct/23_1016_eu-steel-tariff-rate-quota-2022-q1-2.pdf.

Tin-free steel originating in Belgium, Germany, Italy, the Netherlands, Portugal, Spain, and Sweden containing steel "melted and poured" in the United Kingdom is also allowed to enter the U.S. market exempted from these duties under the United Kingdom's TRQ. CBP, "2022 4th Quarter Tariff Rate Quota (TRQ) for Steel Mill Articles of Japan or the United Kingdom," Quota Bulletin No. QB 22-624, December 16, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-624-2022.

See also HTS heading 9903.80.01; HTS subheadings 9903.80.74, 9903.80.75; HTS headings 9903.81.80, 9903.81.81; and U.S. notes 16(a)(i), 16(b), 16(e), 16(f), and 16(g) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2024) Basic Edition, Publication 5483, January 2024, pp. 72-47, 99-III-5 – 99-III-8, 99-III-27, 99-III-280, 99-III-292 – 99-III-293.

[20] The UK officially withdrew its membership from the EU on January 31, 2020. Under the Withdrawal Agreement, the UK subsequently remained a member of the EU Single Market and the EU Customs Union, and EU law continued to apply in the UK, until the end of the year-long transition period, January 31, 2021. EC, "Agreement on the Withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community," Official Journal of the European Union, January 31, 2020, pp. L 29/7–L 29/187, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:12020W/TXT; EC, "The EU-UK Withdrawal Agreement," no date, https://commission.europa.eu/strategy-and-policy/relations-non-eu-countries/relations-united-
(continued...)

are exempt from these duties within annual tariff rate quotas ("TRQs") but imports above the quotas are subject to the section 232 duties. Otherwise, tin mill products originating in China, or any other U.S. trade partner are subject to these 25 percent additional duties.[21] Products

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kingdom/eu-uk-withdrawal-agreement_en, retrieved August 3, 2023; EC, "Questions and Answers on the United Kingdom's Withdrawal from the European Union on 31 January 2020," press release, January 24, 2020, https://ec.europa.eu/commission/presscorner/detail/en/qanda_20_104; EU, "The History of the European Union – 2020 to Today," June 16, 2021, https://europa.eu/european-union/about-eu/history/2020-today/2020_en, retrieved July 12, 2021.

CBP, "2022 Tariff Rate Quota (TRQ) for Steel Articles of Japan or the United Kingdom," Quota Bulletin No. QB 22-623, December 16, 2022, https://www.cbp.gov/trade/quota/bulletins/QB%2022-623.

See also HTS heading 9903.80.01; HTS subheadings 9903.81.34, 9903.81.35; and U.S. notes 16(a)(i), 16(b), 16(e), 16(f), and 16(g) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2024) Basic Edition, Publication 5483, January 2024, pp. 72-47, 99-III-5 – 99-III-8, 99-III-272, 99-III-287, 99-III-292.

[21] The President also issued subsequent Proclamations to exempt or adjust these duties for selected U.S. trade partners:

- Presidential Proclamation 9711, March 22, 2018 (83 FR 13361, March 28, 2018), exempted steel articles originating in Argentina, Australia, Brazil, Canada, the EU member states (including the United Kingdom), South Korea, and Mexico, effective March 23, 2018.
- Presidential Proclamation 9740, April 30, 2018 (83 FR 20683, May 7, 2018), continued the duty exemptions for Argentina, Australia, Brazil, but established annual absolute quota limits on steel articles originating in South Korea, effective May 1, 2018, and did not continue the duty exemptions on steel articles originating in Canada, Mexico, and the EU member states (including the United Kingdom), effective June 1, 2018.
- Presidential Proclamation 9759, May 31, 2018 (83 FR 25857, June 5, 2018), continued the duty exemptions, but established annual absolute quota limits on steel articles originating in Argentina, Brazil, and South Korea, effective June 1, 2018.
- Presidential Proclamation 9772, August 10, 2018 (83 FR 40429, August 15, 2018), continued the duty exemptions on steel articles originating in Australia; continued the duty exemptions within annual absolute quota limits on steel articles originating in Argentina, Brazil, and South Korea, effective June 1, 2018; and doubled the duty rate to 50 percent on such imported products originating in Turkey, effective August 13, 2018.
- Presidential Proclamation 9886, May 16, 2019 (84 FR 23421, May 21, 2019), restored the original additional duty rate of 25 percent on steel articles originating in Turkey, effective May 21, 2019.
- Presidential Proclamation 9894, May 19, 2019 (84 FR 23987, May 23, 2019), restored the duty exemptions on steel articles originating in Canada and Mexico, effective May 20, 2019.
- Presidential Proclamation 10328, December 27, 2021 (87 FR 11, January 3, 2022), provided duty exemptions within annual TRQs on steel articles originating in EU member countries, effective January 1, 2022. Each EU member country is subject to separate TRQs and the requirement that the steel be "melted and poured" within the EU for the steel articles to qualify for duty exemptions under the TRQs through December 31, 2023.
- Presidential Proclamation 10356, March 31, 2022 (87 FR 19351, April 1, 2022), provided duty exemptions within annual TRQs on steel articles originating in Japan, effective April 1, 2022. The

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subject to section 232 tariffs also continue to be subject to all applicable anti-dumping, countervailing, or other duties and charges, as well as the additional ad valorem rate of duty imposed by the respective HTS headings and subheadings.[22]

Under section 232 of the Trade Expansion Act of 1962, as amended, the President authorized the Secretary of Commerce, in consultation with other appropriate federal agency heads, to provide relief from the additional duties for any steel articles determined "…not to be produced in the United States in a sufficient and reasonably available amount or of a satisfactory quality and is also authorized to provide such relief based upon specific national security considerations. Such relief shall be provided for any article only after a request for exclusion is made by a directly affected party located in the United States."[23] Commerce

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steel must be "melted and poured" within Japan for the steel articles to qualify for duty exemptions under the TRQs.

- Presidential Proclamation 10403, May 27, 2022 (87 FR 33407, June 2, 2022), suspended the duties for one year on steel articles originating in Ukraine, effective June 1, 2022.
- Presidential Proclamation 10406, May 31, 2022 (87 FR 33591, June 3, 2022), provided duty exemptions within annual TRQs on steel articles originating in the United Kingdom, effective June 1, 2022. The steel must be "melted and poured" within the United Kingdom for the steel articles to qualify for duty exemptions under the TRQs. Steel articles originating in Belgium, Germany, Italy, the Netherlands, Portugal, Spain, and Sweden containing steel "melted and poured" in the United Kingdom also can qualify for duty exemptions under the United Kingdom's TRQs. *See* CBP, "2022 4th Quarter Tariff Rate Quota (TRQ) for Steel Mill Articles of Japan or the United Kingdom," Quota Bulletin No. QB 22-624, December 16, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-624-2022.
- Presidential Proclamation 10588, May 31, 2023 (88 FR 36437, June 5, 2023), extended the suspension of duties for another year on steel articles originating in Ukraine, effective June 1, 2023. The steel articles must be accompanied by a certificate of origin as a product of Ukraine to qualify for duty exemptions. Steel articles of an EU member country produced from steel "melted and poured within Ukraine also qualifies for duty exemptions through June 1, 2024.
- Presidential Proclamation 10691, December 28, 2023 (89 FR 227, January 3, 2024), extended the duty exemptions within annual TRQs on steel articles originating in EU member countries for two years, effective January 1, 2024. The steel must be "melted and poured" within the EU for the steel articles to qualify for duty exemptions under the TRQs, through December 31, 2025.

See also HTS heading 9903.80.01; HTS subheadings 9903.80.14, 9903.80.15, 9903.80.60 – 9903.80.62, 9903.80.74, 9903.80.75, 9903.81.34, 9903.81.35; HTS headings 9903.81.80 – 9903.81.83; and U.S. notes 16(a)(i), 16(b), 16(e), 16(f), and 16(g) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2024) Basic Edition, Publication 5483, January 2024, pp. 72-47, 99-III-5 – 99-III-8, 99-III-272 – 99-III-273, 99-III-279 – 99-III-280, 99-III-287, 99-III-292 – 99-III-293.

[22] See U.S. note 16(a). USITC, HTSUS (2024) Basic Edition, pp. 99-III-5, 99-III-272.

[23] 83 FR 45025, September 4, 2018.

reviews all exclusion requests and any objections, rebuttals, and sur-rebuttals to the requests and determines whether the items warrant an exclusion based on the above criteria.[24]

Excluded steel articles including any tin mill products, do not count toward filling the annual TRQs for the EU member countries, effective January 1, 2022.[25] Conversely, these "quota exclusion entries" do count toward filling the annual quotas for Argentina, Brazil, and South Korea, effective August 30, 2018;[26] and the annual TRQs for Japan, effective April 1, 2022;[27] and the annual TRQs for the United Kingdom, effective June 1, 2022.[28] Imports of excluded products ("quota exclusion entries") are counted against the quarterly quota in place at the time of entry and count toward the annual quota. However, as they are exempt from both the quarterly and annual quotas, they continue to be accepted until closure of the annual quota period. CBP tracks and reports exclusion quantities quarterly or "exclusion quota overflow" quantities annually.[29]

Table I-8 presents the section 232 steel absolute quota and TRQ limits, usages, and fill rates for imports originating in the investigated sources during full-year 2022. Likewise, table I-9 presents these limits, usages, and fill rates for first-half 2023.

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[24] U.S. Bureau of Industry and Security ("BIS"), "Section 232 National Security Investigation of Steel Imports, Information on the Exclusion Process," December 20, 2022, https://www.bis.doc.gov/index.php/232-steel.

See also HTS heading 9903.80.01; HTS subheadings 9903.80.60 – 9903.80.62; HTS heading 9903.81.80; and U.S. notes 16(c) and 16(g) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2024) Basic Edition, Publication 5483, January 2024, pp. 99-III-7, 99-III-279, 99-III-292.

[25] 87 FR 11, January 3, 2022; CBP, "2022 Fourth Quarter Tariff Rate Quota (TRQ) for Steel Mill Articles of European Union (EU) Countries," Quota Bulletin No. QB 22-614, December 16, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-614-2022.

[26] 83 FR 45025, September 4, 2018.

[27] 87 FR 19351, April 1, 2022.

[28] 87 FR 33591, June 3, 2022.

[29] Exclusion quota overflow quantities are designated with the "ALXC" suffix in the CBC quota fill reports for Argentina, Brazil, and South Korea; and with the "STXC" suffix for the reports for Japan and the United Kingdom. CBP, "2022 4th Quarter Tariff Rate Quota (TRQ) for Steel Mill Articles of Japan or the United Kingdom," Quota Bulletin No. QB 22-624, October 3, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-604-2022; CBP, "2022 4th Quarter Tariff Rate Quota (TRQ) for Steel Mill Articles of Japan or the United Kingdom," Quota Bulletin No. QB 22-624, December 16, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-624-2022.

Table I-8
Tin mill products: Subject sources, section 232 steel quota limits, usages, and fill rates, 2022

Limits and usages in short tons, fill rates in percent

Source	Quota type	Item	Tin-free steel	Tinplate	Total
Germany	Tariff-rate	Limit	17,599	133,584	151,183
Germany	Tariff-rate	Usage	16,092	73,721	89,813
Germany	Tariff-rate	Fill rate	91.4	55.2	59.4
South Korea	Absolute	Limit	20,254	60,351	80,605
South Korea	Absolute	Usage	18,577	60,015	78,592
South Korea	Absolute	Fill rate	91.7	99.4	97.5

Source: CBP, "2022 Fourth Quarter Tariff Rate Quota (TRQ) for Steel Mill Articles of European Union (EU) Countries," Quota Bulletin No. QB 22-614, December 16, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-614-2022; CBP, "European Union Steel TRQ 2022 Annual Totals," September 25, 2023, https://www.cbp.gov/sites/default/files/assets/documents/2023-Sep/European_Union_Steel_TRQ_2022_Annual_Totals.pdf; CBP, "2022 Fourth Quarter Absolute Quota for Steel Articles of Argentina, Brazil and South Korea," Quota Bulletin No. QB 22-604, October 3, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-22-604-2022; CBP, "Steel Quarter Usage 2022," January 30, 2023, https://www.cbp.gov/document/publications/steel-quarter-usage-2022.

Notes: CBP Quota ID categories with HTS subheadings for tin mill products:

Germany TRQs— 9903.80.74: Tin-free steel (HTS 7210.50.00) and 9903.80.75: Tinplate (HTS 7210.11.00, 7210.12.00, 7212.10.00).

South Korea absolute quotas— 9903.80.14: Tin-free steel (HTS 7210.50.00) and 9903.80.15: Tinplate (HTS 7210.11.00, 7210.12.00, 7212.10.00). Data are for all imports from all of South Korea with no data breakout for subject versus nonsubject imports.

Other HTS subheadings for tin mill products are included in Quota ID categories containing numerous other HTS subheadings for nonsubject products.

Table I-9
Tin mill products: Subject sources, section 232 steel quota limits, usages, and fill rates, first-half 2023

Limits and usages in short tons, fill rates in percent

Source	Quota type	Item	Tin-free steel	Tinplate	Total
Germany	Tariff-rate	Limit	8,800	66,792	75,592
Germany	Tariff-rate	Usage	6,460	44,067	50,527
Germany	Tariff-rate	Fill rate	73.4	66.0	66.8
South Korea	Absolute	Limit	12,153	36,210	48,363
South Korea	Absolute	Usage	10,490	26,246	36,737
South Korea	Absolute	Fill rate	86.3	72.5	76.0

Source: CBP, "European Union Section 232 Steel Tariff Rate Quota 2023 Q1 and Q2," January 10, 2023, https://www.cbp.gov/sites/default/files/assets/documents/2023-Jan/EU%20Steel%20TRQ%20Limit%20Table%202023_Q1_Q2.pdf; CBP, "European Union Section 232 Steel Tariff Rate Quota Quarter 1 Usage / Quarter 3 Limits 2023," June 14, 2023, https://www.cbp.gov/sites/default/files/assets/documents/2023-Jun/EU_Steel_TRQ_Limit_Table_Q1_Usage_Q3_Limits_2023.pdf; CBP, "European Union Section 232 Steel Tariff Rate Quota Quarter 2 Usage / Quarter 4 Limits 2023," September 21, 2023, https://www.cbp.gov/sites/default/files/assets/documents/2023-Sep/EU_Steel_TRQ_Limit_Table_Q2_Usage_Q4_Limits_2023.pdf; CBP, "2023 First Quarter Absolute Quota for Steel Mill Articles of Argentina, Brazil and South Korea," Quota Bulletin No. QB 23-601, December 12, 2022, https://www.cbp.gov/trade/quota/bulletins/qb-23-601-2023; CBP, "2023 Second Quarter Absolute Quota for Steel Mill Articles of Argentina, Brazil and South Korea," Quota Bulletin No. QB 23-602, March 9, 2023, https://www.cbp.gov/trade/quota/bulletins/qb-23-602; CBP, "Annual Usage by Quarter - Absolute Steel and Aluminum Report, Steel Usage 2023," July 20, 2023, https://www.cbp.gov/sites/default/files/assets/documents/2023-Jul/STEEL%20USAGE%202023%20Q2_0.pdf.

Note: CBP Quota ID Nos. (HTS subheadings):

Germany TRQs-- 9903.80.74: Tin-free steel (HTS 7210.50.00) and 9903.80.75: Tinplate (HTS 7210.11.00, 7210.12.00, 7212.10.00).

South Korea absolute quotas-- 9903.80.14: Tin-free steel (HTS 7210.50.00) and 9903.80.15: Tinplate (HTS 7210.11.00, 7210.12.00, 7212.10.00). Data are for all imports from all of South Korea with no data breakout for subject versus nonsubject imports.

Other HTS subheadings for tin mill products are included in Quota ID categories containing numerous other HTS subheadings for nonsubject products.

The product

Description and applications[30]

Tinplate

Tinplate is a tin-coated flat-rolled steel product manufactured from black plate, an uncoated flat-rolled steel that is the substrate material for tin mill products.[31] To produce tinplate, black plate is coated on both sides with commercially pure tin via electrolytic deposition. Tin coatings vary by thickness, depending on intended end use.

A common commercial weight for tin is 20 pounds/base box.[32] Tinplate is also available with different coating weights on the two sides of the sheet. Single-reduced (or conventional) electrolytic tinplate is commonly produced by cold rolling in thicknesses of 0.49 mm and lighter while double-reduced electrolytic tinplate is normally produced by cold rolling and annealing, followed by further cold reduction in thicknesses of 0.29 mm and lighter.[33] Tinplate is

[30] Unless otherwise noted, this information is based on Tin Mill Products from Canada, China, Germany, Netherlands, South Korea, Taiwan, Turkey, and United Kingdom, Inv. Nos. 701-TA-685 and 731-TA-1599-1606 (Preliminary), Pub. 5413, March 2023 ("preliminary publication"), pp. I-17 – I-20.

[31] The steel feedstock for tin mill products is traditionally provided by integrated steel mills because of the steel purity and quality requirements. Conference transcript, p. 85 (Goncalves).

[32] A base box is a unit of sale that refers to an area equivalent to 31,360 square inches (217.78 square feet or 20.23 square meters) consisting of 112 tinplate sheets, each measuring 14 inches (356 mm) by 20 inches (508 mm). The corresponding surface area (on both sides) of a base box is 62,720 square inches (435.56 square feet or 40.46 square meters). The weight of the tinplate coating is expressed in terms of pounds per base box ("lbs/bb"). Satyendra Kumar Sarna, "Tinplate," ISPAT Guru, July 14, 2013, https://www.ispatguru.com/tinplate/; ITRI Ltd., "Thickness" and "The Tin Coating," Guide to Tinplate, ©2000, pp. 27, 30, https://www.tinplategroup.com/wp-content/uploads/2019/08/Guide-toTinplate.pdf, retrieved June 13, 2023.

For more details about how to calculate the equivalent number of base boxes, see: ASTM International, "Annex AI. Abbreviated Ratio Tables for Tin Mill Products," in "A623-11: Standard Specification for Tin Mill Products, General Requirements," Annual Book of ASTM Standards 2017, Section 1 Iron and Steel Products, Volume 01.06 Coated Products, 2017, pp. 122–134.

[33] Satyendra Kumar Sarna, "Tinplate," ISPAT Guru, July 14, 2013, https://www.ispatguru.com/tinplate/; ITRI Ltd., "Thickness," Guide to Tinplate, ©2000, p. 27, https://www.tinplategroup.com/wp-content/uploads/2019/08/Guide-toTinplate.pdf, retrieved June 13, 2023.

commonly manufactured to several ASTM standard specifications, including A599,[34] A623,[35] A624,[36] and A626.[37]

Single-reduced tinplate is produced with different surface finishes. The five following basic surface finishes are available, however, for general can-making operations, a bright or stone finish is most common:[38]

- ***Bright finish*** – Consists of a surface provided by a flow-brightened tin coating on a smooth finish steel base. Bright finishes are normally for general use.
- ***Light stone finish*** – Consists of a surface provided by a flow-brightened tin coating on a steel base finish characterized by a light directional pattern.
- ***Stone finish*** – Consists of a surface provided by a flow-brightened tin coating on a steel base finish characterized by a directional pattern. This type of finish makes the scratches of printing and can making less conspicuous.
- ***Matte finish*** – Consists of a surface provided by an un-melted coating normally on a shot blast finish steel base. This is dull type of finish and mainly used for making bottle crowns.
- ***Silver finish*** – Consists of a matt finish product which has been flow melted. This type of finish is also called "satin finish." This is rough dull finish mainly for artistic cans.

Double-reduced tinplate is customarily supplied with a stone finish; however, it is also available with an un-melted tin coating.[39]

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[34] ASTM International, "A599/A599M-07 (Reapproved 2012): Standard Specification for Tin Mill Products, Electrolytic Tin-Coated, Cold-Rolled Sheet," Annual Book of ASTM Standards 2017, Section 1 Iron and Steel Products, Volume 01.06 Coated Products, 2017, pp. 108–110.

[35] ASTM International, "A623-11: Standard Specification for Tin Mill Products, General Requirements," Annual Book of ASTM Standards 2017, Section 1 Iron and Steel Products, Volume 01.06 Coated Products, 2017, pp. 117–121; "A623M-11: Standard Specification for Tin Mill Products, General Requirements (Metric)," pp. 155–160.

[36] ASTM International, "A624/A624M-13: Standard Specification for Tin Mill Products, Electrolytic Tin Plate, Single Reduced," Annual Book of ASTM Standards 2017, Section 1 Iron and Steel Products, Volume 01.06 Coated Products, 2017, pp. 181–185.

[37] ASTM International, "A626/A626M-13: Standard Specification for Tin Mill Products, Electrolytic Tin Plate, Double Reduced," Annual Book of ASTM Standards 2017, Section 1 Iron and Steel Products, Volume 01.06 Coated Products, 2017, pp. 188–192.

[38] Satyendra Kumar Sarna, "Tinplate," ISPAT Guru, July 14, 2013, https://www.ispatguru.com/tinplate/; JFE Steel Corp., *Tin* Mill *Products*, ©2003–23, p. 16,, https://www.jfe-steel.co.jp/en/products/sheets/catalog/b1e-006.pdf, retrieved June 16, 2023; ITRI Ltd., *Guide to Tinplate*, ©2000, p.29, https://www.tinplategroup.com/wp-content/uploads/2019/08/Guide-toTinplate.pdf, retrieved June 13, 2023.

[39] Satyendra Kumar Sarna, "Tinplate," ISPAT Guru, July 14, 2013, https://www.ispatguru.com/tinplate/.

Chromium-coated steel sheet

Chromium-coated steel sheet, also known in the industry as "tin-free steel" or "TFS," generally consists of black plate that is further processed by the electrolytic deposition of chromium metal and chromium oxide on both sides. Like tinplate, single-reduced chromium-coated steel sheet is commonly available in thicknesses of 0.38 mm and lighter, while double-reduced chromium-coated steel sheet is normally available in thicknesses of 0.28 mm and lighter. Minimum and maximum coating weights for chromium-coated steel sheet range from 3 to 13 milligrams per square foot of metallic chromium and 0.7 to 2.5 milligrams per square foot of chromium oxide. Chromium-coated steel sheet is manufactured to ASTM Standard Specification A657.[40]

Primary applications

Tinplate is used primarily to manufacture welded cans for food, beverages, aerosol, paint, filtration, and more general applications. End users do not consider tin mill products to be commodity products but rather as a broad range of specialized products suitable for particular applications, for which they are not otherwise interchangeable.[41] Cans for food and beverages may be constructed in either two or three pieces. Three-piece cans consist of a cylindrical body rolled from a piece of flat steel with a longitudinal seam (usually formed by welding) together with the two can ends, which are seamed onto each end of the body. Two-piece cans have only one seam around the top end and are formed from a disc, cut from a sheet, which is formed into a cylinder with one completed (enclosed) end. To this enclosed end is seamed a loose end to close the can. A two-piece can is formed (shaped) by pushing a flat disc through progressively smaller rings to form the base and body of the can from a single piece of steel. This "drawing and ironing" process involves forming sheet metal without changing its thickness ("drawing") and thinning the walls of the can ("ironing").[42] According to the Can Manufacturers Institute ("CMI"), a trade association composed of many of the leading U.S. metal can manufacturers, over the past 10 years, demand has been shifting away from three-piece cans toward two-piece cans, a trend that accelerated during the COVID-19

[40] ASTM International, "A657/A657M-13: Standard Specification for Tin Mill Products, Black Plate, Electrolytic Chromium-Coated, Single and Double Reduced," Annual Book of ASTM Standards 2017, Section 1 Iron and Steel Products, Volume 01.06 Coated Products, 2017, pp. 225–232.

[41] Hearing transcript, p. 211 (Quinn); CMI's prehearing brief, pp. 33–34.

[42] Metal Packaging Manufacturers Association ("MPMA"), "How Food and Drink Cans are Made," https://www.mpma.org.uk/information/how-cans-are-made/#:~:text=Drawn, retrieved February 13, 2023.

pandemic.[43] At the Commission's staff conference, can producer Trivium Packaging's witness stated that two-piece cans are lighter and faster to produce than three-piece cans, and provide superior quality standards and a simpler supply chain.[44] At the Commission's hearing, canned-goods producer McCall Farms Inc. stated that because of better consistency and fewer seams, two-piece cans are less prone to getting caught on the production line and hold up better to the cooking process than three-piece cans.[45] Moreover, two-piece cans stack more readily, as the shape of the smaller diameter seamless bottom fits onto the top end of another such can, and are also more stable, thereby reducing both potential damage to cans falling off a shelf and food waste.[46] Bush Brothers, a user of tin mill products, noted that sturdier two-piece cans, having fewer seams than three-piece cans, pose less risk of contents discoloration or spoilage from air getting into the can from a seam failure or seam degradation.[47] The shift in demand is reflected in data collected by CMI showing a trend away from three-piece and toward two-piece food cans from 2005 to 2022; two-piece cans accounted for 75 percent of food cans produced in the United States in 2022.[48]

Two-piece cans are produced from drawn and walled ironed or drawn and ironed ("D&I") tinplate, sometimes sold in wider coils than tinplate used in other applications.[49] [50] At

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[43] CMI's postconference brief, p. 20.

[44] Conference transcript, p. 142 (Dietrich). More specifically, two-piece cans are approximately 35-percent lighter than three-piece cans. Bush Brothers' prehearing brief, p. 7.

[45] Hearing transcript, p. 202 (Swink).

[46] Conversely, the top and bottom ends of three-piece cans do not fit together, being of the same diameter. Bush Brothers' prehearing brief, p. 8; hearing transcript, p. 202 (Swink).

[47] Bush Brothers' prehearing brief, pp. 7–8; hearing transcript, pp. 200–201 (Madrecki), p. 204 (Williams).

[48] CMI's prehearing brief, p. 8. Likewise, according to Bush Brothers, a domestic can manufacturer, two-piece cans now account for a growing (now at 76-percent) share of all food cans produced in the United States. Bush Brothers' posthearing brief, p. 7.

[49] According to witnesses for DS Containers, Duferco Steel LLC, and thyssenkrupp, D&I steel is harder to make than standard tinplate used in three-piece cans, because the steel used to produce D&I tinplate must satisfy the industry's "clean steel" criteria, which means that it is a higher quality product than other tinplate steel. This tinplate has certain mechanical properties and tensile strength which allow it to be elongated and drawn into a two-piece can. Conference transcript, pp. 203–205 (Brolly, Klacik, Biele).

According to witnesses for Sonoco Metal Packaging LLC and Consumer Brands Association, manufacturing D&I steel requires advanced system controls and equipment to identify and remove the microscopic impurities that could result in pin holes, cracks, rust, corrosion, or other defects that can pose food safety hazards. Hearing transcript, p. 193 (Haynes), pp. 200–201 (Madrecki).

***. Petitioners' postconference brief, exhibit 15, p. 3; petitioners' prehearing brief, p. 23, exhibit 9, paras. 8–9.

[50] Wide D&I tinplate is not referred to as "DWI tinplate" in this section to avoid any potential confusion with "drawn and walled ironed tinplate." U.S. Steel's posthearing brief, p. 1, footnote 2.

the Commission's staff conference and hearing, several U.S. can manufacturers stated that they rely on wide D&I tinplate (typically in widths greater than 44.5 inches) to produce two-piece cans with maximum efficiency.[51] Historically, tinplate has been produced in widths below one meter (39.4 inches).[52] The petitioners noted that D&I products account for a relatively small percentage of the overall U.S. tinplate market.[53] Some wide D&I products for two-piece cans are available from domestic producer U.S. Steel and from some foreign producers.[54] Conversely, several purchasers and importers claim that D&I products are not available in the preferred widths, volumes, specifications, and qualities from domestic tinplate producers.[55]

Chromium-coated steel sheet is used primarily for certain two-piece drawn cans and ends (tops) for food and beverage cans, as well as caps and closures for glass containers. Tinplate is used for can bodies because of its corrosion-resistance qualities. Chromium-coated

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[51] CMI's postconference brief, p. 20; conference transcript, p. 142 (Dietrich), p. 159 (Jacobson), pp. 173–174 (Biele); CMI's prehearing brief, pp. 29–31; hearing transcript, pp. 186–187, 228, 244, 259, 261 (Hughes), pp. 189–190, 228 (Dietrich), p. 197 (Heuther), p. 215 (Biele), p. 238 (Lutz), p. 258 (Huffman).

At the Commission's hearing, thyssenkrupp's witness stated that U.S. can manufacturers have invested in wider can-making lines, to maximize production and cost efficiency for two-piece cans, and require wider tinplate, 46 or 47 inches wide. Hearing transcript, p. 215 (Biele).

A witness for can manufacturer Trivium Packaging noted that a wider line allows for cutting out more blanks and producing more cans per unit time with a small efficiency or productivity throughput gain than with narrower widths. Hearing transcript, pp. 117, 233–234 (Dietrich).

According to CMI, using narrower tinplate on equipment designed to run wider tinplate results in losses of metal-use efficiency and edge utilization as well as greater equipment wear. More specifically, narrower tinplate is as much as 40-percent less efficient than wider tinplate and can result in production of a billion less cans annually using the same equipment and process speeds. Hearing transcript, p. 187 (Hughes); CMI's posthearing brief, CMI's Posthearing Q&A, p. 7.

[52] Conference transcript, p. 56 (Goncalves).

[53] Petitioners' prehearing brief, p. 8. In the preliminary phase of these investigations,***. Petitioners' postconference brief, p. 38, exhibit 15, p. 4.

[54] At the staff conference, some respondents from subject countries stated that they produce this product for the domestic industry. For example, Canadian producer ArcelorMittal Dofasco's counsel stated that a large portion of its supply is D&I tin mill products, which are wider and thicker than typical tin mill steel products. Counsel also claimed that much of the recent investments by the U.S. can makers have been to expand manufacturing of D&I two-piece cans. Conference transcript, p. 159 (Jacobson); U.S. Steel, "Products, Tin," ©2023, https://www.ussteel.com/customers/products/tin, retrieved February 13, 2023; U.S. Steel's postconference brief, p. 1.

[55] ArcelorMittal Dofasco's prehearing brief, pp. 18, 23–25; Bush Brothers' prehearing brief, pp. 9–11; respondent CMI's prehearing brief, pp. 24–42; thyssenkrupp's prehearing brief, pp. 9–19; Bush Brothers' posthearing brief, pp. 5, 7; CMI's posthearing brief, pp. 3–4; hearing transcript, pp. 183–184 (Arena), pp. 186–188, 228, 244, 246–247, 261 (Hughes), pp. 190–191, 228, 247 (Dietrich), pp. 193–195 (Haynes), 196–197, 243, 261 (Huether), p. 201 (Madrecki), pp. 207–209, (Gill), p. 218 (Klacik), pp. 219–222, 238 (Lutz), pp. 227–228, 250, 261–262, 280–281 (Smith), pp. 262–263 (Klacik).

steel sheet is used for ends where there is less need for corrosion-resistance, because the tops have less contact with the contents of the can.

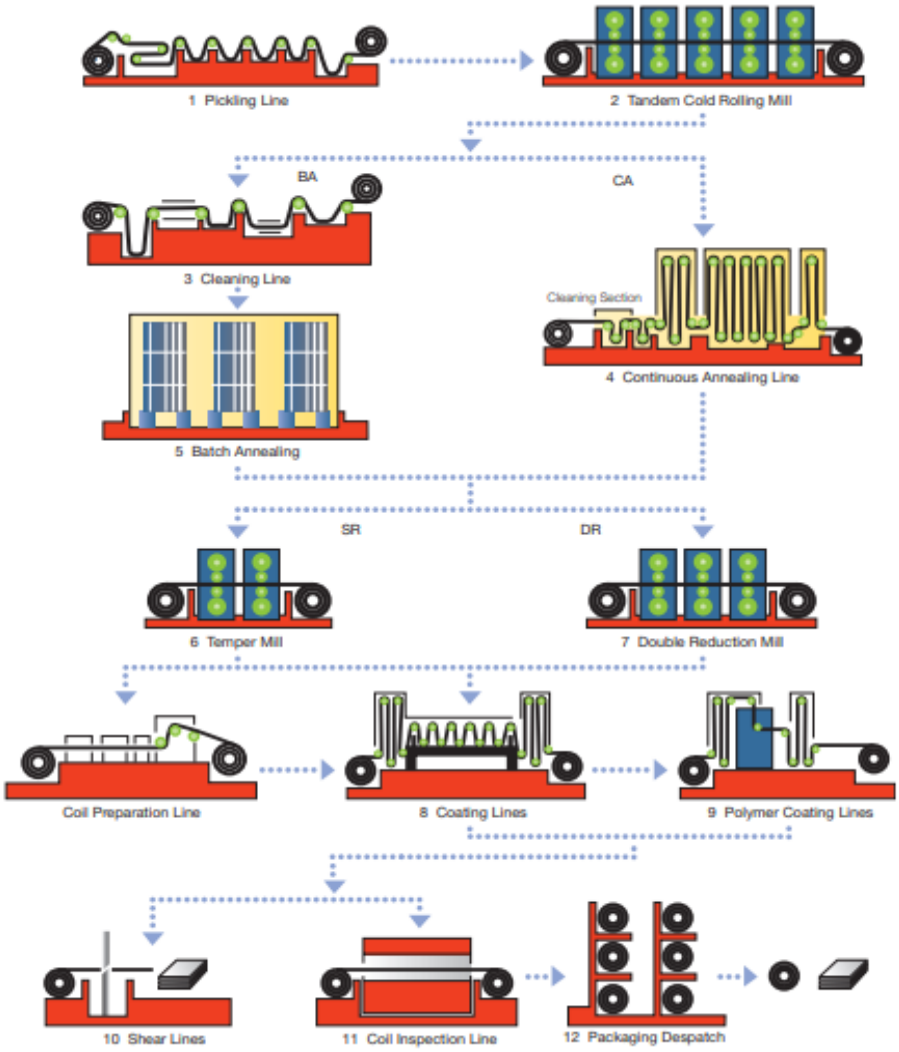
Manufacturing processes[56]

Both tinplate and chromium-coated steel sheet are manufactured in five major production steps. Producers need not engage in all five steps, as steel inputs can be obtained from outside a tin mill production facility. For example, in the Tin- and Chromium-Coated Steel Sheet from Japan review in 2018, the Commission found that Ohio Coatings neither produces nor rolls steel– instead, it obtains black plate and begins its production process with the coating step.[57] The production process steps are displayed in figure (I-1) and described below.

[56] Unless otherwise noted, this information is based on preliminary publication, pp. I-20 – I-22.

[57] Tin- and Chromium-Coated Steel Sheet from Japan, Inv. 731-TA-860 (Third Review), Pub. 4795, June 2018, pp. 12, III-13.

Figure I-1
Tin mill products: Manufacturing process flow diagram



Source: Steel Mills of the World, "The Manufacturing Route for Tinplate Products," https://www.steelmillsoftheworld.com/products/cs/tinplatecoils/Tinplate_manufacturing_route.pdf, retrieved June 13, 2023.

Note: BA=batch annealing, CA=continuous annealing, SR=single reduction, and DR=double reduction.

1. Hot rolling and cold reduction

Both tinplate and chromium-coated steel sheet are produced from molten steel that is either cast into slabs or poured as ingots that are rolled into slabs in a separate mill. While hot, the slabs are reduced in thickness and greatly elongated by further rolling through a series of roughing and finishing stands in a hot strip mill. The hot strip passes between rolls in successive

roll stands being reduced to a predetermined thickness, typically between 1.6 and 2.5 mm. Upon leaving the last finishing stand, the strip is coiled.

After cooling, the hot-rolled strip is uncoiled and pickled[58] by passing it through a series of tanks or sprays of diluted acid to remove the oxide scale formed during the hot rolling process. The pickled strip is then typically dried, oiled, and recoiled.[59] The hot-rolled and pickled strip is cold reduced by passing it through a series of rolls, in much the same manner as in the hot-rolling operation, except that a lubricant is applied between the stands as an aid in reduction and to prevent undue heating of the rolls and strip. Because the cold-reduction process hardens the strip, the strip must be annealed.

2. Annealing

Annealing is a heat treatment process that changes the physical (and sometimes the chemical) properties of a material to increase ductility and reduce the hardness to make the material more workable.[60] There are two basic types of annealing operations for cold-rolled strip: batch annealing and continuous annealing.

In batch annealing ("BA" in figure I-1), the coiled strips are placed in a sealed container and slowly heated to, and cooled from, a subcritical temperature to soften the steel and to relieve stresses produced during rolling. To reduce oxidation, an inert or slightly reducing gas is introduced into the container during the operation. Batch annealing produces a steel product with a relatively bright surface finish and relatively greater flexibility than continuous annealing.

Continuous annealing ("CA" in figure I-1) is accomplished by passing the cold-reduced strip through a series of vertical passes within a furnace consisting of heating, soaking, and cooling zones. The strip is heated rapidly to the desired temperature and cooled before leaving the furnace. This process results in a product with less flexibility than batch-annealed steel.

After the strip is annealed, it undergoes further processing. Single-reduced strip ("SR" in figure I-1) is temper rolled, while double-reduced strip ("DR" in figure I-1) is subjected to a second cold reduction process. Each of these processes is described below.

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[58] Pickling is an acid bath process to remove the unusable iron oxide scale that forms on hot worked steels as well as other impurities. Metal Supermarkets, "What is Steel Pickling?" November 23, 2021, https://metalsupermarkets.com/what-is-steel-pickling/.

[59] The oil serves as protection against rusting prior to and as a lubricant during cold reduction.

[60] TWI Global Inc., "What is Annealing? A Complete Process Guide," ©2024, https://www.twi-global.com/technical-knowledge/faqs/what-is-annealing, retrieved February 13, 2023.

3. Temper rolling

After annealing, single-reduced strip is rolled in one or more passes through a temper mill. The object of temper rolling is to improve mechanical and surface properties by imparting the desired degree of stiffness and hardness, minimizing fluting and stretcher straining, and producing the desired surface type or texture.

4. Additional cold reduction

Double-reduced strip is typically not temper rolled; instead, it is subjected to a second cold-reduction process after annealing to impart mechanical and surface properties to the steel. This reduction is accomplished by passing the strip through either a single roller, or a series of rollers, using a suitable lubricant. This second cold reduction supplies the final thickness and finish and the desired stiffness, strength, and flatness. It also produces a stronger, lighter weight product.

After final reduction, the coils are ready to be trimmed and sheared, which occurs in a series of operations. This product, known as "black plate," is highly susceptible to rusting in storage and transportation. Therefore, it is typically oiled– or chemically treated and then oiled– after cold reduction. The oil is later removed prior to coating.

5. Coating

In the electroplating process, the temper-rolled or double-reduced coiled strip travels through a lower and upper plating unit where individual plating cells are arranged in tandem. The plating cells contain the plating solution– either a stannous tin-containing sulphonic acid for tinplate, or a chromate solution for chromium-coated steel sheet. A conductor roll at the end of each cell rides along the top surface of the strip and serves as the cathode, while the tin- or chromium-coating material is deposited in the bottom of each cell and serves as the anode. The coating material dissolves into the plating solution and is electrochemically deposited on the steel substrate.[61] The electroplating process is followed by rinsing, drying, quenching, and applying a lubricating film.

Tinplate and chromium-coated steel sheet are produced in varying coating weights and can be differentially coated, where the heavier coated surface is employed as the more protected inside of containers. Most producers that manufacture both tinplate and chromium-coated steel sheet do so in the same mill, but on different coating lines. While the coating

[61] ***. USITC staff notes, field visit to Cleveland-Cliffs, Weirton Tin Mill facility, October 14, 2023.

process is similar for both products, it is financially impractical for a producer to shift product to another production line because of the expense that would be involved in retrofitting the production line.

Domestic like product issues

No issues with respect to the domestic like product have been raised in these investigations. Petitioners argue that the Commission should define a single domestic like product coextensive with Commerce's scope.[62] In the preliminary phase of these investigations, no respondent contested the petitioners' proposed definition of the domestic like product.[63] In its preliminary determinations, the Commission defined the domestic like product as a single domestic like product consisting of tin mill products, coextensive with the scope of these investigations.[64] In the final phase investigations, no parties requested data or other information necessary for the analysis of the domestic like product. No party disputed the proposed domestic like product definition in their prehearing or posthearing briefs or during the Commission's hearing.

[62] Preliminary publication, p. 12.
[63] *ibid*.
[64] Preliminary publication, p. 14

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

U.S. market characteristics

Tin mill products are a component in the manufacturing of containers, especially cans. The largest use for tin mill products is for food cans, both household and for restaurants, but also for cans used for aerosol sprays and paint. Tin mill products face competition from substitute materials as well as pressure from can manufacturers to reduce the weight of tin mill products used per container.[1]

The U.S. tin mill product market was supplied by U.S. producers, imports from subject and nonsubject sources during January 2020-June 2023. In 2022, U.S.-produced tin mill products accounted for *** percent of the U.S. market, subject imports accounted for *** percent, and nonsubject imports accounted for *** percent based on quantity.[2] [3] Apparent U.S. consumption of tin mill products increased by *** percent in 2021 but decreased by *** percent in 2022, for an overall decrease of *** percent by quantity. Apparent U.S. consumption was *** percent lower in January-June 2023 ("interim 2023") than in January-June 2022 ("interim 2022"). In terms of value, however, apparent U.S. consumption increased by *** percent between 2020 and 2022.

Distinctive conditions of competition

All three U.S. producers, 14 of 24 importers, and 13 of 23 purchasers indicated that the U.S. tin mill products market was subject to distinctive conditions of competition other than business cycles. Specifically, U.S. producer *** cited the relatively small number of customers for the product, *** stated that customers have discussed alternative packaging types like plastic containers and foil packs, and *** reported that increased subject imports have "eroded our sales volumes and transaction prices." Four importers and five purchasers also noted that the existence of alternative packaging material is an important consideration in the market, and that demand for these alternatives has been increasing. Two importers and two purchasers noted that the increased imports of finished cans and/or can components (with one purchaser noting that the increase in the amount of filled can imports is "dramatic") is distinctive. Three importers and a purchaser indicated that there are domestic supply

[1] Conference transcript, p. 151 (Haynes); Tin- and Chromium-Coated Steel Sheet from Japan, Inv. No. 731-TA-860 (Second Review), USITC Pub. 4325, May 2012, p. II-1.

[2] Subject South Korean imports accounted for *** percent of U.S. apparent consumption.

[3] Responding U.S. producers were ***.

issues, at least for certain types. One importer and a purchaser noted that the role of section 232 duties, and the exclusion of some imports of tin mill products therefrom, were distinctive to this market. One importer and one purchaser indicated that the interaction between alternative uses for flat-rolled substrates (e.g., cold-rolled or galvanized steels) impacts the market for tin mill products: they have significant price fluctuations, can be used as substitutes in some applications, and the supply of the flat-rolled substrates could be diverted to manufacture these alternative products based on their relative prices.[4] One importer reported that calendar year-based contracts differ from harvest seasons. One purchaser noted that tin mill products can only be manufactured using blast furnace technology, not in an electric arc furnace, due to strict food grade cleanliness requirements.[5] Finally, one importer noted that the market is driven by ***.

One of three U.S. producers and 7 of 24 responding importers reported changes to the product mix or marketing of tin mill products since January 1, 2020. U.S. producer *** reported increased customer demand for wider D&I and laminated tin mill products.[6] Importers reported a wide variety of changes, including COVID-19 pandemic-related changes, such as a change in the product mix of cans toward more individual consumer sizes as consumers increased at-home meals and purchases of non-perishable foods, and record production and demand for aerosol cleaning products. Other changes reported by importers included U.S. producers eliminating certain specifications from the products they are willing to produce; more suppliers in the food, industrial, and pharmaceutical industries changing their containers or packages; and demand and supply growth for drawn and ironed ("D&I", "DNI", or "DWI") product based on increased demand for two-piece cans that use wide D&I tin mill products and

[4] *** noted that the price of tin mill products is typically higher than that of hot-rolled or cold-rolled steel, but because of the "escalation of hot-rolled and cold-rolled spot prices beginning in Q4 2020 and throughout 2021, the price of rolled material exceeded the fixed contract price of tinplate," which it believed caused domestic manufacturers of both to choose to deliver less tin mill products, which were priced according to contracts signed during the prior year, in order to take advantage of increased short-term relative prices in these alternative markets.

[5] Tin mill products can be made using an electric arc furnace with direct reduced iron technology. Hearing transcript, p. 276 (Wegiel).

[6] Witnesses for thyssenkrupp and Trivium also noted that wide tin mill products can produce cans more efficiently and create less scrap. See, e.g., conference transcript, pp. 142 (Dietrich) and 173 (Biele). Importer thyssenkrupp asserts that Cleveland-Cliffs would have to invest approximately $1 billion to install the requisite pickling, rolling, and annealing equipment to make wider tin mill products at its Weirton facility – much higher than the $50 million it has already invested to bring the facility back up to "the standard" it should have. Respondent thyssenkrupp's postconference brief, p. 12 and conference transcript, p. 101 (Goncalves).

decreased demand for other tin mill products used in the manufacture of three-piece cans in the food service/restaurant industry during the COVID-19 pandemic.

U.S. purchasers

The Commission received 26 usable purchaser questionnaire responses from firms that had purchased tin mill products during January 2020-June 2023.[7] [8] Fifteen purchasers are can producers, seven are other end users (***), five are distributors, and two are steel processors. Large purchasers of tin mill products include ***. A plurality of responding purchasers (10) noted making purchases monthly, with 7 making purchases more frequently and 8 making purchases less frequently. Twenty of the 26 purchasers have not changed their purchasing frequency since January 1, 2020.

Purchases by type of product

Purchasers reported buying a variety of types of tin mill products during January 2020-June 2023: electrolytic tin plate ("ETP") - both drawn and ironed and not drawn and ironed - and tin-free steel ("TFS") - both laminated and not laminated. Purchasers' total purchases and imports during the period totaled 7.9 million short tons, just slightly lower than total apparent U.S. consumption (8.5 million short tons).[9] As shown in table II-1, the largest proportion of

[7] The following firms provided purchaser questionnaire responses: ***.

[8] Of the 26 responding purchasers, 21 purchased domestic tin mill products, 11 purchased or imported tin mill products from Canada, 12 from China, 9 from Germany, 13 from South Korea (subject or nonsubject), and 18 from nonsubject or unknown sources.

[9] Since some volumes may have been purchased more than once (e.g., to distributors and then to end users), a ratio of purchases and imports to total U.S. consumption may not reflect exact market shares.

purchases and imports during the period (*** percent) was of non-D&I electrolytic tin plate, followed by D&I electrolytic tin plate (*** percent).

Table II-1
Tin mill products: U.S. purchasers' purchases and imports (in total, regardless of source), by product type and period

Quantity in short tons; shares in percent

Product type	Measure	2020	2021	2022	Jan-June 2023
Laminated tin-free steel	Quantity	***	***	***	***
All other tin-free steel	Quantity	***	***	***	***
All tin-free steel	Quantity	***	***	***	***
D&I electrolytic tin plate	Quantity	***	***	***	***
All other electrolytic tin plate	Quantity	***	***	***	***
All electrolytic tin plate	Quantity	***	***	***	***
All product types	Quantity	2,363,979	2,368,906	2,222,913	968,871
Laminated tin-free steel	Share	***	***	***	***
All other tin-free steel	Share	***	***	***	***
All tin-free steel	Share	***	***	***	***
D&I electrolytic tin plate	Share	***	***	***	***
All other electrolytic tin plate	Share	***	***	***	***
All electrolytic tin plate	Share	***	***	***	***
All product types	Share	100.0	100.0	100.0	100.0

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

Note: For more detailed information regarding purchases by product type, see Appendix E.

In addition, purchasers were asked about their quantities of purchases that qualify for production of easy-open and easy-peel cans from domestic, certain specified nonsubject sources,[10] and other sources. Two of 20 purchasers noted buying tin mill products for easy-open applications and 1 of 20 for easy-peel applications from domestic sources. Each amounted to *** of the responding firms' purchases. Few purchasers also bought tin mill products for easy-open applications from imported sources (3 of 19 and 3 of 18 purchasers, respectively) and fewer purchased for easy-peel applications (2 of 19 and 0 of 18 purchasers, respectively). Purchasers reported slightly higher percentages of their purchases were for these types than they reported for domestic purchases: between 3 and 17 percent of purchases from

[10] Commission questionnaires were sent before the Department of Commerce determined that various sources were de minimis. Some questions were asked about subject sources in general, without reference to individual countries. As a result, some data are presented with respect to all eight sources that were specified, not just the three countries and the firms in South Korea that were found during the Commerce's investigations to have greater than de minimis margins.

import sources for easy-open applications and between 1 and 4 percent of purchases for easy-peel applications.[11]

Purchases by width of product

Purchasers reported a variety of widths of tin mill products during January 2020-June 2023 as well. Collected data covered four width ranges: less than 39 inches, from 39 inches to less than 41 inches, from 41 inches to less than 45 inches, and 45 inches or wider. As shown in table II-2, the largest proportion of purchases and imports during the period (*** percent) was of tin mill products less than 39 inches wide, although this percentage decreased during the period – from *** percent in 2020 to *** percent in 2022 and *** percent in the first half of 2023. Wide tin mill products gained market share during the period, whether defining wide products as at least 45 inches (increasing from *** to *** percent during 2020-22, and was *** percent in the first half of 2023) or as at least 41 inches wide (increasing from *** percent to *** percent in 2020-22, and was *** percent in the first half of 2023).

Table II-2
Tin mill products: U.S. purchasers' purchases and imports (in total, regardless of source), by width and period

Quantity in short tons; shares in percent

Width	Measure	2020	2021	2022	Jan-June 2023
< 39 inches	Quantity	***	***	***	***
≥ 39 inches and < 41 inches	Quantity	***	***	***	***
≥ 41 inches and < 45 inches	Quantity	***	***	***	***
≥ 45 inches	Quantity	***	***	***	***
All widths	Quantity	2,363,979	2,368,906	2,222,913	968,871
< 39 inches	Share	***	***	***	***
≥ 39 inches and < 41 inches	Share	***	***	***	***
≥ 41 inches and < 45 inches	Share	***	***	***	***
≥ 45 inches	Share	***	***	***	***
All widths	Share	100.0	100.0	100.0	100.0

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

Note: For more detailed information regarding purchases by product type, see Appendix E.

[11] Less than 1 percent of purchases for either application were made from all other sources.

Respondents have argued that the wide-width D&I products, laminated tin-free steel, and easy-open and easy-peel ends are products that have grown in importance in the tin mill products market and are not available from domestic producers.[12] A witness for petitioners claims, "We would be able to offer drawn & ironed, D&I, steel to the U.S. market, and we have. For months now, we have been in negotiations with customers regarding D&I steel and we have a number of trial orders underway." He also indicated, "We would be willing to invest in wider material if and only if market conditions justified doing so."[13] Detailed data regarding purchases of the four product types by width were collected in the Commission's questionnaires and are presented in Appendix E.

Impact of section 301 tariffs

As discussed in Part I, tin mill products from China are currently subject to section 301 tariffs of 7.5 percent *ad valorem*. Responses from U.S. producers, importers, and purchasers were mixed with respect to the impact of the section 301 duties on imports of tin mill products from China during the period. *** and the majority of responding importers (18 of 24) and responding purchasers (21 of 26) did not know if there had been an impact on the tin mill products market from the section 301 tariffs. *** stated that while there was an impact on the market when the duties were at 15 percent (i.e., until January 15, 2020), the current 7.5 percent rate does not have an effect on import levels. *** stated that the imports from China would have been greater in the absence of the section 301 duties. Three importers noted that there had been no impact, and three importers (***) reported that the 7.5 percent tariff had an effect – two noted that there was a direct impact on cost and that this cost was passed through to customers, while the third noted it lost competitiveness due to cost increases. Similarly, two purchasers indicated that the duties had an impact on the market and three indicated they had not.

[12] Respondent Can Manufacturers Institute prehearing brief, pp. 12, 27-28, and 75.
[13] Hearing transcript, pp. 57-58 (Goncalves).

Impact of section 232 tariffs

U.S. producers, importers, and purchasers were asked to report the impact of section 232 trade measures on steel and/or aluminum, and any effects of exclusions from those section 232 measures, on raw material costs and sales prices for tin mill products.[14] All 3 producers and 20 importers, along with 17 of 18 responding purchasers, noted that section 232 trade measures, or exclusion therefrom, had an impact on the tin mill products market. Producer, importer, and purchaser descriptions of the impact of these measures are listed in table II-3. Many firms listed price increases, decreased ability to source tin mill products ***.

Exclusions were noted to have an ameliorating effect on these issues by some, but were noted to have little effect by others. Nine of 11 importers which sought exclusions and 11 of 12 purchasers that sought exclusions to section 232 duties were granted some or all of their requests. In total, 558 of 969 importer requests and 694 of 896 purchaser requests were granted.[15] Some importers noted that they either did not import from the eight investigated sources[16] or did not request exclusions because their customers request them. Individual firm data for importers and purchasers regarding section 232 exclusion requests are presented in tables II-4 and II-5, respectively.

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[14] These trade measures include 25 percent duties on subject imports from China, Taiwan, and Turkey, a tariff-rate quota on imports from the United Kingdom, and annual quotas on imports from Germany and the Netherlands (as part of the quota for the European Union), as well as for South Korea. Respondent ArcelorMittal Dofasco's postconference brief, p. 7 and Chinese respondents' postconference brief, p. 21. For more information, see Part I.

[15] ***.

[16] As noted in Part I, the petitions also included allegations for tin mill products imported from the Netherlands, Taiwan, Turkey, and the United Kingdom. As a result, some questions were asked of market participants that referred to imports from all eight included sources and responses were not provided that allow for separation of responses between subject and nonsubject imports. As a result, in this chapter, the term "investigated" refers to the group of sources that were originally named in the original petitions filed in these investigations.

Table II-3
Tin mill products: U.S. producers', importers', and purchasers' perceptions regarding the impact of section 232 measures on market prices and dynamics

Firm name	Firm type	Impact of section 232 measures
***	U.S. producer	***
***	U.S. producer	***
***	U.S. producer	***
***	Importer	***
***	Importer	***
***	Importer	***
***	Importer	***
***	Importer	***

Table continued.

Table II-3 Continued
Tin mill products: U.S. producers', importers', and purchasers' perceptions regarding the impact of section 232 measures on market prices and dynamics

Firm name	Firm type	Impact of section 232 measures
***	Importer	***
***	Importer	***
***	Importer, purchaser	***
***	Importer	***
***	Importer	***
***	Importer	***
***	Importer	***
***	Importer	***
***	Importer	***
***	Importer	***
***	Importer	***
***	Importer	***
***	Importer	***

Table continued.

Table II-3 Continued
Tin mill products: U.S. producers', importers', and purchasers' perceptions regarding the impact of section 232 measures on market prices and dynamics

Firm name	Firm type	Impact of section 232 measures
***	Importer, purchaser	***
***	Importer	***
***	Purchaser	***
***	Purchaser	***
***	Purchaser	***
***	Purchaser	***

Table continued.

Table II-3 Continued
Tin mill products: U.S. producers', importers', and purchasers' perceptions regarding the impact of section 232 measures on market prices and dynamics

Firm name	Firm type	Impact of section 232 measures
***	Purchaser	***

Table continued.

Table II-3 Continued
Tin mill products: U.S. producers', importers', and purchasers' perceptions regarding the impact of section 232 measures on market prices and dynamics

Firm name	Firm type	Impact of section 232 measures
***	Purchaser	***
***	Purchaser	***
***	Purchaser	***
***	Purchaser	***
***	Purchaser	***
***	Purchaser	***
***	Purchaser	***
***	Purchaser	***
***	Purchaser	***
***	Purchaser	***

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

Note: Three importers that reported that prices of tin mill products increased noted some reason other than section 232 duties in explaining the price increase.

Table II-4
Tin mill products: Data regarding importers' section 232 exclusion requests

Count in number of exclusions; n.a. not applicable

Firm name	Number requested	Number granted	Explanation
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***

Table continued.

Table II-4 Continued
Tin mill products: Data regarding importers' section 232 exclusion requests

Count in number of exclusions; n.a. not applicable

Firm name	Number requested	Number granted	Explanation
***	***	***	***
***	***	***	***
Total	971	560	n.a.

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

Table II-5
Tin mill products: Data regarding purchasers' section 232 exclusion requests

Count in number of exclusions; n.a. not applicable

Firm name	Number requested	Number granted	Explanation
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***

Table continued.

Table II-5 Continued
Tin mill products: Data regarding purchasers' section 232 exclusion requests

Count in number of exclusions; n.a. not applicable

Firm name	Number requested	Number granted	Explanation
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
Total	896	694	n.a.

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

Channels of distribution

U.S. producers sold mainly to canning end users during each full year and in interim 2023 but a slight majority to distributors in interim 2022, as shown in table II-6. Nearly all subject imports, as well as most imports from nonsubject sources, were shipped to canning end users throughout the period of investigation. *** accounted for the greatest share of shipments sold to distributors among all sources.

Table II-6
Tin mill products: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent

Source	Channel	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
United States	Distributors	***	***	***	***	***
United States	Can manufacturers	***	***	***	***	***
United States	Other end users	***	***	***	***	***
Canada	Distributors	***	***	***	***	***
Canada	Can manufacturers	***	***	***	***	***
Canada	Other end users	***	***	***	***	***
China	Distributors	***	***	***	***	***
China	Can manufacturers	***	***	***	***	***
China	Other end users	***	***	***	***	***
Germany	Distributors	***	***	***	***	***
Germany	Can manufacturers	***	***	***	***	***
Germany	Other end users	***	***	***	***	***
South Korea, subject	Distributors	***	***	***	***	***
South Korea, subject	Can manufacturers	***	***	***	***	***
South Korea, subject	Other end users	***	***	***	***	***
Subject sources	Distributors	***	***	***	***	***
Subject sources	Can manufacturers	***	***	***	***	***
Subject sources	Other end users	***	***	***	***	***
Subject sources, less South Korea, subject	Distributors	***	***	***	***	***
Subject sources, less South Korea, subject	Can manufacturers	***	***	***	***	***
Subject sources, less South Korea, subject	Other end users	***	***	***	***	***

Table continued.

Table II-6 Continued
Tin mill products: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent

Source	Channel	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Netherlands	Distributors	***	***	***	***	***
Netherlands	Can manufacturers	***	***	***	***	***
Netherlands	Other end users	***	***	***	***	***
South Korea, nonsubject	Distributors	***	***	***	***	***
South Korea, nonsubject	Can manufacturers	***	***	***	***	***
South Korea, nonsubject	Other end users	***	***	***	***	***
Taiwan	Distributors	***	***	***	***	***
Taiwan	Can manufacturers	***	***	***	***	***
Taiwan	Other end users	***	***	***	***	***
Turkey	Distributors	***	***	***	***	***
Turkey	Can manufacturers	***	***	***	***	***
Turkey	Other end users	***	***	***	***	***
United Kingdom	Distributors	***	***	***	***	***
United Kingdom	Can manufacturers	***	***	***	***	***
United Kingdom	Other end users	***	***	***	***	***
All other sources	Distributors	***	***	***	***	***
All other sources	Can manufacturers	***	***	***	***	***
All other sources	Other end users	***	***	***	***	***
Nonsubject sources	Distributors	***	***	***	***	***
Nonsubject sources	Can manufacturers	***	***	***	***	***
Nonsubject sources	Other end users	***	***	***	***	***
Nonsubject sources, plus South Korea, subject	Distributors	***	***	***	***	***
Nonsubject sources, plus South Korea, subject	Can manufacturers	***	***	***	***	***
Nonsubject sources, plus South Korea, subject	Other end users	***	***	***	***	***
All imports	Distributors	***	***	***	***	***
All imports	Can manufacturers	***	***	***	***	***
All imports	Other end users	***	***	***	***	***

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

Geographic distribution

U.S. producers and importers from subject countries reported selling tin mill products to all regions in the United States (table II-7). Importers reported selling subject imports from only one country, ***, in all contiguous U.S. regions. Importers of subject product from China and Germany sold to a majority of regions as well. For U.S. producers, *** percent of sales were within 100 miles of their production facility, *** percent were between 101 and 1,000 miles, and *** percent were over 1,000 miles. Importers of tin mill products from investigated sources sold *** percent within 100 miles of their U.S. point of shipment, *** percent between 101 and 1,000 miles, and *** percent over 1,000 miles.

Table II-7
Tin mill products: Count of U.S. producers' and U.S. importers' geographic markets

Count in number of firms reporting

Region	U.S.	Canada	China	Germany	South Korea, subject	Subject sources	Subject sources less South Korea, subject
Northeast	3	3	2	***	***	6	***
Midwest	3	4	4	***	***	9	***
Southeast	3	3	3	***	***	8	***
Central Southwest	2	1	0	***	***	2	***
Mountains	1	1	2	***	***	4	***
Pacific Coast	3	1	3	***	***	5	***
Other	0	0	0	***	***	1	***
All regions (except Other)	1	1	0	***	***	1	***
Reporting firms	3	4	4	***	***	0	***

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

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

Supply and demand considerations

U.S. supply

Table II-8 provides summaries of the supply factors regarding tin mill products from U.S. producers, responding producers from subject sources, and responding producers from subject sources.

Table II-8
Tin mill products: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in short tons; ratio and share in percent; count in number of firms reporting

Factor	Measure	United States	Canada	China	Germany
Capacity 2020	Quantity	***	***	***	***
Capacity 2022	Quantity	***	***	***	***
Capacity utilization 2020	Ratio	***	***	***	***
Capacity utilization 2022	Ratio	***	***	***	***
Inventories to total shipments 2020	Ratio	***	***	***	***
Inventories to total shipments 2022	Ratio	***	***	***	***
Home market shipments 2022	Share	***	***	***	***
Non-US export market shipments 2022	Share	***	***	***	***
Ability to shift production	Count	***	***	***	***

Table continued.

Table II-8 Continued
Tin mill products: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in short tons; ratio and share in percent; count in number of firms reporting

Factor	Measure	South Korea, subject	Subject sources	Subject less South Korea, subject
Capacity 2020	Quantity	***	***	***
Capacity 2022	Quantity	***	***	***
Capacity utilization 2020	Ratio	***	***	***
Capacity utilization 2022	Ratio	***	***	***
Inventories to total shipments 2020	Ratio	***	***	***
Inventories to total shipments 2022	Ratio	***	***	***
Home market shipments 2022	Share	***	***	***
Non-US export market shipments 2022	Share	***	***	***
Ability to shift production	Count	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Counts equal the number of firms reporting "yes."

Domestic production

Based on available capacity information, U.S. producers of tin mill products have the ability to respond to changes in demand with moderate to large changes in the quantity of shipments of U.S.-produced tin mill products to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity and elevated levels of inventories. Factors mitigating responsiveness of supply include a limited ability to shift shipments from export markets and no ability to shift production to or from alternate products.

Domestic capacity and production decreased at different rates during 2020-22, showing fluctuating capacity utilization.[17] U.S. producers' U.S. shipments decreased by *** percent from 2020 to 2022, and were *** percent lower in interim 2022 than in interim 2021. The ratio of ending inventories to total shipments increased by *** percent from 2020 to 2022 and were higher in interim 2023 than interim 2022 by *** percent. Exports comprised a very small share of U.S. producer shipments (less than *** percent) throughout the period.

All three U.S. producers reported being unable to produce other products on the same equipment used to product tin mill products. ***.

Subject imports

Based on available information, producers of tin mill products from subject sources have the ability to respond to changes in demand with small to moderate changes in the quantity of shipments of tin mill products to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the very low availability of unused capacity, relatively low inventories, and the inability to shift production to or from alternate products for most foreign producers.[18] Increasing the responsiveness of supply, however, are relatively large non-U.S. export shipments for some subject producers (those in China and Germany).

[17] Capacity decreased by *** percent and production increased by *** percent during 2020-2022.
[18] This foreign producer, ***.

Overall, reported capacity for subject suppliers decreased slightly (*** percent) and capacity utilization decreased by *** percentage points between 2020 and 2022. Subject suppliers in Canada and Germany reported decreased capacity, while subject suppliers in China reported increased capacity. Capacity utilization for subject suppliers in all four countries exceeded 90 percent during the period. The ratio of inventories to total shipments increased for subject suppliers in all four countries. Foreign producers generally reported that they were unable to shift production between tin mill products and other products, with eight of nine responding firms reporting the inability to shift production.

Subject suppliers reported that about *** percent of their shipments of tin mill products were to non-U.S. export markets in 2022 and *** percent were to their respective home markets. More than half of shipments from producers in China were to the home market whereas most shipments from Germany were to non-U.S. export markets; producers in Canada shipping almost all their tin mill products to the U.S. market.

Imports from nonsubject sources

Imports from nonsubject countries comprised more than *** percent of total imports during 2020-2022 (see Part IV). The largest nonsubject sources of tin mill products were the Netherlands, the United Kingdom, and nonsubject sources in South Korea.

New suppliers

Eight of 26 purchasers indicated that new suppliers entered the U.S. market since January 1, 2020. Purchasers specifically cited JSW (India), Perstima (Malaysia), Ton Yi (Taiwan), and Tosyali Toyo (Turkey), and generally cited mills from China, India, Serbia, Turkey, and Vietnam.

Supply constraints

U.S. producers, importers, and purchasers were asked if they have experienced supply constraints since January 2020 and were asked specifically about supply constraints before and after the filing of the petitions on January 18, 2023. Two of three U.S. producers, 12 of 22 responding importers, and 18 of 26 purchasers reported that they had experienced such supply constraints before the filing of the petition on January 18, 2023.

Among U.S. producers, ***

***.

Importers reported supply constraints resulting from section 232 tariffs and quotas, market scarcity because of high demand for tin mill products during pandemic stay-at-home orders, U.S. mills placing customers on allocation starting in 2020 for calendar-year 2021 supply, supply chain disruptions (including port congestion and lack of warehouse availability and trucking capacity), mills running at full capacity, a Taiwan mill not accepting orders in September 2022 because of low domestic pricing, and occasional production reliability issues (***). *** reported it has experienced worsening supply chain disruptions since 2020, with some materials held for four months at the ports in 2022. Importer *** noted that domestic mills placed customers on allocations, limited volume and specifications produced, reduced contract volume from prior years' contractual volume, "***." Importer *** noted being unable to source enough TMBP from offshore sources ***.

Purchasers cited delays, refusals, and allocation limits from domestic mills, primarily in 2020 and 2021. Eleven purchasers specifically cited Cleveland-Cliffs, seven purchasers cited U.S. Steel, three cited OCC, and one purchaser each specifically cited Cleveland-Cliffs (Weirton) and Duferco.[19]

[19] Purchaser *** reported, "***

***."

Purchaser *** reported, "***."

Purchaser *** reported, "***."

Purchaser *** reported, "***."

With respect to the post-petition period, however, all 3 producers, 12 of 21 responding importers, and 23 of 26 purchasers indicated that there have been no supply constraints. Producer *** reported that customers are not taking agreed-upon volumes due to inventory buildup, and *** noted that purchasers may be turning to imports.

Importer *** noted that Cleveland-Cliffs and U.S. Steel "maintain priority channels" for certain purchasers and end markets and refuse to sell to *** or sell at a competitive price. Importer *** stated that Chinese foreign producer Ton Yi stopped offering its products to the U.S. market after the petition was filed. Importers *** stopped supplying tin mill products as well. Importer *** declined new or additional orders due to delivery schedule uncertainties. Importer *** stated that it began to focus its business on supplying specifications that cannot be supplied by domestic tin mill product producers and therefore did not accept any new customers for specifications not exempt from section 232 duties.

***."

Purchasers *** and *** stated that domestic producers have continued to limit their sales of certain types of products and insisted on take-or-pay requirements in contracts. Purchaser *** noted that Cleveland-Cliffs' ready dates are poor and erratic. Purchaser *** expects demand "to exceed domestic capacity in the USA in the 2nd half of 2024 resulting increased pricing forcing buyers to source offshore in order to remain competitive against alternative packaging and of filled cans/products from China where Tariffs do not exist."

On-time, in-full delivery rates

Purchasers were asked how often their suppliers of tin mill products were able to deliver their purchases both on-time and in full during each of the years in the period. They provided information for each of the domestic producers (table II-9) and for their four largest investigated import sources (table II-10).[20] In general, delivery rates improved between 2021 and 2023.

[20] Purchasers were also requested to explain how they defined on-time, in-full delivery. Purchasers described a variety of ways, with some purchasers noting it differs by contract.

Table II-9
Tin mill products: Purchasers responses regarding "on-time in-full" delivery rates for domestic suppliers, by producer

Delivery rates in percent

Domestic supplier	Purchaser	2020	2021	2022	2023 YTD
Cleveland-Cliffs	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
U.S. Steel	***	***	***	***	***
U.S. Steel	***	***	***	***	***
U.S. Steel	***	***	***	***	***
U.S. Steel	***	***	***	***	***
U.S. Steel	***	***	***	***	***
U.S. Steel	***	***	***	***	***
U.S. Steel	***	***	***	***	***
U.S. Steel	***	***	***	***	***
U.S. Steel	***	***	***	***	***
UPI	***	***	***	***	***
UPI	***	***	***	***	***
UPI	***	***	***	***	***

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

Table II-10
Tin mill products: Purchasers responses regarding "on-time in-full" delivery rates for suppliers of imported product from investigated sources, by purchaser

Delivery rates in percent

Domestic supplier	Purchaser	2020	2021	2022	2023 YTD
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

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

Note: Answers containing "0" for all periods remain in the presentation for purchasers that reported an import source. Precision of responses is presented verbatim from precision reported by each purchaser.

Hot-rolled steel spot market effects

Purchasers were also asked about whether the market for tin mill products was influenced by variations in the hot-rolled steel spot market. Fourteen of 24 responding purchasers indicated that it was not affected by variations in the hot-rolled steel spot market, and one indicated "yes" and "no." Descriptions of the effects for those firms that answered affirmatively are presented in table II-11.

Table II-11
Tin mill products: Purchasers' responses regarding how the hot-rolled steel market affects the tin mill products market

Purchaser	Explanation
***	***
***	***
***	***
***	***

Table continued.

Table II-11 Continued
Tin mill products: Purchasers' responses regarding how the hot-rolled steel market affects the tin mill products market

Purchaser	Explanation
***	***
***	***
***	***
***	***
***	***
***	***

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

Impact of reductions in domestic production

Purchasers were asked whether any reduction in production at U.S. Steel's tin mill production facilities in East Chicago and Gary, Indiana had any effect on their purchases and on the market for tin mill products in general. Purchasers' responses are presented in table II-12. Most firms reported little to no effect on their operations or on the U.S. market in general. Those purchasers that did report an effect noted decreased availability, higher prices, longer lead times, and the need to find tin mill products offshore in order to meet purchase needs. Purchasers which purchased from these U.S. Steel facilities were also asked whether they were offered products from alternative sources. Five purchasers noted that they were offered products from alternative sources, whereas ten indicated that they were not (table II-13).

Purchasers were also asked to report the effect on their firm of any anticipated changes to the tin mill products industry on their purchases and on the market for tin mill products in general. Purchasers' responses are presented in table II-14.

Table II-12
Tin mill products: Purchasers' responses regarding the impact of the reduction of production in East Chicago and Gary, Indiana, by firm

Purchaser	Effect on firm or U.S. market	Narrative on the impact of domestic reductions
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***

Table continued.

Table II-12 Continued
Tin mill products: Purchasers' responses regarding the impact of the reduction of production in East Chicago and Gary, Indiana, by firm

Purchaser	Effect on firm or U.S. market	Narrative on the impact of domestic reductions
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***

Table continued.

Table II-12 Continued
Tin mill products: Purchasers' responses regarding the impact of the reduction of production in East Chicago and Gary, Indiana, by firm

Purchaser	Effect on firm or U.S. market	Narrative on the impact of domestic reductions
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***

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

Table II-13
Tin mill products: Responding purchasers' answers regarding whether they were offered product by U.S. Steel from alternative sources to meet contractual obligations due to production reductions, by firm

Purchaser	U.S. Steel offered products from alternative sources	Narrative on the alternative sources
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
All firms	Yes--5; No--10	

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

Table II-14
Tin mill products: Purchasers' responses regarding the impact of anticipated changes in the tin mill products industry, by firm

Purchaser	Effect on firm or U.S. market	Narrative on the impact of anticipated changes
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***

Table continued.

Table II-14 Continued
Tin mill products: Purchasers' responses regarding the impact of anticipated changes in the tin mill products industry, by firm

Purchaser	Effect on firm or U.S. market	Narrative on the impact of anticipated changes
***	Firm	***
***	Firm	***
***	Firm	***
***	Firm	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***

Table continued.

Table II-14 Continued
Tin mill products: Purchasers' responses regarding the impact of anticipated changes in the tin mill products industry, by firm

Purchaser	Effect on firm or U.S. market	Narrative on the impact of anticipated changes
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***

Table continued.

Table II-14 Continued
Tin mill products: Purchasers' responses regarding the impact of anticipated changes in the tin mill products industry, by firm

Purchaser	Effect on firm or U.S. market	Narrative on the impact of anticipated changes
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***
***	U.S. market	***

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

U.S. demand

Based on available information, the overall demand for tin mill products is likely to experience moderate changes in response to changes in price. The main contributing factors are the availability of substitute products and the moderate-to-high cost share of tin mill products in its end-use products. This responsiveness is somewhat mitigated by the investment required for purchasers to change from use of cans to containers made from other materials.

End uses and cost share

U.S. demand for tin mill products depends on the demand for cans for food and other products. Tin mill products account for a moderate-to-large share of the cost of the end-use products in which it is used. Most reported cost shares for cans and other downstream products were 60 to 80 percent, with reported shares ranging from 1 percent (wire and cable) to 85 percent (home canning lids and paint trays). With respect to food cans, firms noted that the tin mill products comprise 50 to 85 percent of the cost of manufacturing the can. Even further downstream, as noted by respondent CMI, "{t}he cost of metal cans is by far the largest component of production cost for companies that package fruits and vegetables. For example, the steel for canned corn represents about twice the value of the corn and almost half of the total input cost."[21]

Business cycles

All three U.S. producers, 14 of 24 importers, and 19 of 25 responding purchasers indicated that the tin mill products market was subject to business cycles. Many firms reported seasonality in demand, with higher demand in the summer when food and produce is packaged and slightly lower demand in winter, although firms noted that demand timing can vary throughout the year based on the specific product being packaged. Firms reported that some tin mill product specifications are seasonal while others have more consistent use throughout the year and that weather and other conditions affecting harvests can affect demand, as can seasonal demand for items like bakeware or other holiday products. Other downstream uses of a cyclical nature reported by purchasers may also affect demand for tin mill products, such as automotive production, home canning, or manufacturing building products.

Firms also reported increased demand in 2020 during the COVID-19 pandemic because of concerns regarding food availability and security and higher demand for aerosol cleaning products such as Lysol disinfectant sprays. During that time, demand for food cans from

[21] Respondent CMI's postconference brief, p. 42.

restaurants, which use three-piece cans, dropped, while demand for two-piece food cans which are the type of cans that individual consumers buy at the supermarket, increased.[22] In 2020, food can sales increased 12.8 percent and another 1 percent in 2021, but decreased 8.5 percent in 2022. In all, food can sales are 3 percent above 2019 levels.[23] A representative for petitioner Cleveland-Cliffs stated that it is limited in its ability to supply two-piece cans. As restaurants have reopened, demand for three-piece cans has been increasing.[24] Purchaser *** noted that food container demand, which can drive demand for tin mill products, can be counter-cyclical to observed trends in GDP.

Other factors may have contributed to demand pattern changes as well. The large change in contract pricing levels in 2022 may also have contributed to changes in tin mill product demand patterns. As noted in Part V, pricing for the following year is determined in the fall. During the summer 2021 contract negotiations, prices were anticipated to increase considerably for 2022 based on the mid-2021 price of tin mill product raw materials (e.g., hot-rolled steel in coils). Despite this, petitioner Cleveland-Cliffs reported that it had ***.[25] ***.[26] Additionally, *** reported that *** were switching to using plastic paint cans, ***.[27]

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[22] Conference transcript, p. 72 (Goncalves).

[23] Conference transcript, p. 186 (Budway).

[24] Conference transcript, pp. 72-73 (Goncalves and Vaughn).

[25] Petitioner's postconference brief, answers to staff questions, question 2.

[26] ***. A representative for Cleveland-Cliffs noted that during 2021 and 2022, after it had purchased the Weirton facility from ArcelorMittal, it invested over $50 million in capital improvements, which it implemented while producing tin mill products and caused somewhat decreased production during that time, similar to "trying to renovate your whole house while trying to live in it. There's going to be certain things you can't do in that house during that project. Or trying to rebuild the engine in your car while you're trying to drive it. That's going to place some limitations on you." Conference transcript, pp. 19 (Goncalves) and 64 (Jarvis).

[27] ***.

Demand trends

U.S. producers and importers were asked how demand for tin mill products have changed since January 1, 2020, in two separate time periods due to the effects of the COVID-19 pandemic and its influence on end uses for tin mill products. Purchasers were asked about the demand for end use products throughout the entire period. U.S. producers provided varying responses for U.S. demand in 2020-21 but all three reported declines in demand in 2022-23, and one each reported a decrease and fluctuate up for demand outside the United States (table II-15). Most importers reported a steady increase or fluctuation upward in both U.S. and foreign demand.

Table II-15
Tin mill products: Firms' responses regarding overall domestic and foreign demand in 2020-21 and 2022-23, by firm type, and purchasers' responses regarding overall demand for downstream products in all years

Count in number of firms reporting

Market	Firm type	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease
Domestic demand: 2020-21	U.S. producers	0	2	0	1	0
Domestic demand: 2020-21	Importers	8	10	4	0	1
Domestic demand: 2020-21	Purchasers	4	12	3	2	1
Foreign demand: 2020-21	U.S. producers	0	1	0	1	0
Foreign demand: 2020-21	Importers	6	4	6	0	1
Foreign demand: 2020-21	Purchasers	3	5	2	1	1
Domestic demand: 2022-23	U.S. producers	0	0	0	3	0
Domestic demand: 2022-23	Importers	1	3	5	6	9
Domestic demand: 2022-23	Purchasers	0	4	3	8	7
Foreign demand: 2022-23	U.S. producers	0	0	1	1	0
Foreign demand: 2022-23	Importers	1	1	6	3	6
Foreign demand: 2022-23	Purchasers	2	2	2	4	4
Demand for end use products: All years	Purchasers	1	2	3	11	2

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

Substitute products

Two of the three U.S. producers (***) and a minority of importers (8 of 20) and responding purchasers (9 of 25) reported that there were substitutes for tin mill products. U.S. producers listed as substitutes Tetra Paks and plastic, aluminum, and glass containers for food and beverage packaging, as well as aluminum for aerosol cans and plastic for paint cans. Importers and purchasers that reported substitutes generally reported the same substitutes as U.S. producers well as other types of steel, aluminum, laminates, paper, and imported finished steel containers – either empty or filled.

U.S. producers generally reported that changes in the prices of these substitutes have not affected the price for tin mill products. However, *** stated that ***. Unlike U.S. producers, six of nine responding importers that reported substitutes generally reported that changes in the prices of at least one substitute had affected the price for tin mill products or may affect demand in the tin mill industry. Importer *** reported that aluminum has replaced tin in the beverage can industry; has made significant inroads in the aerosol can industry; that laminates can be substituted in aerosol cans and closures and are affecting tin mill product pricing and volumes since they are not subject to section 232 tariffs; and that plastics are a less costly alternative despite a shorter shelf life. Importer *** stated that cost has been a driver for tin mill products and that increasing costs for tin mill products relative to substitutes has reduced the demand for the product over the long term. Purchasers were almost evenly split with respect to the effect of whether the price of substitutes affects the price of tin mill products. Various purchasers noted that plastic is cheaper than tin mill products, but is not strong enough, not friendly to the environment, nor can they meet the full technical specifications for food safety. Aluminum was noted to be significantly more expensive than tin mill products by one purchaser.

Substitutability issues

This section assesses the degree to which U.S.-produced tin mill products and imports of tin mill products from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of tin mill products from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderate degree of substitutability between domestically produced tin mill products and those imported from subject sources.[28] The main factors limiting substitutability were availability/available capacity to produce domestic tin mill products, rejection rates and lack of qualification for certain types of domestic tin mill products, and certain types of tin mill products only being available only from certain sources. For tin mill products of the same type, substitutability is higher, as there is reportedly general interchangeability among tin mill products of similar quality and usage.

Factors affecting purchasing decisions

Purchaser decisions based on source

As shown in table II-16, purchasers' responses were varied with respect to whether they or their customers base their decisions on the producer or country manufacturing tin mill products. A plurality of purchasers never base their decision on the producer or country of manufacture (9 of 25 and 10 of 25, respectively). A majority of purchasers' customers never purchase tin mill products based on the producer (14 of 22) and a plurality of purchasers' customers never base their decisions on the country of manufacture either (9 of 22). Despite this, 7 of 25 purchasers always make decisions based on the producer of tin mill products. Among the reasons noted by purchasers that always base their purchases on the producer, the quality of the product and qualification status were noted by three purchasers, contracts and reliability/on-time performance were noted by two purchasers, and ability to manufacture certain specifications, availability, and flexibility were noted by one purchaser each.

[28] The degree of substitution between domestic and imported tin mill products depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced tin mill products to the tin mill products imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as relative prices (discounts/rebates), quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

Table II-16
Tin mill products: Count of purchasers' responses regarding frequency of purchasing decisions based on producer and country of origin

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	7	3	6	9
Customer	Producer	1	2	5	14
Purchaser	Country	5	2	8	10
Customer	Country	2	1	9	9

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

Importance of purchasing domestic product

Whereas some purchasers noted that they prefer to buy from domestic sources, 24 of 25 responding purchasers reported that most or all of their purchases did not require purchasing U.S.-produced products. Three reported that the domestic product was required by law (for 1 to 5 percent of their purchases), six reported it was required by their customers (for 3 to 40 percent of their purchases), and two reported other preferences for the domestic product (for 30 and 100 percent of their purchases. Reasons cited for preferring the domestic product included a desire to promote "Made in USA" for one firm and contingency of supply, lead times, and product mix for the other.

Most important purchase factors

Purchasers were asked to identify the main purchasing factors their firm considered in their purchasing decisions for tin mill products. The major purchasing factors identified by firms include quality and availability (including available capacity). As shown in table II-17, the most often cited top-three factors that firms consider in their purchasing decisions for tin mill products were quality (23 firms), availability (17 firms) and price (16 firms). Quality was the most frequently cited first-most important factor (cited by 10 firms), followed by availability (8 firms); quality was the most frequently reported second-most important factors (8 firms); and price was the most frequently reported third-most important factors (8 firms).

Table II-17
Tin mill products: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Factor	First	Second	Third	Total
Quality	10	8	5	23
Availability	8	5	4	17
Price	3	5	8	16
On-time delivery/reliability/lead time	1	4	4	9
Product line/capacity to produce quantity or specifications	3	2	0	5
Credit/payment terms	1	0	2	3
Traditional supplier/relationship	0	1	2	3
Other	0	3	3	6

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

Note: Some firms reported more than two characteristics for each ranking. Both were included.
Note: Other includes service/responsiveness, "source if qualified," and technical support as second factors and communication, flexibility, and location as third factors.
Note: Twelve purchasers reported additional factors beyond their top-three factors. Four reported on-time delivery, three reported price, two reported payment terms, and one each reported conditions of sale, country of origin, traditional supplier, service and standing behind product sold. The final purchaser (***) reported a number of factors: "***."

Importance of specified purchase factors

Purchasers were asked to rate the importance of 18 factors in their purchasing decisions (table II-18). Three factors were rated as very important by all responding purchasers – availability, quality meets industry standards, and reliability. Product consistency was rated as very important by all but one purchaser. The other factors rated as very important by more than half of responding purchasers were delivery time, price, delivery terms, technical support/ service, payment terms, and U.S. transportation costs. The availability of drawn and ironed products and products greater than 45 inches wide were rated as not important by a majority of purchasers, but among the remaining purchasers, these factors were rated as very important by six of nine and seven of nine purchasers, respectively.

Table II-18
Tin mill products: Count of purchasers' responses regarding importance of purchase factors, by factor

Factor	Very important	Somewhat important	Not important
Quality meets industry standards	26	0	0
Reliability of supply	26	0	0
Availability	25	0	0
Product consistency	25	1	0
Delivery time	23	2	0
Price	19	6	0
Delivery terms	17	8	1
Technical support/service	15	11	1
Payment terms	15	9	1
U.S. transportation costs	13	11	1
Product range	11	12	2
Quality exceeds industry standards	11	11	3
Availability – product >39 inches	10	6	8
Packaging	9	14	2
Discounts offered	9	13	2
Availability – product >45 inches	7	2	15
Availability – drawn & ironed product	6	3	13
Minimum quantity requirements	5	16	2

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

Lead times

Tin mill products are primarily produced-to-order, with over 99 percent of both U.S. producer and importer shipments in 2022 produced-to-order. U.S. producers reported average lead times for produced-to-order product of slightly more than two months, and importers reported average lead times for produced-to-order product of slightly more than four months, with firms reporting lead times between six weeks and six months.

Supplier certification

Eighteen of 26 responding purchasers require their suppliers to become certified or qualified to sell tin mill products to their firm. Purchasers reported that the time to qualify a new supplier ranged from 1 month to 18 months, averaging slightly more than 7 months. Nine of 25 purchasers reported that at least one domestic or foreign supplier of tin mill products had failed in its attempt to qualify tin mill products or had lost its approved status since 2020. Domestic producers U.S. Steel and Cleveland-Cliffs were noted by four and three purchasers, respectively, as not qualifying. Among subject imports, one Chinese producer, Jintai, was noted to have failed at a purchaser due to poor shape in its first trial in 2021, but in a re-trial in 2022, the product qualified. South Korean firms TCC Steel and Shin Hwa were both noted to have

failed certification at one purchaser each. One nonsubject producer in South Korea was noted to have failed, and one each in Brazil, Taiwan, Turkey, and the United Kingdom.

In the tin mill products market, specific products from specific producers are what purchasers test in order to achieve qualification, not just a producer or manufacturing location in general. Multiple purchasers noted successive trial qualification phases. Purchasers were requested to supply the number of tin mill product specifications that they purchased in 2022 based upon the source which supplied those specifications (table II-19). Some purchasers purchased every specification from which they had a qualified source (e.g., ***), whereas other purchasers had specifications which were qualified from a source but did not purchase all the specifications which were qualified at from that source. For example, *** had *** specifications for which at least one domestic supplier was qualified, but it purchased only *** specifications from domestic suppliers. At 14 purchasers, the total number of qualified specifications matched the total number of specifications purchased, whereas two purchasers did not purchase all the specifications for which a source or multiple sources were qualified. Domestic producers qualified to supply all of the specifications for four purchasers in 2022, and suppliers from investigated sources were qualified to supply all of eight purchasers' specifications in 2022. The remainder of the purchasers required multiple sources (at least one domestic producer/one investigated supplier/one nonsubject supplier from a non-investigated source) to fully meet the number of specifications that they purchased in 2022.

Table II-19
Tin mill products: Number of specifications purchased and qualified, by source, 2022

Purchaser	Number of specifications in 2022 that were:	Total	At least one domestic supplier	At least one investigated supplier	At least one non-investigated nonsubject supplier
***	Qualified	***	***	***	***
***	Purchased	***	***	***	***
***	Qualified	See note	***	***	***
***	Purchased	See note	***	***	***
***	Qualified	***	***	***	***
***	Purchased	***	***	***	***
***	Qualified	***	***	***	***
***	Purchased	***	***	***	***
***	Qualified	***	***	***	***
***	Purchased	***	***	***	***
***	Qualified	***	***	***	***
***	Purchased	***	***	***	***
***	Qualified	***	***	***	***
***	Purchased	***	***	***	***
***	Qualified	***	***	***	***
***	Purchased	***	***	***	***
***	Qualified	***	***	***	***
***	Purchased	See note	***	***	***

Table continued.

Table II-19 Continued
Tin mill products: Number of specifications purchased and qualified, by source, 2022

Purchaser	Number of specifications in 2022 that were:	Total	At least one domestic supplier	At least one investigated supplier	At least one non-investigated nonsubject supplier
***	Qualified	***	***	***	***
***	Purchased	***	***	***	***
***	Qualified	***	***	***	***
***	Purchased	***	***	***	***
***	Qualified	***	***	***	***
***	Purchased	***	***	***	***
***	Qualified	***	***	***	***
***	Purchased	***	***	***	***
***	Qualified	See note	***	***	***
***	Purchased	See note	***	***	***
***	Qualified	***	***	***	***
***	Purchased	***	***	***	***
***	Qualified	See note	***	***	***
***	Purchased	See note	***	***	***
***	Qualified	***	***	***	***
***	Purchased	***	***	***	***
***	Qualified	***	***	***	***
***	Purchased	***	***	***	***
***	Qualified	***	***	***	***
***	Purchased	***	***	***	***
***	Qualified	***	***	***	***
***	Purchased	***	***	***	***
***	Qualified	***	***	***	***
***	Purchased	***	***	***	***

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

Note: Purchasers *** did not supply totals that were at least as large as the largest number of qualified or purchased specifications.

Minimum quality specifications

As can be seen from table II-20, half (10 of 20) of responding purchasers reported that domestically produced product usually met minimum quality specifications, with six each reporting they always usually or sometimes meet minimum quality specifications. Nearly all responding purchasers reported that the tin mill products imported from subject countries always or usually meet minimum quantity requirements, with only one purchaser noting that subject imports from a country rarely or never meet minimum quality specifications (China). A large majority of purchasers noted that tin mill product imports from Germany always meet minimum quality specifications. With respect to nonsubject sources, purchasers also generally noted that they always or usually met minimum quality specifications.

Table II-20
Tin mill products: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source

Source of purchases	Always	Usually	Sometimes	Rarely or never	Don't Know
United States	6	10	6	0	4
Canada	5	8	0	0	10
China	6	5	0	1	12
Germany	9	2	0	0	11
Netherlands	5	2	0	0	15
South Korea	7	6	0	0	11
Taiwan	8	5	1	0	9
Turkey	2	2	2	0	17
United Kingdom	3	3	0	0	16
All other sources	3	4	0	0	7

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

Note: Purchasers were asked how often domestically produced or imported tin mill products meets minimum quality specifications for their own or their customers' uses.

Twenty-five of the 26 purchasers reported factors that determined the quality of tin mill products. The vast majority noted multiple types of physical attributes of the product, including various mechanical and chemical properties, performance in purchasers' manufacturing process, surface characteristics, size and shape, and issues related to product uniformity.

Purchasers were asked to provide the proportion of the tin mill products that were delivered to them by the top five suppliers of tin mill products during January 2020-June 2023 that ended up being rejected (e.g., returned or scrapped) in each calendar year during the period. Purchaser's responses for products from which they are aware of the import source are provided in table II-21. Rejection rates for product from U.S. producers or other domestic sources (e.g., steel service centers) are provided in table II-22.

Table II-21
Tin mill products: Rejection rates of imported tin mill products, by firm and period by source

Share in percent

Source of purchase	Evaluated firm	Purchaser	2020	2021	2022	2023 (YTD)
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
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***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***

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

Note: Shares presented in the number of significant digits submitted by purchasers. Therefore, 0 and 0.0 represent purchaser's data, while --- represents a purchaser submitting no data for that year.

Table II-22
Tin mill products: Rejection rates of domestically sourced tin mill products, by firm and period, by source

Share in percent

Type of purchase	Evaluated firm	Purchaser	2020	2021	2022	2023 (YTD)
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
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***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***

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

Note: Purchasers may be unsure of the origin of the tin mill products and listed the domestic source (steel service center, processor, etc.) from which they purchased. Shares presented in the number of significant digits submitted by purchasers. Therefore, 0 and 0.0 represent purchaser’s data, while --- represents a purchaser submitting no data for that year.

Changes in purchasing patterns

Most purchasers reported that their purchases from various sources had fluctuated over the period, as presented in table II-23, with 51 responses indicating either a fluctuation upward or downward. In terms of direction, 43 responses noted increasing purchase patterns, 38 noted decreasing purchase patterns, and 30 responses noting no change in purchase patterns. A majority of purchasers (14 of 22) noted a steady or fluctuating increase in purchases from the United States. Half of purchasers of tin mill products imported from China and Germany and 4 of 10 purchasers of tin mill products imported from Canada noted increasing purchases from those sources. Among other sources, only for imports from South Korea did a majority of purchasers (6 of 10) note increasing purchases. A majority of responding purchasers (8 of 13) noted decreasing their purchases of imports from Taiwan, and all five responding purchasers indicated that their purchases of imported tin mill products from Turkey fluctuated downward. Most U.S. purchasers described their reasons for changing their purchase quantities from domestic producers. These reasons, along with how their purchases changed, are presented in table II-24.

Table II-23
Tin mill products: Purchasers' reported change in purchase patterns from U.S., subject, and nonsubject sources, January 2020-June 2023

Source	Increase steadily	Fluctuate, ending higher	Constant	Fluctuate, ending lower	Decrease steadily	Did not purchase
United States	7	7	3	5	0	2
Canada	2	2	3	1	2	8
China	2	3	2	3	0	9
Germany	0	4	1	0	3	11
Netherlands	0	0	3	1	4	10
South Korea	1	5	4	0	0	8
Taiwan	1	2	2	3	5	6
Turkey	0	0	0	5	0	13
United Kingdom	0	1	3	2	1	11
All other sources	0	3	6	2	1	6
Sources unknown	1	2	3	0	0	13

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

Table II-24
Tin mill products: Purchasers' responses describing why their purchases of domestic product changed since January 2020, by firm

Purchaser	Change in purchase pattern	Reason(s) for changes in purchases from domestic sources
***	Steadily increase	***
***	Steadily increase	***
***	Fluctuate higher	***
***	Steadily increase	***
***	Constant	***
***	Fluctuate lower	***
***	Fluctuate higher	***
***	Fluctuate higher	***
***	Steadily increase	***
***	Fluctuate higher	***
***	Fluctuate lower	***
***	Fluctuate lower	***
***	Fluctuate higher	***
***	Steadily increase	***
***	Fluctuate lower	***
***	Fluctuate higher	***

Table continued.

Table II-24 Continued
Tin mill products: Purchasers' responses describing why their purchases of domestic product changed since January 2020, by firm

Purchaser	Change in purchase pattern	Reason(s) for changes in purchases from domestic sources
***	Fluctuate higher	***
***	Steadily increase	***
***	Did not purchase	***
***	Fluctuate lower	***
***	Steadily increase	***

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

Purchase factor comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a number of questions comparing tin mill products produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 15 factors (table II-18) for which they were asked to rate the importance.

Most purchasers reported that U.S. and tin mill products imported from subject countries were comparable on most factors. In comparing products from Canada with that from the United States, U.S. product was rated as superior by a majority of purchasers on no factors, but inferior with respect to the availability of wide tin mill products (both >39 inches and >45 inches) and reliability of supply; an equal number of purchasers rated availability of drawn and ironed product from the United States as either comparable or inferior to that imported from Canada. Purchasers also rated the tin mill products imported from China as comparable to those produced in the United States on most factors. Product from the United States was rated as superior with respect to delivery time and equal numbers of purchasers rated the U.S. product and that imported from China as superior or comparable with respect to technical support/service and U.S. transportation costs. U.S. product was rated as inferior to that imported from China by a majority of purchasers with respect to availability of wide tin mill products (both >39 inches and >45 inches), price, and quality exceeds industry standards. An equal number of purchasers rated availability of drawn and ironed product from the United States as either comparable or inferior to product that was imported from China. In comparing product from Germany with that from the United States, U.S. product was rated as superior by a majority of purchasers on no factors, but inferior with respect to seven factors: the availability of drawn and ironed products, the availability of wide tin mill products (both >39 inches and >45 inches), product consistency, product range, quality exceeds industry standards, and reliability of supply. An equal number of purchasers rated delivery time as superior, comparable, and inferior. An equal number of purchasers rated price and technical support/service from the United States as either comparable or inferior to that for product imported from Germany. Comparisons for tin mill products imported from other nonsubject, investigated sources and nonsubject non-investigated sources as a whole with product manufactured in the United States are also presented in table II-25.

Table II-25
Tin mill products: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Canada	2	10	1
Availability – drawn & ironed product	U.S. vs Canada	0	4	4
Availability – product >39 inches	U.S. vs Canada	0	2	6
Availability – product >45 inches	U.S. vs Canada	0	3	5
Delivery terms	U.S. vs Canada	0	12	0
Delivery time	U.S. vs Canada	0	9	3
Discounts offered	U.S. vs Canada	0	10	0
Minimum quantity requirements	U.S. vs Canada	0	8	4
Packaging	U.S. vs Canada	0	11	0
Payment terms	U.S. vs Canada	0	12	0
Price	U.S. vs Canada	1	11	0
Product consistency	U.S. vs Canada	0	7	5
Product range	U.S. vs Canada	1	6	4
Quality meets industry standards	U.S. vs Canada	1	9	2
Quality exceeds industry standards	U.S. vs Canada	0	7	5
Reliability of supply	U.S. vs Canada	0	5	7
Technical support/service	U.S. vs Canada	1	7	4
U.S. transportation costs	U.S. vs Canada	2	8	2

Table continued.

Table II-25 Continued
Tin mill products: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs China	2	8	3
Availability – drawn & ironed product	U.S. vs China	0	4	4
Availability – product >39 inches	U.S. vs China	1	2	5
Availability – product >45 inches	U.S. vs China	0	2	6
Delivery terms	U.S. vs China	4	8	1
Delivery time	U.S. vs China	7	4	1
Discounts offered	U.S. vs China	0	7	4
Minimum quantity requirements	U.S. vs China	4	8	1
Packaging	U.S. vs China	1	9	2
Payment terms	U.S. vs China	1	7	5
Price	U.S. vs China	0	5	8
Product consistency	U.S. vs China	0	7	6
Product range	U.S. vs China	0	8	3
Quality meets industry standards	U.S. vs China	0	10	3
Quality exceeds industry standards	U.S. vs China	0	5	8
Reliability of supply	U.S. vs China	4	7	2
Technical support/service	U.S. vs China	5	5	2
U.S. transportation costs	U.S. vs China	6	6	0

Table continued.

Table II-25 Continued
Tin mill products: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Germany	1	7	5
Availability – drawn & ironed product	U.S. vs Germany	0	2	5
Availability – product >39 inches	U.S. vs Germany	0	3	8
Availability – product >45 inches	U.S. vs Germany	1	1	8
Delivery terms	U.S. vs Germany	1	8	3
Delivery time	U.S. vs Germany	4	4	4
Discounts offered	U.S. vs Germany	0	10	1
Minimum quantity requirements	U.S. vs Germany	3	6	3
Packaging	U.S. vs Germany	0	9	3
Payment terms	U.S. vs Germany	1	6	5
Price	U.S. vs Germany	0	6	6
Product consistency	U.S. vs Germany	0	5	7
Product range	U.S. vs Germany	0	2	10
Quality meets industry standards	U.S. vs Germany	0	7	5
Quality exceeds industry standards	U.S. vs Germany	0	4	8
Reliability of supply	U.S. vs Germany	0	2	10
Technical support/service	U.S. vs Germany	0	6	6
U.S. transportation costs	U.S. vs Germany	5	6	1

Table continued.

Table II-25 Continued
Tin mill products: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Netherlands	1	2	5
Availability – drawn & ironed product	U.S. vs Netherlands	0	2	5
Availability – product >39 inches	U.S. vs Netherlands	0	1	6
Availability – product >45 inches	U.S. vs Netherlands	0	1	6
Delivery terms	U.S. vs Netherlands	1	5	1
Delivery time	U.S. vs Netherlands	2	3	2
Discounts offered	U.S. vs Netherlands	0	6	0
Minimum quantity requirements	U.S. vs Netherlands	2	4	1
Packaging	U.S. vs Netherlands	0	6	1
Payment terms	U.S. vs Netherlands	0	4	3
Price	U.S. vs Netherlands	0	5	1
Product consistency	U.S. vs Netherlands	0	5	2
Product range	U.S. vs Netherlands	0	2	6
Quality meets industry standards	U.S. vs Netherlands	0	5	2
Quality exceeds industry standards	U.S. vs Netherlands	0	3	4
Reliability of supply	U.S. vs Netherlands	1	2	4
Technical support/service	U.S. vs Netherlands	1	3	3
U.S. transportation costs	U.S. vs Netherlands	3	4	0

Table continued.

Table II-25 Continued
Tin mill products: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs South Korea	5	8	2
Availability – drawn & ironed product	U.S. vs South Korea	2	3	3
Availability – product >39 inches	U.S. vs South Korea	2	3	4
Availability – product >45 inches	U.S. vs South Korea	0	4	4
Delivery terms	U.S. vs South Korea	4	10	0
Delivery time	U.S. vs South Korea	6	7	2
Discounts offered	U.S. vs South Korea	1	10	0
Minimum quantity requirements	U.S. vs South Korea	3	9	1
Packaging	U.S. vs South Korea	2	9	2
Payment terms	U.S. vs South Korea	1	8	4
Price	U.S. vs South Korea	1	9	4
Product consistency	U.S. vs South Korea	2	6	6
Product range	U.S. vs South Korea	2	7	5
Quality meets industry standards	U.S. vs South Korea	1	8	4
Quality exceeds industry standards	U.S. vs South Korea	2	2	9
Reliability of supply	U.S. vs South Korea	3	7	4
Technical support/service	U.S. vs South Korea	4	8	1
U.S. transportation costs	U.S. vs South Korea	5	7	1

Table continued.

Table II-25 Continued
Tin mill products: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Taiwan	2	9	1
Availability – drawn & ironed product	U.S. vs Taiwan	0	3	0
Availability – product >39 inches	U.S. vs Taiwan	0	7	2
Availability – product >45 inches	U.S. vs Taiwan	1	5	2
Delivery terms	U.S. vs Taiwan	2	10	0
Delivery time	U.S. vs Taiwan	5	7	0
Discounts offered	U.S. vs Taiwan	0	12	0
Minimum quantity requirements	U.S. vs Taiwan	3	8	1
Packaging	U.S. vs Taiwan	0	10	2
Payment terms	U.S. vs Taiwan	1	7	4
Price	U.S. vs Taiwan	0	6	6
Product consistency	U.S. vs Taiwan	0	7	5
Product range	U.S. vs Taiwan	2	7	3
Quality meets industry standards	U.S. vs Taiwan	0	7	5
Quality exceeds industry standards	U.S. vs Taiwan	0	6	5
Reliability of supply	U.S. vs Taiwan	2	7	3
Technical support/service	U.S. vs Taiwan	4	8	0
U.S. transportation costs	U.S. vs Taiwan	4	7	1

Table continued.

Table II-25 Continued
Tin mill products: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Turkey	2	4	1
Availability – drawn & ironed product	U.S. vs Turkey	0	2	0
Availability – product >39 inches	U.S. vs Turkey	0	2	2
Availability – product >45 inches	U.S. vs Turkey	0	3	1
Delivery terms	U.S. vs Turkey	1	4	1
Delivery time	U.S. vs Turkey	3	2	1
Discounts offered	U.S. vs Turkey	0	6	0
Minimum quantity requirements	U.S. vs Turkey	1	4	1
Packaging	U.S. vs Turkey	0	6	0
Payment terms	U.S. vs Turkey	0	4	2
Price	U.S. vs Turkey	0	4	2
Product consistency	U.S. vs Turkey	0	5	1
Product range	U.S. vs Turkey	0	4	2
Quality meets industry standards	U.S. vs Turkey	1	4	1
Quality exceeds industry standards	U.S. vs Turkey	0	5	0
Reliability of supply	U.S. vs Turkey	1	3	2
Technical support/service	U.S. vs Turkey	1	3	1
U.S. transportation costs	U.S. vs Turkey	3	3	0

Table continued.

Table II-25 Continued
Tin mill products: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs United Kingdom	0	2	4
Availability – drawn & ironed product	U.S. vs United Kingdom	0	1	5
Availability – product >39 inches	U.S. vs United Kingdom	0	1	5
Availability – product >45 inches	U.S. vs United Kingdom	0	1	5
Delivery terms	U.S. vs United Kingdom	0	4	1
Delivery time	U.S. vs United Kingdom	1	2	2
Discounts offered	U.S. vs United Kingdom	0	4	0
Minimum quantity requirements	U.S. vs United Kingdom	1	3	1
Packaging	U.S. vs United Kingdom	0	4	1
Payment terms	U.S. vs United Kingdom	0	2	3
Price	U.S. vs United Kingdom	0	3	1
Product consistency	U.S. vs United Kingdom	0	2	3
Product range	U.S. vs United Kingdom	0	0	6
Quality meets industry standards	U.S. vs United Kingdom	0	3	2
Quality exceeds industry standards	U.S. vs United Kingdom	0	1	4
Reliability of supply	U.S. vs United Kingdom	0	1	4
Technical support/service	U.S. vs United Kingdom	0	2	3
U.S. transportation costs	U.S. vs United Kingdom	1	3	1

Table continued.

Table II-25 Continued
Tin mill products: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs. Other	2	4	3
Availability – drawn & ironed product	U.S. vs. Other	0	1	3
Availability – product >39 inches	U.S. vs. Other	0	2	4
Availability – product >45 inches	U.S. vs. Other	0	2	4
Delivery terms	U.S. vs. Other	2	5	1
Delivery time	U.S. vs. Other	4	3	0
Discounts offered	U.S. vs. Other	0	7	0
Minimum quantity requirements	U.S. vs. Other	4	3	1
Packaging	U.S. vs. Other	0	8	0
Payment terms	U.S. vs. Other	0	6	2
Price	U.S. vs. Other	0	5	2
Product consistency	U.S. vs. Other	0	5	3
Product range	U.S. vs. Other	1	4	4
Quality meets industry standards	U.S. vs. Other	0	5	3
Quality exceeds industry standards	U.S. vs. Other	0	6	2
Reliability of supply	U.S. vs. Other	1	4	3
Technical support/service	U.S. vs. Other	1	6	1
U.S. transportation costs	U.S. vs. Other	3	4	1

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

Note: A rating of superior means that price/U.S. transportation cost is generally lower. For example, if a firm reported "U.S. superior," it meant that the U.S. product was generally priced lower than the imported product.

Fourteen of 17 purchasers indicated that there are certain types of products that are only available from one source and to note from which sources these products were available. Products listed by purchasers include single-reduced 65#, single-reduced BW metal, coil widths greater than 39 inches (not domestic), single reduced tinplate under .0077 thickness (no source noted), single-reduced products (no source noted), single-reduced 55#-65# ETP and TFS, certain laminates and ETP coatings (only available from Germany), light-gauge single-reduced TFS (not produced domestically), laminated TFS (not produced/qualified domestically), tinplate of .0239 inches in thickness (only domestic), high elongation of 8 percent minimum (limited worldwide partners), vacuum degassed products, laminated tinplate and TFS produced in a single production stream to make a higher quality product (only Germany), and drawn and ironed coils greater than 44 inches (only from Canada, China, Germany, the Netherlands, South Korea, and the UK).

Purchasers were asked to list from what sources drawn and ironed products and products in four width categories were available (table II-26). Tin mill products had highest availability in widths of less than 39 inches from all sources. Although nine purchasers indicated that drawn and ironed product was available from at least one domestic source, no purchaser indicated that it was available in widths of at least 45 inches.

Table II-26
Tin mill products: Count of purchasers' responses regarding the availability of drawn and ironed product and product of different widths, by source

Source	D&I available	Less than 39 inches	39 to <41 inches	41 to <45 inches	45 inches or more
United States	9	16	7	2	0
Canada	7	10	6	6	4
China	7	12	7	7	4
Germany	9	11	8	8	8
South Korea	6	12	5	4	3
Subject sources	10	16	8	8	8
Subject sources less South Korea	9	15	8	8	8
Only domestic	2	2	1	0	0
Only subject sources	2	1	2	6	8
Both domestic and subject sources	7	14	6	2	0
Netherlands	7	9	7	7	6
Taiwan	3	11	3	1	0
Turkey	1	6	2	2	1
United Kingdom	4	7	4	4	4

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

Purchasers were also asked to relay information regarding their interactions in 2022 with domestic producers of tin mill products for four width categories of drawn and ironed products (table II-27). Most purchasers interacted with domestic producers with respect to product of less than 39 inches wide. Although a few purchasers did inquire about tin mill products of 41 inches or greater, no purchaser received trial quantities in this width.

Table II-27
Tin mill products: U.S. purchasers' responses to interaction with domestic producers regarding drawn and ironed electrolytic plate, 2022

Factor	Less than 39 inches	39 to <41 inches	41 to <45 inches	45 inches or more
Inquired about potential supply	9	3	3	1
Received trial quantities for qualification purposes	4	1	0	0
Received price quotes in negotiations	6	2	1	0
Purchased commercial quantities after qualification	7	2	0	0

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

Comparison of U.S.-produced and imported tin mill products

In order to determine whether U.S.-produced tin mill products can generally be used in the same applications as imports from Canada, China, Germany, and other sources, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. All U.S. producers reported that tin mill products from all countries are always interchangeable. On the other hand, as shown in table II-28, at least half of responding importers reported that tin mill products from each subject source were sometimes interchangeable with those produced in the United States. Importer interchangeability comparisons among subject sources and between subject and investigated nonsubject sources were varied, though most responses were generally in the sometimes and frequently interchangeable categories. Comparisons between domestic and subject with other nonsubject sources all had a majority rating products as sometimes interchangeable.

Importer *** reported that subject imports were sometimes interchangeable with domestic products because of differences in product capabilities, D&I product, delivery, and quality. Importer *** reported that the domestic product and imported product from *** are never interchangeable since the types of tin mill products imported from *** are not available from U.S. producers and have received exclusions from section 232 measures. Importer *** reported that domestic products and products imported from *** are sometimes interchangeable since “the vast majority of material” it sells in the U.S. market is wide-DWI tinplate or laminated tin-free steel, which is not produced domestically. Importer *** reported that subject imports from South Korea were never interchangeable with domestic products since the product it imports (***) is not made domestically. Importer *** reported that certain products are not available domestically, specifically widths greater than 40 inches that are imported from Canada, Taiwan, and the United Kingdom, and easy-open ends imported from Taiwan, Turkey, and the United Kingdom. Importer *** reported that "valve mounting cups (laminated)" and D&I wide dimensions were not fully available from domestic producers and subject countries except Canada and the Netherlands. Importers *** noted that TFS laminate products are not able to be produced in the United States. Importer *** noted that most tin mill products imported from China are mostly interchangeable with U.S. products, with the exception of wide-width tin mill products (>43 inches) and products with gauges greater than .018 inches.

Table II-28
Tin mill products: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. Canada	0	3	3	0
United States vs. China	1	2	6	0
United States vs. Germany	0	2	4	0
United States vs. Netherlands	0	0	4	0
United States vs. South Korea	1	2	4	1
United States vs. Taiwan	0	5	6	0
United States vs. Turkey	0	0	3	0
United States vs. United Kingdom	0	0	4	1
Canada vs. China	1	2	2	0
Canada vs. Germany	1	3	2	0
Canada vs. Netherlands	1	0	2	0
Canada vs. South Korea	1	2	3	0
Canada vs. Taiwan	0	3	3	0
Canada vs. Turkey	0	0	1	0
Canada vs. United Kingdom	1	0	2	0
China vs. Germany	1	1	2	0
China vs. Netherlands	1	0	1	0
China vs. South Korea	1	1	2	0
China vs. Taiwan	0	2	4	0
China vs. Turkey	0	1	1	0
China vs. United Kingdom	1	1	0	1

Table continued.

Table II-28 Continued
Tin mill products: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
Germany vs. Netherlands	1	1	1	0
Germany vs. South Korea	3	0	3	0
Germany vs. Taiwan	1	1	3	0
Germany vs. Turkey	0	0	2	0
Germany vs. United Kingdom	1	1	2	0
South Korea vs. Netherlands	1	0	2	0
South Korea vs. Taiwan	1	1	3	0
South Korea vs. Turkey	0	0	1	0
South Korea vs. United Kingdom	1	0	1	0
United States vs. Other	0	1	6	2
Canada vs. Other	0	1	2	0
China vs. Other	0	1	3	0
Germany vs. Other	1	0	2	0
South Korea vs. Other	1	0	2	0

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

In comparing domestic product to product from subject countries, a plurality of purchasers noted that tin mill products imported from Canada frequently are interchangeable with those from the United States, but half of purchaser indicated that those imported from Germany are sometimes interchangeable. Equal numbers of purchasers indicated that product from China was either always or sometimes interchangeable with that produced in the United States (table II-29). Purchaser comparisons between the United States and other countries, and among other countries, was varied.

Table II-29
Tin mill products: Count of purchasers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. Canada	3	6	4	0
United States vs. China	5	3	5	0
United States vs. Germany	1	5	6	0
United States vs. Netherlands	1	2	3	2
United States vs. South Korea	3	6	2	2
United States vs. Taiwan	6	6	1	0
United States vs. Turkey	3	1	3	0
United States vs. United Kingdom	1	1	2	2
Canada vs. China	3	2	2	0
Canada vs. Germany	1	6	1	0
Canada vs. Netherlands	1	2	2	0
Canada vs. South Korea	2	4	3	1
Canada vs. Taiwan	2	4	1	0
Canada vs. Turkey	1	1	2	0
Canada vs. United Kingdom	1	2	1	0
China vs. Germany	1	2	3	0
China vs. Netherlands	2	1	2	0
China vs. South Korea	3	3	1	1
China vs. Taiwan	3	3	0	0
China vs. Turkey	2	0	1	0
China vs. United Kingdom	2	1	1	0

Table continued.

Table II-29 Continued
Tin mill products: Count of purchasers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
Germany vs. Netherlands	2	2	1	0
Germany vs. South Korea	3	4	0	2
Germany vs. Taiwan	1	4	0	0
Germany vs. Turkey	0	1	1	0
Germany vs. United Kingdom	1	3	0	0
South Korea vs. Netherlands	1	2	1	1
South Korea vs. Taiwan	5	4	0	0
South Korea vs. Turkey	1	1	1	0
South Korea vs. United Kingdom	2	2	1	0
United States vs. Other	2	3	3	2
Canada vs. Other	1	3	1	1
China vs. Other	1	2	1	1
Germany vs. Other	1	2	2	1
South Korea vs. Other	2	1	2	1

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

Importer/purchaser *** reported that U.S. producers are not able to produce all specifications required by U.S. can manufacturers, including wide-coil DWI and easy open can ends specifications. It added that most of its imports are of specifications that Ohio Coatings and Cleveland-Cliffs have never produced, and in 2021, U.S. Steel stopped production of wide-coil DWI because of quality and production equipment issues. Purchaser *** provided a general listing of products not able to be produced in certain countries: “For the most part, the U.S. mills, as a whole, can manufacturer *** 3 pc products with some exceptions. U.S. mills cannot manufacture 2 pc wide DWI material, nor laminated TFS, nor a few other specifications. With the reductions of capacity in the U.S., certain products are limited - i.e., TFS, batch anneal, etc. Canada cannot manufacture batch anneal material. China can produce 3 pc material and 2 pc DWI >43 inches. Germany, Netherlands, UK, and South Korea can produce all specifications. South Korea is limited on capacity due to hard quotas. Other countries (laminate with Japan as the focus) - is the only region we can source our laminated TFS products.” Purchaser *** noted that Germany and Turkey can produce certain coil widths and high elongation products (for easy-open and easy-peel application) the U.S. producers cannot. Purchaser *** provided that it sources tin mill steel based on “objective quality criteria for specific applications and if a supplier is able to meet those specifications the country of origin {is} immaterial.” However, it also stated that “{t}here are many types of tin mill steel that many producers can make and some types of tin mill steel that few producers can make.” Purchaser *** stated that for three-piece food/aerosol cans, domestic and foreign steel are

substitutable, but not for two-piece food cans, which use wide DWI coil that is not manufactured domestically. Further information regarding two-piece and three-piece cans is presented in Part I.

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of tin mill products from the United States, subject, or nonsubject countries. As seen in table II-30, U.S. producers reported that factors other than price were sometimes or never significant in comparing domestic product and subject countries and never significant in comparing domestic product and nonsubject countries and in comparing among each subject country.

Table II-30
Tin mill products: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. Canada	0	0	2	1
United States vs. China	0	0	1	2
United States vs. Germany	0	0	2	1
United States vs. Netherlands	0	0	2	1
United States vs. South Korea	0	0	1	2
United States vs. Taiwan	0	0	1	2
United States vs. Turkey	0	0	1	2
United States vs. United Kingdom	0	0	2	1
Canada vs. China	0	0	0	2
Canada vs. Germany	0	0	0	2
Canada vs. Netherlands	0	0	0	2
Canada vs. South Korea	0	0	0	2
Canada vs. Taiwan	0	0	0	2
Canada vs. Turkey	0	0	0	2
Canada vs. United Kingdom	0	0	0	2
China vs. Germany	0	0	0	2
China vs. Netherlands	0	0	0	2
China vs. South Korea	0	0	0	2

Table continued.

Table II-30 Continued
Tin mill products: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
China vs. Taiwan	0	0	0	2
China vs. Turkey	0	0	0	2
China vs. United Kingdom	0	0	0	2
Germany vs. Netherlands	0	0	0	2
Germany vs. South Korea	0	0	0	2
Germany vs. Taiwan	0	0	0	2
Germany vs. Turkey	0	0	0	2
Germany vs. United Kingdom	0	0	0	2
South Korea vs. Netherlands	0	0	0	2
South Korea vs. Taiwan	0	0	0	2
South Korea vs. Turkey	0	0	0	2
South Korea vs. United Kingdom	0	0	0	2
United States vs. Other	0	0	0	2
Canada vs. Other	0	0	0	2
China vs. Other	0	0	0	2
Germany vs. Other	0	0	0	2
South Korea vs. Other	0	0	0	2

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

Tables II-31 and II-32 demonstrate that importer and purchaser responses were more varied. Most importers reported that differences other than price were always significant in comparing domestic product to imports from China, the Netherlands, South Korea, and the United Kingdom, and were always or frequently important in comparing domestic product to tin mill products from Canada, Germany, and Turkey. In comparing domestic product to subject imports from Taiwan, a plurality of importers reported that such differences were frequently important. A majority of purchasers noted that there are always differences other than price that are important when comparing domestic product to that imported from China and Germany, as well as a plurality of purchasers which indicated the same when comparing domestic product to that imported from Canada.

Most (16) responding importers and half of responding purchasers (13) reported at least one factor other than price that was important in the tin mill products market. Firms reported a variety of factors, and on average reported more than three different factors. Factors noted most frequently as distinguishing tin mill products between sources were quality (noted by 10 importers and 7 purchasers); on-time delivery (3 importers and 3 purchasers); production capabilities (5 importers and 3 purchasers); product availability (2 importers and 4 purchasers); availability of laminated TFS (3 importers and 2 purchasers), wide tin mill products (4 importers and 2 purchasers), drawn and ironed product (2 importers), and wide drawn and ironed

product (3 importers and 1 purchaser); supplier relationships (1 importer and 2 purchasers); product cleanliness (2 importers and 1 purchaser); and other issues noted by just one importer or purchaser.

Table II-31
Tin mill products: Count of U.S. importers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. Canada	1	2	1	0
United States vs. China	7	1	1	0
United States vs. Germany	2	2	0	0
United States vs. Netherlands	3	1	0	0
United States vs. South Korea	4	1	1	0
United States vs. Taiwan	3	4	3	0
United States vs. Turkey	2	2	1	0
United States vs. United Kingdom	3	1	0	0
Canada vs. China	2	2	0	0
Canada vs. Germany	1	2	1	0
Canada vs. Netherlands	1	1	0	0
Canada vs. South Korea	1	2	1	0
Canada vs. Taiwan	1	4	0	0
Canada vs. Turkey	1	1	0	0
Canada vs. United Kingdom	1	1	0	0
China vs. Germany	0	3	0	0
China vs. Netherlands	0	1	0	0
China vs. South Korea	0	1	2	0
China vs. Taiwan	0	2	3	0
China vs. Turkey	0	1	0	0
China vs. United Kingdom	0	1	0	0

Table continued.

Table II-31 Continued
Tin mill products: Count of U.S. importers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
Germany vs. Netherlands	0	1	1	0
Germany vs. South Korea	0	1	2	1
Germany vs. Taiwan	0	2	1	1
Germany vs. Turkey	0	1	1	0
Germany vs. United Kingdom	0	1	2	0
South Korea vs. Netherlands	1	1	0	0
South Korea vs. Taiwan	0	2	0	1
South Korea vs. Turkey	0	1	0	0
South Korea vs. United Kingdom	0	1	0	1
United States vs. Other	3	1	2	0
Canada vs. Other	0	2	0	0
China vs. Other	0	1	1	0
Germany vs. Other	0	1	1	1
South Korea vs. Other	0	1	0	1

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

Table II-32
Tin mill products: Count of U.S. purchasers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
United States vs. Canada	6	4	3	0
United States vs. China	8	0	2	3
United States vs. Germany	7	2	3	0
United States vs. Netherlands	6	0	2	0
United States vs. South Korea	9	1	3	1
United States vs. Taiwan	6	2	3	2
United States vs. Turkey	3	1	3	0
United States vs. United Kingdom	5	0	1	1
Canada vs. China	3	2	0	0
Canada vs. Germany	1	2	4	0
Canada vs. Netherlands	1	1	2	0
Canada vs. South Korea	2	1	4	0
Canada vs. Taiwan	2	1	3	1
Canada vs. Turkey	1	0	2	0
Canada vs. United Kingdom	1	1	1	0
China vs. Germany	1	2	2	0
China vs. Netherlands	1	0	2	1
China vs. South Korea	1	0	3	1
China vs. Taiwan	1	0	2	2
China vs. Turkey	1	0	1	0
China vs. United Kingdom	1	0	1	1

Table continued.

Table II-32 Continued
Tin mill products: Count of U.S. purchasers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
Germany vs. Netherlands	1	0	3	0
Germany vs. South Korea	2	0	4	2
Germany vs. Taiwan	1	0	3	3
Germany vs. Turkey	0	0	2	0
Germany vs. United Kingdom	1	0	2	1
South Korea vs. Netherlands	1	0	3	0
South Korea vs. Taiwan	2	0	3	2
South Korea vs. Turkey	1	0	2	0
South Korea vs. United Kingdom	1	0	2	1
United States vs. Other	8	1	1	0
Canada vs. Other	3	1	1	0
China vs. Other	2	0	2	0
Germany vs. Other	2	0	1	1
South Korea vs. Other	3	0	1	1

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

Elasticity estimates

This section discusses elasticity estimates; parties were encouraged to comment on these estimates in their prehearing or posthearing briefs. No parties made any comments regarding suggested elasticities.

U.S. supply elasticity

The domestic supply elasticity for tin mill products measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of tin mill products. The elasticity of domestic supply depends on several factors, including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced tin mill products. Analysis of these factors above indicates that the U.S. industry has the ability somewhat increase or decrease shipments to the U.S. market; an estimate in the range of 4 to 6 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for tin mill products measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of tin mill products. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the tin mill products in the production of any downstream products. Based on the available information, the aggregate demand for tin mill products is likely to be slightly inelastic; a range of -0.75 to -1.0 is suggested.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.[29] Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced tin mill products and imported tin mill products is likely to be in the range of 2 to 4. The main factors limiting substitutability are available capacity to produce domestic tin mill products, rejection rates and lack of qualification for certain types of domestic tin mill products, and certain types of tin mill products only being available only from certain sources. For tin mill products of the same type, substitutability is higher, as there is reportedly general interchangeability among tin mill products of similar quality and usage.

[29] The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

Part III: U.S. producers' production, shipments, and employment

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the subsidies and dumping margins was presented in Part I of this report and information on the volume and pricing of imports of the subject merchandise is presented in Part IV and Part V. Information on the other factors specified is presented in this section and/or Part VI and (except as noted) is based on the questionnaire responses of three firms that accounted for all known U.S. production of tin mill products during 2022.

U.S. producers

The Commission issued a U.S. producer questionnaire to three firms based on information contained in the petitions. Three firms provided usable data on their operations. Staff believes that these responses represent all known U.S. production of tin mill products.

Table III-1 lists U.S. producers of tin mill products, their production locations, positions on the petitions, and shares of total production.

Table III-1
Tin mill products: U.S. producers, their position on the petitions, location of production, and share of reported production, 2022

Firm	Position on petitions	Production location(s)	Share of production
Cleveland-Cliffs	Petitioner	Weirton, WV	***
Ohio Coatings	***	Yorkville, OH	***
U.S. Steel	***	Gary, IN Portage, IN East Chicago, IN Pittsburg, CA	***
All firms	Various	Various	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". ***.

Table III-2 presents information on U.S. producers' ownership, related and/or affiliated firms.

Table III-2
Tin mill products: U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

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

As indicated in Table III-2, *** is related to *** foreign producer and exporter of the subject merchandise, which is a *** company to ***.[1] No responding U.S. producer imported or purchased the subject merchandise from U.S. importers from any subject source.

Table III-3 presents events in the U.S. industry since January 1, 2020.

[1] *** is also related to a U.S. importer of the subject merchandise *** which is a ***. *** only imported tin mill products from ***.

Table III-3
Tin mill products: Important industry events since January 1, 2020

Item	Firm	Event
Acquisition	U.S. Steel, UPI	March 2020— U.S. Steel acquired POSCO California Corp.'s 50 percent share of joint-venture USS-POSCO Industries Inc., ("UPI") steel mill (rolling mill without melt shop) in Pittsburg, California, to take full ownership. UPI produces cold-rolled and galvanized sheet and subject tin mill products, from hot bands principally provided by U.S. Steel. UPI primarily serves customers in the western United States and has a total annual production capability of 1.5 million short tons of flat steel.
Acquisition	Cleveland-Cliffs	December 2020— Cleveland-Cliffs completed the acquisition of "substantially all of the operations of ArcelorMittal USA LLC and its subsidiaries", including the Weirton, West Virginia steel facility that produces domestic-like tin mill products.
Production milestone	Ohio Coatings	February 2021— Ohio Coatings, a 50-50 joint venture of Esmark Steel Group. and TCC Steel, announced its electrolytic tin coating line (the newest in the United States) reached a production milestone of 4 million short tons of tin plate steel since operations commenced in 1997. According to Lori Clark, Vice President of Commercial, "…demand for tin plate cans has increased throughout the COVID pandemic as more sanitary food cans are being used, as well as aerosol cans for disinfectant and cleaning products." She also noted that "{T}here's been a very strong demand. It's just a matter of getting enough steel to take advantage of that." Ohio Coatings sources its steel substrate materials from Cleveland-Cliffs' Weirton steel facility.
Environmental protection violations	UPI	August 2021— UPI reached a $4 million civil settlement with the Contra Costa County District Attorney's Office to resolve allegations that the firm violated state and environmental regulations by improperly storing and illegally disposing of hazardous materials and wastes, dating back to 2017.
Plant closing	U.S. Steel	March 2022— U.S. Steel permanently idled tin mill production at its East Chicago tin mill operations. The mill, located in in East Chicago, Indiana, had been idled on an indefinite basis since fourth-quarter 2019.
Plant closing announcement	UPI	August 2022— U.S. Steel reportedly announced that UPI will cease production in 2023, with the shuttered facility to be sold in 2023 or 2024.
Labor agreement	Cleveland-Cliffs	October 2022— The USW membership overwhelmingly approved a new four-year labor contract (through September 2026) covering 12,000 members at 13 Cleveland-Cliffs facilities, including the Weirton tin mill operations. The new contract raises base wages by 20 percent, improves insurance benefits for both active and retired employees, raises pensions, improves vacation provisions, includes an additional holiday, and includes new provisions for parental paid leave and for employees who are victims of domestic violence.

Table continued.

Table III-3 Continued
Tin mill products: Important industry events since January 1, 2020

Item	Firm	Event
Labor agreement	U.S. Steel	December 2022— The USW membership overwhelmingly approved a new, four-year contract covering 11,000 members of 13 local unions at U.S. Steel facilities. The new contract provides a lump sum bonus, raises wages by more than 20 percent over its term, raises pensions, includes an additional holiday, improves healthcare benefits for both active and retired employees.
Plant closing	U.S. Steel	December 2022— U.S. Steel indefinitely idled most tin mill operations at its Gary Works steel mill in Gary, Indiana. The idling included tin line No. 5, which was previously temporarily idled in third-quarter 2022, and tin line No. 6. It was reported that the firm plans to lay off 244 workers at the mill in February 2023. In a notification to the state of Indiana Department of Labor, a U.S. Steel official stated that "these actions are due to market conditions which were out of the company's control, including the continuing reduced demand for the Company's tin products and significantly increased tin mill imports."
Layoffs	Cleveland-Cliffs	May 2023— Cleveland-Cliffs will lay off approximately 300 of the 950 employees in June at the Weirton tin mill facility, citing unfair import competition. According to Lourenco Goncalves, Chairman, President, and Chief Executive Officer, "{O}nce again, unfair trade practices are harming good paying, union jobs."
Acquisition offers	U.S. Steel, Cleveland-Cliffs, Esmark	August 2023— U.S. Steel received two unsolicited purchase offers from Cleveland-Cliffs for $7.3 billion and from Esmark Steel Group ("Esmark") for $7.8 billion.
Acquisition offer rejected	U.S. Steel, Cleveland-Cliffs	August 2023— U.S. Steel turned down Cleveland-Cliffs' $7.3 billion offer after the latter "…refused to engage in the necessary and customary process to assess valuation and certainty unless U. S. Steel agreed to the economic terms of the proposal in advance." The former will also conduct a strategic corporate planning review of the "multiple unsolicited proposals" received.
Acquisition offer withdrawn	Esmark	August 2023— Esmark withdrew its $7.8 billion offer to purchase U.S. Steel, citing its partnership with the USW in acquiring Wheeling Pittsburgh Steel (in November 2007) and acknowledging the USW's support for Cleveland-Cliffs' purchase offer.
Acquisition offer evaluation	U.S. Steel	August 2023— U.S. Steel announced to its shareholders that the firm is signing non-disclosure agreements with potential buyers ahead of sharing due diligence information with them, while it reviews its options for evaluating the multiple unsolicited offers for either selected or all of U.S. Steel's facilities and other assets.
Acquisition offer reported	ArcelorMittal, U.S. Steel	August 2023— ArcelorMittal SA (Luxembourg), the world's second largest steelmaker, is reportedly conferring with its investment bankers to finance a potential purchase offer for U.S. Steel. However, the USW reportedly will not endorse any buyers other than Cleveland-Cliffs.

Table continued.

Table III-3 Continued
Tin mill products: Important industry events since January 1, 2020

Item	Firm	Event
Acquisition process disagreement	Cleveland-Cliffs, U.S. Steel	September 2023— Cleveland-Cliffs was locked out from the ongoing due diligence and acquisition process after declining to sign U.S. Steel's non-disclosure agreement. The former refused to sign a six-month standstill agreement that would prevent it from challenging the latter's board of directors, reportedly to keep its options open. Previously, Cleveland-Cliffs opened its books to U.S. Steel, revealing that close to one-half the value of its $7.1 billion offer is in stock and provided commitment letters from five major national and regional commercial banks to fund its proposed purchase.
Acquisition offer	Stelco	September 2023— Canadian steelmaker Stelco Holdings Co. ("Stelco") is reportedly considering, with the backing of unnamed partners, a purchase offer for selected iron ore mine and steel facilities of U.S. Steel. No further details are available as this information was not confirmed officially by Stelco or any of its potential partners.
Plant closing interventions	U.S. Steel, UPI	November 2023— Three Congressional members representing Northern California's East Bay Area districts— Mark DeSaulnier (CA-10), John Garamendi (D-8), and Barbara Lee (D-12)— jointly called upon U.S. Steel to seek a buyer to keep UPI operating with the existing workers. They also called upon U.S. Steel to keep two support facilities— CEMCO, a producer of steel framing, and Roll Technology West ("RTW"), which provides chrome plates for UPI products— operating with existing workers.
Acquisition offer	U.S. Steel, Nippon Steel	December 2023— U.S. Steel announced its agreement to be acquired by Japan's largest steelmaker, Nippon Steel Corp., in an all-cash transaction valued at $14.1 billion, plus assumption of $800,000 of U.S. Steel's debt for a total equivalent buyout offer of $14.9 billion. Under this acquisition agreement, Nippon Steel will honor current U.S. Steel labor agreements and U.S. Steel will retain its current corporate name for its operations going forward. The acquisition offer was approved by the Boards of Directors of both firms but still needs U.S. Steel shareholder and official regulatory approvals. Both firms anticipate completing this transaction by second- or third-quarter 2024. None of Nippon Steel's U.S. steel facilities currently produce tin mill products.
Acquisition offer	USW	December 2023— In opposition to Nippon Steel's acquisition offer for U.S. Steel, USW International President stated that: "{N}either U.S. Steel nor Nippon reached out to our union regarding the deal, which is in itself a violation of our partnership agreement that requires U.S. Steel to notify us of a change in control or business conditions. Based on this alone, the USW does not believe that Nippon understands the full breadth of the obligations of all our agreements, and we do not know whether it has the capacity to live up to our existing contract. This includes not just the day-to-day commitments of our labor agreement, but also significant obligations to fund pension and retiree insurance benefits that are the most extensive in the domestic steel industry."

Table continued.

Table III-3 Continued
Tin mill products: Important industry events since January 1, 2020

Item	Firm	Event
Acquisition offer	Cleveland-Cliffs	December 2023— According to the Chairman, President, and Chief Executive Officer ("CEO") of Cleveland-Cliffs: "We identified U.S. Steel as an extremely undervalued company with significant synergy potential when combined with Cleveland-Cliffs, creating a union-friendly American champion among the top-ten steelmakers in the world. Even though U.S. Steel's Board of Directors and CEO chose to go a different direction with a foreign buyer, their move validates our view that our sector remains undervalued by the broader market, and that a multiple re-rating for Cleveland-Cliffs is long overdue. We congratulate U.S. Steel on their announcement and wish them luck in closing the transaction with Nippon Steel."
Plant closing	UPI	December 2023— U.S. Steel's official closure announcement for UPI was reported in early-November 2023. Production operations concluded at UPI in December 2023 with shipping operations anticipated to conclude by March 2024.
Labor grievance filing	USW	January 2024— The USW International and five locals representing U.S. Steel employees filed grievances against the acquisition, contending that provisions of the basic labor agreement were violated during the acquisition review process and requested dispute resolution. According to the USW, information was not shared about the sale process and that the union was neither consulted nor reassured that its collective bargaining agreements will be upheld after completion of the acquisition.

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Table continued.

Table III-3 Continued
Tin mill products: Important industry events since January 1, 2020

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Table continued.

Table III-3 Continued
Tin mill products: Important industry events since January 1, 2020

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ArcelorMIttal Dofasco's prehearing brief, exhibit 1, annex E; petitioner's prehearing brief, exhibits 3, 4; CMI's prehearing brief, exhibits 51, 52; Government of Canada's prehearing brief, exhibits 3, 4, 6, 8; thyssenkrupp's prehearing brief, exhibit 3.

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of tin mill products since January 1, 2020. All three producers indicated in their questionnaires that they had experienced such changes.[2] Table III-4 presents the changes identified by these producers.

[2] As noted in Table III-4, ***. However, ***

(*continued*...)

Table III-4
Tin mill products: U.S. producers' reported changes in operations, since January 1, 2020

Item	Firm name and narrative response on changes in operations
Plant closings	***
Plant closing	***
Prolonged shutdowns	***

Table continued.

***. U.S. Steel's posthearing brief, p. 2, January 11, 2024. ***. U.S. Steel Questionnaire response, II-2c. *** had a constant capacity of *** short tons and a constant practical production of *** short tons in practical tin mill products production capacity during 2020-22. *** production was *** short tons in 2020, *** short tons in 2021, and *** short tons in 2022. Its commercial shipments were *** short tons in 2020, *** short tons in 2021 and *** short tons in 2022. Email from ***, November 21, 2023.

Table III-4 Continued
Tin mill products: U.S. producers' reported changes in operations, since January 1, 2020

Item	Firm name and narrative response on changes in operations
Prolonged shutdowns	***
Production curtailments	***
Acquisitions	***
Acquisitions	***
Other	***
Other	***

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

U.S. production, capacity, and capacity utilization

Table III-5 presents U.S. producers' installed and practical capacity and production on the same equipment. Virtually all the production capacity is dedicated to the production of tin mill products.

Table III-5
Tin mill products: U.S. producers' installed and practical capacity, production, and utilization on the same equipment as subject production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical tin mill products	Capacity	***	***	***	***	***
Practical tin mill products	Production	***	***	***	***	***
Practical tin mill products	Utilization	***	***	***	***	***

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

Table III-6 presents U.S. producers' reported narratives regarding practical capacity constraints.

Table III-6
Tin mill products: U.S. producers' reported constraints to practical overall capacity, since January 1, 2020

Item	Firm name and narrative response on constraints to practical overall capacity
Production bottlenecks	***
Existing labor force	***
Supply of material inputs	***
Other constraints	***
Other constraints	***
Other constraints	***

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

Table III-7 and figure III-1 present U.S. producers' production, capacity, and capacity utilization. Responding U.S. producers' practical capacity decreased in each year during 2020-22, ending *** percent lower in 2022 than in 2020, with most of the decrease occurring from 2021 to 2022. It was *** percent lower in interim 2023 compared with interim 2022. While *** accounted for the majority of the decrease during 2020 to 2022, it reported a higher capacity in interim 2023 than in interim 2022.[3] ***, reported only a decrease from 2021 to 2022 and a lower capacity in interim 2022 compared to

[3] ***. Email from ***, October 17, 2023.

interim 2023.[4] *** in its practical capacity during 2020-22 and the interim periods.

Responding U.S. producers' production decreased in each year during 2020-22, ending *** percent lower in 2022 than in 2020 and was *** percent lower in interim 2023 compared to interim 2022. *** reported a decrease in each period, ending 2022 *** percent lower than in 2020, while *** production fluctuated and increased overall by *** percent during 2020-22, including a *** percent increase from 2021 to 2022.[5] [6] *** production also fluctuated during 2020-22, increasing modestly from 2020 to 2021 before decreasing by *** percent from 2021 to 2022, ending 2022 *** percent lower than in 2020.[7] All three firms reported production between *** lower in interim 2023 compared to interim 2022.

Responding U.S. producers' average practical capacity utilization fluctuated during 2020-22, increasing by *** percentage points from 2020 to 2021 before decreasing by *** percentage points from 2021 to 2022, decreasing overall by *** percentage points during 2020-22. The increase in *** capacity utilization largely offset the decrease in *** from 2021 to 2022, resulting in a modest decrease during that period. Responding producers' average practical capacity utilization was *** percentage points lower in interim 2023 than in interim 2022, with all three producers reporting a lower capacity utilization in interim 2023 than interim 2022.

[4] ***. *** U.S. Producer Questionnaire response II-2a; U.S. Steel's posthearing brief, January 11, 2024.

[5] *** reported the decrease in production from 2020 to 2022 was a result of ***. Email from ***, October 16, 2023.

[6] The overall increase in ***. Email from ***, October 17, 2023.

[7] ***. Email from ***, October 13, 2023.

Table III-7
Tin mill products: U.S. producers' output: Practical capacity, by firm and period

Practical capacity

Capacity in short tons

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-7 Continued
Tin mill products: U.S. producers' output: Production, by firm and period

Production

Production in short tons

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-7 Continued
Tin mill products: U.S. producers' output: Capacity utilization, by firm and period

Capacity utilization

Capacity utilization in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-7 Continued
Tin mill products: U.S. producers' output: Share of production, by firm and period

Share of production

Share in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

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

Figure III-1
Tin mill products: U.S. producers' capacity, production, and capacity utilization, by period

* * * * * * *

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

Alternative products

No responding U.S. producer reported production of out-of-scope merchandise on the same machinery used to produce in-scope merchandise during the period of investigation.

U.S. producers' U.S. shipments and exports

Table III-8 presents U.S. producers' U.S. shipments, export shipments, and total shipments. U.S. shipments accounted for *** of responding U.S. producers' total shipments in each year during 2020-22 and in both interim periods.[8] Responding U.S. producers' collective U.S. shipments decreased during 2020-22, ending *** percent lower in 2022 than in 2020. All three firms reported a decrease in every period except for ***, which reported an increase of *** percent from 2021 to 2022.[9] The responding U.S. producers' collective U.S. shipments were *** percent lower in interim 2023 than in interim

[8] *** reported internal consumption or transfers to related firms during 2020-22 and in both interim periods.

[9] The increase in ***. Email from ***, October 17, 2023.

2022. The value of responding U.S. producers' collective U.S. shipments increased in each year during 2020-22, ending *** percent higher in 2022 than in 2020.[10] However, it was *** percent lower in interim 2023 than in interim 2022. *** reported a lower U.S. shipments value in interim 2023 than in interim 2022.

The average unit value of responding U.S. producers' U.S. shipments increased each year, ending *** percent higher in 2022 than in 2020, reaching a period high of *** in 2022.[11] However, the unit value of responding U.S. producers' U.S. shipments was *** percent lower in interim 2023 than interim 2022.[12]

By quantity, export shipments accounted for *** percent of responding U.S. producers' total shipments throughout 2020-23 and in interim 2022 and interim 2023.[13] The quantity of responding U.S. producers' export shipments decreased in each year, ending *** percent lower in 2022 than in 2020 and was *** percent lower in interim 2023 than in interim 2022. The value of responding U.S. producers' export shipments fluctuated, decreasing from 2020 to 2021, then increasing from 2021 to 2022, ending *** percent higher in 2022 than in 2020. It was *** percent higher in interim 2023 than in interim 2022. The average unit value of responding U.S. producers' export shipments increased in each year, ending *** percent higher in 2022 than in 2020. It reached a period-high of $*** in interim 2023 which was *** percent higher in interim 2023 than in interim 2022.

[10] *** reported a decrease in each period.

[11] *** noted that the increase in unit value reflects that ***. Email from ***, October 17, 2023.

[12] The increase in the unit value of ***. Email from ***, October 17, 2023. In contrast, *** reported a unit value that was *** percent higher in interim 2022 than in interim 2023, which it reported was due ***. Email from ***, October 16, 2023.

[13] *** did not report export shipments during the period of investigation.

Table III-8
Tin mill products: U.S. producers' total shipments, by destination and period

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

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	***	***	***	***	***
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

U.S. producers’ inventories

Table III-9 presents U.S. producers’ end-of-period inventories and the ratio of these inventories to U.S. producers’ production, U.S. shipments, and total shipments**.** Responding U.S. producers’ end-of-period inventories increased in each year, ending *** percent higher in 2022 than in 2020.[14] They were *** percent higher in interim 2023 than in interim 2022.[15]

[14] *** reported a decrease in end-of-period inventories from 2020 to 2021 but *** reported an increase from 2021 to 2022. ***. Email from ***, October 17, 2023, email from ***, October 16, 2023, and email from ***, October 17, 2023.

[15] *** to report lower end-of-period inventories in interim 2023 compared to interim 2022.

The ratio of the responding U.S. producers' end-of-period inventories to U.S. production increased in each year, ending *** percentage points higher in 2022 than in 2020. It was *** percentage points higher in interim 2023 than in interim 2022. The ratio of the responding U.S. producers' end-of-period inventories to U.S. shipments similarly increased in each year, ending *** percentage points higher in 2022 than in 2020 and it was *** percentage points higher in interim 2023 than in interim 2022.

Table III-9
Tin mill products: U.S. producers' inventories and their ratio to select items, by period

Quantity in short tons; inventory ratios in percent

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
End-of-period inventory quantity	***	***	***	***	***
Inventory ratio to U.S. production	***	***	***	***	***
Inventory ratio to U.S. shipments	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***

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

U.S. producers' imports from subject sources

Table III-10 presents data on responding U.S. producers' and/or their affiliates' U.S. production and U.S. imports of tin mill products from subject sources by source. No U.S. producer directly imported tin mill products from current subject sources Canada, China, or Germany during the period of investigation. However, *** is related to importer *** through common ownership.[16] *** reported imports from *** in each year during 2020-22 and in both interim periods. The ratio of that affiliate's U.S. imports from *** to *** U.S. production did not exceed *** percent in any year during 2020-22 and was *** percent in interim 2023, compared with *** percent in interim 2022.

[16] As presented in Table III-2 ***.

Table III-11
Tin mill products: U.S. producers' employment related information, by item and period

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid ($1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***
Productivity (short tons per 1,000 hours)	***	***	***	***	***
Unit labor costs (dollars per short ton)	***	***	***	***	***

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

Part IV: U.S. imports, apparent U.S. consumption, and market shares

U.S. importers

The Commission issued importer questionnaires to 31 firms believed to be importers of subject tin mill products, as well as to all U.S. producers of tin mill products.[1] Usable questionnaire responses were received from 24 companies[2], representing *** percent of U.S. imports from Canada[3], *** percent of imports from China[4], *** imports from Germany, *** percent of imports from South Korea, subject, *** percent of subject imports, *** imports from South Korea, nonsubject[5], and *** percent of imports

[1] The Commission issued questionnaires to those firms identified in the petitions, along with firms that, based on a review of data from third-party sources, may have accounted for more than one percent of total imports under HTS subheadings 7210.11.00, 7210.12.00, 7210.50.00, 7212.10.00, and 7212.50.00, 7225.99.00, and 7226.99.01 in 2022.

[2] The Commission received a total of 28 questionnaires. Three firms, ***, reported only importing out of scope products during the period of investigation, and staff did not use the questionnaire response from *** due to a lack of data. Therefore, the questionnaires from these four firms were not incorporated into the staff report.

[3] *** is the only producer of tin mill products in Canada and reported exporting *** short tons of tin mill products to the United States in 2022. ***'s foreign producer questionnaire response, table II-9. Using *** export quantity, import questionnaire responses account for *** percent of imports from Canada. ***. Email from ***.

[4] The coverage figure for China uses proprietary, Census-edited Customs records to remove *** that submitted a questionnaire response reporting they only imported out of scope product from China during the period of investigation. The coverage figure using official import statistics is *** percent.

[5] On January 10, 2024, Commerce's affirmative final AD determination for imports from South Korea set a de minimis rate for KG Steel. In this report, South Korea, nonsubject, are imports from KG Steel and South Korea, subject, is considered to be imports from all other producers of tin mill products from South Korea. The coverage figure for South Korea, subject, is based on proprietary, Census-edited Customs records using the same statistical reporting numbers, and the coverage figure for South Korea, nonsubject is based on exports to the U.S. obtained from *** foreign producer questionnaire response.

from nonsubject sources, in 2022. [6] [7] [8] Table IV-1 lists all responding U.S. importers of tin mill products from Canada, China, Germany, South Korea, and other sources, their locations, and their shares of U.S. imports, in 2022.

[6] A U.S. importer from Canada and all other sources, ***. Email from ***, September 6, 2023.

[7] These percentages represent the share of imports under HTS subheadings 7210.11.00, 7210.12.00, 7210.50.00, 7212.10.00, 7212.50.00, 7225.99.00, and 7226.99.01, which are "basket" categories.

[8] Official imports statistics are likely overstated for imports from all other sources. ***. Email from ***.

Table IV-1
Tin mill products: U.S. importers, their headquarters, and share of total imports within a given source by firm, 2022

Share in percent

Firm	Headquarters	Canada	China	Germany	Canada, China and Germany combined
ArcelorMittal Dofasco	Hamilton, ON	***	***	***	***
ArcelorMittal International	Chicago, IL	***	***	***	***
CSN	Chicago, IL	***	***	***	***
Duferco Steel	Houston, TX	***	***	***	***
EP Steel	South River, NJ	***	***	***	***
JFE Shoji America	Long Beach, CA	***	***	***	***
Kemeny	Fort Myers, FL	***	***	***	***
KG Steel Americas	Fountain Valley, CA	***	***	***	***
Lakeside Metals	Willowbrook, IL	***	***	***	***
Marubeni-Itochu	New York, NY	***	***	***	***
Metal One	Rosemont, IL	***	***	***	***
Mitsui	New York, NY	***	***	***	***
Nippon Steel	Schaumburg, IL	***	***	***	***
POSCO	Teaneck, NJ	***	***	***	***
Reynolds Services	Greenville, PA	***	***	***	***
Songlin	Buena Park, CA	***	***	***	***
Tata International	Schaumburg, IL	***	***	***	***
Tata Steel UK	London,	***	***	***	***
TCC America	Torrance, CA	***	***	***	***
TKSNA	Southfield, MI	***	***	***	***
Titan	Baltimore, MD	***	***	***	***
Trivium	Rosemont, IL	***	***	***	***
TSIJ	Ijmuiden, Netherlands, NH	***	***	***	***
All firms	Various	***	***	***	***

Table continued.

Table IV-1 Continued
Tin mill products: U.S. importers, their headquarters, and share of total imports within a given source by firm, 2022

Share in percent

Firm	Headquarters	Netherlands	South Korea	Taiwan	Turkey
ArcelorMittal Dofasco	Hamilton, ON	***	***	***	***
ArcelorMittal International	Chicago, IL	***	***	***	***
CSN	Chicago, IL	***	***	***	***
Duferco Steel	Houston, TX	***	***	***	***
EP Steel	South River, NJ	***	***	***	***
JFE Shoji America	Long Beach, CA	***	***	***	***
Kemeny	Fort Myers, FL	***	***	***	***
KG Steel Americas	Fountain Valley, CA	***	***	***	***
Lakeside Metals	Willowbrook, IL	***	***	***	***
Marubeni-Itochu	New York, NY	***	***	***	***
Metal One	Rosemont, IL	***	***	***	***
Mitsui	New York, NY	***	***	***	***
Nippon Steel	Schaumburg, IL	***	***	***	***
POSCO	Teaneck, NJ	***	***	***	***
Reynolds Services	Greenville, PA	***	***	***	***
Songlin	Buena Park, CA	***	***	***	***
Tata International	Schaumburg, IL	***	***	***	***
Tata Steel UK	London,	***	***	***	***
TCC America	Torrance, CA	***	***	***	***
TKSNA	Southfield, MI	***	***	***	***
Titan	Baltimore, MD	***	***	***	***
Trivium	Rosemont, IL	***	***	***	***
TSIJ	Ijmuiden, Netherlands, NH	***	***	***	***
All firms	Various	***	***	***	***

Table continued.

Table IV-1 Continued
Tin mill products: U.S. importers, their headquarters, and share of total imports within a given source by firm, 2022

Share in percent

Firm	Headquarters	United Kingdom	All other sources	All sources other than Canada, China, and Germany	All import sources
ArcelorMittal Dofasco	Hamilton, ON	***	***	***	***
ArcelorMittal International	Chicago, IL	***	***	***	***
CSN	Chicago, IL	***	***	***	***
Duferco Steel	Houston, TX	***	***	***	***
EP Steel	South River, NJ	***	***	***	***
JFE Shoji America	Long Beach, CA	***	***	***	***
Kemeny	Fort Myers, FL	***	***	***	***
KG Steel	Fountain Valley, CA	***	***	***	***
Lakeside Metals	Willowbrook, IL	***	***	***	***
Marubeni-Itochu	New York, NY	***	***	***	***
Metal One	Rosemont, IL	***	***	***	***
Mitsui	New York, NY	***	***	***	***
Nippon Steel	Schaumburg, IL	***	***	***	***
POSCO	Teaneck, NJ	***	***	***	***
Reynolds Services	Greenville, PA	***	***	***	***
Songlin	Buena Park, CA	***	***	***	***
Tata International	Schaumburg, IL	***	***	***	***
Tata Steel UK	London,	***	***	***	***
TCC America	Torrance, CA	***	***	***	***
TKSNA	Southfield, MI	***	***	***	***
Titan	Baltimore, MD	***	***	***	***
Trivium	Rosemont, IL	***	***	***	***
TSIJ	Ijmuiden, Netherlands, NH	***	***	***	***
All firms	Various	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

U.S. imports

Table IV-2 and figure IV-1 present data for U.S. imports of tin mill products from Canada, China, Germany, South Korea, subject, South Korea, nonsubject, and all other sources.

Table IV-2
Tin mill products: U.S. imports, by source and period

Quantity in short tons; Value in 1,000 dollars

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Canada	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Germany	Quantity	***	***	***	***	***
South Korea, subject	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Subject sources less South Korea, subject	Quantity	***	***	***	***	***
Netherlands	Quantity	***	***	***	***	***
South Korea, nonsubject	Quantity	***	***	***	***	***
Taiwan	Quantity	43,815	72,194	85,500	51,920	51,789
Turkey	Quantity	***	***	***	***	***
United Kingdom	Quantity	***	***	***	***	***
All other sources	Quantity	51,631	68,687	92,824	49,426	35,003
Nonsubject sources	Quantity	***	***	***	***	***
Nonsubject sources plus South Korea, subject	Quantity	***	***	***	***	***
All import sources	Quantity	1,135,999	1,191,271	1,407,274	706,075	607,689
Canada	Value	***	***	***	***	***
China	Value	***	***	***	***	***
Germany	Value	***	***	***	***	***
South Korea, subject	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Subject sources less South Korea, subject	Value	***	***	***	***	***
Netherlands	Value	***	***	***	***	***
South Korea, nonsubject	Value	***	***	***	***	***
Taiwan	Value	37,549	73,955	145,396	89,622	67,727
Turkey	Value	***	***	***	***	***
United Kingdom	Value	***	***	***	***	***
All other sources	Value	54,992	77,912	167,663	86,664	60,004
Nonsubject sources	Value	***	***	***	***	***
Nonsubject sources plus South Korea, subject	Value	***	***	***	***	***
All import sources	Value	1,165,124	1,341,479	2,693,685	1,296,638	1,043,358

Table continued.

Table IV-2 Continued
Tin mill products: U.S. imports, by source and period

Unit value in dollars per short ton; Share in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Canada	Unit value	***	***	***	***	***
China	Unit value	***	***	***	***	***
Germany	Unit value	***	***	***	***	***
South Korea, subject	Unit value	***	***	***	***	***
Subject sources	Unit value	***	***	***	***	***
Subject sources less South Korea, subject	Unit value	***	***	***	***	***
Netherlands	Unit value	***	***	***	***	***
South Korea, nonsubject	Unit value	***	***	***	***	***
Taiwan	Unit value	857	1,024	1,701	1,726	1,308
Turkey	Unit value	***	***	***	***	***
United Kingdom	Unit value	***	***	***	***	***
All other sources	Unit value	1,065	1,134	1,806	1,753	1,714
Nonsubject sources	Unit value	***	***	***	***	***
Nonsubject sources plus South Korea, subject	Unit value	***	***	***	***	***
All import sources	Unit value	1,026	1,126	1,914	1,836	1,717
Canada	Share of quantity	***	***	***	***	***
China	Share of quantity	***	***	***	***	***
Germany	Share of quantity	***	***	***	***	***
South Korea, subject	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
Subject sources less South Korea, subject	Share of quantity	***	***	***	***	***
Netherlands	Share of quantity	***	***	***	***	***
South Korea, nonsubject	Share of quantity	***	***	***	***	***
Taiwan	Share of quantity	***	***	***	***	***
Turkey	Share of quantity	***	***	***	***	***
United Kingdom	Share of quantity	***	***	***	***	***
All other sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
Nonsubject sources plus South Korea, subject	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0

Table continued.

Table IV-2 Continued
Tin mill products: U.S. imports, by source and period

Share and ratios in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Canada	Share of value	***	***	***	***	***
China	Share of value	***	***	***	***	***
Germany	Share of value	***	***	***	***	***
South Korea, subject	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
Subject sources less South Korea, subject	Share of value	***	***	***	***	***
Netherlands	Share of value	***	***	***	***	***
South Korea, nonsubject	Share of value	***	***	***	***	***
Taiwan	Share of value	***	***	***	***	***
Turkey	Share of value	***	***	***	***	***
United Kingdom	Share of value	***	***	***	***	***
All other sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
Nonsubject sources plus South Korea, subject	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
Canada	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Germany	Ratio	***	***	***	***	***
South Korea, subject	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Subject sources less South Korea, subject	Ratio	***	***	***	***	***
Netherlands	Ratio	***	***	***	***	***
South Korea, nonsubject	Ratio	***	***	***	***	***
Taiwan	Ratio	***	***	***	***	***
Turkey	Ratio	***	***	***	***	***
United Kingdom	Ratio	***	***	***	***	***
All other sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
Nonsubject sources plus South Korea, subject	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-1
Tin mill products: U.S. import quantities and average unit values, by source and period

* * * * * * *

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

The two largest sources of subject imports, by quantity, were Canada and Germany. South Korea, subject, is the smallest source of subject imports, by quantity. Subject imports accounted for between *** percent and *** percent of total imports in each calendar year during 2020-22 and *** percent and *** percent in interim 2022 and interim 2023, respectively.

The Netherlands was the largest source of nonsubject imports and accounted for the largest share of total imports, by quantity, of any source in 2021 and 2022. Most of the reported imports from all other sources were from Japan. Nonsubject imports, by quantity, accounted for between *** percent and *** during 2020-22 and accounted for *** percent of total imports in interim 2022 and *** percent in interim 2023.

U.S. imports from Canada, by quantity, decreased in each year from 2020 to 2022, ending *** percent lower in 2022 than in 2020, predominately driven by Canada's largest importer ***.[9] U.S. imports from Canada were *** percent lower in

[9] The decrease reflects ***

(*continued*...)

interim 2023 than in interim 2022. Imports from Canada were the only subject source to experience a decrease in each year during 2022 to 2020. U.S. imports from Germany increased in each year during 2020-22, ending *** percent higher in 2022 than in 2020 but were *** percent lower in interim 2023 than in interim 2022.[10] U.S. imports from China increased in each year from 2020 to 2022, ending *** percent higher in 2022 than in 2020. U.S. imports from China were *** percent lower in interim 2023 than in interim 2022.[11] U.S. imports from South Korea, subject, fluctuated during 2020-22, ending *** percent lower in 2022 than in 2020 and were *** percent lower in interim 2023 than in interim 2022.

Overall, the quantity of subject imports fluctuated in each year during 2020-22, decreasing by *** percent from 2020 to 2021, before increasing by *** percent from 2021 to 2022, and ending *** percent higher in 2022 than in 2020. The quantity of imports from nonsubject sources increased in each year during 2020 to 2022, ending *** percent higher in 2022 than in 2020. It was *** percent lower in interim 2023 than in interim 2022.[12]

The value of U.S. imports from Canada increased irregularly by *** percent from 2020 to 2022. The value of imports from Germany and China increased in each year, overall increasing by *** percent and *** percent, respectively, reflecting the changes in quantity. The value of U.S. imports from South Korea, subject, fluctuated during 2020-22, ending 2022 *** percent higher than in 2020. The values of imports from Canada, Germany, and China were *** percent, *** percent, and *** percent lower, respectively, in interim 2023 than in interim 2022. The value of U.S. imports from South Korea, subject, were *** percent lower in interim 2023 than in interim 2022.

(…*continued*)
***. Email from ***, October 17, 2023.

[10] *** accounted for *** of tin mill product imports from Germany and reported the fluctuations in quantity were due to ***. Email from ***, October 20, 2023.

[11] The increase in the quantity of imports of tin mill products from China during the calendar years largely reflects *** operations as it accounted for the majority of imports from China. ***. Email from ***, October 24, 2023.

[12] ***, the largest importer of tin mill products from all other sources, reported that customer demand increased between 2020 and 2022 ***. Email from ***, October 10, 2023.

Overall, the value of imported tin mill products from subject sources increased in each year during 2020 to 2022, reflecting the rise of prices globally as a result of increased demand and supply constraints in the industry, ending 2022 *** percent higher than in 2020. The value of subject sources was *** percent lower in interim 2023 than in interim 2022, reflecting the stabilizing of prices. The value of nonsubject sources increased by *** percent during 2020-22 and was *** percent lower in interim 2023 than in interim 2022.

The unit values of tin mill product imports from Canada and Germany moved in the same direction, increasing in each year during 2020-22, ending *** percent and *** percent, respectively, higher in 2022 than in 2020. The unit value of imports from Canada and Germany were lower in interim 2022 than in interim 2023 by *** percent and *** percent, respectively. The unit values of imports from China and South Korea, subject, increased in each year, ending *** percent and *** percent higher in 2022 than in 2020, respectively. The unit values of imports from China and South Korea, subject, were *** percent and *** percent higher, respectively, in interim 2023 than in interim 2022.

Overall, the unit value of subject imports increased in each calendar year, ending *** percent higher in 2022 than in 2020. It was *** percent lower in interim 2023 than in interim 2022.

The unit value of imports from nonsubject sources increased in each year during 2020-22 and was *** percent lower in interim 2023 than in interim 2022.[13]

Table IV-3 presents data on the changes in import quantity, value, and unit value between the comparison periods.

[13] *** was the only responding firm that imported from all other sources to report a higher unit value in interim 2023 than in interim 2022.

Table IV-3
Tin mill products: Changes in import quantity and values between comparison periods

Changes in percent

Source	Measure	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Canada	%Δ Quantity	▼***	▼***	▼***	▼***
China	%Δ Quantity	▲***	▲***	▲***	▼***
Germany	%Δ Quantity	▲***	▲***	▲***	▼***
South Korea, subject	%Δ Quantity	▼***	▼***	▲***	▼***
Subject sources	%Δ Quantity	▲***	▼***	▲***	▼***
Subject sources less South Korea, subject	%Δ Quantity	▲***	▼***	▲***	▼***
Netherlands	%Δ Quantity	▲***	▲***	▲***	▼***
South Korea, nonsubject	%Δ Quantity	▼***	▼***	▲***	▼***
Taiwan	%Δ Quantity	▲***	▲***	▲***	▼***
Turkey	%Δ Quantity	▲***	▲***	▲***	▼***
United Kingdom	%Δ Quantity	▲***	▲***	▼***	▼***
All other sources	%Δ Quantity	▲***	▲***	▲***	▼***
Nonsubject sources	%Δ Quantity	▲***	▲***	▲***	▼***
Nonsubject sources plus South Korea, subject	%Δ Quantity	▲***	▲***	▲***	▼***
All import sources	%Δ Quantity	▲23.9	▲4.9	▲18.1	▼(13.9)
Canada	%Δ Value	▲***	▼***	▲***	▼***
China	%Δ Value	▲***	▲***	▲***	▼***
Germany	%Δ Value	▲***	▲***	▲***	▼***
South Korea, subject	%Δ Value	▲***	▼***	▲***	▼***
Subject sources	%Δ Value	▲***	▲***	▲***	▼***
Subject sources less South Korea, subject	%Δ Value	▲***	▲***	▲***	▼***
Netherlands	%Δ Value	▲***	▲***	▲***	▼***
South Korea nonsubject	%Δ Value	▲***	▼***	▲***	▼***
Taiwan	%Δ Value	▲***	▲***	▲***	▼***
Turkey	%Δ Value	▲***	▲***	▲***	▼***
United Kingdom	%Δ Value	▲***	▲***	▲***	▼***
All other sources	%Δ Value	▲***	▲***	▲***	▼***
Nonsubject sources	%Δ Value	▲***	▲***	▲***	▼***
Nonsubject sources plus South Korea, subject	%Δ Value	▲***	▲***	▲***	▼***
All import sources	%Δ Value	▲131.2	▲15.1	▲100.8	▼(19.5)

Table continued.

Table IV-3 Continued
Tin mill products: Changes in import unit values between comparison periods

Changes in percent

Source	Measure	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Canada	%Δ Unit value	▲***	▲***	▲***	▼***
China	%Δ Unit value	▲***	▲***	▲***	▲***
Germany	%Δ Unit value	▲***	▲***	▲***	▼***
South Korea, subject	%Δ Unit value	▲***	▲***	▲***	▲***
Subject sources	%Δ Unit value	▲***	▲***	▲***	▼***
Subject sources less South Korea, subject	%Δ Unit value	▲***	▲***	▲***	▼***
Netherlands	%Δ Unit value	▲***	▲***	▲***	▼***
South Korea, nonsubject	%Δ Unit value	▲***	▲***	▲***	▼***
Taiwan	%Δ Unit value	▲***	▲***	▲***	▼***
Turkey	%Δ Unit value	▲***	▲***	▲***	▼***
United Kingdom	%Δ Unit value	▲***	▲***	▲***	▼***
All other sources	%Δ Unit value	▲***	▲***	▲***	▼***
Nonsubject sources	%Δ Unit value	▲***	▲***	▲***	▼***
Nonsubject sources plus South Korea, subject	%Δ Unit value	▲***	▲***	▲***	▼***
All import sources	%Δ Unit value	▲86.6	▲9.8	▲70.0	▼(6.5)

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.[14] Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all

[14] Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Act (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

such merchandise imported into the United States during the applicable twelve-month period, then imports from such countries are deemed not to be negligible.[15]

Table IV-4 presents data on the U.S. imports in the twelve-month period preceding the filing of the petition. By quantity, imports from Canada, China, and Germany each accounted for more than *** percent of total imports of tin mill products by quantity during 2022. By quantity, imports from South Korea, subject, accounted for only *** percent of total imports of tin mill products by quantity during 2022. Table IV-5 and figure IV-2 present data on U.S. imports from South Korea, subject, in the twelve-month period preceding the filing of the petitions.

Table IV-4
Tin mill products: U.S. imports in the twelve-month period preceding the filing of the petitions, January 2022 through December 2022

Quantity in short tons; Share of quantity in percent

Source of imports	Quantity	Share of quantity
Canada	***	***
China	***	***
Germany	***	***
South Korea, subject	***	***
Netherlands	***	***
South Korea, nonsubject	***	***
Taiwan	***	***
Turkey	***	***
United Kingdom	***	***
All other sources	***	***
All import sources	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

[15] Section 771 (24) of the Act (19 U.S.C § 1677(24)).

Table IV-5
Tin mill products: U.S. imports from the South Korea, subject and all sources in various twelve-month periods in the lead up to the twelve months immediately prior to the filing of the petitions

Quantity in short tons; Share of quantity in percent

Twelve month period through to and including	South Korea, subject quantity	Other than South Korea, subject quantity	All import sources quantity	South Korea, subject share	Other than South Korea, subject share	All import sources share
January 2021	***	***	***	***	***	100.0
February 2021	***	***	***	***	***	100.0
March 2021	***	***	***	***	***	100.0
April 2021	***	***	***	***	***	100.0
May 2021	***	***	***	***	***	100.0
June 2021	***	***	***	***	***	100.0
July 2021	***	***	***	***	***	100.0
August 2021	***	***	***	***	***	100.0
September 2021	***	***	***	***	***	100.0
October 2021	***	***	***	***	***	100.0
November 2021	***	***	***	***	***	100.0
December 2021	***	***	***	***	***	100.0
January 2022	***	***	***	***	***	100.0
February 2022	***	***	***	***	***	100.0
March 2022	***	***	***	***	***	100.0
April 2022	***	***	***	***	***	100.0
May 2022	***	***	***	***	***	100.0
June 2022	***	***	***	***	***	100.0
July 2022	***	***	***	***	***	100.0
August 2022	***	***	***	***	***	100.0
September 2022	***	***	***	***	***	100.0
October 2022	***	***	***	***	***	100.0
November 2022	***	***	***	***	***	100.0
December 2022	***	***	***	***	***	100.0
January 2023	***	***	***	***	***	100.0
February 2023	***	***	***	***	***	100.0
March 2023	***	***	***	***	***	100.0
April 2023	***	***	***	***	***	100.0
May 2023	***	***	***	***	***	100.0
June 2023	***	***	***	***	***	100.0
July 2023	***	***	***	***	***	100.0
August 2023	***	***	***	***	***	100.0

Source: Monthly imports data for February 2020 through December 2021 were compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.50.0020, 7210.50.0090, and 7212.10.0000, accessed August 24, 2023 adjusted using data compiled from proprietary Census-edited, Customs records using the same statistical reporting numbers listed above to remove nonsubject imports from South Korea ***. For 2022 forward, monthly imports data are based on data submitted in response to Commission questionnaires. Imports are based on the imports for consumption data series from all data sources.

Figure IV-2
Tin mill products: Share of U.S. imports from South Korea, subject out of total imports in the various twelve-month periods in the lead up to the twelve months immediately prior to the filing of the petition

* * * * * * *

Source: Monthly imports data for February 2020 through December 2021 were compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.50.0020, 7210.50.0090, and 7212.10.0000, accessed August 24, 2023 adjusted using data compiled from proprietary Census-edited, Customs records using the same statistical reporting numbers listed above to remove nonsubject imports from South Korea ***. For 2022 forward, monthly imports data are based on data submitted in response to Commission questionnaires. Imports are based on the imports for consumption data series from all data sources.

Critical circumstances

On January 10, 2024, Commerce issued its final affirmative determination that critical circumstances exist with regard to LTFV imports of tin mill products from China for the China-wide entity as well as with regard to imports from the Chinese firm Baoshan in the countervailing duty investigation.[16] In this proceeding, if both Commerce and the Commission

[16] 89 FR 1532, 89 FR 1538, January 10, 2024. When petitioners file timely allegations of critical circumstances, Commerce examines whether there is a reasonable basis to believe or suspect that (1) either there is a history of dumping and material injury by reason of dumped imports in the United States or elsewhere of the subject merchandise, or the person by whom, or for whose account, the merchandise was imported knew or should have known that the exporter was selling the subject

(*continued*...)

make affirmative final critical circumstances determinations, certain subject imports may be subject to antidumping duties retroactive by 90 days from August 22, 2023, the effective date of Commerce's preliminary affirmative LTFV determination. Table IV-6 presents this data.

Table IV-6
Tin mill products: U.S. imports from China subject to final affirmative Commerce critical circumstances determination in the AD investigation, by month

Quantity in short tons

Month	Relation to petition	Quantity
August 2022	Before	***
September 2022	Before	***
October 2022	Before	***
November 2022	Before	***
December 2022	Before	***
January 2023	Before	***
February 2023	After	***
March 2023	After	***
April 2023	After	***
May 2023	After	***
June 2023	After	***
July 2023	After	***

Table continued.

Table IV-6 Continued
Tin mill products: U.S. imports from China subject to a final affirmative Commerce critical circumstances determination in the AD investigation, by differing number of months before and after the filing of the petition

Quantity in short tons; Difference in percent

Comparison pre-post petition period	Cumulative before period quantity	Cumulative after period quantity	Difference
1 month	***	***	***
2 months	***	***	***
3 months	***	***	***
4 months	***	***	***
5 months	***	***	***
6 months	***	***	***

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

Note: Commerce's final affirmative China AD critical circumstances determination pertains to imports from the China-wide entity.

(…*continued*)
merchandise at LTFV and that there was likely to be material injury by reason of such sales; and (2) there have been massive imports of the subject merchandise over a relatively short period.

Figure IV-3
Tin mill products: U.S. imports from China subject to final affirmative Commerce critical circumstances determination in the AD investigation, by month

* * * * * * *

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

Table IV-7 presents data on U.S. importers' U.S. inventories of imports from China.

Table IV-7
Tin mill products: U.S. importers' U.S. inventories of imports from China for analysis in relation to a final affirmative Commerce critical circumstances determination in the AD investigation, by date

Quantity in short tons; Index in percent

Date	Quantity	Index
January 31, 2023	***	***
February 28, 2023	***	***
March 31, 2023	***	***
April 30, 2023	***	***
May 31, 2023	***	***
June 30, 2023	***	***
July 31, 2023	***	***

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

Note: Index based on end of period inventories on January 31, 2022, equal to 100.0 percent.

Table IV-8 and figure IV-4 present data on U.S. imports from Chinese firm Baoshan by month.

Table IV-8
Tin mill products: U.S. imports from Chinese firm Baoshan subject to preliminary affirmative Commerce critical circumstances determination in the CVD investigation, by month

Quantity in short tons

Month	Relation to petition	Quantity
August 2022	Before	***
September 2022	Before	***
October 2022	Before	***
November 2022	Before	***
December 2022	Before	***
January 2023	Before	***
February 2023	After	***
March 2023	After	***
April 2023	After	***
May 2023	After	***
June 2023	After	***
July 2023	After	***

Table continued.

Table IV-8 Continued
Tin mill products: U.S. imports from Chinese firm Baoshan subject to a final affirmative Commerce critical circumstances determination in the CVD investigation, by differing number of months before and after the filing of the petition

Quantity in short tons; Difference in percent

Comparison pre-post petition period	Cumulative before period quantity	Cumulative after period quantity	Difference
1 month	***	***	***
2 months	***	***	***
3 months	***	***	***
4 months	***	***	***
5 months	***	***	***
6 months	***	***	***

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

Note: Commerce's final affirmative China CVD critical circumstances determination pertains to imports from the Chinese firm Baoshan.

Figure IV-4
Tin mill products: U.S. imports from Chinese firm Baoshan subject to final affirmative Commerce critical circumstances determination in the CVD investigation, by month

* * * * * * *

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

Table IV-9 presents data on U.S. importers' U.S. inventories of imports from Chinese firm Baoshan by date.

Table IV-9
Tin mill products: U.S. importers' U.S. inventories of imports from Chinese firm Baoshan for analysis in relation to final affirmative Commerce critical circumstances determination in the CVD investigation, by date

Quantity in short tons; Index in percent

Date	Quantity	Index
January 31, 2023	***	***
February 28, 2023	***	***
March 31, 2023	***	***
April 30, 2023	***	***
May 31, 2023	***	***
June 30, 2023	***	***
July 31, 2023	***	***

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

Note: Index based on end of period inventories on January 31, 2023, equal to 100.0 percent.

Cumulation considerations

In assessing whether imports should be cumulated, the Commission determines whether U.S. imports from the subject countries compete with each other and with the

domestic like product and has generally considered four factors: (1) fungibility, (2) presence of sales or offers to sell in the same geographical markets, (3) common or similar channels of distribution, and (4) simultaneous presence in the market. Information regarding channels of distribution, market areas, and interchangeability appear in Part II. Additional information concerning fungibility, geographical markets, and simultaneous presence in the market is presented below.

Fungibility

Table IV-10 and figure IV-5 present data on U.S. producers' and U.S. importers' U.S. shipments of tin mill products by coating type in 2022. Tin plate other than drawn and ironed ("D&I") accounted for the majority of U.S. producers' U.S. shipments. Tin plate other than D&I also accounted for the largest share of imports from Canada, China, and South Korea, subject, followed by tin free steel ("TFS") other than laminated. D&I tin plate accounted for the largest share of U.S. shipments of imports from Germany, followed by tin plate other than D&I. Out of the subject sources, only Germany reported any shipments of laminated TFS in 2022.

U.S. producers accounted for the largest share of total U.S. shipments of tin plate other than D&I and of TFS other than laminated. Imports from Canada accounted for the second largest share of imports of tin plate other than D&I, closely followed by imports from Germany. Imports from Canada accounted for the second-largest share of U.S. shipments of TFS other than laminated. Imports from the Netherlands accounted for the largest share of U.S. shipments of D&I tin plate, and imports from Germany accounted for the second-largest share with U.S. producers accounting for the third-largest share. Imports from the United Kingdom accounted for the largest share of U.S. shipments of laminated TFS, followed by imports from all other sources.

Table IV-10
Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and coating type, 2022

Quantity in short tons

Source	Tin plate: D&I	Tin plate: Other	TFS: Laminated	TFS: Other	All coating types
U.S. producers	***	***	***	***	***
Canada	***	***	***	***	***
China	***	***	***	***	***
Germany	***	***	***	***	***
South Korea, subject	***	***	***	***	***
South Korea, nonsubject	***	***	***	***	***
Netherlands	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
United Kingdom	***	***	***	***	***
All other sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	***

Table continued.

Table IV-10 Continued
Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and coating type, 2022

Share across in percent

Source	Tin plate: D&I	Tin plate: Other	TFS: Laminated	TFS: Other	All coating types
U.S. producers	***	***	***	***	100.0
Canada	***	***	***	***	100.0
China	***	***	***	***	100.0
Germany	***	***	***	***	100.0
South Korea, subject	***	***	***	***	100.0
South Korea, nonsubject	***	***	***	***	100.0
Netherlands	***	***	***	***	100.0
Taiwan	***	***	***	***	100.0
Turkey	***	***	***	***	100.0
United Kingdom	***	***	***	***	100.0
All other sources	***	***	***	***	100.0
All import sources	***	***	***	***	100.0
All sources	***	***	***	***	100.0

Table continued.

Table IV-10 Continued
Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and coating type, 2022

Share down in percent

Source	Tin plate: D&I	Tin plate: Other	TFS: Laminated	TFS: Other	All coating types
U.S. producers	***	***	***	***	***
Canada	***	***	***	***	***
China	***	***	***	***	***
Germany	***	***	***	***	***
South Korea, subject	***	***	***	***	***
South Korea, nonsubject	***	***	***	***	***
Netherlands	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
United Kingdom	***	***	***	***	***
All other sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-5
Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and coating type, 2022

* * * * * * *

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

Table IV-11 and figure IV-6 present data on U.S. producers' and U.S. importers' U.S. shipments of tin mill products by width in 2022. Tin mill products with a width less than 39 inches accounted for the vast majority of U.S. producers' U.S. shipments, as well as U.S. shipments of imports from China and the majority of U.S. shipments of imports from Canada. A width between 41 and 45 inches was the second largest share of U.S. shipments from Canada and China. *** U.S. shipments of imports from South Korea, subject, were less than 39 inches. Tin mill products with a width between 41 and 45 inches accounted for the largest share of U.S. shipments of imports from Germany, followed by a width greater than 45 inches.

U.S. producers accounted for the largest share of U.S. shipments of tin mill products of a width of less than 39 inches. U.S. shipments of imports from Canada accounted for the second-largest share of a width less than 39 inches, followed by U.S. shipments imports from Germany. Imports from the Netherlands accounted for the largest share of U.S. shipments of tin mill products of a width between 39 and 41 inches, with U.S. producers accounting for the second-largest share. Imports from the Netherlands also accounted for the largest share of U.S. shipments of tin mill products with a width between 41 and 45 inches, followed by U.S. shipments from Germany and imports from Canada accounted for the third-largest share.

Imports from the Netherlands accounted for the largest share of U.S. shipments of tin mill products that are greater than 45 inches. Imports from Germany accounted for the second-largest share of a width greater than 45 inches, followed by imports from Canada.

Table IV-11
Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and width, 2022

Quantity in short tons

Source	<39 inches	≥39 inches and <41 inches	≥41 inches and <45 inches	≥45 inches	All widths
U.S. producers	***	***	***	***	***
Canada	***	***	***	***	***
China	***	***	***	***	***
Germany	***	***	***	***	***
South Korea, subject	***	***	***	***	***
South Korea, nonsubject	***	***	***	***	***
Netherlands	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
United Kingdom	***	***	***	***	***
All other sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	***

Table continued.

Table IV-11 Continued
Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and width, 2022

Share across in percent

Source	<39 inches	≥39 inches and <41 inches	≥41 inches and <45 inches	≥45 inches	All widths
U.S. producers	***	***	***	***	100.0
Canada	***	***	***	***	100.0
China	***	***	***	***	100.0
Germany	***	***	***	***	100.0
South Korea, subject	***	***	***	***	100.0
South Korea, nonsubject	***	***	***	***	100.0
Netherlands	***	***	***	***	100.0
Taiwan	***	***	***	***	100.0
Turkey	***	***	***	***	100.0
United Kingdom	***	***	***	***	100.0
All other sources	***	***	***	***	100.0
All import sources	***	***	***	***	100.0
All sources	***	***	***	***	100.0

Table continued.

Table IV-11 Continued
Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and width, 2022

Share down in percent

Source	<39 inches	≥39 inches and <41 inches	≥41 inches and <45 inches	≥45 inches	All widths
U.S. producers	***	***	***	***	***
Canada	***	***	***	***	***
China	***	***	***	***	***
Germany	***	***	***	***	***
South Korea, subject	***	***	***	***	***
South Korea, nonsubject	***	***	***	***	***
Netherlands	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
United Kingdom	***	***	***	***	***
All other sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

Figure IV-6
Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and width, 2022

* * * * * * *

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

Table IV-12 and figure IV-7 present data on U.S. producers' and U.S. importers' U.S. shipments of tin mill products by base weight in 2022. Tin mill products with a base weight between 75 and 107 short tons accounted for the largest share of U.S. producers' U.S. shipments and the largest share U.S. shipments of imports from Canada, China, Germany, and South Korea, subject.

U.S. producers accounted for the largest share of U.S. shipments of tin mill products of all base weights. Imports from South Korea, nonsubject, accounted for the second-largest share of U.S. shipments of tin mill products with a base weight less than 73 short tons, and imports from Canada accounted for the third-largest share. Imports from Germany accounted for the second-largest share of U.S. shipments of tin mill products with a base weight between 75 and 107 short tons. Imports from the Netherlands accounted for the second-largest U.S. shipments of tin mill products with a base weight greater than 112 short tons and imports from Germany accounted for the third-largest share.

Table IV-12
Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and base weight, 2022

Quantity in short tons

Source	Base weight ≤ 73	Base weight 75-107	Base weight ≥ 112	All base weights
U.S. producers	***	***	***	***
Canada	***	***	***	***
China	***	***	***	***
Germany	***	***	***	***
South Korea, subject	***	***	***	***
South Korea, nonsubject	***	***	***	***
Netherlands	***	***	***	***
Taiwan	***	***	***	***
Turkey	***	***	***	***
United Kingdom	***	***	***	***
All other sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

Table IV-12 Continued
Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and base weight, 2022

Share across in percent

Source	Base weight ≤ 73	Base weight 75-107	Base weight ≥ 112	All base weights
U.S. producers	***	***	***	100.0
Canada	***	***	***	100.0
China	***	***	***	100.0
Germany	***	***	***	100.0
South Korea, subject	***	***	***	100.0
South Korea, nonsubject	***	***	***	100.0
Netherlands	***	***	***	100.0
Taiwan	***	***	***	100.0
Turkey	***	***	***	100.0
United Kingdom	***	***	***	100.0
All other sources	***	***	***	100.0
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

Table IV-12 Continued
Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and base weight, 2022

Share down in percent

Source	Base weight ≤ 73	Base weight 75-107	Base weight ≥ 112	All base weights
U.S. producers	***	***	***	***
Canada	***	***	***	***
China	***	***	***	***
Germany	***	***	***	***
South Korea, subject	***	***	***	***
South Korea, nonsubject	***	***	***	***
Netherlands	***	***	***	***
Taiwan	***	***	***	***
Turkey	***	***	***	***
United Kingdom	***	***	***	***
All other sources	***	***	***	***
All import sources	***	***	***	***
All sources	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Base weight also indicates the thickness of the product. A base weight of less than 73 short tons is less than or equal to 0.2 mm/0.0080 inches in thickness. Base weight between 75-107 short tons are greater than 0.2 mm/0.0080 inches but less than or equal to 0.3 mm/0.0118 inches in thickness. Base weights greater than 112 short tons are greater than 0.3 mm/0.0118 inches in thickness.

Figure IV-7
Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and base weight, 2022

* * * * * * *

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

Table IV-13 and figure IV-8 present data on U.S. producers' and U.S. importers' U.S. shipments of tin mill products by finish type in 2022. Tin mill products with a bright finish accounted for the largest share of U.S. producers' U.S. shipments and U.S. shipments of imports from Canada and China. Regarding subject sources, tin mill products with a finish other than bright accounted for *** U.S. shipments from South Korea, subject and *** of the U.S. shipments from Germany.

U.S. producers accounted for the largest share of U.S. shipments of tin mill products of bright and other finishes. Imports from Canada accounted for the second-largest share of U.S. shipments of tin mill products with a bright finish, and imports from China accounted for the third-largest share. Imports from Germany accounted for the second-largest share of U.S. shipments of tin mill products with a finish other than bright.

Table IV-13
Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and finish type, 2022

Quantity in short tons

Source	Bright	Other	All finish types
U.S. producers	***	***	***
Canada	***	***	***
China	***	***	***
Germany	***	***	***
South Korea, subject	***	***	***
South Korea, nonsubject	***	***	***
Netherlands	***	***	***
Taiwan	***	***	***
Turkey	***	***	***
United Kingdom	***	***	***
All other sources	***	***	***
All import sources	***	***	***
All sources	***	***	***

Table continued.

Table IV-13 Continued
Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and finish type, 2022

Share across in percent

Source	Bright	Other	All finish types
U.S. producers	***	***	100.0
Canada	***	***	100.0
China	***	***	100.0
Germany	***	***	100.0
South Korea, subject	***	***	100.0
South Korea, nonsubject	***	***	100.0
Netherlands	***	***	100.0
Taiwan	***	***	100.0
Turkey	***	***	100.0
United Kingdom	***	***	100.0
All other sources	***	***	100.0
All import sources	***	***	100.0
All sources	***	***	100.0

Table continued.

Table IV-13 Continued
Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and finish type, 2022

Share down in percent

Source	Bright	Other	All finish types
U.S. producers	***	***	***
Canada	***	***	***
China	***	***	***
Germany	***	***	***
South Korea, subject	***	***	***
South Korea, nonsubject	***	***	***
Netherlands	***	***	***
Taiwan	***	***	***
Turkey	***	***	***
United Kingdom	***	***	***
All other sources	***	***	***
All import sources	***	***	***
All sources	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

Figure IV-8
Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and finish type, 2022

* * * * * * *

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

Geographical markets

Table IV-14 presents data on U.S. imports of tin mill products by border of entry in 2022. According to official import statistics, out of the subject sources, only imports from ***. Imports from Canada entered the United States through ports in every region except in the South, while imports from Germany entered the United States through ports in every region except the West.

The majority of imports from Germany entered the United States through ports located in the East, while the majority of imports from Canada entered the United States through ports located in the North. Nearly all imports from China entered the United States through ports located in the East, North, or South. The majority of imports from South Korea, subject, entered through ports in ***.

Table IV-14
Tin mill products: U.S. imports, by source and by border of entry, 2022

Quantity in short tons

Source	East	North	South	West	All borders
Canada	94,682	180,694	---	46	275,421
China	57,424	37,929	105,099	1,756	202,208
Germany	168,437	86,622	13,640	---	268,699
South Korea, subject	***	***	***	***	***
South Korea, nonsubject	***	***	***	***	***
Netherlands	129,227	151,054	19	7,488	287,787
Taiwan	40,072	---	42,733	2,427	85,231
Turkey	23,322	16,785	11,639	---	51,747
United Kingdom	9,920	35,157	---	2	45,080
All other sources	67,253	6,827	79,667	11,215	164,961
All import sources	601,792	522,437	292,797	43,984	1,461,010

Table continued.

Table IV-14 Continued
Tin mill products: U.S. imports, by source and by border of entry, 2022

Share across in percent

Source	East	North	South	West	All borders
Canada	34.4	65.6	---	0.0	100.0
China	28.4	18.8	52.0	0.9	100.0
Germany	62.7	32.2	5.1	---	100.0
South Korea, subject	***	***	***	***	***
South Korea, nonsubject	***	***	***	***	***
Netherlands	44.9	52.5	0.0	2.6	100.0
Taiwan	47.0	---	50.1	2.8	100.0
Turkey	45.1	32.4	22.5	---	100.0
United Kingdom	22.0	78.0	---	0.0	100.0
All other sources	40.8	4.1	48.3	6.8	100.0
All import sources	41.2	35.8	20.0	3.0	100.0

Table continued.

Table IV-14 Continued
Tin mill products: U.S. imports, by source and by border of entry, 2022

Share down in percent

Source	East	North	South	West	All borders
Canada	15.7	34.6	---	0.1	18.9
China	9.5	7.3	35.9	4.0	13.8
Germany	28.0	16.6	4.7	---	18.4
South Korea, subject	***	***	***	***	***
South Korea, nonsubject	***	***	***	***	***
Netherlands	21.5	28.9	0.0	17.0	19.7
Taiwan	6.7	---	14.6	5.5	5.8
Turkey	3.9	3.2	4.0	---	3.5
United Kingdom	1.6	6.7	---	0.0	3.1
All other sources	11.2	1.3	27.2	25.5	11.3
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.50.0020, 7210.50.0090, and 7212.10.0000, accessed August 24, 2023, and from proprietary, Census-edited Customs records using the same statistical reporting numbers to show South Korea broken out by nonsubject and subject suppliers. Imports are based on the imports for consumption data series.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

Table IV-15 and figures IV-9 and IV-10 present monthly data for subject and nonsubject imports of tin mill products during January 2020-June 2023. U.S. imports of tin mill products from each subject source, ***, were present in every month during January 2020-June 2023. U.S. imports of tin mill products from South Korea, subject, were present in *** out of 42 months during January 2020-June 2023.

Table IV-15
Tin mill products: U.S. imports, by month and source

Quantity in short tons

Year	Month	Canada	China	Germany	South Korea, subject	Subject sources
2020	January	25,169	3,694	6,294	***	***
2020	February	22,280	2,230	10,724	***	***
2020	March	25,597	3,404	12,291	***	***
2020	April	22,845	7,057	12,771	***	***
2020	May	24,450	7,382	18,130	***	***
2020	June	23,940	9,343	18,474	***	***
2020	July	24,498	29,349	20,446	***	***
2020	August	21,210	9,408	17,843	***	***
2020	September	21,241	3,219	22,467	***	***
2020	October	17,740	4,411	23,429	***	***
2020	November	19,466	16,615	18,863	***	***
2020	December	19,874	7,451	17,441	***	***
2021	January	17,138	2,960	410	***	***
2021	February	23,186	17,515	19,059	***	***
2021	March	24,730	3,426	30,365	***	***
2021	April	20,253	1,948	8,376	***	***
2021	May	18,697	23,738	37,726	***	***
2021	June	18,719	1,440	18,227	***	***
2021	July	18,138	8,101	21,858	***	***
2021	August	18,923	6,637	25,704	***	***
2021	September	22,613	24,198	27,215	***	***
2021	October	19,360	2,070	17,580	***	***
2021	November	18,165	4,487	16,405	***	***
2021	December	20,968	33,256	16,118	***	***

Table continued.

Table IV-15 Continued
Tin mill products: U.S. imports, by year, by month, and by source

Quantity in short tons

Year	Month	Canada	China	Germany	South Korea, subject	Subject sources
2022	January	26,941	39,020	10,755	***	***
2022	February	29,416	5,594	19,166	***	***
2022	March	31,159	10,821	22,391	***	***
2022	April	26,498	38,195	31,568	***	***
2022	May	28,505	4,616	33,649	***	***
2022	June	33,718	15,313	22,345	***	***
2022	July	20,288	6,445	13,755	***	***
2022	August	21,010	23,128	30,516	***	***
2022	September	17,952	20,754	31,064	***	***
2022	October	14,176	30,071	19,134	***	***
2022	November	12,350	4,077	27,773	***	***
2022	December	13,408	4,174	6,582	***	***
2023	January	19,157	26,672	19,182	***	***
2023	February	17,777	6,747	13,987	***	***
2023	March	24,007	27,011	32,654	***	***
2023	April	19,993	9,424	23,689	***	***
2023	May	21,862	1,736	39,070	***	***
2023	June	16,818	1,813	10,922	***	***

Table continued.

Table IV-15 Continued
Tin mill products: U.S. imports, by year, by month, and by source

Quantity in short tons

Year	Month	Netherlands	South Korea nonsubject	Taiwan	Turkey
2020	January	3,566	***	1,118	117
2020	February	20,222	***	2,446	---
2020	March	17,121	***	889	---
2020	April	21,949	***	7,226	---
2020	May	27,272	***	2,853	---
2020	June	15,488	***	892	---
2020	July	21,656	***	4,100	---
2020	August	25,054	***	3,668	---
2020	September	19,448	***	6,901	---
2020	October	13,012	***	2,314	---
2020	November	18,902	***	6,339	3
2020	December	37,925	***	7,003	188
2021	January	1,333	***	4,076	46
2021	February	18,833	***	5,487	---
2021	March	30,880	***	172	247
2021	April	5,336	***	4,764	---
2021	May	34,682	***	5,530	---
2021	June	22,439	***	15,145	5,353
2021	July	30,784	***	8,055	20
2021	August	22,310	***	8,473	3
2021	September	24,203	***	6,662	---
2021	October	21,010	***	5,228	---
2021	November	24,811	***	1,910	---
2021	December	20,634	***	10,039	10,756

Table continued.

Table IV-15 Continued
Tin mill products: U.S. imports, by year, by month, and by source

Quantity in short tons

Year	Month	Netherlands	South Korea nonsubject	Taiwan	Turkey
2022	January	16,783	***	7,561	2,998
2022	February	23,066	***	201	2,202
2022	March	15,918	***	12,557	8,100
2022	April	22,129	***	7,077	11,099
2022	May	30,426	***	10,393	---
2022	June	25,838	***	13,678	6,281
2022	July	23,212	***	12,520	9,133
2022	August	26,042	***	418	---
2022	September	18,356	***	12,236	5,935
2022	October	32,215	***	341	5,888
2022	November	29,244	***	4,686	110
2022	December	24,558	***	3,564	---
2023	January	11,719	***	2,391	20
2023	February	33,655	***	6,470	---
2023	March	7,003	***	18,320	---
2023	April	22,869	***	17,209	---
2023	May	31,503	***	5,226	5,666
2023	June	18,262	***	935	---

Table continued.

Table IV-15 Continued
Tin mill products: U.S. imports, by year, by month, and by source

Quantity in short tons

Year	Month	United Kingdom	All other sources	Nonsubject sources	All import sources
2020	January	59	10,657	***	65,220
2020	February	183	9,886	***	70,909
2020	March	1,553	8,936	***	74,928
2020	April	4,665	11,324	***	95,201
2020	May	5,678	9,699	***	107,516
2020	June	4,846	6,696	***	83,501
2020	July	4,361	8,762	***	124,247
2020	August	2,043	5,102	***	89,140
2020	September	3,737	14,219	***	98,790
2020	October	689	7,679	***	74,843
2020	November	661	4,286	***	89,088
2020	December	1,387	11,730	***	106,546
2021	January	406	6,863	***	44,564
2021	February	1,592	14,121	***	104,112
2021	March	5,260	13,690	***	114,005
2021	April	604	6,269	***	55,255
2021	May	5,740	16,957	***	152,565
2021	June	2,014	10,351	***	98,366
2021	July	5,722	11,716	***	115,556
2021	August	2,511	3,405	***	91,809
2021	September	5,641	9,475	***	124,913
2021	October	2,588	9,860	***	84,125
2021	November	1,426	16,833	***	90,320
2021	December	5,696	16,089	***	137,534

Table continued.

Table IV-15 Continued
Tin mill products: U.S. imports, by year, by month, and by source

Quantity in short tons

Year	Month	United Kingdom	All other sources	Nonsubject sources	All import sources
2022	January	933	24,697	***	137,431
2022	February	1,120	14,612	***	99,957
2022	March	498	21,420	***	129,356
2022	April	2,529	12,753	***	157,153
2022	May	2,694	9,051	***	131,132
2022	June	3,688	12,747	***	138,773
2022	July	3,174	16,280	***	119,508
2022	August	7,397	6,257	***	118,994
2022	September	4,323	10,029	***	124,264
2022	October	3,807	12,447	***	120,968
2022	November	5,634	15,268	***	107,342
2022	December	9,281	9,399	***	76,132
2023	January	3,640	20,385	***	106,231
2023	February	57	456	***	86,692
2023	March	2,641	11,494	***	126,526
2023	April	838	10,678	***	110,831
2023	May	1,568	6,319	***	122,268
2023	June	2,612	9,557	***	68,200

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.50.0020, 7210.50.0090, and 7212.10.0000, accessed August 24, 2023, and from proprietary, Census-edited Customs records using the same statistical reporting numbers to show South Korea broken out by nonsubject and subject suppliers. Imports are based on the imports for consumption data series.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---". Staff adjusted the South Korea nonsubject quantity reported in for January 2020 to compensate for the larger volume of reported products in proprietary import records relative to the public official import statistics.

Figure IV-9
Tin mill products: U.S. imports from individual subject sources and other nonsubject sources, by source and by month

* * * * * * *

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.50.0020, 7210.50.0090, and 7212.10.0000, accessed August 24, 2023, and from proprietary, Census-edited Customs records using the same statistical reporting numbers to show South Korea broken out by nonsubject and subject suppliers. Imports are based on the imports for consumption data series.

Figure IV-10
Tin mill products: U.S. imports from subject and nonsubject sources, by month

* * * * * * *

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.50.0020, 7210.50.0090, and 7212.10.0000, accessed August 24, 2023, and from proprietary, Census-edited Customs records using the same statistical reporting numbers to show South Korea broken out by nonsubject and subject suppliers. Imports are based on the imports for consumption data series.

Apparent U.S. consumption and market shares

Quantity

Table IV-16 and figure IV-11 present data on apparent U.S. consumption and U.S. market shares by quantity for tin mill products. Apparent U.S. consumption fluctuated during 2020-22, increasing by *** percent from 2020 to 2021, then decreasing by *** percent from 2021 to 2022, ending *** percent lower in 2022 than in 2020. It was *** percent lower in interim 2023 than in interim 2022. The overall decrease in apparent U.S. consumption generally reflects the decrease in U.S. producers' U.S. shipments, which offset the increases in the U.S. shipments of imports from both subject and nonsubject sources during 2020-22.[17] The difference in apparent U.S. consumption between the interim periods largely reflects U.S.

[17] For further discussion on the trends in U.S. producers' U.S. shipments, see Part III.

shipments of U.S. producers' U.S. shipments, as well as U.S. shipments of imports from China, South Korea, nonsubject, Taiwan, Turkey, and all other sources, which were lower in interim 2023 than in interim 2022. U.S. shipments from Canada, Germany, South Korea, subject, the Netherlands, and the United Kingdom were all higher in interim 2023 than in interim 2022.

U.S. producers' market share, by quantity, decreased in every year during 2020-22, ending *** percentage points lower in 2022 than in 2020. It was *** percentage points lower in interim 2023 than in interim 2022. U.S. shipments of imports from Canada and Germany accounted for the highest market shares among the subject sources during 2020-22 (between *** percent and *** percent). The market share of U.S. shipments of imports from Canada decreased in each year during 2020-22, ending *** percentage points lower in 2022 than in 2020. The market share of U.S. shipments of imports from Germany increased in each year, ending 2022 *** percentage points higher than in 2020. The market share of U.S. shipments of imports from China increased in each year during 2020-22, ending *** percentage points higher in 2022 than in 2020. The market share of U.S. shipments of imports from South Korea, subject, decreased marginally, ending 2022 *** percentage points lower than in 2020. The market shares of U.S. shipments of imports from Canada, Germany, and China reached period-highs during interim 2023 and were ***, ***, and *** percentage points higher, respectively, in interim 2023 than in interim 2022. The market share of U.S. shipments of imports from South Korea, subject, was *** percentage points higher in interim 2023 compared to interim 2022.

Overall, the market share of U.S. shipments of subject imports increased in each year during 2020-22, ending *** percentage points higher in 2022 than in 2020, and was *** percentage points higher in interim 2023 than in interim 2022.

U.S. shipments of imports from the Netherlands, South Korea, nonsubject, and the United Kingdom accounted for the next largest market shares among nonsubject sources during 2020-22 (between *** percent and *** percent). U.S. shipments of imports from Taiwan and Turkey accounted for the smallest market shares among the subject sources during 2020-22 (no more than *** percent). Overall, the market share of U.S. shipments of imports from nonsubject sources increased in each year during 2020-22, ending *** percentage points higher in 2022 than in 2020. It was *** percentage points higher in interim 2023 than in interim 2022.

Table IV-16
Tin mill products: Apparent U.S. consumption and market shares based on quantity data, by source and period

Quantity in short tons

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers: Cleveland-Cliffs	Quantity	***	***	***	***	***
U.S. producers: Ohio Coatings	Quantity	***	***	***	***	***
U.S. producers: U.S. Steel	Quantity	***	***	***	***	***
U.S. producers: All firms	Quantity	***	***	***	***	***
Canada	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Germany	Quantity	***	***	***	***	***
South Korea, subject	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Subject sources less South Korea, subject	Quantity	***	***	***	***	***
Netherlands	Quantity	***	***	***	***	***
South Korea, nonsubject	Quantity	***	***	***	***	***
Taiwan	Quantity	33,142	68,889	81,532	39,318	33,079
Turkey	Quantity	***	***	***	***	***
United Kingdom	Quantity	***	***	***	***	***
All other sources	Quantity	53,566	67,142	84,660	46,860	40,410
Nonsubject sources	Quantity	***	***	***	***	***
Nonsubject sources plus South Korea, subject	Quantity	***	***	***	***	***
All import sources	Quantity	1,072,065	1,193,128	1,291,918	622,598	652,137
All sources	Quantity	***	***	***	***	***

Table continued.

Table IV-16 Continued
Tin mill products: Apparent U.S. consumption market shares based on quantity data, by source and period

Shares in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers: Cleveland-Cliffs	Share	***	***	***	***	***
U.S. producers: Ohio Coatings	Share	***	***	***	***	***
U.S. producers: U.S. Steel	Share	***	***	***	***	***
U.S. producers: All firms	Share	***	***	***	***	***
Canada	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Germany	Share	***	***	***	***	***
Korea, subject	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Subject sources less South Korea, subject	Share	***	***	***	***	***
Netherlands	Share	***	***	***	***	***
South Korea, nonsubject	Share	***	***	***	***	***
Taiwan	Share	***	***	***	***	***
Turkey	Share	***	***	***	***	***
United Kingdom	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
Nonsubject sources plus South Korea, subject	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Table continued.

Table IV-16 Continued
Tin mill products: Changes in U.S. producers' U.S. shipments quantity and apparent U.S. consumption market share between comparison periods, by firm

Quantity change in short tons; Percent change in percent; Market share change in percentage points

Item	Firm	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Δ Quantity	Cleveland-Cliffs	▼***	▼***	▲***	▼***
Δ Quantity	Ohio Coatings	▼***	▼***	▼***	▼***
Δ Quantity	U.S. Steel	▼***	▼***	▼***	▼***
Δ Quantity	All U.S. producers	▼***	▼***	▼***	▼***
%Δ Quantity	Cleveland-Cliffs	▼***	▼***	▲***	▼***
%Δ Quantity	Ohio Coatings	▼***	▼***	▼***	▼***
%Δ Quantity	U.S. Steel	▼***	▼***	▼***	▼***
%Δ Quantity	All U.S. producers	▼***	▼***	▼***	▼***
pptΔ Market share	Cleveland-Cliffs	▼***	▼***	▲***	▼***
pptΔ Market share	Ohio Coatings	▼***	▼***	▼***	▼***
pptΔ Market share	U.S. Steel	▼***	▼***	▼***	▼***
pptΔ Market share	All U.S. producers	▼***	▼***	▼***	▼***

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

Note: Percentage points have the acronym ppt. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-11
Tin mill products: Apparent U.S. consumption based on quantity data, by source and period

* * * * * * *

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

Value

Table IV-17 and figure IV-12 present data on apparent U.S. consumption and U.S. market shares by value for tin mill products. The value of apparent U.S. consumption increased in each year during 2020-22, ending *** percent higher in 2022 than in 2020, with most of the increase occurring from 2021 to 2022. It was *** percent lower in interim 2023 than in interim 2022. As with quantity, the increase in the value of apparent U.S. consumption during 2020-22 largely reflects the increase in the values of U.S. producers' U.S. shipments, as well as U.S. shipments of imports from every source. The difference in apparent U.S. consumption between the interim periods largely reflects U.S. shipments of U.S. producers' U.S. shipments, as well as U.S. shipments of imports from Canada and China. U.S. shipments from Germany, South Korea, subject, the United Kingdom, and all other nonsubject sources were higher in interim 2023 than in interim 2022.

U.S. producers' market share, by value, decreased in each year during 2020-22, ending *** percentage points lower in 2022 than in 2020. It was *** percentage points lower in interim 2023 than in interim 2022. As with quantity, U.S. shipments of imports from Canada and Germany accounted for the largest market shares among the subject sources during 2020-22 (between *** percent and *** percent). The market share of imports from Canada fluctuated, decreasing from 2020 to 2021, then increasing from 2021 to 2022, ending *** percentage points lower in 2022 than in 2020. The market share of imports from Germany increased in each year during 2020-22, ending *** percentage points higher in 2022 than in 2020. The market share of U.S. shipments of imports from China also increased in each year, ending *** percentage points higher in 2022 than in 2020. The market share of imports from South Korea, subject, decreased in each year during 2020-22, ending 2022 *** percentage points lower than 2020. The market shares of U.S. shipments of imports from Canada, Germany, China, and South Korea, subject, were ***, ***, ***, and *** percentage points higher, respectively, in interim 2023 than in interim 2022. Overall, the market share of U.S. shipments of imports, by value, from subject sources fluctuated during 2020-22, ending *** percentage points higher in 2022 than in 2020, and was *** percentage points higher in interim 2023 than in interim 2022.

The value of U.S. shipments of imports from the Netherlands, South Korea, nonsubject, and the United Kingdom accounted for the next largest market shares among nonsubject subject sources during 2020-22 (between *** percent and *** percent). Overall, the market share of U.S. shipments of imports from nonsubject sources increased in each year during 2020-22, ending *** percentage points higher in 2022 than in 2020. It was *** percentage points higher in interim 2023 than in interim 2022, reaching a period high.

Table IV-17
Tin mill products: Apparent U.S. consumption and market shares based on value data, by source and period

Value in 1,000 dollars; shares in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers: Cleveland-Cliffs	Value	***	***	***	***	***
U.S. producers: Ohio Coatings	Value	***	***	***	***	***
U.S. producers: U.S. Steel	Value	***	***	***	***	***
U.S. producers: All firms	Value	***	***	***	***	***
Canada	Value	***	***	***	***	***
China	Value	***	***	***	***	***
Germany	Value	***	***	***	***	***
South Korea, subject	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Subject sources less South Korea, subject	Value	***	***	***	***	***
Netherlands	Value	***	***	***	***	***
South Korea, nonsubject	Value	***	***	***	***	***
Taiwan	Value	35,001	80,405	161,238	74,218	64,542
Turkey	Value	***	***	***	***	***
United Kingdom	Value	***	***	***	***	***
All other sources	Value	73,340	104,150	154,391	83,916	83,121
Nonsubject sources	Value	***	***	***	***	***
Nonsubject sources plus South Korea, subject	Value	***	***	***	***	***
All import sources	Value	1,230,921	1,419,686	2,622,440	1,206,570	1,239,013
All sources	Value	***	***	***	***	***

Table continued.

Table IV-17 Continued
Tin mill products: Apparent U.S. consumption market shares based on value data, by source and period

Shares in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers: Cleveland-Cliffs	Share	***	***	***	***	***
U.S. producers: Ohio Coatings	Share	***	***	***	***	***
U.S. producers: U.S. Steel	Share	***	***	***	***	***
U.S. producers: All firms	Share	***	***	***	***	***
Canada	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Germany	Share	***	***	***	***	***
South Korea, subject	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Subject sources less South Korea, subject	Share	***	***	***	***	***
Netherlands	Share	***	***	***	***	***
South Korea, nonsubject	Share	***	***	***	***	***
Taiwan	Share	***	***	***	***	***
Turkey	Share	***	***	***	***	***
United Kingdom	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
Nonsubject sources plus South Korea, subject	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Table continued.

Table IV-17 Continued
Tin mill products: Changes in U.S. producers' U.S. shipments value and apparent U.S. consumption market share between comparison periods, by firm

Value change in 1,000 dollars; Percent change in percent; Market share change in percentage points

Item	Firm	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Δ Value	Cleveland-Cliffs	▲***	▼***	▲***	▼***
Δ Value	Ohio Coatings	▼***	▼***	▼***	▼***
Δ Value	U.S. Steel	▲***	▲***	▲***	▼***
Δ Value	All U.S. producers	▲***	▲***	▲***	▼***
%Δ Value	Cleveland-Cliffs	▲***	▼***	▲***	▼***
%Δ Value	Ohio Coatings	▼***	▼***	▼***	▼***
%Δ Value	U.S. Steel	▲***	▲***	▲***	▼***
%Δ Value	All U.S. producers	▲***	▲***	▲***	▼***
pptΔ Market share	Cleveland-Cliffs	▼***	▼***	▲***	▼***
pptΔ Market share	Ohio Coatings	▼***	▼***	▼***	▲***
pptΔ Market share	U.S. Steel	▼***	▼***	▼***	▼***
pptΔ Market share	All U.S. producers	▼***	▼***	▼***	▼***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-12
Tin mill products: Apparent U.S. consumption based on value data, by source and period

* * * * * * *

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

Part V: Pricing data

Factors affecting prices

Raw material costs

U.S. producers' raw material costs decreased as a share of cost of goods sold from *** percent in 2020 to *** percent in 2021 before increasing to *** percent in 2022. They were *** percent in January-June ("interim") 2023 compared with *** percent in interim 2022. The cost of steel, rather than tin or chromium, is the single largest raw material cost in producing tin mill products; tin and/or chromium materials accounted for *** percent of raw material costs in 2022. Prices for cold-rolled coil (in particular, tin mill black plate) and hot-rolled coil (used to produce tin mill black plate) fluctuated between January 2020 and September 2023 (figure V-1 and table V-1). Prices decreased slightly from January 2020 through August 2020–by *** percent for hot-rolled coil and *** percent for cold-rolled coil. Between August 2020 and September 2021, however, hot-rolled coiled prices increased by *** percent and cold-rolled coil prices increased by *** percent. Except for price increases in early 2022 and 2023, peaking in April of both years, prices have decreased for both products–by *** percent for hot-rolled coil and *** percent for cold-rolled coil from September 2021 to October 2023.

Two of 3 U.S. producers and 15 of 22 responding importers reported that raw material prices had fluctuated since January 2020 but ended higher.[1] Fifteen of 26 purchasers reported being familiar with tin mill products' raw material costs and 10 of 22 reported that raw materials affect contract prices. Because contracts are negotiated in the second half of the prior year, there is a lag between the raw material prices and the prices that are in effect in the tin mill products market.[2]

[1] In the preliminary phase of these investigations, one of three producers and slightly fewer than half of importers reported that tin mill product prices correlate with the price of the raw materials used to make them. One other producer and two importers noted that tin mill product prices do not fluctuate with raw material costs, but that those expected costs are included in the annual contract prices. Tin Mill Products from Canada, China, Germany, Netherlands, South Korea, Taiwan, Turkey, and United Kingdom, Investigation Nos. 701-TA-685 and 731-TA-1599-1606 (Preliminary), Publication 5413, March 2023, p. V-1.

[2] Conference transcript, p. 30 (Jarvis).

Figure V-1
Hot-rolled and cold-rolled coil, monthly average prices, January 2020-October 2023

* * * * * * *

Source: ***, accessed November 15, 2023.

Table V-1
Raw materials: Hot-rolled and cold-rolled coil, monthly average prices, January 2019-December 2022

Price in dollars per short ton

Period	Hot-rolled coil	Cold-rolled coil
January 2020	***	***
February 2020	***	***
March 2020	***	***
April 2020	***	***
May 2020	***	***
June 2020	***	***
July 2020	***	***
August 2020	***	***
September 2020	***	***
October 2020	***	***
November 2020	***	***
December 2020	***	***

Table continued.

Table V-1 Continued
Raw materials: Hot-rolled and cold-rolled coil, monthly average prices, January 2019-December 2022

Price in dollars per short ton

Item	Hot-rolled coil	Cold-rolled coil
January 2021	***	***
February 2021	***	***
March 2021	***	***
April 2021	***	***
May 2021	***	***
June 2021	***	***
July 2021	***	***
August 2021	***	***
September 2021	***	***
October 2021	***	***
November 2021	***	***
December 2021	***	***
January 2022	***	***
February 2022	***	***
March 2022	***	***
April 2022	***	***
May 2022	***	***
June 2022	***	***
July 2022	***	***
August 2022	***	***
September 2022	***	***
October 2022	***	***
November 2022	***	***
December 2022	***	***
January 2023	***	***
February 2023	***	***
March 2023	***	***
April 2023	***	***
May 2023	***	***
June 2023	***	***
July 2023	***	***
August 2023	***	***
September 2023	***	***
October 2023	***	***

Source: ***, accessed November 15, 2023.

Transportation costs to the U.S. market

Transportation costs for tin mill products shipped from the three subject countries to the United States during 2022 were 0.3 percent of the customs value of product imported from Canada, 11.1 percent for China, and 5.3 percent for Germany, and 7.1 percent for South Korea (subject and nonsubject). These estimates were derived from official import data and represent the transportation and other charges on imports.[3]

U.S. inland transportation costs

All three responding U.S. producers and 16 of 22 responding importers reported that transportation is arranged by the seller. U.S. producers reported U.S. inland transportation costs of *** to *** percent and most responding importers reported costs ranging from 3 to 12 percent and averaging 6.0 percent.[4]

Pricing practices

Pricing methods

U.S. producers and importers reported typically setting prices using contracts and transaction-by-transaction negotiations (table V-2).[5] Two importers reported price setting using price lists, and one uses "a combination of contract and spot" to determine its prices. Respondent Tata International noted that prices for tin mill products "are built from a base price that is adjusted based on specification specific extras or allowances." [6] Respondent ArcelorMittal Dofasco notes that U.S. Steel is the largest supplier of tin mill products in the U.S. market and is acknowledged to be the price leader; the market reportedly follows the pricing that U.S. Steel sets during contract negotiations season. [7]

[3] The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2021 and then dividing by the customs value based on the HTS statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.50.0020, 7210.50.0090, 7212.10.0000, and 7225.99.0090, accessed January 31, 2023.

[4] This calculation does not include any firms that reported 0 percent.

[5] Multiple firms reported using more than one method to set prices. One importer categorized its method as a combination of contract and spot sales. This response is shown in table V-3 as both contract and transaction-by-transaction methods.

[6] Respondent Tata International's postconference brief, Answers to staff question 5.

[7] ArcelorMittal Dofasco's postconference brief, pp. 16-17 and conference transcript, p. 164 (Klacik).

Table V-2
Tin mill products: Count of U.S. producers' and importers' reported price setting methods

Count in number of firms reporting

Method	U.S. producers	U.S. importers
Transaction-by-transaction	2	13
Contract	3	15
Set price list	0	2
Other	0	1
Responding firms	3	22

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

Note: The sum of responses down may not add up to the total number of responding firms as each firm was instructed to check all applicable price setting methods employed.

U.S. producers and importers reported selling a large majority of tin mill products via annual contracts, with the remainder on the spot market (table V-3). A representative for petitioner stated that a great majority of its sales are made via annual contracts, which are negotiated in the preceding fall.[8] All three producers noted that their contracts fix prices (with *** also noting that *** quantities), are not indexed to raw material prices, and that prices are not re-negotiable. The quantities that are agreed upon may include a range, with a minimum and maximum that may vary some percentage above or below that amount, such as 5 or 10 percent. During fall 2021, when steel prices were nearing their peak during the investigation period, the 2022 contracts were negotiated. U.S. Steel started negotiating 2022 tin mill prices in July 2021 with "price increases of 50 percent or more."[9] Purchaser *** reported that negotiations with Cleveland-Cliffs also began in July 2021, with "pricing that was 80-100 percent higher than the previous year." As a result, it described pricing for tin mill products as "substantially higher" in 2022. *** noted changes to its contracts with *** for 2022 and 2023 shipments, such as ***.[10] *** importer *** also reported domestic producer Cleveland-Cliffs reduced its contractual volume for 2022 from 2021 levels and ***.[11]

[8] Conference transcript, pp. 10 (Vaughn) and 30 (Jarvis).
[9] Conference transcript, p. 164 (Klacik).
[10] Respondent Silgan's postconference brief, exh. 1, p. 11.
[11] Respondent CMI's postconference brief, p. 14.

Table V-3
Tin mill products: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2022

Share in percent

Item	U.S. producers	Subject U.S. importers
Long-term contracts	***	***
Annual contract	***	***
Short-term contracts	***	***
Spot sales	***	***
Total	100.0	100.0

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

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

More than three-quarters of importers' tin mill product sales were also made pursuant to annual contracts, though a portion of their sales were made on the spot market as well. Seven of eight responding importers' annual contracts were reported to fix both price and quantity (the other firm typically fixes only price), not be indexed to raw material prices, and not have prices that can be renegotiated. Slightly more importers reported using short-term contracts (9) than annual contracts (7), but the volumes were much smaller. All these short-term contracts also fix price and quantity, none allowed for indexing to raw material prices, and one allowed for price re-negotiation.

Purchasers were asked to provide some details regarding their largest contracts during 2020-23, including the date contract negotiations began and were signed, the quantity requested by the purchaser, the quantity offered by the supplier, the contract quantity, the tolerance below or above that contract quantity, and the final delivered quantity for each of 2020, 2021, and 2022. Details regarding these contracts are presented in appendix G. Purchasers were also asked whether they had sought any additional volumes or reduced contracted volume purchases during the years investigated. Early in the period, purchasers tended to request additional volumes, whereas in later periods, they reduced contracted volumes (table V-4).

Table V-4
Tin mill products: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2022

Count in number of firms

Year	Sought more	Sought less	No change
2020	6	1	14
2021	9	1	12
2022	4	5	15
2023	1	8	15

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

Sales terms and discounts

All U.S. producers reported typically quoting prices for tin mill products on an f.o.b. basis, whereas 13 of 19 responding importers reported quoting only on a delivered basis and two more on both a delivered and f.o.b. basis. *** reported not offering discounts, but *** discounts and ***. Twenty-one of 23 responding importers also reported having no discount policy. The two that reported offering discounts offered either loyalty or payment terms discounts.

Price leadership

Purchasers were asked which firms, if any, exhibited price leadership in the tin mill products market. Fourteen purchasers responded that U.S. Steel was the price leader and five responded that Cleveland Cliffs was the price leader in the market. Purchasers most frequently noted that these firms were the first to establishing a price for upcoming tin mill products contracts. For example, *** reported, "Typically, negotiations with other potential suppliers do not even begin until AFTER U.S. Steel indicates which products, at what volume and at what prices they will supply for the upcoming year."

Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following tin mill products shipped to unrelated U.S. customers during January 2020-June 2023.

Product 1.-- Single reduced, electrolytic tinplate with base box weights of 75–95 lbs. inclusive and less than 41 inches in width, in coils.

Product 2.-- Double reduced, electrolytic tinplate with base box weights of 55–65 lbs. inclusive and less than 41 inches in width, in coils.

Product 3.-- Single reduced, electrolytic chromium-coated steel with base box weights of 65–80 lbs. inclusive and less than 41 inches in width, in coils.

Product 4.-- Double reduced, electrolytic chromium-coated steel with base box weights of 55–65 lbs. inclusive and less than 41 inches in width, in coils.

Three U.S. producers and six importers provided usable pricing data for sales of the requested products from the subject countries (*** for product from Canada, *** for product from China, and *** for product from Germany), although not all firms reported pricing for all products for all quarters.[12] Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' commercial U.S. shipments of tin mill products in 2022, along with *** percent of U.S. commercial shipments of subject imports from Canada, *** percent from China, and *** percent from Germany.[13] [14] U.S. producers reported price data for all quarters and all four products. Price data were received for at least one quarter for imports for each of the four pricing products from Canada and China. Pricing data for Germany were reported only for product 1. Price data for products 1-4 are presented in tables V-5 to V-8 and figures V-2 to V-5.

[12] Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates. Data for imports originating from foreign producers/exporters in South Korea that were not found to be de minimis are presented in Appendix G. These data represent *** percent from U.S. commercial shipments of imports of tin mill products South Korea, subject firms. Responses from *** account for this data.

[13] Pricing coverage is based on U.S. shipment quantities reported in questionnaires.

[14] Data for nonsubject sources are presented in Appendix G. Among these nonsubject sources, quarterly pricing data represent *** percent of U.S. commercial shipments from the Netherlands, *** from South Korea, nonsubject, *** percent from Taiwan, *** percent from Turkey, and *** percent from the United Kingdom.

Table V-5
Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***

Table continued.

Period	China price	China quantity	China margin	Germany price	Germany quantity	Germany margin
2020 Q1	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***
2020 Q4	--	0	--	***	***	***
2021 Q1	--	0	--	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***

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

Note: Product 1: Single reduced, electrolytic tinplate with base box weights of 75–95 lbs. inclusive and less than 41 inches in width, in coils.

Table V-6
Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***

Table continued.

Period	China price	China quantity	China margin	Germany price	Germany quantity	Germany margin
2020 Q1	***	***	***	--	0	--
2020 Q2	--	0	--	--	0	--
2020 Q3	***	***	***	--	0	--
2020 Q4	--	0	--	--	0	--
2021 Q1	--	0	--	--	0	--
2021 Q2	--	0	--	--	0	--
2021 Q3	--	0	--	--	0	--
2021 Q4	***	***	***	--	0	--
2022 Q1	***	***	***	--	0	--
2022 Q2	***	***	***	--	0	--
2022 Q3	***	***	***	--	0	--
2022 Q4	***	***	***	--	0	--
2023 Q1	--	0	--	--	0	--
2023 Q2	--	0	--	--	0	--

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

Note: Product 2: Double reduced, electrolytic tinplate with base box weights of 55–65 lbs. inclusive and less than 41 inches in width, in coils.

Table V-7
Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***

Table continued.

Period	China price	China quantity	China margin	Germany price	Germany quantity	Germany margin
2020 Q1	***	***	***	--	0	--
2020 Q2	***	***	***	--	0	--
2020 Q3	***	***	***	--	0	--
2020 Q4	***	***	***	--	0	--
2021 Q1	***	***	***	--	0	--
2021 Q2	***	***	***	--	0	--
2021 Q3	***	***	***	--	0	--
2021 Q4	***	***	***	--	0	--
2022 Q1	***	***	***	--	0	--
2022 Q2	***	***	***	--	0	--
2022 Q3	***	***	***	--	0	--
2022 Q4	***	***	***	--	0	--
2023 Q1	***	***	***	--	0	--
2023 Q2	***	***	***	--	0	--

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

Note: Product 3: Single reduced, electrolytic chromium-coated steel with base box weights of 65–80 lbs. inclusive and less than 41 inches in width, in coils.

Table V-8
Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Canada price	Canada quantity	Canada margin
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***

Table continued.

Period	China price	China quantity	China margin	Germany price	Germany quantity	Germany margin
2020 Q1	--	0	--	--	0	--
2020 Q2	--	0	--	--	0	--
2020 Q3	***	***	***	--	0	--
2020 Q4	***	***	***	--	0	--
2021 Q1	--	0	--	--	0	--
2021 Q2	***	***	***	--	0	--
2021 Q3	***	***	***	--	0	--
2021 Q4	***	***	***	--	0	--
2022 Q1	***	***	***	--	0	--
2022 Q2	***	***	***	--	0	--
2022 Q3	--	0	--	--	0	--
2022 Q4	***	***	***	--	0	--
2023 Q1	***	***	***	--	0	--
2023 Q2	--	0	--	--	0	--

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

Note: Product 4: Double reduced, electrolytic chromium-coated steel with base box weights of 55–65 lbs. inclusive and less than 41 inches in width, in coils.

Figure V-2
Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter

Price of product 1

* * * * * * *

Volume of product 1

* * * * * * *

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

Note: Product 1: Single reduced, electrolytic tinplate with base box weights of 75–95 lbs. inclusive and less than 41 inches in width, in coils.

Figure V-3
Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter

Price of product 2

* * * * * * *

Volume of product 2

* * * * * * *

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

Note: Product 2: Double reduced, electrolytic tinplate with base box weights of 55–65 lbs. inclusive and less than 41 inches in width, in coils.

Figure V-4
Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter

Price of product 3

* * * * * * *

Volume of product 3

* * * * * * *

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

Note: Product 3: Single reduced, electrolytic chromium-coated steel with base box weights of 65–80 lbs. inclusive and less than 41 inches in width, in coils.

Figure V-5
Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by source and quarter

Price of product 4

* * * * * * *

Volume of product 4

* * * * * * *

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

Note: Product 4: Double reduced, electrolytic chromium-coated steel with base box weights of 55–65 lbs. inclusive and less than 41 inches in width, in coils.

Price trends

Prices increased during January 2020-June 2023 for all countries and all products. Prices were slightly increasing in 2020 and 2021 for tin mill products from most sources, although prices started increasing in all four products for imports from China in the fourth quarter of 2021. Prices increased sharply in the first two quarters of 2022. Since that time, prices have remained elevated, though somewhat lower than their mid-2022 peaks. Table V-9 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from *** percent to *** percent during January 2020-June 2023. Import prices also increased from all sources, with increases ranging from *** to *** percent for product imported from Canada and *** to *** percent for products imported from China; the tin mill products imported from Germany increased by (*** percent).

Table V-9
Tin mill products: Summary of price data, by product and source, January 2020-June 2023

Price in dollars per short ton, quantity in short tons, change in percent.

Product	Source	Number of quarters	Quantity	Low price	High price	First quarter price	Last quarter price	Change over period
Product 1	United States	14	***	***	***	***	***	***
Product 1	Canada	14	***	***	***	***	***	***
Product 1	China	12	***	***	***	***	***	***
Product 1	Germany	14	***	***	***	***	***	***
Product 2	United States	14	***	***	***	***	***	***
Product 2	Canada	14	***	***	***	***	***	***
Product 2	China	7	***	***	***	***	***	***
Product 2	Germany	---	---	---	---	---	---	---
Product 3	United States	14	***	***	***	***	***	***
Product 3	Canada	14	***	***	***	***	***	***
Product 3	China	14	***	***	***	***	***	***
Product 3	Germany	---	---	---	---	---	---	---
Product 4	United States	14	***	***	***	***	***	***
Product 4	Canada	14	***	***	***	***	***	***
Product 4	China	9	***	***	***	***	***	***
Product 4	Germany	---	---	---	---	---	---	---

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

Note: Percent change column is percentage change from the first quarter for which there is data in 2020 to the last quarter for which data are available in 2023 (Q4 2022 for product 2 imported from China).

Price comparisons

As shown in tables V-10 to V-12, prices for product imported from subject countries oversold U.S.-produced product in 91 of 112 quarters (81.3 percent of the time); these quarters accounted for 87.4 percent of subject imported volume of the pricing products (*** short tons).[15] Subject product undersold domestic product in the remaining 21 quarters and accounted for *** short tons. Margins of overselling ranged from 0.1 to 47.9 percent, averaging 13.5 percent, while margins of underselling ranged from 0.03 to 27.4 percent and averaged 8.4 percent. Underselling occurred most frequently in 2022, when sales contracts had been based on the high-priced 2021 steel sheet prices (table V-11). As seen in table V-12, *** accounted for *** percent of undersold volumes during January 2020-June 2023 while *** accounted for *** percent) of oversold volumes. Nevertheless, all countries had at least one quarter of underselling during the period.

Table V-10
Tin mill products: Instances of underselling and overselling, and the range and average of margins, by product

Quantity in short tons; margin in percent

Products	Type	Number of quarters	Quantity	Average margin	Minimum margin	Maximum margin
Product 1	Underselling	6	***	***	***	***
Product 2	Underselling	4	***	***	***	***
Product 3	Underselling	8	***	***	***	***
Product 4	Underselling	3	***	***	***	***
All products	Underselling	21	***	8.4	0.03	27.4
Product 1	Overselling	34	***	***	***	***
Product 2	Overselling	17	***	***	***	***
Product 3	Overselling	20	***	***	***	***
Product 4	Overselling	20	***	***	***	***
All products	Overselling	91	***	(13.5)	(0.1)	(47.9)

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

[15] ***.

Table V-11
Tin mill products: Instances of underselling and overselling, and the range and average of margins, by country

Quantity in short tons; margin in percent

Country	Type	Number of quarters	Quantity	Average margin	Minimum margin	Maximum margin
Canada	Underselling	8	***	***	***	***
China	Underselling	12	***	***	***	***
Germany	Underselling	1	***	***	***	***
All subject sources	Underselling	21	***	8.4	0.03	27.4
Canada	Overselling	48	***	***	***	***
China	Overselling	30	***	***	***	***
Germany	Overselling	13	***	***	***	***
All subject sources	Overselling	91	***	(13.5)	(0.1)	(47.9)

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

Table V-12
Tin mill products: Instances of underselling and overselling, by period and country

Quantity in short tons

Period	Country	Number of quarters of underselling	Quantity undersold	Number of quarters of overselling	Quantity oversold
2020	Canada	***	***	***	***
2021	Canada	***	***	***	***
2022	Canada	***	***	***	***
Jan-Jun 2023	Canada	***	***	***	***
All years	Canada	***	***	***	***
2020	China	***	***	***	***
2021	China	***	***	***	***
2022	China	***	***	***	***
Jan-Jun 2023	China	***	***	***	***
All years	China	***	***	***	***
2020	Germany	***	***	***	***
2021	Germany	***	***	***	***
2022	Germany	***	***	***	***
Jan-Jun 2023	Germany	***	***	***	***
All years	Germany	***	***	***	***
2020	Subject sources	***	***	***	***
2021	Subject sources	***	***	***	***
2022	Subject sources	***	***	***	***
Jan-Jun 2023	Subject sources	***	***	***	***
All years	Subject sources	21	***	91	***

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

Lost sales and lost revenue

The Commission requested that U.S. producers of tin mill products report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of tin mill products since 2020. All three responding U.S. producers reported that they had lost sales, lost revenue, and rolled back announced price increases. One U.S. producer (***) submitted lost sales allegations and identified seven firms at which it lost sales (at six purchasers) or lost revenues (at three purchasers), though it did not quantify the total amounts of either.

Staff contacted 47 purchasers and received responses from 27 purchasers.[16] Responding purchasers reported purchasing or importing *** short tons of tin mill products during January 2020-June 2023 (table V-13).

[16] One of these responding purchasers noted that it had not purchased tin mill products since January 1, 2020.

Table V-13
Tin mill products: Purchasers' reported purchases and imports, by firm and source

Quantity in short tons, share in percent

Firm	Domestic quantity	Subject source quantity	All other quantity	Change in domestic share	Change in subject share
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	***	***	***	***	***

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

Note: The "all other quantity" category includes nonsubject sources and unknown sources. Change is the percentage point change in the share of the firm's total purchases of domestic and/or subject country imports between first and last years. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Most purchasers reported that their purchases from various sources had fluctuated over the period, as presented in table V-14, with 51 responses indicating either a fluctuation upward or downward. In terms of direction, 43 responses noted increasing purchase patterns, 38 noted decreasing purchase patterns, and 30 responses noting no change in purchase patterns. A majority of purchasers (14 of 22) noted a steady or fluctuating increase in purchases from the United States. Half of purchasers of tin mill products imported from China and Germany, and 4 of 10 purchasers of tin mill products imported from Canada noted increasing purchases from those sources. Only for imports from South Korea did a majority of purchasers (6 of 10) note increasing purchases. A majority of responding purchasers (8 of 13) noted decreasing their purchases of imports from Taiwan, and all five responding purchasers indicated that their purchases of imported tin mill products from Turkey fluctuated downward. Most U.S. purchasers described their reasons for changing their purchase quantities from domestic producers. These reasons, along with how their purchases changed, are presented in table V-15. Further information informing purchasers' decisions regarding sourcing is found in Part II.

Table V-14
Tin mill products: Purchasers' reported change in purchase patterns from U.S., subject, and nonsubject sources, January 2020-June 2023

Source	Increase steadily	Fluctuate, ending higher	Constant	Fluctuate, ending lower	Decrease steadily	Did not purchase
United States	7	7	3	5	0	2
Canada	2	2	3	1	2	8
China	2	3	2	3	0	9
Germany	0	4	1	0	3	11
Netherlands	0	0	3	1	4	10
South Korea	1	5	4	0	0	8
Taiwan	1	2	2	3	5	6
Turkey	0	0	0	5	0	13
United Kingdom	0	1	3	2	1	11
Nonsubject sources	0	3	6	2	1	6
Sources unknown	1	2	3	0	0	13

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

Table V-15
Tin mill products: Purchasers' responses describing why their purchases of domestic product changed since January 2020, by firm

Purchaser	Change in purchase pattern	Reason(s) for changes in purchases from domestic sources
***	Steadily increase	***
***	Steadily increase	***
***	Fluctuate higher	***
***	Steadily increase	***
***	Constant	***
***	Fluctuate lower	***
***	Fluctuate higher	***
***	Fluctuate higher	***
***	Steadily increase	***
***	Fluctuate higher	***
***	Fluctuate lower	***
***	Fluctuate lower	***
***	Steadily increase	***
***	Fluctuate lower	***

Table continued.

Table V-15 Continued
Tin mill products: Purchasers' responses describing why their purchases of domestic product changed since January 2020, by firm

Purchaser	Change in purchase pattern	Reason(s) for changes in purchases from domestic sources
***	Fluctuate higher	***
***	Steadily increase	***
***	Did not purchase	***
***	Fluctuate lower	***
***	Steadily increase	***

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

Of the 25 responding purchasers, 11 reported that they had purchased imported tin mill products from any of the three subject countries instead of U.S.-produced tin mill products since 2019 (table V-16).[17] Of the 11 purchasers that had responded that they had bought tin mill products from at least one subject country, 7 reported that imports from at least one subject country were priced lower than the domestic product. Specifically, one (***) indicated that some imports from Canada were priced lower, three purchasers each indicated that imports from China were priced lower (***) and three purchasers each indicated that imports from Germany were lower priced for ***. Table V-17 displays these data totals by country. In total, equal numbers of responding purchasers (three) indicated that imports of tin mill products from China and Germany were priced lower than domestic product, whereas six of seven responding purchasers indicated that tin mill products imported from Canada were not priced lower than domestic tin mill products. Two firms estimated the quantity of tin mill products imported from China that they purchased instead of domestic product; quantities ranged from *** short tons to *** short tons and totaled *** short tons.

All 14 responding purchasers reported that domestic producers had not lowered prices in response to competition from imports from Canada, China, or Germany since January 1, 2020.[18]

[17] Purchaser questionnaires did not require answers by foreign producer/exporter, so responses for South Korea are unable to be divided between subject and nonsubject sources. In total, seven purchasers noted that they had purchased imports from South Korea instead of domestic product. Five of these purchasers responded "Yes" for Canada, China, and/or Germany. The other two purchasers only noted purchasing product from South Korea instead of domestic product, but neither reported that their choice was based on price, and the sole responding purchaser to the question regarding relative prices noted that South Korean prices were not lower than domestic prices.

[18] In addition, nine purchasers indicated that they did not know and one did not provide a response.

Table V-16
Tin mill products: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in short tons

Firm	Purchased subject imports instead of domestic	Investigated imports priced lower	Choice based on price	Quantity	Reason(s) for purchasing imports
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued.

Table V-16 Continued
Tin mill products: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in short tons

Firm	Purchased subject imports instead of domestic	Investigated imports priced lower	Choice based on price	Quantity	Reason(s) for purchasing imports
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued.

Table V-16 Continued
Tin mill products: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in short tons

Firm	Purchased subject imports instead of domestic	Investigated imports priced lower	Choice based on price	Quantity	Reason(s) for purchasing imports
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued.

Table V-16 Continued
Tin mill products: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in short tons

Firm	Purchased subject imports instead of domestic	Investigated imports priced lower	Choice based on price	Quantity	Reason(s) for purchasing imports
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued.

Table V-16 Continued
Tin mill products: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in short tons

Firm	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Reason(s) for purchasing imports
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	Yes--11; No--14	Yes--7; No--8	Yes--2; No--14	***	NA

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

Note: Purchaser questionnaires did not separate South Korea, subject import source from South Korea, nonsubject sources. Listed purchaser responses show responses for Canada, China, and Germany. If a subject source was noted by a purchaser to be a source for which it purchased imports rather than domestic product, or if imports were prices lower than domestic product, the subject source is signified by a superscript (CA for Canada, CN for China, and DE for Germany). Responses regarding purchaser choices based on price are listed as "Yes" if the purchaser selected "Yes" for any subject source, with responses regarding subject sources listed parenthetically.

Table V-17
Tin mill products: Purchasers' responses to purchasing imports from subject sources instead of domestic product, by source

Quantity in short tons

Source	Count of purchasers reporting subject product instead of domestic	Count of purchasers reported that subject imports were priced lower	Count of purchasers reporting that price was a primary reason for shift	Quantity
Canada	7	1	---	***
China	6	3	2	***
Germany	5	3	---	***
Canada, China, and Germany total	11	7	2	***
South Korea, subject and nonsubject	7	2	2	***

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

Note: Purchaser questionnaires did not separate South Korea, subject import source from South Korea, nonsubject sources. Volumes for South Korea are unable to be classified as subject or nonsubject imports. Purchaser ***, responsible for *** short tons of these imports, reported that "***."

Part VI: Financial experience of the U.S. producers

Background[1]

Three U.S. producers, Cleveland-Cliffs, Ohio Coatings, and U.S. Steel, reported financial results and related information on their U.S. tin mill products operations. The reported financial results are based on information from accounting systems designed to generate/report overall financial results on a U.S. GAAP basis and were reported for calendar-year periods.[2] Staff conducted a verification of Cleveland-Cliffs' financial results and related information on November 29-December 1, 2023.[3]

With respect to their overall operations, publicly traded Cleveland-Cliffs and U.S. Steel are both vertically integrated, to varying degrees, while Ohio Coatings, a privately held company, is not.[4] In addition to the level of integration, U.S. producers differ to some extent in terms of product mix and services.[5] [6]

[1] The following abbreviations may be used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development expenses ("R&D expenses"), and return on assets ("ROA").

[2] *** U.S. producer questionnaire responses, section III-2.

[3] ***. Verification report, p. 3. ***. Email with attachment from ***, December 4, 2023.

[4] ***. Email with attachment from ***, February 13, 2023.

[5] ***. Email with attachment from ***, February 6, 2023.

[6] ***. Email with attachment from ***, February 13, 2023.

As described in Part III of this report, Cleveland-Cliffs and U.S. Steel engaged in acquisition-related activity involving tin mill products operations during the period: Cleveland-Cliffs purchased the assets of ArcelorMittal USA (December 2020), inclusive of the Weirton facility, and U.S. Steel acquired the remaining equity interest in USS-UPI (March 2020).[7] ***.[8] U.S. Steel idled various operations related to its tin mill products operations during the period.[9] The only change in operations noted by Ohio Coatings was the ***.[10]

[7] ***. Email with attachment from ***, February 13, 2023. ***. Email with attachment from ***, February 13, 2023.

[8] *** U.S. producer questionnaire, responses to II-2a.

[9] ***. Email with attachment from ***, February 13, 2023.

[10] *** U.S. producer questionnaires response, section II-2a. ***. Ibid. As described by the CEO of Cleveland-Cliffs, "When we have fewer orders of tin plate for our tinning facility at Weirton, we will always give priority to our own facilities. So, instead of having surplus of tin mill black plate that I can sell to others, I have a shortage of orders of tin mill products out of Weirton. So I was using all my tin mill black plate to supply the fewer orders that I had to Weirton and to also force the clients to put orders with us and not with Ohio Coatings." Hearing transcript, p. 86 (Goncalves).

Figure VI-1 presents firm-specific shares of total 2022 net sales quantity.

Figure VI-1
Tin mill products: U.S. producers' share of net sales quantity in 2022, by firm

* * * * * * *

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

Operations on tin mill products

Table VI-1 and table VI-2 present income-and-loss data for the U.S. producers' tin mill products operations and corresponding changes in AUVs, respectively. Table VI-3 presents a variance analysis of the financial results.[11] Appendix H presents selected company-specific financial information.

[11] The Commission's variance analysis is calculated in three parts: sales variance, COGS variance, and SG&A expenses variance. Each part consists of a price variance (in the case of the sales variance) or a cost or expense variance (in the case of the COGS and SG&A expenses variance), and a volume variance. The sales or cost/expense variance is calculated as the change in unit price or per-unit cost/expense times the new volume, while the volume variance is calculated as the change in volume times the old unit price or per-unit cost/expense. As summarized at the bottom of the variance analysis, the price variance is from sales, the cost/expense variance is the sum of those items from COGS and SG&A variances, respectively, and the volume variance is the sum of the volume components of the net sales, COGS, and SG&A expenses variances. The Commission's variance analysis is more meaningful when product mix remains the same throughout the period. In general, U.S. producers indicated that changes in product mix were not an important factor in terms of explaining the pattern of average sales value during the period.

Table VI-1
Tin mill products: U.S. producers' results of operations, by item and period

Quantity in short tons; Value in 1,000 dollars; Ratios in percent; Shares in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Raw materials	Value	***	***	***	***	***
COGS: Direct labor	Value	***	***	***	***	***
COGS: Other factory costs	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Interest expense	Value	***	***	***	***	***
All other expenses	Value	***	***	***	***	***
All other income	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation expense included above	Value	***	***	***	***	***
Estimated cash flow from operations	Value	***	***	***	***	***
COGS: Raw materials	Ratio to NS	***	***	***	***	***
COGS: Direct labor	Ratio to NS	***	***	***	***	***
COGS: Other factory costs	Ratio to NS	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit or (loss)	Ratio to NS	***	***	***	***	***
SG&A expenses	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***
COGS: Raw materials	Share	***	***	***	***	***
COGS: Direct labor	Share	***	***	***	***	***
COGS: Other factory costs	Share	***	***	***	***	***
COGS: Total	Share	***	***	***	***	***

Table continued.

Table VI-1 Continued
Tin mill products: U.S. producers' results of operations, by item and period

Unit values in dollars per short ton; Count in number of firms reporting

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Total net sales	Unit value	***	***	***	***	***
COGS: Raw materials	Unit value	***	***	***	***	***
COGS: Direct labor	Unit value	***	***	***	***	***
COGS: Other factory costs	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	***	***	***	***	***

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

Note: Ratios represent the ratio to net sales value and shares represent the share of COGS.

Table VI-2
Tin mill products: Changes in AUVs between comparison periods

Changes in percent

Item	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Total net sales	***	***	***	***
COGS: Raw materials	***	***	***	***
COGS: Direct labor	***	***	***	***
COGS: Other factory costs	***	***	***	***
COGS: Total	***	***	***	***

Table continued.

Table VI-2 Continued
Tin mill products: Changes in AUVs between comparison periods

Changes in dollars per short ton

Item	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Total net sales	***	***	***	***
COGS: Raw materials	***	***	***	***
COGS: Direct labor	***	***	***	***
COGS: Other factory costs	***	***	***	***
COGS: Total	***	***	***	***
Gross profit or (loss)	***	***	***	***
SG&A expenses	***	***	***	***
Operating income or (loss)	***	***	***	***
Net income or (loss)	***	***	***	***

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

Table VI-3
Tin mill products: Variance analysis on the operations of the U.S. producers between comparison periods

Value in 1,000 dollars

Item	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Net sales price variance	***	***	***	***
Net sales volume variance	***	***	***	***
Net sales total variance	***	***	***	***
COGS cost variance	***	***	***	***
COGS volume variance	***	***	***	***
COGS total variance	***	***	***	***
Gross profit variance	***	***	***	***
SG&A cost variance	***	***	***	***
SG&A volume variance	***	***	***	***
SG&A total variance	***	***	***	***
Operating income price variance	***	***	***	***
Operating income cost variance	***	***	***	***
Operating income volume variance	***	***	***	***
Operating income total variance	***	***	***	***

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

Net sales

Commercial sales, primarily reflecting U.S. commercial shipments, was the *** category of tin mill products sales reported. Given the ***, a single line item for sales is presented in the relevant tables above.[12]

Quantity

On a company-specific basis, U.S. producers reported the same directional pattern of declining total tin mill products sales quantity in 2021 (see table H-1). In 2022, the company-specific directional patterns diverged somewhat with *** reporting modestly higher sales quantity,[13] while *** reported lower sales quantities. ***, which reported the largest company-specific percentage decline in sales volume in 2022, attributed the overall decline in its sales volume after 2021 to the *** (see also footnote 5).[14] In January-June 2023

[12] A relatively small quantity of commercial export sales was reported by ***. *** U.S. producer questionnaire, section II-8. ***. Email with attachment from ***, October 11, 2023. Tolling was limited to ***, which reported that this activity accounted for *** percent of its 2022 commercial sales quantity. *** U.S. producer questionnaire, section II-6.

[13] ***. Email with attachment from ***, February 13, 2023.

[14] Email with attachment from ***, September 29, 2023. With regard to the pattern of its sales quantity, ***. Email with attachment from ***, February 6, 2023.

compared to January-June 2022, U.S. producers were again directionally uniform with all reporting lower sales volume.[15]

Value

A large share of tin mill products sales reflect fixed prices agreed to in annual sales contracts negotiated during the fall of the preceding year.[16] While average sales value and raw material cost were directionally the same throughout the period, U.S. producers confirmed that tin mill products sales value does not include a direct or formulaic pass through of primary raw material costs.[17]

Total tin mill products sales value increased throughout the full-year period and then was lower in January-June 2023 compared with January-June 2022. On an overall basis, the sales section of the variance analysis (table VI-3) shows that the overall increases in total sales value in 2021 and 2022 reflect positive price variances that more than offset corresponding negative sales volume variances. In contrast, lower total sales value in January-June 2023 compared with January-June 2022 reflects a negative sales volume variance, the primary factor, as well as a smaller negative price variance.

*** alternated in terms of which reported the highest company-specific average sales value during the period (see table H-1). *** reported the lowest average sales value for most of the period, the exception being January-June 2022 when *** reported the lowest average sales value.[18] U.S. producers reported the same directional pattern of average sales value from 2020 to 2022 (increases for *** U.S. producers) and diverged in January-June 2023 compared with January-June 2022

[15] ***. Email with attachment from ***, October 11, 2023.

[16] Conference transcript, p. 30 (Jarvis). ***. Verification report p. 4.

[17] Email with attachment from ***, February 13, 2023. Email with attachment from ***, February 6, 2023. Email with attachment from ***, February 13, 2023.

[18] ***. Verification report p. 5 (footnote 2).

(*** reporting lower average sales values while *** reported a higher average sales value).[19] U.S. producers generally attributed the pattern of average sales value during the period to changes in input costs and demand, as opposed to changes in underlying product mix.[20]

Cost of goods sold and gross profit or loss

Raw materials

In addition to tin and/or chromium coating materials, which would be reported by all U.S. producers, total raw material costs reported in table VI-1 reflect a combination of primary steel-making inputs, as well as purchased black plate. On an overall basis total raw material costs ranged from *** percent of total COGS (January-June 2023) to *** percent (January-June 2022). While *** was the *** U.S. producer to report input purchases from

[19] ***. Email with attachment from ***, September 29, 2023.

[20] ***. Email with attachment from ***, February 13, 2023. ***. Email with from ***, October 11, 2023. ***. Email with attachment from ***, February 6, 2023. ***. Email with attachment from ***, February 13, 2023.

related suppliers,[21] [22] *** confirmed that the facilities producing tin mill products either consume ***.[23]

As shown in table H-1, for most of the period *** reported the lowest company-specific average raw material costs, the exception being 2020 when *** reported the lowest average raw material cost. ***, whose average raw material cost reflects ***, reported the highest average raw material cost throughout the period.

With regard to the steel component specifically, non-integrated producer Ohio Coatings reported that it *** consumed ***, accounting for *** percent of its total 2022 raw material cost,[24] while the two integrated producers consumed either hot-rolled steel only

[21] ***. *** U.S. Producer questionnaire response, sections III-5-III-7b. ***. Email with attachment from ***, February 13, 2023.

[22] ***. Email from ***, February 13, 2023.

[23] Email with attachment from ***, October 11, 2023. *** U.S. producer questionnaire response, section III-9c. ***. *** U.S. producer questionnaire responses, section III-9d. ***. USITC auditor final phase notes. ***. *** U.S. producer questionnaire responses, section III-9d.

[24] *** U.S. producer questionnaire responses, section III-9c. ***

(*continued*...)

(***) or a combination of hot-rolled steel and black plate (***).[25] ***.[26]

The U.S. industry's average per short ton raw material cost began the period at its lowest level in 2020, increasing somewhat in 2021, and then increasing notably in 2022, the only year when all U.S. producers were directionally the same in terms of change in average raw material cost. While January-June 2023 average raw material cost was higher compared with January-June 2022, it was lower compared with full-year 2022. Like average sales value, changes in average raw material cost were generally attributed to underlying input prices/costs, as opposed to changes in product mix.

***. *** U.S. producer questionnaire responses, section III-9d. ***. Ibid.

[25] ***. Email with from ***, October 11, 2023. ***. *** U.S. producer questionnaire responses, section III-9d. ***. USITC auditor final phase notes. ***. *** U.S. producer questionnaire responses, section III-9d.

[26] Email with attachment from ***, February 13, 2023. Email with attachment from ***, February 13, 2023. ***. Email from ***, February 21, 2023.

Tin mill products sales, as noted previously, do not include a direct or formulaic passthrough of raw material costs and/or other inputs.[27] As it relates to tin mill products in general, Cleveland-Cliffs' formal hedging of input costs includes natural gas and other inputs.[28] ***.[29] With respect to inputs related to tin mill products in general, the notes to U.S. Steel's public financial statements report a combination of fixed-price forward purchase contracts for natural gas and tin, as well as commodity purchase swaps for purchases of natural gas, tin, electricity, and iron ore pellets.[30]

Direct labor cost and other factory costs

The U.S. industry's direct labor cost, the smallest primary component of total COGS, declined irregularly as a share of total COGS throughout the period, ranging from *** percent of total COGS (January-June 2023) to *** percent (2021). Other factory costs, the second largest primary component of COGS, increased irregularly as a share of total COGS during the period, ranging from *** percent (January-June 2022) to *** percent (January-June 2023). As indicated in footnote 26, the direct labor and other factory costs reported by ***.

On a company-specific basis average per short ton direct labor cost and other factory costs reflect relatively wide ranges (see table H-1): *** reporting the lowest average direct labor cost and lowest average other factory costs throughout the period; *** reporting the highest average direct labor cost and, for most of the period, the highest average other factory costs; *** with the exception of 2020, when it reported the highest average other factory costs, reporting average direct labor and average factory costs between those of ***.[31]

[27] From the perspective of a vertically integrated producer that owns/controls most of the primary raw materials, a direct or formulaic passthrough of raw material cost in sales value is reportedly unnecessary. Conference transcript, pp. 58-59 (Goncalves).

[28] Ibid. Cleveland-Cliffs began hedging programs for electricity and tin during 2022. Cleveland-Cliffs 2022 10-K, pp. 52-53.

[29] Email from ***, February 13, 2023.

[30] U.S. Steel 2022 10-K, pp. 90-91.

[31] ***

(*continued*...)

Given the capital intensive nature of manufacturing tin mill products, the level of capacity utilization and corresponding fixed cost absorption are important determinants of average COGS.[32] *** noted that the pattern of its average direct labor costs and other factory costs during the period also reflects items such as ***.[33] [34] With respect to the impact of large-scale capital expenditure projects during the period (see *Capital expenditures and R&D expenses* section), Cleveland-Cliffs noted ***.[35] *** attributed

***.

[32] Petitioner's postconference brief, p. 24. ***. Petitioner's postconference brief, Exhibit 15, p. 5. ***.

[33] ***. Email with attachment from ***, February 13, 2023. ***. Verification report, p. 6. ***.

[34] ***. Email from ***, February 21, 2023. USITC auditor preliminary-phase notes. ***. Verification report, p. 7. ***.

[35] Petitioner's postconference brief, Exhibit 1, pp. 10-12; Exhibit 15, pp. 1-3.

the variations in its average direct labor cost and other factory costs to capacity utilization and corresponding fixed cost absorption.[36] Similarly, *** reported that reduced capacity utilization contributed to higher average direct labor cost and other factory costs in 2022 and higher other factory costs in January-June 2023.[37]

*** and *** reported the lowest and highest average COGS throughout the period, respectively. As a group, U.S. producers reported progressively higher average COGS throughout the period.[38] As noted previously and since *** reported the lowest company-specific average raw material cost during most of the period, the company's higher total average direct labor and other factory costs generally explains why its average COGS was the highest on a company-specific basis.[39]

[36] Email with attachment from ***, February 6, 2023.

[37] ***. Email with attachment from ***, February 13, 2023. ***. Email with attachment from ***, October 11, 2023.

[38] ***. Email with from ***, October 11, 2023.

[39] ***.

Gross profit or loss

The U.S. industry reported a gross loss in 2020 and transitioned to increasing gross profit in 2021 and in 2022. While remaining positive, January-June 2023 gross profit was notably lower compared with January-June 2022. On a company-specific basis gross results were mixed: *** reporting gross losses throughout most of the period, the exception being January-June 2022; *** reporting gross profit of varying magnitude throughout the period.

To the extent that all U.S. producers reported higher average COGS in 2022, the notable improvement in gross results in that year is generally a function of higher average sales value. As shown in table VI-2, the expansion in gross profit ratio in 2022 reflects a percentage increase in average sales value that exceeded the corresponding increase in average COGS. As noted previously, fixed prices for tin mill products are negotiated with customers in the fall of each year and subsequently recognized in the following year's sales values. With regard to the level of average sales value in 2022 and with respect to Cleveland-Cliffs specifically, the company's CEO stated during the company's third quarter 2021 earnings call that "Our tinplate business, for example, which we have already renegotiated with all the clients, they are increasing between 2021, 2022 price-wise, 100%. In other words, we are doubling the price of our tinplate. So because the costs are not increased, not even marginally close, it's a fraction of that, so we're going to have a meaningful bigger contribution from tinplate."[40]

In conjunction with a decline in sales quantity, the decline in gross profitability in January-June 2023 compared with January-June 2022 reflects the negative impact of lower average sales value amplified by an increase in average COGS. As noted previously, higher average COGS, in part, reflects lower throughput and a reduction in corresponding fixed cost absorption. While company-specific directional patterns were mixed during the full-year period, all U.S. producers reported lower relative gross results in January-June 2023 compared to January-June 2022.

SG&A expenses and operating income or loss

The U.S. industry's total SG&A expenses increased to its highest level in 2021, declined in 2022, and was lower in January-June 2023 compared with January-June 2022. Company-specific SG&A expense ratios (total SG&A expenses divided by total sales value) varied and generally occupied distinct ranges (see table H-1): *** SG&A expense ratio exhibiting the least amount of variability; *** increasing to its highest level in 2021 and

[40] Transcript of Cleveland-Cliffs Q3 2021 earnings call, p. 17.

then declining through the rest of the period; *** declining notably in 2021, its first full-year of operations subsequent to acquisition, and remaining at a relatively low level throughout the rest of the period.[41]

The U.S. industry, which began the period with an operating loss in 2020, reported an increased operating loss in 2021, followed by operating income in 2022, and a transition back to an operating loss in January-June 2023 compared with operating income in January-June 2022. To the extent that the U.S. industry's gross results were negative in 2020, SG&A expenses were additive in that year and more than offset the gross profit generated in 2021. The relatively large expansion in gross profit ratio in 2022, combined with a modest decline in total SG&A expenses, yielded 2022 (full-year and interim period) operating income. In conjunction with reduced sales volume, the lower level of operating income in January-June 2023 reflects a sharp contraction in the U.S. industry's gross profit ratio, which was only partially offset by a modest reduction in corresponding SG&A expense ratio.

On a company-specific basis, U.S. producers were directionally uniform in terms of reporting deterioration in their operating results in 2021, relative improvements in 2022, followed by lower operating results in January-June 2023 compared with January-June 2022. While magnitudes varied, ***.[42]

[41] The relatively large increase in the U.S industry's total 2021 SG&A expenses was attributable to ***, whose SG&A expenses increased from *** in 2020 to *** in 2021, partially offset by a decline in *** SG&A expenses in that year (see table H-1). ***. Email with attachment from ***, December 4, 2023. ***. Email with attachment from ***, February 13, 2023.

[42] With regard to the impact of COVID 19 on operations and financial results in general, ***. *** U.S. producer questionnaire responses, section III-18. ***

(*continued*...)

Interest expense, other expenses and income, and net income or loss

The differences between the U.S. industry's operating and net results during the period (see table VI-1) are largely explained by the presence of interest expense; i.e., other expenses and other income, while present, generally had a more limited net impact. Overall operating and net results were directionally the same (both improving in 2021 and 2022 and lower between the interim periods).[43] [44]

Capital expenditures and R&D expenses

Table VI-4 and table VI-6 present U.S. producers' capital expenditures and R&D expenses related to their tin mill products operations, respectively, by firm. Table VI-5 and table VI-7 present corresponding narrative descriptions.

Table VI-4
Tin mill products: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

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

***. *** U.S. producer questionnaire, section III-18.

[43] Interest expense was reported by *** with *** accounting for the substantial majority. In 2020, *** reported a minimal amount of other income, followed by a comparatively larger level in 2021. With regard to the increase in 2021 other income, ***. Email with attachment from ***, February 6, 2023.

[44] *** reported no non-recurring items during the period. *** U.S. producer questionnaire, sections III-10a-b. *** other income (see footnote 43) was reported as a non-recurring item. According to ***, items that it would consider non-recurring are recorded at a higher reporting level and therefore not included in its tin mill products financial results. *** U.S. producer questionnaire, section III-11.

Table VI-5
Tin mill products: U.S. producers' narrative descriptions of their capital expenditures, by firm

Firm	Narrative on capital expenditures
Cleveland-Cliffs	***
Ohio Coatings	***
U.S. Steel	***

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

Table VI-6
Tin mill products: U.S. producers' R&D expenses, by firm and period

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

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

Table VI-7
Tin mill products: U.S. producers' narrative descriptions of their R&D expenses, by firm

Firm	Narrative on R&D expenses
Cleveland-Cliffs	***
Ohio Coatings	***
U.S. Steel	***

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

For the period as a whole *** accounted for the largest share of the U.S. industry's total capital expenditures (*** percent), followed by *** (*** percent), and *** (*** percent). As shown in table VI-4, the directional pattern of capital expenditures varied by company: *** capital expenditures increased throughout the full-year period, reaching their highest level in 2022; *** capital expenditures were at their highest level in 2020 and subsequently declined; *** capital expenditures were relatively low and in about the same range in 2020 and 2021 with *** capital expenditures reported in 2022 or January-June 2023.

Capital expenditure projects undertaken by Cleveland-Cliffs, initiated in the fall of 2020 and largely completed by the end of 2022, reportedly impacted to some extent the Weirton facility's ongoing operations.[45] [46] In 2017, prior to the period examined, U.S. Steel initiated

[45] Conference transcript, pp. 63-64, 76, 130 (Jarvis). ***. Email from ***, February 21, 2023. USITC auditor preliminary-phase notes.

[46] As described by the CEO of Cleveland-Cliffs at the Commission's staff conference, ". . . Weirton had been subject to systematic disinvestment by ArcelorMittal for years. In the three years leading up to our acquisition {in December 2020}, ArcelorMittal had invested an average of only $6 million of annual CAPEX in Weirton. For a facility producing tin mill products to serve the discerning and specification-sensitive packaging market, that level of capital investment is insufficient. In sharp contrast to the way that ArcelorMittal had been operating Weirton, Cleveland-Cliffs immediately began an aggressive capital investment campaign to optimize Weirton's production and quality capabilities, investing more than $50 million over the course of 2021 and 2022." Conference transcript, pp. 18-19 (Goncalves). At the Commission's hearing and regarding specific capital expenditures, the CEO of Cleveland-Cliffs stated "We installed a tension leveler on the No. 4 line at Weirton to improve the shape

(*continued*...)

large capital investment projects related to its *** tin mill operations.[47]

Assets and ROA

Table VI-8 presents data on the U.S. producers' total assets and table VI-9 presents corresponding ROA.[48] Table VI-10 presents U.S. producers' narrative information regarding aspects of reported asset information.

Table VI-8
Tin mill products: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2020	2021	2022
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

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

of the products we make. We spent 10 million dollars to rebuild the No. 6 line at Weirton. We also hired approximately 200 additional workers needed to operate Weirton efficiently and safely." Hearing transcript, p. 55 (Goncalves). The Director of Product Control at Cleveland-Cliffs also noted "In 2021 we added two extra gauges on the Tandem Mill at Weirton. This investment allowed the mill to reach the proper gauge more quickly and respond more rapidly to any variation in gauge of the material being processed through the mill. For tin mill products, which would be made to produce very precise gauges. This was a significant and meaningful investment. It has improved our yield and resulted in fewer quality issues." Hearing transcript, p. 72 (O'Neill).

[47] Information provided by U.S. Steel in its postconference brief detailed specific aspects of each facility that was upgraded, indicating that discrete upgrades took place between ***. U.S. Steel postconference brief (Attachment 1). ***.

[48] ROA is calculated here as operating results divided by total assets. With regard to a company's overall operations, staff notes that a total asset value (i.e., the bottom line value on the asset side of a company's balance sheet) reflects an aggregation of a number of current and non-current assets, which, in many instances, are not product specific. The ability of U.S. producers to assign total asset values to discrete product lines affects the meaningfulness of calculated operating return on net assets.

Table VI-9
Tin mill products: U.S. producers' ROA, by firm and period

Ratios in percent

Firm	2020	2021	2022
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

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

Table VI-10
Tin mill products: U.S. producers' narrative description of their total net assets, by firm

Firm	Narrative on total assets
Cleveland-Cliffs	***
Ohio Coatings	***
U.S. Steel	***

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

As shown in table VI-8, U.S. producers' total net assets increased irregularly during the full-year period, declining somewhat in 2021 and then increasing to the highest level of the period in 2022. On a percentage basis, *** reported the largest overall increase in total assets, which the company attributed to ***.[49] ***

[49] ***. Email with attachment from ***, September 29, 2023.

***.[50]

Capital and investment

The Commission requested the U.S. producers to describe any actual or potential negative effects of imports of tin mill products from Canada, China, Germany, the Netherlands, South Korea, Taiwan, Turkey, and the United Kingdom on their growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table VI-11 presents the effects reported and table VI-12 provides the U.S. producers' narrative descriptions.

Table VI-11
Tin mill products: Count indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2020, by effect

Number of firms reporting

Effect	Category	Count
Cancellation, postponement, or rejection of expansion projects	Investment	1
Denial or rejection of investment proposal	Investment	1
Reduction in the size of capital investments	Investment	1
Return on specific investments negatively impacted	Investment	1
Other investment effects	Investment	2
Any negative effects on investment	Investment	3
Rejection of bank loans	Growth	0
Lowering of credit rating	Growth	0
Problem related to the issue of stocks or bonds	Growth	0
Ability to service debt	Growth	0
Other growth and development effects	Growth	3
Any negative effects on growth and development	Growth	3
Anticipated negative effects of imports	Future	3

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

[50] Email with attachment from ***, February 13, 2023. Email with attachment from ***, February 13, 2023. Verification report, p. 8.

Table VI-12
Tin mill products: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2020

Item	Firm name and accompanying narrative response relating to actual and anticipated negative effects of imports
Cancellation, postponement, or rejection of expansion projects	***
Denial or rejection of investment proposal	***
Reduction in the size of capital investments	***
Return on specific investments negatively impacted	***
Other (effects of imports on investment)	***

Item	Firm name and accompanying narrative response relating to actual and anticipated negative effects of imports
Other (effects of imports on investment)	***
Other (effects of imports on growth and development)	***
Other (effects of imports on growth and development)	***

Item	Firm name and accompanying narrative response relating to actual and anticipated negative effects of imports
Other (effects of imports on growth and development)	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***

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

Part VII: Threat considerations and information on nonsubject countries

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

> *In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors*[1]*--*
>
> *(I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
>
> *(II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,*
>
> *(III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,*
>
> *(IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,*
>
> *(V) inventories of the subject merchandise,*

[1] Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that "The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition."

(VI) 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,

(VII) in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),

(VIII) the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and

(IX) any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).[2]

Information on the nature of the subsidies was presented earlier in this report; information on the volume and pricing of imports of the subject merchandise is presented in Parts IV and V; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in Part VI. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

[2] Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, ". . . the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

The industry in Canada

The Commission issued a foreign producers' or exporters' questionnaire to one firm believed to produce and/or export tin mill products from Canada.[3] The Commission received one response from ArcelorMittal Dofasco G.P ("ArcelorMittal Dofasco"). ArcelorMittal Dofasco estimates that it accounted for *** percent of tin mill products production in Canada in 2022. It also estimates that its exports to the United States accounted for *** percent of total exports of subject merchandise from Canada to the United States in 2022. Table VII-1 presents summary data for responding producers and exporters in Canada during 2022.

Table VII-1
Tin mill products: Summary data for producers in Canada, 2022

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
ArcelorMittal	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

[3] This firm was identified through a review of information submitted in the petitions and presented in third-party sources.

Table VII-2 presents events in Canada's tin mill products industry since January 1, 2020.

Table VII-2
Tin mill products: Important industry events in Canada's industry since January 1, 2020

Item	Firm	Event
Capital investment	ArcelorMittal Dofasco	September 2021—ArcelorMittal Dofasco is Canada's largest manufacturer of flat rolled steel. Its facility in Hamilton, Ontario, uses both the integrated blast furnace-basic oxygen furnace ("BF/BOF") and electric-arc furnace ("EAF")-based steelmaking processes. Mill product output includes hot-rolled, cold-rolled, galvanized, and subject tinplate. Dofasco announced plans for a CA$1.8 billion (US$1.34 billion) investment—including CA$500 million (US$298 million) in provincial grants and loans—in decarbonization technologies. Steelmaking at the Hamilton facility will transition its existing BF/BOF process to a directly reduced iron ("DRI")-EAF process, which is anticipated to lower its carbon dioxide ("CO_2") emissions by approximately 60 percent by 2030. The new EAF will have capacity to produce 2.4 million metric tons (2.6 million short tons) of crude steel per year.
Emission release	ArcelorMittal Dofasco	October 2023—Dofasco reported a plume of iron oxide was emitted after a "malfunction" during the process of blowing oxygen into one of the facility's two BOFs.

Source: ArcelorMittal, "Game-changing Announcement at ArcelorMittal Dofasco," News release, September 14, 2021, https://northamerica.arcelormittal.com/media/news-articles/game-changing-announcement-at-arcelormittal-dofasco;
ArcelorMittal, "ArcelorMittal Dofasco is Canada's Leading Flat Steel Producer and a Hallmark of Advanced Manufacturing in North America," https://northamerica.arcelormittal.com/our-operations/arcelormittal-dofasco, accessed February 16, 2023;
Kenneth Mann, "Province Invests $500 Million in Green Steel-making in Hamilton, Global News, February 15, 2022, https://globalnews.ca/news/8621273/ontario-funding-green-steel-making-hamilton/;
Fallon Hewitt, "'Malfunction' at ArcelorMittal Dofasco Sends Rust-coloured Plume Over Hamilton," Hamilton Spectator, October 29, 2023, https://www.thespec.com/news/hamilton-region/malfunction-at-arcelormittal-dofasco-sends-rust-coloured-plume-over-hamilton/article_70f4c604-0a65-5dd5-ba5a-dccd63bd3b9a.html.

Changes in operations

ArcelorMittal Dofasco was asked to report any change in the character of its operations or organization relating to the production of tin mill products since 2020. ArcelorMittal Dofasco reported ***. The firm ***.

Operations on Canada

Table VII-3 presents data on ArcelorMittal Dofasco's installed capacity, practical overall capacity, and practical tin mill products capacity and production on the same equipment. Installed overall capacity remained constant at *** short tons during 2020-22, and it was *** short tons in both interim period 2022 and interim period 2023. By comparison, practical tin mill products capacity decreased by *** percent from *** short tons in 2020 to *** short tons in 2022, and it was *** percent lower in interim period 2023 (*** short tons) compared with interim period 2022 (*** short tons).

Table VII-3
Tin mill products: ArcelorMittal Dofasco's installed capacity, practical overall capacity, and practical tin mill products capacity and production on the same equipment, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical tin mill products	Capacity	***	***	***	***	***
Practical tin mill products	Production	***	***	***	***	***
Practical tin mill products	Utilization	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table VII-4 presents ArcelorMittal Dofasco's reported capacity constraints since January 1, 2020.

Table VII-4
Tin mill products: Foreign producers' in Canada reported constraints to practical overall capacity, since January 1, 2020

Item	Firm name and narrative response on constraints to practical overall capacity
Other constraints	***

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

Table VII-5 presents information on ArcelorMittal Dofasco's tin mill products operations. Production decreased by *** percent from *** short tons in 2020 to *** short tons in 2022. It is projected to decrease by *** percent during 2022-23 and then increase by *** percent during 2023-24. During the periods examined, exports to the United States as a share of total shipments ranged between *** percent (in 2022) and *** percent (in 2021). By quantity, exports to the United States decreased by *** percent from *** short tons in 2020 to *** short tons in 2022. These exports are projected to increase by *** percent during 2022-23 and increase by *** percent during 2023-24. End-of-period inventories decreased *** percent from *** short tons in 2020 to *** short tons in 2022. They are projected to increase by *** percent during 2022-23 and then decrease by *** percent during 2023-24.

Table VII-5
Tin mill products: Data on ArcelorMittal Dofasco, by period

Quantity in short tons

Item	2020	2021	2022
Capacity	***	***	***
Production	***	***	***
End-of-period inventories	***	***	***
Internal consumption	***	***	***
Commercial home market shipments	***	***	***
Home market shipments	***	***	***
Exports to the United States	***	***	***
Exports to all other markets	***	***	***
Export shipments	***	***	***
Total shipments	***	***	***

Table continued.

Table VII-5 Continued
Tin mill products: Data on ArcelorMittal Dofasco, by period

Quantity in short tons

Item	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity	***	***	***	***
Production	***	***	***	***
End-of-period inventories	***	***	***	***
Internal consumption	***	***	***	***
Commercial home market shipments	***	***	***	***
Home market shipments	***	***	***	***
Exports to the United States	***	***	***	***
Exports to all other markets	***	***	***	***
Export shipments	***	***	***	***
Total shipments	***	***	***	***

Table continued.

Table VII-5 Continued
Tin mill products: Data on ArcelorMittal Dofasco, by period

Shares and ratios in percent

Item	2020	2021	2022
Capacity utilization ratio	***	***	***
Inventory ratio to production	***	***	***
Inventory ratio to total shipments	***	***	***
Internal consumption share	***	***	***
Commercial home market shipments share	***	***	***
Home market shipments share	***	***	***
Exports to the United States share	***	***	***
Exports to all other markets share	***	***	***
Export shipments share	***	***	***
Total shipments share	***	***	***

Table continued.

Table VII-5 Continued
Tin mill products: Data on ArcelorMittal Dofasco, by period

Shares and ratios in percent

Item	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity utilization ratio	***	***	***	***
Inventory ratio to production	***	***	***	***
Inventory ratio to total shipments	***	***	***	***
Internal consumption share	***	***	***	***
Commercial home market shipments share	***	***	***	***
Home market shipments share	***	***	***	***
Exports to the United States share	***	***	***	***
Exports to all other markets share	***	***	***	***
Export shipments share	***	***	***	***
Total shipments share	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

Alternative products

As shown in table VII-6, ArcelorMittal Dofasco *** on the same equipment and machinery that is used to produce tin mill products. ArcelorMittal Dofasco reported that ***.

Table VII-6
Tin mill products: ArcelorMittal Dofasco's overall production on the same equipment as subject production, by product type and period

Quantities in short tons; shares in percent

Product type	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Tin mill products	Quantity	***	***	***	***	***
Excluded tin mill products	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Tin mill products	Share	***	***	***	***	***
Excluded tin mill products	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All out-of-scope products	Share	***	***	***	***	***
All products	Share	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Exports

According to the Global Trade Atlas ("GTA"), the leading export market for tin- and chromium-coated steel sheet, including tin mill products, by quantity, from Canada is the United States (table VII-7). During 2022, the United States was the top export market for tin- and chromium-coated steel sheet from Canada, accounting for 94.9 percent, followed by Italy, accounting for 1.9 percent.

Table VII-7
Tin- and chromium-coated steel sheet: Exports from Canada, by destination market and by period

Quantity in short tons; Value in 1,000 dollars

Destination market	Measure	2020	2021	2022
United States	Quantity	269,373	245,863	279,196
Italy	Quantity	2,293	1,801	5,699
Pakistan	Quantity	6,763	2,202	2,449
Bangladesh	Quantity	2,034	849	2,013
India	Quantity	3,722	2,450	1,426
Mexico	Quantity	185	1,078	1,069
Turkey	Quantity	164	---	788
Kenya	Quantity	---	82	728
Philippines	Quantity	662	212	544
All other destination markets	Quantity	642	1,113	267
All destination markets	Quantity	285,838	255,649	294,179
United States	Value	282,680	283,216	465,658
Italy	Value	1,186	1,222	3,583
Pakistan	Value	3,435	1,376	1,358
Bangladesh	Value	809	450	799
India	Value	1,441	1,442	640
Mexico	Value	87	652	781
Turkey	Value	95	---	516
Kenya	Value	---	102	666
Philippines	Value	304	145	508
All other destination markets	Value	287	702	173
All destination markets	Value	290,323	289,309	474,683

Table continued.

Table VII-7 Continued
Tin- and chromium-coated steel sheet: Exports from Canada, by destination market and by period

Unit values in dollars per short ton; shares in percent

Destination market	Measure	2020	2021	2022
United States	Unit value	1,049	1,152	1,668
Italy	Unit value	517	679	629
Pakistan	Unit value	508	625	555
Bangladesh	Unit value	398	530	397
India	Unit value	387	589	449
Mexico	Unit value	472	605	731
Turkey	Unit value	581	---	655
Kenya	Unit value	---	1,247	915
Philippines	Unit value	459	684	933
All other destination markets	Unit value	447	631	646
All destination markets	Unit value	1,016	1,132	1,614
United States	Share of quantity	94.2	96.2	94.9
Italy	Share of quantity	0.8	0.7	1.9
Pakistan	Share of quantity	2.4	0.9	0.8
Bangladesh	Share of quantity	0.7	0.3	0.7
India	Share of quantity	1.3	1.0	0.5
Mexico	Share of quantity	0.1	0.4	0.4
Turkey	Share of quantity	0.1	---	0.3
Kenya	Share of quantity	---	0.0	0.2
Philippines	Share of quantity	0.2	0.1	0.2
All other destination markets	Share of quantity	0.2	0.4	0.1
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7210.11, 7210.12, 7210.50, and 7212.10 as reported by Statistics Canada in the Global Trade Atlas Suite database, accessed October 3, 2023.

Note: These data do not include HS subheadings 7212.50, 7225.99, and 7226.99 as they are believed to contain a large share of products outside the scope of these investigations.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“. United States is shown at the top, all remaining top export destinations shown in descending order of 2022 data.

The industry in China

The Commission issued foreign producers' or exporters' questionnaires to six firms believed to produce and/or export tin mill products from China.[4] Usable responses to the Commission's questionnaire were received from six firms: Baoshan Iron & Steel Co., Ltd. ("Baoshan"); Handan Jintai Packing Material Co., Ltd. ("Handan Jintai"); Shanghai Meishan Iron & Steel Co., Ltd. ("Meishan"); Shougang Casey Steel Co., Ltd. ("Shougang Casey"); Shougang Jingtang United Iron & Steel Co., Ltd. ("Shougang Jingtang"); and Wisco-Nippon Steel Tinplate Co., Ltd. ("Wisco-Nippon"). These firms estimate that they accounted for *** percent of tin mill products production in China in 2022. These firms also estimate that their exports to the United States accounted for *** percent of total exports of subject merchandise from China to the United States in 2022. Table VII-8 presents summary data for responding producers and exporters in China during 2022.

Table VII-8
Tin mill products: Summary data for producers in China, 2022

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Baoshan	***	***	***	***	***	***
Handan Jintai	***	***	***	***	***	***
Meishan	***	***	***	***	***	***
Shougang Casey	***	***	***	***	***	***
Shougang Jingtang	***	***	***	***	***	***
Wisco-Nippon	***	***	***	***	***	***
All firms	2,400,984	100.0	145,384	100.0	2,318,762	6.3

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Note: Handan Jintai reported *** during 2022.

[4] These firms were identified through a review of information submitted in the petitions and presented in third-party sources.

Table VII-9 presents events in China's tin mill products industry since January 1, 2020.

Table VII-9
Tin mill products: Important industry events in China's industry since January 1, 2020

Item	Firm	Event
Industry conference	SMM News	October 2020— According to an article published by a Chinese steel industry group from the "10th Tin Industry Chain Trading Summit," China's tinplate industry had total production capacity of 9.1 million metric tons (10.0 million short tons) and demand for tinplate in China was 3.77 million metric tons (4.16 million short tons). The article further stated that, in recent years, the Chinese tinplate industry operated at capacity utilization rates between 55 to 60 percent.
New equipment	Handan ZhouLi	March 2020— Handan ZhouLi Fine Steel Plate Co. Ltd. ("Handan ZhouLi") commissioned its new high-speed tin plate continuous annealing line at its tin mill facility in Handan City, Hebei Province. The maximum throughputs speed is 500 meters (1,640 feet) per minute, more than double that of conventional annealing lines. This new line will facilitate rapid annealing of a new ultra-thin tin plate product for the food canning industry, available in thicknesses of 0.17–0.55 mm (0.0067–0.0216 inch) and widths of 700–1,050 mm (27.5591–41.3386 inches). The annual production capacity at this facility is 250,000 metric tons (275,578 short tons).
Ownership transfer	PATIN	December 2020— Nippon Steel Corp. sold-off its ownership share in Guangzhou Pacific Tinplate Co. Ltd. ("PATIN") by transferring its 25-percent equity investment to its partner Guangzhou Hi-tech Investment Group Co. Ltd. Nippon Steel continues to operate in China's tinplate industry through its joint-venture with Wuhan Iron & Steel (Group) Corp. ("WISCO" or "WINSteel"), WISCO-Nippon Steel Tinplate Co. Ltd.
Acquistion	Shougang Jingtang	April 2021— Beijing Shougang Co. Ltd. completed its September-2020 acquisition of an additional 11.51-percent ownership share in Shougang Jingtang from Beijing Capital Investment Holdings Co. Ltd. for CNY3.2 billion ($491 million). This transaction raised the former's ownership share of the latter to 70.18 percent.
New equipment	Shougang Jingtang	May 2021— Toshiba Mitsubishi-Electric Industrial Systems Corporation ("TMEIC") finalized delivery of the motor drive and automation systems for Shougang Jingtang's Multi-Mode Continuous Casting & Rolling Plant ("MCCR") as part of the second-phase expansion at its Caofeidian facility. The MCCR includes a hot strip mill facility for high-precision, endless rolling of ultra-thin steel gauges.
Value added tax rebate (cancellation)	Ministry of Finance and Tariff Commission	August 2021— China's Ministry of Finance and Tariff Commission canceled a value added tax ("VAT") rebate of around 13 percent on exports of most major steel products, including tin mill products. The majority of steel mill products are subject to this export VAT. According to industry sources, changes to the VAT rebate have historically been used by China to manage exports of steel, to encourage exports of high value-added products, and to control those of low value-added and/or resource-intensive commodities.

Table continued.

Table VII-9 Continued
Tin mill products: Important industry events in China's industry since January 1, 2020

Item	Firm	Event
Production cut-back announcement	Baowu	August 2021— As a parastatal firm, China Baowu Steel Group ("Baowu"), the world's largest steel producer, confirmed that it will cut back output in second-half 2021 as part of China's commitments to reduce its CO_2 emissions by 2030 and achieve carbon neutrality by 2060. The Chinese steel industry is reportedly committed to start reducing its CO_2 emissions by 30 percent by 2035 to achieving carbon neutrality by 2050.
Domestic steelmaking controls	Baowu	July 2023— Baowu received crude steelmaking target output levels for 2023, as the Central Government seeks tighter control over domestic output. Target levels will vary among Baowu subsidiaries at either their 2022 or 2021 steelmaking levels. Reportedly, target levels are also anticipated for other Chinese steelmakers. Lower domestic steel production in the second-half 2023 reportedly could provide some support for improved pricing and market sentiment, as the domestic steel market is anticipated to remain sluggish, in the near future, and domestic market inventories are currently low.

Source: SMM News, "2020 (10th) Tin Industry Chain Trading Summit Invites You to Explore the Future Trend of Tin Market!," October 29, 2020, https://news.metal.com/newscontent/101228540/2020-10th-tin-industry-chain-trading-summit-invites-you-to-explore-the-future-trend-of-tin-market;
CISDI Group, "Handan Zhuoli Ready to Produce Ultra-thin Tin for Food Industry," March 9, 2020, http://cisdigroup.com.cn/html/2/download/Events/20/03/2599.html;
Metal Packager Team, "Nippon Steel Withdraws from Patin Tinplate Co.," Metal Packager, February 2, 2021, https://metalpackager.com/2021/02/metalpackager-com-nippon/;
MarketScreener, "Beijing Shougang Co., Ltd. Completed the Acquisition of an ddditional 11.51% Stake in Shougang Jingtang United Iron & Steel Co. Ltd. from Beijing Capital Investment Holdings Co. Ltd.," April 21, 2021, https://www.marketscreener.com/quote/stock/BEIJING-SHOUGANG-CO-LTD-6517197/news/Beijing-Shougang-Co-Ltd-completed-the-acquisition-of-an-additional-11-51-stake-in-Shougang-Jingt-33431216/;
TMEIC, "TMEIC Delivers Complete Set of Electrical Equipment for Continuous Thin-Slab Caster and Hot Strip Mill to Shougang Jingtang Iron and Steel Co., Ltd. in China," July 14, 2021, https://www.tmeic.com/news/tmeic-delivers-complete-set-electrical-equipment-continuous-thin-slab-caster-and-hot-strip;
Steel Orbis, "China Cancels Export Tax Rebate for CRC and HDG, Duty on HRC Discussed, July 29, 2012, https://www.steelorbis.com/steel-news/latest-news/china-cancels-export-tax-rebate-for-crc-and-hdg-duty-on-hrc-discussed-1209568.htm;
CRU Group, "China Removes VAT Rebate on Steel Exports," September 30, 2021, https://www.crugroup.com/knowledge-and-insights/insights/2021/china-removes-vat-rebate-on-steel-exports/#:~:text=Historically%2C%20China%20has%20provided%20a,cost%20of%20exporting%20steel%20products;
Daniel Moore, "China Baowu Steel Group to Cut Output to Reduce CO2 Emissions," Capital.com, August 10, 2021, https://capital.com/baowu-group-to-cut-output-in-co2-emissions-drive;
Halina Yermolenko, "China's Baowu Group Became the Largest Steel Producer in 2022," GMK Center, June 8, 2023, https://gmk.center/en/news/chinas-baowu-group-became-the-largest-steel-producer-in-2022/;
Halina Yermolenko, "Baowu Steel Received Steel Production Limitation Indicators," GMK Center, July 2023, https://gmk.center/en/news/baowu-steel-received-steel-production-limitation-indicators/.

Changes in operations

Producers in China were asked to report any change in the character of their operations or organization relating to the production of tin mill products since 2020. One of the six producers indicated in its questionnaire that it had experienced such changes. Table VII-10 presents the changes identified by this producer.

Table VII-10
Tin mill products: Reported changes in operations in China since January 1, 2020, by firm

Item	Firm name and accompanying narrative response on changes in operations
Expansions	***

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

In addition, Shougang Casey reported that the COVID-19 pandemic resulted in ***. Baoshan, Meishan, and Wisco-Nippon further reported that COVID-19 pandemic "***." The firms also noted that during 2020 to 2022, "***."

Operations on China

Table VII-11 presents data on foreign producers' installed capacity, practical overall capacity, and practical tin mill products capacity and production on the same equipment. Installed overall capacity increased by 3.5 percent from 2.81 million short tons in 2020 to 2.91 million short tons in 2022, and it was 2.2 percent higher in interim period 2023 (1.49 million short tons) compared with interim period 2022 (1.46 million short tons). Practical tin mill products capacity also expanded, increasing by 3.7 percent from 2.48 million short tons in 2020 to 2.57 million shorts tons in 2022, and it was 2.9 percent higher in interim period 2023 (1.32 million short tons) compared with interim period 2022 (1.28 million short tons).

Table VII-11
Tin mill products: Chinese producers' installed and practical capacity and production on the same equipment as subject production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	2,813,552	2,887,026	2,911,463	1,455,732	1,488,245
Installed overall	Production	2,322,010	2,451,981	2,400,984	1,197,574	1,253,549
Installed overall	Utilization	82.5	84.9	82.5	82.3	84.2
Practical overall	Capacity	2,478,475	2,546,917	2,569,680	1,284,840	1,322,573
Practical overall	Production	2,322,010	2,451,981	2,400,984	1,197,574	1,253,549
Practical overall	Utilization	93.7	96.3	93.4	93.2	94.8
Practical tin mill products	Capacity	2,478,475	2,546,917	2,569,680	1,284,840	1,322,573
Practical tin mill products	Production	2,322,010	2,451,981	2,400,984	1,197,574	1,253,549
Practical tin mill products	Utilization	93.7	96.3	93.4	93.2	94.8

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table VII-12 presents foreign producers' reported capacity constraints since January 1, 2020. In addition to production bottlenecks, storage capacity, logistics/transportation, firms reported other constraints such ***.

Table VII-12
Tin mill products: Chinese foreign producers' reported constraints to practical overall capacity, since January 1, 2020

Item	Firm name and narrative response on constraints to practical overall capacity
Production bottlenecks	***
Storage capacity	***
Logistics/transportation	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***

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

Table VII-13 presents information on the tin mill products operations of the responding producers and exporters in China. Production increased by 3.4 percent from 2.32 million short tons in 2020 to 2.40 million short tons in 2022. It is projected to decrease by 0.5 percent during 2022-23 and then increase by 0.8 percent during 2023-24. During the periods examined, exports to the United States as a share of total shipments ranged between 1.4 percent (in projected 2023) and 8.0 percent (in interim period 2022). By quantity, exports to the United States increased by 88.7 percent from 77,031 short tons in 2020 to 145,384 short tons in 2022. These exports are projected to decrease by 76.8 percent during 2022-23 and are projected to be zero in 2024. End-of-period inventories increased by 173.7 percent from 75,348 short tons in 2020 to 206,209 short tons in 2022. They are projected to decrease by 6.5 percent during 2022-23 and then decrease by 8.5 percent during 2023-24.

Table VII-13
Tin mill products: Data on the industry in China, by period

Quantity in short tons

Item	2020	2021	2022
Capacity	2,478,475	2,546,917	2,569,680
Production	2,322,010	2,451,981	2,400,984
End-of-period inventories	75,348	123,987	206,209
Internal consumption	***	***	***
Commercial home market shipments	***	***	***
Home market shipments	1,513,312	1,492,074	1,269,794
Exports to the United States	77,031	129,646	145,384
Exports to all other markets	749,144	781,622	903,584
Export shipments	826,175	911,268	1,048,968
Total shipments	2,339,487	2,403,342	2,318,762

Table continued.

Table VII-13 Continued
Tin mill products: Data on the industry in China, by period

Quantity in short tons

Item	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity	1,284,840	1,322,573	2,604,887	2,604,887
Production	1,197,574	1,253,549	2,389,515	2,408,522
End-of-period inventories	144,892	160,118	192,882	176,423
Internal consumption	***	***	***	***
Commercial home market shipments	***	***	***	***
Home market shipments	633,327	749,201	1,495,783	1,529,122
Exports to the United States	94,027	33,732	33,732	---
Exports to all other markets	449,315	516,707	873,327	895,859
Export shipments	543,342	550,439	907,059	895,859
Total shipments	1,176,669	1,299,640	2,402,842	2,424,981

Table continued.

Table VII-13 Continued
Tin mill products: Data on the industry in China, by period

Shares and ratios in percent

Item	2020	2021	2022
Capacity utilization ratio	93.7	96.3	93.4
Inventory ratio to production	3.2	5.1	8.6
Inventory ratio to total shipments	3.2	5.2	8.9
Internal consumption share	***	***	***
Commercial home market shipments share	***	***	***
Home market shipments share	64.7	62.1	54.8
Exports to the United States share	3.3	5.4	6.3
Exports to all other markets share	32.0	32.5	39.0
Export shipments share	35.3	37.9	45.2
Total shipments share	100.0	100.0	100.0

Table continued.

Table VII-13 Continued
Tin mill products: Data on the industry in China, by period

Shares and ratios in percent

Item	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity utilization ratio	93.2	94.8	91.7	92.5
Inventory ratio to production	6.0	6.4	8.1	7.3
Inventory ratio to total shipments	6.2	6.2	8.0	7.3
Internal consumption share	***	***	***	***
Commercial home market shipments share	***	***	***	***
Home market shipments share	53.8	57.6	62.3	63.1
Exports to the United States share	8.0	2.6	1.4	---
Exports to all other markets share	38.2	39.8	36.3	36.9
Export shipments share	46.2	42.4	37.7	36.9
Total shipments share	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

Alternative products

*** reported production of other products on the same equipment and machinery used to produce tin mill products. Moreover, ***.

Exports

According to GTA, the leading export markets for tin- and chromium-coated steel sheet, including tin mill products, by quantity, from China are Italy, Mexico, and the United States (table VII-14). During 2022, the United States was the third-largest export market for tin- and chromium-coated steel sheet from China, accounting for 6.2 percent, behind Italy, accounting for 13.4 percent, and Mexico, accounting for 7.1 percent.

Table VII-14
Tin- and chromium-coated steel sheet: Exports from China, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2020	2021	2022
United States	Quantity	93,528	134,421	145,402
Italy	Quantity	214,865	202,968	316,550
Mexico	Quantity	55,104	146,252	168,398
Thailand	Quantity	152,198	141,640	131,148
Belgium	Quantity	18,980	30,612	120,903
Philippines	Quantity	60,827	67,149	100,648
South Africa	Quantity	69,279	128,608	96,749
United Arab Emirates	Quantity	27,893	91,550	94,272
Spain	Quantity	79,147	84,986	93,876
All other destination markets	Quantity	795,945	837,522	1,094,268
All destination markets	Quantity	1,567,765	1,865,708	2,362,215
United States	Value	62,976	141,181	179,747
Italy	Value	149,062	219,239	383,025
Mexico	Value	38,500	178,333	223,659
Thailand	Value	104,826	153,274	155,588
Belgium	Value	12,692	33,585	151,173
Philippines	Value	45,463	72,774	134,089
South Africa	Value	47,711	141,116	121,161
United Arab Emirates	Value	19,311	93,217	113,745
Spain	Value	54,938	85,293	112,331
All other destination markets	Value	583,491	926,512	1,404,919
All destination markets	Value	1,118,970	2,044,524	2,979,438

Table continued.

Table VII-14 Continued
Tin- and chromium-coated steel sheet: Exports from China, by destination market and by period

Unit values in dollars per short ton; shares in percent

Destination market	Measure	2020	2021	2022
United States	Unit value	673	1,050	1,236
Italy	Unit value	694	1,080	1,210
Mexico	Unit value	699	1,219	1,328
Thailand	Unit value	689	1,082	1,186
Belgium	Unit value	669	1,097	1,250
Philippines	Unit value	747	1,084	1,332
South Africa	Unit value	689	1,097	1,252
United Arab Emirates	Unit value	692	1,018	1,207
Spain	Unit value	694	1,004	1,197
All other destination markets	Unit value	733	1,106	1,284
All destination markets	Unit value	714	1,096	1,261
United States	Share of quantity	6.0	7.2	6.2
Italy	Share of quantity	13.7	10.9	13.4
Mexico	Share of quantity	3.5	7.8	7.1
Thailand	Share of quantity	9.7	7.6	5.6
Belgium	Share of quantity	1.2	1.6	5.1
Philippines	Share of quantity	3.9	3.6	4.3
South Africa	Share of quantity	4.4	6.9	4.1
United Arab Emirates	Share of quantity	1.8	4.9	4.0
Spain	Share of quantity	5.0	4.6	4.0
All other destination markets	Share of quantity	50.8	44.9	46.3
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7210.11, 7210.12, 7210.50, and 7212.10 as reported by China Customs in the Global Trade Atlas Suite database, accessed October 3, 2023.

Note: These data do not include HS subheadings 7212.50, 7225.99, and 7226.99 as they are believed to contain a large share of products outside the scope of these investigations.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“. United States is shown at the top, all remaining top export destinations shown in descending order of 2022 data.

The industry in Germany

The Commission issued a foreign producers' or exporters' questionnaire to one firm believed to produce and/or export tin mill products from Germany.[5] The Commission received one response from thyssenkrupp Rasselstein GmbH ("thyssenkrupp"). Thyssenkrupp estimates that it accounted for *** percent of tin mill products production in Germany in 2022. It also estimates that its exports to the United States accounted for *** percent of total exports of subject merchandise from Germany to the United States in 2022. Table VII-15 presents summary data for responding producers and exporters in Germany during 2022.

Table VII-15
Tin mill products: Summary data for producers in Germany, 2022

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
thyssenkrupp	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

[5] This firm was identified through a review of information submitted in the petitions and presented in third-party sources.

Table VII-16 presents events in Germany's tin mill products industry since January 1, 2020.

Table VII-16
Tin mill products: Important industry events in Germany's industry since January 1, 2020

Item	Firm	Event
New products	thyssenkrupp	March 2021— thyssenkrupp will introduce its new CO_2-reduced bluemint® flat steels at the Blechexpo 2021. "Bluemint® pure" has a 70-percent lower CO_2 intensity from addition of reduced sponge iron, and "bluemint® pure" has a 65-percent lower CO_2 intensity from addition of more high-quality recycled scrap, which reduces the amount of CO_2-emitting coke needed to fuel the blast furnace at its steelmaking facility in Andernach.
New products	thyssenkrupp	March 2022— thyssenkrupp, together with the Swiss manufacturers Hoffmann Neopac AG and Ricola AG, introduced the world's first food can assembled with tinplated CO_2-reduced bluemint® steels. Substituting hot-briquetted iron ("HBI") for some of the iron ore allows for combustion of less coke in a blast furnace.
Capital investment	thyssenkrupp	August 2022— The German Federal Ministry for Economic Affairs and Climate Action is sponsoring research projects under the "Hydrogen Technology Offensive" to reduce CO_2 emissions from steelmaking and processing operations. The "FlexHeat2Anneal" and "H2-DisTherPro" projects are assessing how hydrogen fuel can reduce CO_2 emissions, respectively in the continuous and batch annealing operations at thyssenkrupp's tin mill products facility in Andernach.
Capital investment	thyssenkrupp	September 2022— thyssenkrupp currently has production capacity to produce 1.5 million metric tons (1.7 million short tons) of tin mill products per year at its steel facility. Thyssenkrupp announced the completion of a new coating line after three years of construction. The firm invested approximately €120 million ($128 million) in the project, which will allow it to produce thinner and wider chromium-coated sheet steel products. This new line also utilizes energy more efficiently, digitized workflow technology, and chromium-III rather than chromium-IV cation coating solutions to fully comply with EU REACH Regulations.
New products	thyssenkrupp	April 2023— thyssenkrupp will display its tin mill products at Metpack, the world's leading trade show for metal packaging, to be held in Essen on May 2, 2023. Among the firm's innovative tinplate products on display will include its CO_2-reduced bluemint® and rasselstein® Solidflex steels, and its material-saving rasselstein® D&I Solid steels.

Table continued.

Table VII-16 Continued
Tin mill products: Important industry events in Germany's industry since January 1, 2020

Item	Firm	Event
New products	thyssenkrupp	June 2023— To produce its reduced-CO_2 packaging new bluemint® tinplated packaging steels thyssenkrupp utilizes biomethane and specially processed steel scrap to cut back the CO_2 emissions by up to 69 percent. Thyssenkrupp will provide up to 3,000 metric tons (3,307 short tons) of bluemint® tinplated packaging steels to Muhr & Söhne in 2023.

Source: thyssenkrupp, "Bluemint® Steel: Premium Steels with an Environmental Benefit," Press release, October 26, 2021, https://www.thyssenkrupp-steel.com/en/newsroom/press-releases/bluemint-steel-premium-steels-with-an-environmental-benefit.html;
thyssenkrupp, "Innovation: First Food Can With Reduced CO2 Intensity," News release, March 10, 2022, https://www.thyssenkrupp-steel.com/en/newsroom/press-releases/innovation-first-food-can-with-reduced-co2-intensity.html;
thyssenkrupp, "thyssenkrupp Rasselstein Researching Use of Hydrogen in Tinplate Production," News release, August 2022, https://www.thyssenkrupp-steel.com/en/newsroom/press-releases/thyssenkrupp-rasselstein-researching-use-of-hydrogen-in-tinplate-production.html;
thyssenkrupp, "The World's Most Advanced Coating Technology for Packaging Steel: Coating Line 13 is to Start Operation at thyssenkrupp Rasselstein GmbH in Andernach on 17 September 2022," News release, September 17, 2022, https://www.thyssenkrupp-steel.com/en/newsroom/press-releases/coating-line-13-is-to-start-operation-at-thyssenkrupp-rasselstein-gmbh-in-andernach-on-17-september-2022.html;
thyssenkrupp, "100 Years Rasselstein in Andernach," https://www.thyssenkrupp-steel.com/en/newsroom/highlights/100-jahre-rasselstein-in-andernach.html, accessed February 17, 2023;
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thyssenkrupp, "Sika Now Also Relies on Sustainable Bluemint® Packaging Steel from thyssenkrupp Rasselstein," News release, June 15, 2023, https://www.thyssenkrupp-steel.com/en/newsroom/press-releases/sika-now-also-relies-on-sustainable-bluemint-packaging-steel-from-thyssenkrupp-rasselstein.html.

Changes in operations

Thyssenkrupp was asked to report any change in the character of its operations or organization relating to the production of tin mill products since 2020. In its questionnaire, thyssenkrupp indicated a weather-related or force majeure event (table VII-17). In terms of the impact of the COVID-19 pandemic on its operations, thyssenkrupp reported that it ***.

Table VII-17
Tin mill products: thyssenkrupp's changes in operations since January 1, 2020

Item	Firm name and accompanying narrative response on changes in operations
Weather-related or force majeure events	***

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

In terms of anticipated changes to its tin mill products operations, thysssenkrupp reported "***."

Operations on Germany

Table VII-18 presents data on thysssenkrupp's installed capacity, practical overall capacity, and practical tin mill products capacity and production on the same equipment. Installed overall capacity increased, irregularly, by *** percent from *** short tons in 2020 to *** short tons in 2021 to *** short tons in 2022, and it was *** percent higher in interim period 2023 (*** short tons) compared with interim period 2022 (*** short tons). By comparison, practical tin mill products capacity decreased by *** percent from *** shot tons in 2020 to *** short tons in 2022, and it was *** percent lower in interim period 2023 (*** short tons) compared with interim period 2022 (*** short tons).

Table VII-18
Tin mill products: thysssenkrupp's installed and practical capacity and production on the same equipment as subject production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical tin mill products	Capacity	***	***	***	***	***
Practical tin mill products	Production	***	***	***	***	***
Practical tin mill products	Utilization	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table VII-19 presents thyssenkrupp's reported capacity constraints since January 1, 2020.

Table VII-19
Tin mill products: thyssenkrupp's reported constraints to practical overall capacity, since January 1, 2020

Item	Firm name and narrative response on constraints to practical overall capacity
Other constraints	***

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

Table VII-20 presents information on thyssenkrupp's tin mill products operations. Production decreased by *** percent from *** short tons in 2020 to *** short tons in 2022. It is projected to decrease by *** percent during 2022-23 and then increase by *** percent during 2023-24. During the periods examined, exports to the United States as a share of total shipments ranged between *** percent (in 2020) and *** percent (in interim period 2023). By quantity, exports to the United States increased by *** percent from *** short tons in 2020 to *** short tons in 2022. These exports are projected to decrease by *** percent during 2022-23 and then decrease by *** percent during 2023-24. End-of-period inventories decreased by *** percent from *** short tons in 2020 to *** short tons in 2022. They are projected to increase by *** percent during 2022-23 and then increase by *** percent during 2023-24.

Table VII-20
Tin mill products: Data on thyssenkrupp, by period

Quantity in short tons

Item	2020	2021	2022
Capacity	***	***	***
Production	***	***	***
End-of-period inventories	***	***	***
Internal consumption	***	***	***
Commercial home market shipments	***	***	***
Home market shipments	***	***	***
Exports to the United States	***	***	***
Exports to all other markets	***	***	***
Export shipments	***	***	***
Total shipments	***	***	***

Table continued.

Table VII-20 Continued
Tin mill products: Data on thyssenkrupp, by period

Quantity in short tons

Item	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity	***	***	***	***
Production	***	***	***	***
End-of-period inventories	***	***	***	***
Internal consumption	***	***	***	***
Commercial home market shipments	***	***	***	***
Home market shipments	***	***	***	***
Exports to the United States	***	***	***	***
Exports to all other markets	***	***	***	***
Export shipments	***	***	***	***
Total shipments	***	***	***	***

Table continued.

Table VII-20 Continued
Tin mill products: Data on thyssenkrupp, by period

Shares and ratios in percent

Item	2020	2021	2022
Capacity utilization ratio	***	***	***
Inventory ratio to production	***	***	***
Inventory ratio to total shipments	***	***	***
Internal consumption share	***	***	***
Commercial home market shipments share	***	***	***
Home market shipments share	***	***	***
Exports to the United States share	***	***	***
Exports to all other markets share	***	***	***
Export shipments share	***	***	***
Total shipments share	***	***	***

Table continued.

Table VII-20 Continued
Tin mill products: Data on thyssenkrupp, by period

Shares and ratios in percent

Item	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity utilization ratio	***	***	***	***
Inventory ratio to production	***	***	***	***
Inventory ratio to total shipments	***	***	***	***
Internal consumption share	***	***	***	***
Commercial home market shipments share	***	***	***	***
Home market shipments share	***	***	***	***
Exports to the United States share	***	***	***	***
Exports to all other markets share	***	***	***	***
Export shipments share	***	***	***	***
Total shipments share	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

Alternative products

As shown in table VII-21, thyssenkrupp *** on the same equipment and machinery that is used to produce tin mill products. The firm reported that ***.

Table VII-21
Tin mill products: thyssenkrupp's overall production on the same equipment as subject production, by product type and period

Quantities in short tons; shares in percent

Product type	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Tin mill products	Quantity	***	***	***	***	***
Excluded tin mill products	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Tin mill products	Share	***	***	***	***	***
Excluded tin mill products	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All out-of-scope products	Share	***	***	***	***	***
All products	Share	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Exports

According to GTA, the leading export markets for tin- and chromium-coated steel sheet, including tin mill products, by quantity, from Germany are the United States, France, and Italy (table VII-22). During 2022, the United States was the top export market for tin- and chromium-coated steel sheet from Germany, accounting for 30.5 percent, followed by France, accounting for 6.0 percent, and Italy, accounting for 5.8 percent.

Table VII-22
Tin- and chromium-coated steel sheet: Exports from Germany, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2020	2021	2022
United States	Quantity	208,309	245,729	279,346
France	Quantity	69,757	41,490	55,247
Italy	Quantity	28,180	42,733	53,058
Turkey	Quantity	45,790	41,999	40,845
Netherlands	Quantity	36,562	29,575	37,848
Czech Republic	Quantity	44,766	41,310	36,930
Poland	Quantity	38,055	37,276	31,439
Spain	Quantity	38,036	37,003	27,837
Australia	Quantity	14,967	21,772	20,959
All other destination markets	Quantity	464,075	441,135	331,622
All destination markets	Quantity	988,498	980,023	915,130
United States	Value	171,582	220,671	495,662
France	Value	60,639	41,920	89,858
Italy	Value	25,554	43,600	82,817
Turkey	Value	33,251	39,647	55,287
Netherlands	Value	35,147	30,680	61,757
Czech Republic	Value	40,030	40,359	57,263
Poland	Value	38,171	38,141	50,451
Spain	Value	35,468	38,658	44,033
Australia	Value	12,244	20,689	30,058
All other destination markets	Value	388,084	429,677	495,903
All destination markets	Value	840,171	944,041	1,463,086

Table continued.

Table VII-22 Continued
Tin- and chromium-coated steel sheet: Exports from Germany, by destination market and by period

Unit values in dollars per short ton; shares in percent

Destination market	Measure	2020	2021	2022
United States	Unit value	824	898	1,774
France	Unit value	869	1,010	1,626
Italy	Unit value	907	1,020	1,561
Turkey	Unit value	726	944	1,354
Netherlands	Unit value	961	1,037	1,632
Czech Republic	Unit value	894	977	1,551
Poland	Unit value	1,003	1,023	1,605
Spain	Unit value	932	1,045	1,582
Australia	Unit value	818	950	1,434
All other destination markets	Unit value	836	974	1,495
All destination markets	Unit value	850	963	1,599
United States	Share of quantity	21.1	25.1	30.5
France	Share of quantity	7.1	4.2	6.0
Italy	Share of quantity	2.9	4.4	5.8
Turkey	Share of quantity	4.6	4.3	4.5
Netherlands	Share of quantity	3.7	3.0	4.1
Czech Republic	Share of quantity	4.5	4.2	4.0
Poland	Share of quantity	3.8	3.8	3.4
Spain	Share of quantity	3.8	3.8	3.0
Australia	Share of quantity	1.5	2.2	2.3
All other destination markets	Share of quantity	46.9	45.0	36.2
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7210.11, 7210.12, 7210.50, and 7212.10 as reported by Eurostat in the Global Trade Atlas Suite database, accessed October 3, 2023.

Note: These data do not include HS subheadings 7212.50, 7225.99, and 7226.99 as they are believed to contain a large share of products outside the scope of these investigations.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“. United States is shown at the top, all remaining top export destinations shown in descending order of 2022 data.

The industry in South Korea

The Commission issued foreign producers' or exporters' questionnaires to two firms believed to produce and/or export tin mill products from South Korea.[6] Usable responses to the Commission's questionnaire were received from two firms: TCC Steel and KG Dongbu Steel Co., Ltd. ("KG Steel"). As discussed in Part I of this report, Commerce's final dumping margins for imports of tin mill products from South Korea for TCC Steel were 2.69 percent and 0.00 percent for KG Steel. As a result, this section only presents information on the tin mill products' operations of subject producer from South Korea TCC Steel. TCC Steel estimates that it accounted for *** percent of tin mill products production in South Korea in 2022. It also estimates that its exports to the United States accounted for *** percent of total exports of subject merchandise from South Korea to the United States in 2022. Table VII-23 presents summary data for responding subject producers and exporters in South Korea during 2022.

Table VII-23
Tin mill products: Summary data for subject producers in South Korea, 2022

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
TCC Steel	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Changes in operations

TCC Steel was asked to report any change in the character of its operations or organization relating to the production of tin mill products since 2020. In its questionnaire, TCC Steel reported ***.

[6] These firms were identified through a review of information submitted in the petitions and presented in third-party sources.

Operations on South Korea

Table VII-24 presents data on TCC Steel's installed capacity, practical overall capacity, and practical tin mill products capacity and production on the same equipment. Install overall capacity increased by *** percent from *** short tons in 2020 to *** short tons in 2022, and it was the same at *** short tons in both interim period 2022 and interim period 2023. By comparison, practical tin mill products capacity was constant at *** short tons during 2020-22, and it was the same at *** short tons in both interim period 2022 and interim period 2023.

Table VII-24
Tin mill products: TCC Steel's installed and practical capacity and production on the same equipment as subject production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical tin mill products	Capacity	***	***	***	***	***
Practical tin mill products	Production	***	***	***	***	***
Practical tin mill products	Utilization	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table VII-25 presents information on TCC Steel's tin mill products operations. Production decreased by *** percent from *** short tons in 2020 to *** short tons in 2022. It is projected to increase by *** percent during 2022-23 and then decreased by *** percent from 2023 to 2024. During the periods examined, exports to the United States as a share of total shipments ranged between *** percent (in both interim periods 2022 and 2023) and *** percent (in projected 2024). By quantity, exports to the United States decreased by *** percent from *** to short tons in 2020 to *** short tons in 2022. These exports are projected to increase by *** percent during 2022-23 and then increase by *** percent during 2023-24. End-of-period inventories increased, irregularly, by *** percent from *** short tons in 2020 to *** short tons in 2021 to *** short tons in 2022. They are projected to remain at 2022 levels in both 2023 and 2024.

Table VII-25
Tin mill products: Data on TCC Steel, by period

Quantity in short tons

Item	2020	2021	2022
Capacity	***	***	***
Production	***	***	***
End-of-period inventories	***	***	***
Internal consumption	***	***	***
Commercial home market shipments	***	***	***
Home market shipments	***	***	***
Exports to the United States	***	***	***
Exports to all other markets	***	***	***
Export shipments	***	***	***
Total shipments	***	***	***

Table continued.

Table VII-25 Continued
Tin mill products: Data on TCC Steel, by period

Quantity in short tons

Item	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity	***	***	***	***
Production	***	***	***	***
End-of-period inventories	***	***	***	***
Internal consumption	***	***	***	***
Commercial home market shipments	***	***	***	***
Home market shipments	***	***	***	***
Exports to the United States	***	***	***	***
Exports to all other markets	***	***	***	***
Export shipments	***	***	***	***
Total shipments	***	***	***	***

Table continued.

Table VII-25 Continued
Tin mill products: Data on TCC Steel, by period

Shares and ratios in percent

Item	2020	2021	2022
Capacity utilization ratio	***	***	***
Inventory ratio to production	***	***	***
Inventory ratio to total shipments	***	***	***
Internal consumption share	***	***	***
Commercial home market shipments share	***	***	***
Home market shipments share	***	***	***
Exports to the United States share	***	***	***
Exports to all other markets share	***	***	***
Export shipments share	***	***	***
Total shipments share	***	***	***

Table continued.

Table VII-25 Continued
Tin mill products: Data on TCC Steel, by period

Shares and ratios in percent

Item	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity utilization ratio	***	***	***	***
Inventory ratio to production	***	***	***	***
Inventory ratio to total shipments	***	***	***	***
Internal consumption share	***	***	***	***
Commercial home market shipments share	***	***	***	***
Home market shipments share	***	***	***	***
Exports to the United States share	***	***	***	***
Exports to all other markets share	***	***	***	***
Export shipments share	***	***	***	***
Total shipments share	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

Alternative products

As shown in table VII-26, TCC Steel *** on the same equipment and machinery that is used to produce tin mill products. The firm reported that ***.

Table VII-26
Tin mill products: TCC Steel's overall production on the same equipment as subject production, by product type and period

Quantities in short tons; shares in percent

Product type	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Tin mill products	Quantity	***	***	***	***	***
Excluded tin mill products	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All out-of-scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Tin mill products	Share	***	***	***	***	***
Excluded tin mill products	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All out-of-scope products	Share	***	***	***	***	***
All products	Share	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Exports

According to GTA, the leading export markets for tin- and chromium-coated steel sheet, including tin mill products, by quantity, from South Korea are Thailand, the United States, and Indonesia (table VII-27). During 2022, the United States was the second-largest export market for tin- and chromium-coated steel sheet from South Korea, accounting for 15.5 percent, behind Thailand, accounting for 15.7 percent, and then followed by Indonesia, accounting 13.1 percent.

Table VII-27
Tin and chromium-coated steel sheet: Exports from South Korea, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2020	2021	2022
United States	Quantity	83,349	78,615	70,870
Thailand	Quantity	128,770	83,753	71,782
Indonesia	Quantity	63,531	64,968	59,920
Italy	Quantity	29,988	21,913	42,773
Mexico	Quantity	28,531	19,406	36,615
Saudi Arabia	Quantity	22,224	31,112	21,026
Philippines	Quantity	39,188	36,843	20,997
Japan	Quantity	19,607	21,210	19,157
Australia	Quantity	11,177	15,606	17,092
All other destination markets	Quantity	142,187	94,541	97,704
All destination markets	Quantity	568,551	467,967	457,936
United States	Value	81,126	95,866	136,613
Thailand	Value	93,999	92,763	96,675
Indonesia	Value	51,005	75,141	93,408
Italy	Value	22,585	22,682	56,686
Mexico	Value	19,843	25,208	60,098
Saudi Arabia	Value	14,332	32,347	31,334
Philippines	Value	30,843	41,922	31,974
Japan	Value	15,594	29,444	16,907
Australia	Value	8,026	20,890	27,262
All other destination markets	Value	105,450	101,899	143,488
All destination markets	Value	442,804	538,161	694,446

Table continued.

Table VII-27 Continued
Tin and chromium-coated steel sheet: Exports from South Korea, by destination market and by period

Unit values in dollars per short ton; shares in percent

Destination market	Measure	2020	2021	2022
United States	Unit value	973	1,219	1,928
Thailand	Unit value	730	1,108	1,347
Indonesia	Unit value	803	1,157	1,559
Italy	Unit value	753	1,035	1,325
Mexico	Unit value	696	1,299	1,641
Saudi Arabia	Unit value	645	1,040	1,490
Philippines	Unit value	787	1,138	1,523
Japan	Unit value	795	1,388	883
Australia	Unit value	718	1,339	1,595
All other destination markets	Unit value	742	1,078	1,469
All destination markets	Unit value	779	1,150	1,516
United States	Share of quantity	14.7	16.8	15.5
Thailand	Share of quantity	22.6	17.9	15.7
Indonesia	Share of quantity	11.2	13.9	13.1
Italy	Share of quantity	5.3	4.7	9.3
Mexico	Share of quantity	5.0	4.1	8.0
Saudi Arabia	Share of quantity	3.9	6.6	4.6
Philippines	Share of quantity	6.9	7.9	4.6
Japan	Share of quantity	3.4	4.5	4.2
Australia	Share of quantity	2.0	3.3	3.7
All other destination markets	Share of quantity	25.0	20.2	21.3
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7210.11, 7210.12, 7210.50, and 7212.10 as reported by Korea Trade Statistics Promotion Institute (KTSPI) in the Global Trade Atlas Suite database, accessed October 3, 2023.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“. United States is shown at the top, all remaining top export destinations shown in descending order of 2022 data.

Note: Data are for all of South Korea with no data breakout for subject versus nonsubject exports available.

Subject sources combined

Table VII-28 presents summary data on the tin mill products operations of reporting subject producers and exporters. Capacity, production, and, subsequently, capacity utilization decreased irregularly during 2020-22. Capacity decreased by *** percent from *** short tons in 2020 to *** short tons in 2022. Capacity is projected to be *** percent higher in 2023 compared with 2022, and it is projected to be *** percent higher in 2024 compared with 2023. Production decreased by *** percent from *** short tons in 2020 to *** short tons in 2022. Production is projected to be *** percent lower in 2023 compared with 2022; however, it is projected to be *** percent higher in 2024 compared with 2023. As capacity and production decreased, utilization declined *** percentage points from *** percent in 2020 to *** percent in 2022. Capacity utilization is projected to be lower in 2023 compared with 2022; however, it is projected to be higher in 2024 compared with 2023.

During the periods examined, subject producers' exports to the United States as a share of their total shipments ranged between *** percent (in projected 2024) and *** percent (in interim period 2022). By quantity, exports to the United States increased by *** percent from *** short tons in 2020 to *** short tons in 2022. These exports are projected to decrease by *** precent during 2022-23 and by *** percent during 2023-24.

Subject producers' end-of-period inventories increased by *** percent from *** short tons in 2020 to *** short tons in 2022. They are projected to decrease by *** percent during 2022-23 and by *** percent during 2023-24.

Table VII-28
Tin mill products: Data on the industry in aggregated subject sources, by period

Quantity in short tons

Item	2020	2021	2022
Capacity	***	***	***
Production	***	***	***
End-of-period inventories	***	***	***
Internal consumption	***	***	***
Commercial home market shipments	***	***	***
Home market shipments	***	***	***
Exports to the United States	***	***	***
Exports to all other markets	***	***	***
Export shipments	***	***	***
Total shipments	***	***	***

Table continued.

Table VII-28 Continued
Tin mill products: Data on the industry in aggregated subject sources, by period

Quantity in short tons

Item	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity	***	***	***	***
Production	***	***	***	***
End-of-period inventories	***	***	***	***
Internal consumption	***	***	***	***
Commercial home market shipments	***	***	***	***
Home market shipments	***	***	***	***
Exports to the United States	***	***	***	***
Exports to all other markets	***	***	***	***
Export shipments	***	***	***	***
Total shipments	***	***	***	***

Table continued.

Table VII-28 Continued
Tin mill products: Data on the industry in aggregated subject sources, by period

Shares and ratios in percent

Item	2020	2021	2022
Capacity utilization ratio	***	***	***
Inventory ratio to production	***	***	***
Inventory ratio to total shipments	***	***	***
Internal consumption share	***	***	***
Commercial home market shipments share	***	***	***
Home market shipments share	***	***	***
Exports to the United States share	***	***	***
Exports to all other markets share	***	***	***
Export shipments share	***	***	***
Total shipments share	***	***	***

Table continued.

Table VII-28 Continued
Tin mill products: Data on the industry in aggregated subject sources, by period

Shares and ratios in percent

Item	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity utilization ratio	***	***	***	***
Inventory ratio to production	***	***	***	***
Inventory ratio to total shipments	***	***	***	***
Internal consumption share	***	***	***	***
Commercial home market shipments share	***	***	***	***
Home market shipments share	***	***	***	***
Exports to the United States share	***	***	***	***
Exports to all other markets share	***	***	***	***
Export shipments share	***	***	***	***
Total shipments share	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

Table VII-29 presents summary data on the tin mill products operations of reporting subject producers and exporters excluding subject producers and exporters in South Korea. Capacity, production, and, subsequently, capacity utilization decreased irregularly during 2020-22. Capacity decreased by *** percent from *** short tons in 2020 to *** short tons in 2022. Capacity is projected to be *** percent higher in 2023 compared with 2022, and it is projected to be *** percent higher in 2024 compared with 2023. Production decreased by *** percent from *** short tons in 2020 to *** short tons in 2022. Production is projected to be *** percent lower in 2023 compared with 2022; however, it is projected to be *** percent higher in 2024 compared with 2023. As capacity and production decreased, utilization declined *** percentage points from *** percent in 2020 to *** percent in 2022. Capacity utilization is projected to be lower in 2023 compared with 2022; however, it is projected to be higher in 2024 compared with 2023.

During the periods examined, producers' exports to the United States as a share of their total shipments ranged between *** percent (in projected 2024) and *** percent (in interim period 2022). By quantity, exports to the United States increased by *** percent from *** short tons in 2020 to *** short tons in 2022. These exports are projected to decrease by *** precent during 2022-23 and by *** percent during 2023-24.

Producers' end-of-period inventories increased by *** percent from *** short tons in 2020 to *** short tons in 2022. They are projected to decrease by *** percent during 2022-23 and by *** percent during 2023-24.

Table VII-29
Tin mill products: Data on industry in aggregated subject countries excluding subject producers in South Korea, by period

Quantity in short tons

Item	2020	2021	2022
Capacity	***	***	***
Production	***	***	***
End-of-period inventories	***	***	***
Internal consumption	***	***	***
Commercial home market shipments	***	***	***
Home market shipments	***	***	***
Exports to the United States	***	***	***
Exports to all other markets	***	***	***
Export shipments	***	***	***
Total shipments	***	***	***

Table continued.

Table VII-29 Continued
Tin mill products: Data on industry in aggregated subject countries excluding subject producers in South Korea, by period

Quantity in short tons

Item	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity	***	***	***	***
Production	***	***	***	***
End-of-period inventories	***	***	***	***
Internal consumption	***	***	***	***
Commercial home market shipments	***	***	***	***
Home market shipments	***	***	***	***
Exports to the United States	***	***	***	***
Exports to all other markets	***	***	***	***
Export shipments	***	***	***	***
Total shipments	***	***	***	***

Table continued.

Table VII-29 Continued
Tin mill products: Data on industry in aggregated subject countries excluding subject producers in South Korea, by period

Shares and ratios in percent

Item	2020	2021	2022
Capacity utilization ratio	***	***	***
Inventory ratio to production	***	***	***
Inventory ratio to total shipments	***	***	***
Internal consumption share	***	***	***
Commercial home market shipments share	***	***	***
Home market shipments share	***	***	***
Exports to the United States share	***	***	***
Exports to all other markets share	***	***	***
Export shipments share	***	***	***
Total shipments share	***	***	***

Table continued.

Table VII-29 Continued
Tin mill products: Data on industry in aggregated subject countries excluding subject producers in South Korea, by period

Shares and ratios in percent

Item	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity utilization ratio	***	***	***	***
Inventory ratio to production	***	***	***	***
Inventory ratio to total shipments	***	***	***	***
Internal consumption share	***	***	***	***
Commercial home market shipments share	***	***	***	***
Home market shipments share	***	***	***	***
Exports to the United States share	***	***	***	***
Exports to all other markets share	***	***	***	***
Export shipments share	***	***	***	***
Total shipments share	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“.

U.S. inventories of imported merchandise

Table VII-30 presents data on U.S. importers' reported inventories of tin mill products. Inventories from all sources increased irregularly by 79.0 percent during 2020-22 from 114,015 short tons in 2020 to 97,715 short tons in 2021 to 204,032 in 2022. Inventories from all sources were 11.4 percent lower in interim period 2023 compared with interim period 2022. The ratio of inventories to total shipments of imports increased irregularly from 10.5 percent in 2020 to 8.1 percent in 2021 to 15.7 percent in 2022. The ratio was lower in interim period 2023 (12.0 percent) compared with interim period 2022 (14.2 percent).

Table VII-30
Tin mill products: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in short tons; ratios in percent

Measure	Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Inventories quantity	Canada	***	***	***	***	***
Ratio to imports	Canada	***	***	***	***	***
Ratio to U.S. shipments of imports	Canada	***	***	***	***	***
Ratio to total shipments of imports	Canada	***	***	***	***	***
Inventories quantity	China	***	***	***	***	***
Ratio to imports	China	***	***	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***	***	***
Ratio to total shipments of imports	China	***	***	***	***	***
Inventories quantity	Germany	***	***	***	***	***
Ratio to imports	Germany	***	***	***	***	***
Ratio to U.S. shipments of imports	Germany	***	***	***	***	***
Ratio to total shipments of imports	Germany	***	***	***	***	***
Inventories quantity	South Korea, subject	***	***	***	***	***
Ratio to imports	South Korea, subject	***	***	***	***	***
Ratio to U.S. shipments of imports	South Korea, subject	***	***	***	***	***
Ratio to total shipments of imports	South Korea, subject	***	***	***	***	***
Inventories quantity	Subject	***	***	***	***	***
Ratio to imports	Subject	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject	***	***	***	***	***
Ratio to total shipments of imports	Subject	***	***	***	***	***
Inventories quantity	Subject, less South Korea	***	***	***	***	***
Ratio to imports	Subject, less South Korea	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject, less South Korea	***	***	***	***	***
Ratio to total shipments of imports	Subject, less South Korea	***	***	***	***	***

Table continued.

Table VII-30 Continued
Tin mill products: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in short tons; ratios in percent

Measure	Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Inventories quantity	Netherlands	***	***	***	***	***
Ratio to imports	Netherlands	***	***	***	***	***
Ratio to U.S. shipments of imports	Netherlands	***	***	***	***	***
Ratio to total shipments of imports	Netherlands	***	***	***	***	***
Inventories quantity	South Korea, nonsubject	***	***	***	***	***
Ratio to imports	South Korea, nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	South Korea, nonsubject	***	***	***	***	***
Ratio to total shipments of imports	South Korea, nonsubject	***	***	***	***	***
Inventories quantity	Taiwan	***	***	***	***	***
Ratio to imports	Taiwan	***	***	***	***	***
Ratio to U.S. shipments of imports	Taiwan	***	***	***	***	***
Ratio to total shipments of imports	Taiwan	***	***	***	***	***
Inventories quantity	Turkey	***	***	***	***	***
Ratio to imports	Turkey	***	***	***	***	***
Ratio to U.S. shipments of imports	Turkey	***	***	***	***	***
Ratio to total shipments of imports	Turkey	***	***	***	***	***
Inventories quantity	United Kingdom	***	***	***	***	***
Ratio to imports	United Kingdom	***	***	***	***	***
Ratio to U.S. shipments of imports	United Kingdom	***	***	***	***	***
Ratio to total shipments of imports	United Kingdom	***	***	***	***	***
Inventories quantity	All other sources	***	***	***	***	***
Ratio to imports	All other sources	***	***	***	***	***
Ratio to U.S. shipments of imports	All other sources	***	***	***	***	***
Ratio to total shipments of imports	All other sources	***	***	***	***	***

Table continued.

Table VII-30 Continued
Tin mill products: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in short tons; ratios in percent

Measure	Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Inventories quantity	Nonsubject	***	***	***	***	***
Ratio to imports	Nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***	***	***
Inventories quantity	Nonsubject sources plus South Korea, subject	***	***	***	***	***
Ratio to imports	Nonsubject sources plus South Korea, subject	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject sources plus South Korea, subject	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject sources plus South Korea, subject	***	***	***	***	***
Inventories quantity	All	114,015	97,715	204,032	177,585	157,295
Ratio to imports	All	10.0	8.2	14.5	12.6	12.9
Ratio to U.S. shipments of imports	All	10.6	8.2	15.8	14.3	12.1
Ratio to total shipments of imports	All	10.5	8.1	15.7	14.2	12.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of tin mill products from aggregated sources after June 30, 2023. Their reported data is presented in table VII-31. For the period of July 1, 2023 through June 30, 2024, *** short tons of tin mill products have been arranged for importation, with *** accounting for the largest share of those imports at *** precent.

Table VII-31
Tin mill products: Arranged imports, by source and by period

Quantity in short tons

Source	Jul-Sep 2023	Oct-Dec 2023	Jan-Mar 2024	Apr-Jun 2024	Total
Canada	***	***	***	***	***
China	***	***	***	***	***
Germany	***	***	***	***	***
South Korea, subject	***	***	***	***	***
Subject sources	***	***	***	***	***
Subject sources, less South Korea, subject	***	***	***	***	***
Netherlands	***	***	***	***	***
South Korea, nonsubject	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
United Kingdom	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubect sources	***	***	***	***	***
Nonsubject sources plus South Korea, subject	***	***	***	***	***
All import sources	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Third-country trade actions

Based on available information, tin mill products from subject countries have not been subject to countervailing duties in other countries. The following countries have imposed antidumping duties, safeguard measures, or both on imports of tin mill products from the subject sources (table VII-32).

Table VII-32
Tin mill products: Third-country trade actions, since January 1, 2020

Authority	Subject products	Actions and effective dates
European Union ("EU")	Certain steel mill products, including tin mill products, from 37 trade partners including Canada, China, and South Korea.	June 2021— After completing the scheduled reviews of safeguard measures imposed for three years on EU steel imports, effective July 19, 2018, the European Commission ("EC") extended the safeguard measures for another three years, effective July 1, 2021, through June 30, 2024. Steel imports classifiable in 26 product categories were subject to annual tariff rate quotas ("TRQs") based on historical import levels for each product category. For each category, import volumes within the TRQ levels entered free of additional duty but further imports were subject to an additional duty of 25 percent ad valorem.
EU	Certain steel mill products, including tin mill products, from certain trade partners including Canada, China, and South Korea.	June 2, 2023— After completing a review to determine whether, based on the circumstances at that time, the EC reached a determination not to terminate the extended safeguard measures on EU steel imports a year earlier than scheduled, by June 30, 2023.
EU	Electrolytic chromium coated steel ("ECCS") products from China.	November 2022— The EC imposed antidumping duties ranging from €239 ($255) per metric ton to €607 ($647) per metric ton ($231 to $587 per short ton), based on antidumping duty margins ranging from 30.7 percent to 77.9 percent.
India	Coated or plated tin mill flat-rolled steel products from certain trade partners including Germany and South Korea.	June 17, 2020— Antidumping duties recommended for publication in the Gazette of India Extraordinary, with final rates of $310 per metric ton ($281 per short ton) for the EU member country producers (including Germany and the Netherlands) and $251 per metric ton ($228 per short ton) for South Korean producers, for five years.
India	Coated or plated tin mill flat-rolled steel products from certain trade partners including Germany and South Korea.	November 20, 2020— The antidumping investigations terminated without imposition of duties.

Table continued.

Table VII-32 Continued
Tin mill products: Third-country trade actions, since January 1, 2020

Authority	Subject products	Actions and effective dates
Indonesia	Tinplated coils and cut-length sheets from China and South Korea	December 2022— Indonesia's Ministry of Trade, Anti-Dumping Committee ("KADI") initiated a sunset review of the antidumping duties at the request of tinplate producer PT Pelat Timah Nusantara (Latinusa) Tbk. The antidumping duties on the subject tinplate from China (6.1–7.4 percent), South Korea (4.4–7.9 percent), and Taiwan (4.4 percent) were extended in February 2019 for a period of five years, effective December 31, 2018.
Pakistan	Tinplate from China and Germany.	January 2022— The Pakistani National Tariff Commission terminated the May-2019 definitive antidumping duties on tinplate from China (6.87 percent), the EU member countries (including Germany and the Netherlands, 10.88 percent) that were effective January 30, 2019, for three years.
Thailand	Tinplate and tin-free steels from China, Germany, and South Korea.	November 2021— Thailand's Commerce Ministry imposed definitive antidumping duty orders on tinplate and tin-free steels from China (0–17.46 percent for tinplate and 0–24.73 percent for tin-free steels), the EU member countries (5.82 percent for tinplate and 18.52 percent for tin-free steels), and South Korea (0–22.67 percent for tinplate and 3.95–17.06 percent for tin-free steels); and on tinplate from Taiwan (4.28–20.45 percent), for five years through November 2026.
Thailand	Tinplate and tin-free steels from China, Germany, and South Korea.	November 2021 – November 2023— Thai steel firms reportedly could only supply about one-half of domestic consumption demand for tin mill products. To meet this shortfall and to counter rising steel prices for food processors, the Commerce Ministry's Antidumping and Countervailing Committee granted four successive six-month suspensions of the previously imposed antidumping duties on of tinplate and tin-free steels.
Thailand	Tin-free steels from China, Germany, and South Korea.	November 2023— Thailand's Commerce Ministry announced resumed collection of the previously suspended antidumping duties on tin-free steels.

Table continued.

Table VII-32 Continued
Tin mill products: Third-country trade actions, since January 1, 2020

Authority	Subject products	Actions and effective dates
United Kingdom	Certain steel mill products, including tin mill products, from certain trade partners including Canada, China, Germany, and South Korea.	May 21, 2021— The UK Trade Remedies Investigations Directorate ("TRID") reached a preliminary determination finding of "…serious injury or threat thereof caused by increased imports to the domestic industry producing certain steel products" for the UK Secretary of State for International Trade to reach a final determination whether to extend the safeguard measures on UK steel imports. The TRID recommended an import safeguard duty rate of 25 percent.
United Kingdom	Certain steel mill products, including tin mill products, from certain trade partners including Canada, China, Germany, and South Korea.	June 30, 2022— The UK Secretary of State for International Trade announced extension of safeguard measures on UK imports of five categories of steel mill products, including tin mill products, for two more years, effective July 1, 2022, through June 30, 2024.

Source: Global Trade Alert, "EU: Extension of Definitive Safeguard Measure on Imports of Steel Products," Intervention 61213, no date, https://www.globaltradealert.org/intervention/61213/safeguard/eu-extension-of-definitive-safeguard-measure-on-imports-of-steel-products, accessed August 4, 2023;
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Table continued.

Table VII-32 Continued
Tin mill products: Third-country trade actions, since January 1, 2020

Source continued: EC, "Commission Implementing Regulation (EU) 2022/2247 of 15 November 2022 Imposing a Definitive Anti-dumping Duty and Definitively Collecting the Provisional Duty Imposed on Imports of Electrolytic Chromium Coated Steel Products Originating in the People's Republic of China and Brazil," C/2022/8031,
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Table continued.

Table VII-32 Continued
Tin mill products: Third-country trade actions, since January 1, 2020

Source continued: Joy Liu, "Thailand Extends AD Duty Exemption on Tinplate and Tin-free Steel," Yieh Corp., June 8, 2023, https://yieh.com/en/News/NewsItem?id=141616#:~:text=Thailand's%20Commerce%20Ministry%20has%20extended,duty%20exemption%20since%20November%202021;
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Note: The UK officially withdrew its membership from the EU on January 31, 2020. Under the Withdrawal Agreement, the UK remained a member of the EU Single Market and the EU Customs Union, and EU law continued to apply in the UK, until the end of the transition period, January 31, 2021. EC, "Agreement on the Withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community," Official Journal of the European Union, January 31, 2020, pp. L 29/7–L 29/187, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:12020W/TXT; EC, "The EU-UK Withdrawal Agreement," no date, https://commission.europa.eu/strategy-and-policy/relations-non-eu-countries/relations-united-kingdom/eu-uk-withdrawal-agreement_en, accessed August 3, 2023; EC, "Questions and Answers on the United Kingdom's withdrawal from the European Union on 31 January 2020," press release, January 24, 2020, https://ec.europa.eu/commission/presscorner/detail/en/qanda_20_104; EU, "The History of the European Union – 2020," June 16, 2021, https://europa.eu/european-union/about-eu/history/2020-today/2020_en, retrieved July 12, 2021.

Information on nonsubject countries

According to GTA, the leading global exporters of tin- and chromium-coated steel sheet, including tin mill products, by quantity, are investigated subject sources China and Germany, and investigated nonsubject source the Netherlands. Leading nonsubject sources are Japan, Slovakia, and France (table VII-33). During 2022, the United States was not among the top global exporters of tin- and chromium-coated steel sheet, accounting for 1.5 percent. China accounted for 30.6 percent, Germany accounted for 11.9 percent, and the Netherlands accounted for 8.9 percent. Among nonsubject sources, Japan accounted for 8.5 percent, Slovakia accounted for 5.5 percent, and France accounted for 4.7 percent.

Table VII-33
Tin- and chromium-coated steel sheet: Global exports, by reporting country and by period

Quantity in short tons; value in 1,000 dollars

Exporting country	Measure	2020	2021	2022
United States	Quantity	114,416	102,727	116,915
Canada	Quantity	285,838	255,649	294,179
China	Quantity	1,567,765	1,865,708	2,362,215
Germany	Quantity	988,498	980,023	915,130
Subject exporters	Quantity	2,842,101	3,101,379	3,571,524
Netherlands	Quantity	702,535	714,184	689,519
South Korea	Quantity	568,551	467,967	457,936
Taiwan	Quantity	201,383	197,162	177,676
Turkey	Quantity	175,038	180,695	183,888
United Kingdom	Quantity	173,161	105,615	89,757
Investigated nonsubject exporters	Quantity	1,820,669	1,665,622	1,598,776
Japan	Quantity	940,481	765,692	656,805
Slovakia	Quantity	435,648	459,758	421,832
France	Quantity	349,532	387,816	359,914
All other exporters	Quantity	1,243,309	1,145,852	993,992
All reporting exporters	Quantity	7,746,155	7,628,845	7,719,757
United States	Value	76,931	92,168	129,056
Canada	Value	290,323	289,309	474,683
China	Value	1,118,970	2,044,524	2,979,438
Germany	Value	840,171	944,041	1,463,086
Subject exporters	Value	2,249,463	3,277,873	4,917,206
Netherlands	Value	653,037	759,660	1,053,170
South Korea	Value	442,804	538,161	694,446
Taiwan	Value	156,103	220,558	252,933
Turkey	Value	133,942	223,103	270,546
United Kingdom	Value	150,978	134,560	162,189
Investigated nonsubject exporters	Value	1,536,864	1,876,042	2,433,283
Japan	Value	690,163	771,966	933,811
Slovakia	Value	387,518	482,891	641,951
France	Value	297,229	391,020	526,666
All other exporters	Value	1,006,884	1,206,480	1,398,184
All reporting exporters	Value	6,245,053	8,098,440	10,980,157

Table continued.

Table VII-33 Continued
Tin- and chromium-coated steel sheet: Global exports, by reporting country and by period

Unit values in dollars per short ton; shares in percent

Exporting country	Measure	2020	2021	2022
United States	Unit value	672	897	1,104
Canada	Unit value	1,016	1,132	1,614
China	Unit value	714	1,096	1,261
Germany	Unit value	850	963	1,599
Subject exporters	Unit value	791	1,057	1,377
Netherlands	Unit value	930	1,064	1,527
South Korea	Unit value	779	1,150	1,516
Taiwan	Unit value	775	1,119	1,424
Turkey	Unit value	765	1,235	1,471
United Kingdom	Unit value	872	1,274	1,807
Investigated nonsubject exporters	Unit value	844	1,126	1,522
Japan	Unit value	734	1,008	1,422
Slovakia	Unit value	890	1,050	1,522
France	Unit value	850	1,008	1,463
All other exporters	Unit value	810	1,053	1,407
All reporting exporters	Unit value	806	1,062	1,422
United States	Share of quantity	1.5	1.3	1.5
Canada	Share of quantity	3.7	3.4	3.8
China	Share of quantity	20.2	24.5	30.6
Germany	Share of quantity	12.8	12.8	11.9
Subject exporters	Share of quantity	36.7	40.7	46.3
Netherlands	Share of quantity	9.1	9.4	8.9
South Korea	Share of quantity	7.3	6.1	5.9
Taiwan	Share of quantity	2.6	2.6	2.3
Turkey	Share of quantity	2.3	2.4	2.4
United Kingdom	Share of quantity	2.2	1.4	1.2
Investigated nonsubject exporters	Share of quantity	23.5	21.8	20.7
Japan	Share of quantity	12.1	10.0	8.5
Slovakia	Share of quantity	5.6	6.0	5.5
France	Share of quantity	4.5	5.1	4.7
All other exporters	Share of quantity	16.1	15.0	12.9
All reporting exporters	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7210.11, 7210.12, 7210.50, and 7212.10 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed October 3, 2023.

Note: These data do not include HS subheadings 7212.50, 7225.99, and 7226.99 as they are believed to contain a large share of products outside the scope of these investigations.

Note: Chile reported its data in kilograms, and this was converted to short tons. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---“. United States is shown at the top followed by the countries under investigation, all remaining top exporting countries in descending order of 2022 data.

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 4206, January 24, 2023	*Tin Mill Products From Canada, China, Germany, Netherlands, South Korea, Taiwan, Turkey, and United Kingdom; Institution of Anti-Dumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations*	https://www.govinfo.gov/content/pkg/FR-2023-01-24/pdf/2023-01325.pdf
88 FR 9476, February 14, 2023	*Tin Mill Products From the People's Republic of China: Initiation of Countervailing Duty Investigation*	https://www.govinfo.gov/content/pkg/FR-2023-02-14/pdf/2023-03086.pdf
88 FR 9481, February 14, 2023	*Tin Mill Products From Canada, the People's Republic of China, Germany, the Netherlands, the Republic of Korea, Taiwan, the Republic of Turkey, and the United Kingdom: Initiation of Less-Than-Fair-Value Investigations*	https://www.govinfo.gov/content/pkg/FR-2023-02-14/pdf/2023-03085.pdf
88 FR 34827, May 31, 2023	*Tin Mill Products From Canada, the People's Republic of China, Germany, the Netherlands, the Republic of Korea, Taiwan, the Republic of Turkey, and the United Kingdom: Postponement of Preliminary Determinations in the Less-Than-Fair-Value Investigations*	https://www.govinfo.gov/app/details/FR-2023-05-31/2023-11475

Citation	Title	Link
88 FR 17807, March 24, 2023	*Tin Mill Products From the People's Republic of China: Postponement of Preliminary Determination in the Countervailing Duty Investigation*	https://www.govinfo.gov/content/pkg/FR-2023-03-24/pdf/2023-06114.pdf
88 FR 41373, June 26, 2023	*Tin Mill Products From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination, and Alignment of Final Determination With Final Antidumping Duty Determination*	https://www.govinfo.gov/app/details/FR-2023-06-26/2023-13522
88 FR 46738, July 20, 2023	*Countervailing Duty Investigation of Tin Mill Products From the People's Republic of China: Preliminary Determination of Critical Circumstances, in Part*	https://www.govinfo.gov/content/pkg/FR-2023-07-20/pdf/2023-15392.pdf
88 FR 57099, August 22, 2023	*Tin Mill Products From the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value and Preliminary Affirmative Determination of Critical Circumstances*	https://www.govinfo.gov/content/pkg/FR-2023-08-22/pdf/2023-18036.pdf
88 FR 57081, August 22, 2023	*Tin Mill Products From Canada: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Negative Determination of Critical Circumstances, Postponement of Final Determination, and Extension of Provisional Measures*	https://www.govinfo.gov/content/pkg/FR-2023-08-22/pdf/2023-18027.pdf

Citation	Title	Link
88 FR 57078, August 22, 2023	*Tin Mill Products From Germany: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Negative Critical Circumstances Determination, Postponement of Final Determination, and Extension of Provisional Measures*	https://www.govinfo.gov/content/pkg/FR-2023-08-22/pdf/2023-18029.pdf
88 FR 57096. August 22, 2023	*Tin Mill Products From the Netherlands: Preliminary Negative Determination of Sales at Less Than Fair Value and Postponement of Final Determination*	https://www.govinfo.gov/content/pkg/FR-2023-08-22/pdf/2023-18032.pdf
88 FR 57093, August 22, 2023	*Tin Mill Products From the Republic of Korea: Preliminary Negative Determination of Sales at Less Than Fair Value and Postponement of Final Determination*	https://www.govinfo.gov/content/pkg/FR-2023-08-22/pdf/2023-18035.pdf
88 FR 57090, August 22, 2023	*Tin Mill Products From Taiwan: Preliminary Negative Determination of Sales at Less Than Fair Value, Preliminary Negative Determination of Critical Circumstances, and Postponement of Final Determination*	https://www.govinfo.gov/content/pkg/FR-2023-08-22/pdf/2023-18031.pdf
88 FR 57087, August 22, 2023	*Tin Mill Products From the Republic of Turkey: Preliminary Negative Determination of Sales at Less Than Fair Value and Postponement of Final Determination*	https://www.govinfo.gov/content/pkg/FR-2023-08-22/pdf/2023-18028.pdf

Citation	Title	Link
88 FR 57084, August 22, 2023	*Tin Mill Products From the United Kingdom: Preliminary Negative Determination of Sales at Less Than Fair Value and Postponement of Final Determination*	https://www.govinfo.gov/content/pkg/FR-2023-08-22/pdf/2023-18030.pdf
88 FR 60484, September 1, 2023, revised 88 FR 65194, September 21, 2023	*Tin Mill Products From Canada, China, Germany, the Netherlands, South Korea, Taiwan, Turkey, and the United Kingdom; Scheduling of the Final Phase of Countervailing Duty and Antidumping Duty Investigations*	https://www.govinfo.gov/content/pkg/FR-2023-09-01/pdf/2023-18914.pdf
88 FR 34827, September 12, 2023	*Tin Mill Products From Canada, the People's Republic of China, Germany, the Netherlands, the Republic of Korea, Taiwan, the Republic of Turkey, and the United Kingdom: Postponement of Preliminary Determinations in the Less-Than-Fair Value Investigations*	https://www.govinfo.gov/content/pkg/FR-2023-05-31/pdf/2023-11475.pdf
89 FR 1524, January 10, 2024	*Tin Mill Products From the Netherlands: Final Negative Determination of Sales at Less Than Fair Value*	https://www.govinfo.gov/content/pkg/FR-2024-01-10/pdf/2024-00324.pdf
89 FR 1535, January 10, 2024	*Tin Mill Products From the United Kingdom: Final Negative Determination of Sales at Less Than Fair Value*	https://www.govinfo.gov/content/pkg/FR-2024-01-10/pdf/2024-00328.pdf

Citation	Title	Link
89 FR 1520, January 10, 2024	*Tin Mill Products From the Republic of Turkey: Final Negative Determination of Sales at Less Than Fair Value*	https://www.govinfo.gov/content/pkg/FR-2024-01-10/pdf/2024-00327.pdf
89 FR 1526, January 10, 2024	*Tin Mill Products From Taiwan: Final Negative Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances*	https://www.govinfo.gov/content/pkg/FR-2024-01-10/pdf/2024-00326.pdf
89 FR 1545, January 10, 2024	*Tin Mill Products From the Republic of Korea: Final Affirmative Determination of Sales at Less Than Fair Value*	https://www.govinfo.gov/content/pkg/FR-2024-01-10/pdf/2024-00323.pdf
89 FR 1529, January 10, 2024	*Tin Mill Products From Germany: Final Affirmative Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances*	https://www.govinfo.gov/content/pkg/FR-2024-01-10/pdf/2024-00322.pdf
89 FR 1538, January 10, 2024	*Tin Mill Products From the People's Republic of China: Final Affirmative Determination of Sales at Less-Than Fair Value and Final Affirmative Determination of Critical Circumstances*	https://www.govinfo.gov/content/pkg/FR-2024-01-10/pdf/2024-00320.pdf
89 FR 1542, January 10, 2024	*Tin Mill Products From Canada: Final Affirmative Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances*	https://www.govinfo.gov/content/pkg/FR-2024-01-10/pdf/2024-00319.pdf

Citation	Title	Link
89 FR 1532, January 10, 2024	*Tin Mill Products From the People's Republic of China: Final Affirmative Countervailing Duty Determination and Final Affirmative Critical Circumstances Determination, in Part*	https://www.govinfo.gov/content/pkg/FR-2024-01-10/pdf/2024-00321.pdf
89 FR 3694, January 19, 2024	*Tin Mill Products From the Netherlands, Taiwan, Turkey, and the United Kingdom Termination of Investigations*	https://www.govinfo.gov/content/pkg/FR-2024-01-19/pdf/2024-00911.pdf

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed below appeared in the United States International Trade Commission's hearing:

Subject:	Tin Mill Products from Canada, China, Germany, Netherlands, South Korea, Taiwan, Turkey, and United Kingdom
Inv. Nos.:	701-TA-685 and 731-TA-1599-1606 (Final)
Date and Time:	January 4, 2024 - 9:30 a.m.

Sessions were held in connection with these investigations in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, DC.

CONGRESSIONAL APPEARANCES:

The Honorable Sherrod Brown (remote witness), United States Senator, Ohio

The Honorable Joe Manchin III (remote witness), United States Senator, West Virginia

The Honorable Shelley Moore Capito (remote witness), United States Senator, West Virginia

The Honorable Bill Johnson (remote witness), United States Representative, 6th District, Ohio

The Honorable David Rouzer (remote witness), United States Representative, 7th District, North Carolina

EMBASSY APPEARANCE:

Embassy of Canada
Washington, DC

Carlos Vanderloo, Minister-Counsellor

FOREIGN APPEARANCE:

European Union
Delegation to the United States of America

Peter Young, Minister-Counsellor, Deputy Head of Section, Trade and Agriculture

OPENING REMARKS:

In Support of Imposition (**Stephen P. Vaughn**, King & Spalding LLP)
In Opposition to Imposition (**Shara L. Aranoff**, Covington & Burling LLP)

In Support of the Imposition of the Antidumping and Countervailing Duty Orders:

King & Spalding LLP
Washington, DC
on behalf of

Cleveland-Cliffs Inc. ("Cleveland-Cliffs")
United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union ("USW")

Lourenco Goncalves, Chairman, President, and Chief Executive Officer, Cleveland-Cliffs

Gordon O'Neill, Director of Product Control, Cleveland-Cliffs

Michael Millsap, District 7 Director, United Steelworkers

Mark Glyptis, Local 2911 President, United Steelworkers

Andrew Szamosszegi, Principal, Capital Trade

Stephen P. Vaughn)
Neal Reynolds) – OF COUNSEL
Barbara Medrado)

In Opposition to the Imposition of the Antidumping and Countervailing Duty Orders:

Covington & Burling LLP
Washington, DC
on behalf of

Can Manufacturers Institute ("CMI")

Robert Budway, President, CMI

Robert Gatz, General Manager, Can Corporation of America, Inc.

Thomas Hughes, Director Metals Sourcing, CROWN Cork & Seal USA, Inc.

In Opposition to the Imposition of the
Antidumping and Countervailing Duty Orders (comtinued):

Claudine Schelp, Senior Vice President Global Procurement, CROWN Cork & Seal USA, Inc.

Richard (Rick) Huether, President and Chief Executive Officer, Independent Can Company

David Luettgen, Vice President Supply Chain, Independent Can Company

Ernest Haynes, President, Sonoco Metal Packaging Division, Sonoco Metal Packaging, LLC

Rob Huffman, President, Americans and Global Aerosols & Beverage, Trivium Packaging

Daniel Dietrich, Vice President Procurement, Supply Chain and Projects, Trivium Packaging

Jennifer Lutz, Partner, ION Economics LLC

Rebecca Tuzel, Economic Consultant II, ION Economics LLC

James M. Smith)
) – OF COUNSEL
Shara L. Aranoff)

White & Case LLP
Washington, DC
on behalf of

thyssenkrupp Rasselstein GmbH
thyssenkrupp Steel North America, Inc.

Dr. Peter Biele, Chief Executive Officer, thyssenkrupp Rasselstein GmbH

Richard G. King)
) – OF COUNSEL
Cristina Cornejo)

In Opposition to the Imposition of the
Antidumping and Countervailing Duty Orders (continued):

Grunfeld, Desiderio, Lebowitz, Silverman & Klestadt LLP
Washington, DC
on behalf of

Baoshan Iron & Steel Co., Ltd., Shanghai Meishan Iron & Steel Co., Ltd.
WISCO – Nippon Steel Tinplate Co., Ltd., Baosteel America Inc.
Shougang Jingtang United Iron & Steel Co., Ltd.,
China Shougang International Trade & Engineering Corporation,
Shougang Holding Trade (Hong Kong) Limited, Handan Jintai Packing Material Co., Ltd.
and China Iron and Steel Association Tin Mill Flat-rolled Products Subcommittee

Adam C. Gill, Vice President, EP Steel

Matthew R. Klein, Operation Director, EP Steel

Jordan C. Kahn) – OF COUNSEL

Hogan Lovells US LLP
Washington, DC
on behalf of

ArcelorMittal Dofasco G.P.

Henry Wegiel, Director, Government and Trade Relations,
ArcelorMittal Dofasco G.P.

Mark Samuel Quinn, General Manager Sales, Packaging, Manufacturing
and Specialty Products, ArcelorMittal Dofasco G.P.

Michael Gauthier, Director Sales, General Industries,
ArcelorMittal Dofasco G.P.

Craig A. Lewis)
Michael G. Jacobson) – OF COUNSEL
Cayla D. Ebert)

ArentFox Schiff LLP
Washington, DC
on behalf of

Duferco Steel, LLC

David J. Klacik, Tin Plate Manager, Duferco Steel, LLC

Diana Dimitriuc Quaia) – OF COUNSEL

In Opposition to the Imposition of the
Antidumping and Countervailing Duty Orders (continued):

Curtis, Mallet-Prevost, Colt & Mosle LLP
Washington, DC
on behalf of

Silgan Containers Manufacturing Corporation ("Silgan")

James Beaty) – OF COUNSEL

Curtis, Mallet-Prevost, Colt & Mosle LLP
Washington, DC
on behalf of

Government of Canada ("Canada")

James P. Durling)
) – OF COUNSEL
Katherine R. Afzal)

Steptoe & Johnson LLP
Washington, DC
on behalf of

Tata Steel IJmuiden BV
Tata Steel UK Ltd.

Sarah Passmore, Commercial Manager, Packaging, Tata Steel UK Ltd

Chris Richards, Accounting & Transactions Controller, TSUK

Chris LaGette, Global Account Manager, Packaging, Tata Steel IJmuiden BV

Thomas J. Trendl)
) – OF COUNSEL
Zhu (Judy) Wang

Baker, Donelson, Bearman, Caldwell & Berkowitz, PC
Washington, DC
on behalf of

Bush Brothers & Company

Al Williams, Chief Executive Officer, Bush Brothers

Cynthia Gibson, General Counsel, Bush Brothers

Lee Smith) – OF COUNSEL

In Opposition to the Imposition of the
Antidumping and Countervailing Duty Orders (continued):

Akin Gump Strauss Hauer & Feld LLP
Washington, DC
on behalf of

Consumer Brands Association ("Consumer Brands")

Tom Madrecki, Vice President, Supply Chain and Logistics, Consumer Brands Association

Woody Swink, Co-President, McCall Farms, Inc.

Yujin K. McNamara)
) – OF COUNSEL
Julia K. Eppard)

REBUTTAL/CLOSING REMARKS:

In Support of Imposition (**Stephen P. Vaughn**, King & Spalding LLP)
In Opposition to Imposition (**James M. Smith**, Covington & Burling LLP)

APPENDIX C

SUMMARY DATA

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Table C-1
Tin mill products: Summary data concerning the U.S. market, by item and period
Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

	Reported data					Period changes			
	Calendar year			Jan-Jun		Comparison years			Jan-Jun
Item	2020	2021	2022	2022	2023	2020-22	2020-21	2021-22	2022-23
U.S. consumption quantity:									
Amount	***	***	***	***	***	▼***	▲***	▼***	▼***
Producers' share (fn1)	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
Canada	***	***	***	***	***	▼***	▼***	▼***	▲***
China	***	***	***	***	***	▲***	▲***	▲***	▲***
Germany	***	***	***	***	***	▲***	▲***	▲***	▲***
South Korea, subject (KRSUB)	***	***	***	***	***	▼***	▼***	▼***	▲***
Subject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources less KRSUB	***	***	***	***	***	▲***	▲***	▲***	▲***
Netherlands	***	***	***	***	***	▲***	▲***	▼***	▲***
South Korea, nonsubject	***	***	***	***	***	▼***	▼***	▲***	▲***
Taiwan	***	***	***	***	***	▲***	▲***	▲***	▼***
Turkey	***	***	***	***	***	▲***	▲***	▲***	▼***
United Kingdom	***	***	***	***	***	▲***	▲***	▼***	▲***
All other sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources plus KRSUB	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. consumption value:									
Amount	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1)	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
Canada	***	***	***	***	***	▼***	▼***	▲***	▲***
China	***	***	***	***	***	▲***	▲***	▲***	▲***
Germany	***	***	***	***	***	▲***	▲***	▲***	▲***
South Korea, subject (KRSUB)	***	***	***	***	***	▼***	▼***	▼***	▲***
Subject sources	***	***	***	***	***	▲***	▼***	▲***	▲***
Subject sources less KRSUB	***	***	***	***	***	▲***	▼***	▲***	▲***
Netherlands	***	***	***	***	***	▲***	▲***	▲***	▲***
South Korea, nonsubject	***	***	***	***	***	▼***	▼***	▲***	▼***
Taiwan	***	***	***	***	***	▲***	▲***	▲***	▲***
Turkey	***	***	***	***	***	▲***	▲***	▲***	▼***
United Kingdom	***	***	***	***	***	▲***	▲***	▼***	▲***
All other sources	***	***	***	***	***	▲***	▲***	▼***	▲***
Nonsubject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources plus KRSUB	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. importers' U.S. shipments of imports from:									
Canada:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▲***
Value	***	***	***	***	***	▲***	▼***	▲***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
China:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
Value	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
Germany:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▼***
South Korea, subject:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▲***
Value	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Subject sources:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▼***

Table continued.

Table C-1 Continued
Tin mill products: Summary data concerning the U.S. market, by item and period
Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Reported data: Calendar year 2020	2021	2022	Jan-Jun 2022	2023	Period changes: Comparison years 2020-22	2020-21	2021-22	Jan-Jun 2022-23
U.S. importers' U.S. shipments of imports from: Continued									
Subject sources less South Korea, subject:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▼***
Netherlands:									
Quantity	***	***	***	***	***	▲***	▲***	▼***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▼***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▼***
South Korea, nonsubject:									
Quantity	***	***	***	***	***	▼***	▼***	▲***	▼***
Value	***	***	***	***	***	▲***	▼***	▲***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Taiwan:									
Quantity	33,142	68,889	81,532	39,318	33,079	▲146.0	▲107.9	▲18.4	▼(15.9)
Value	35,001	80,405	161,238	74,218	64,542	▲360.7	▲129.7	▲100.5	▼(13.0)
Unit value	$1,056	$1,167	$1,978	$1,888	$1,951	▲87.3	▲10.5	▲69.4	▲3.4
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Turkey:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
Value	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
United Kingdom:									
Quantity	***	***	***	***	***	▲***	▲***	▼***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▼***
All other sources:									
Quantity	53,566	67,142	84,660	46,860	40,410	▲58.0	▲25.3	▲26.1	▼(13.8)
Value	73,340	104,150	154,391	83,916	83,121	▲110.5	▲42.0	▲48.2	▼(0.9)
Unit value	$1,369	$1,551	$1,824	$1,791	$2,057	▲33.2	▲13.3	▲17.6	▲14.9
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▼***
Nonsubject sources plus South Korea, subject:									
Quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▼***
All import sources:									
Quantity	1,072,065	1,193,128	1,291,918	622,598	652,137	▲20.5	▲11.3	▲8.3	▲4.7
Value	1,230,921	1,419,686	2,622,440	1,206,570	1,239,013	▲113.0	▲15.3	▲84.7	▲2.7
Unit value	$1,148	$1,190	$2,030	$1,938	$1,900	▲76.8	▲3.6	▲70.6	▼(2.0)
Ending inventory quantity	114,015	97,715	204,032	177,585	157,295	▲79.0	▼(14.3)	▲108.8	▼(11.4)
U.S. producers':									
Practical capacity quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Production quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Capacity utilization (fn1)	***	***	***	***	***	▼***	▲***	▼***	▼***
U.S. shipments:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▼***
Export shipments:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Inventories/total shipments (fn1)	***	***	***	***	***	▲***	▲***	▲***	▲***
Production workers	***	***	***	***	***	▼***	▼***	▲***	▼***
Hours worked (1,000s)	***	***	***	***	***	▲***	▼***	▲***	▼***
Wages paid ($1,000)	***	***	***	***	***	▲***	▲***	▲***	▼***
Hourly wages (dollars per hour)	***	***	***	***	***	▲***	▲***	▲***	▲***
Productivity (short tons per 1,000 hours)	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit labor costs	***	***	***	***	***	▲***	▲***	▲***	▲***

Table continued.

Table C-1 Continued
Tin mill products: Summary data concerning the U.S. market, by item and period
Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Reported data					Period changes			
	Calendar year			Jan-Jun		Comparison years			Jan-Jun
	2020	2021	2022	2022	2023	2020-22	2020-21	2021-22	2022-23
U.S. producers':									
Net sales:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS)	***	***	***	***	***	▲***	▲***	▲***	▼***
Gross profit or (loss) (fn2)	***	***	***	***	***	▲***	▲***	▲***	▼***
SG&A expenses	***	***	***	***	***	▲***	▲***	▼***	▼***
Operating income or (loss) (fn2)	***	***	***	***	***	▲***	▲***	▲***	▼***
Net income or (loss) (fn2)	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit COGS	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit SG&A expenses	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit operating income or (loss) (fn2)	***	***	***	***	***	▲***	▼***	▲***	▼***
Unit net income or (loss) (fn2)	***	***	***	***	***	▲***	▲***	▲***	▼***
COGS/sales (fn1)	***	***	***	***	***	▼***	▼***	▼***	▲***
Operating income or (loss)/sales (fn1)	***	***	***	***	***	▲***	▲***	▲***	▼***
Net income or (loss)/sales (fn1)	***	***	***	***	***	▲***	▲***	▲***	▼***
Capital expenditures	***	***	***	***	***	▲***	▲***	▲***	▼***
Research and development expenses	***	***	***	***	***	▲***	▲***	▲***	▲***
Net assets	***	***	***	***	***	▲***	▼***	▲***	***

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables containing these data are contained in parts III, IV, VI, and VII of this report.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "---". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.
fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

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APPENDIX D

CHAPTER 99 SPECIAL PROVISIONS

Table D-1
Tin mill products: U.S. imports from Canada, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Subject to chapter 99 provisions, dutied	Quantity	---	---	---	---	---
Subject to chapter 99 provisions, not dutied	Quantity	---	---	---	---	---
Subject to chapter 99 provisions	Quantity	---	---	---	---	---
Not subject to chapter 99 provisions	Quantity	268,311	240,890	275,421	176,237	119,614
All duty statuses	Quantity	268,311	240,890	275,421	176,237	119,614
Subject to chapter 99 provisions, dutied	Share	---	---	---	---	---
Subject to chapter 99 provisions, not dutied	Share	---	---	---	---	---
Subject to chapter 99 provisions	Share	---	---	---	---	---
Not subject to chapter 99 provisions	Share	100.0	100.0	100.0	100.0	100.0
All duty statuses	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.50.0020, 7210.50.0090, and 7212.10.0000, accessed November 22, 2023. Imports are based on the imports for consumption data series.

Note: Shares shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive) and greater than “(0.05)” percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as “---“. Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table D-2
Tin mill products: U.S. imports from China, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Subject to chapter 99 provisions, dutied	Quantity	87,506	116,476	175,604	99,811	73,227
Subject to chapter 99 provisions, not dutied	Quantity	15,569	12,746	26,373	13,687	176
Subject to chapter 99 provisions	Quantity	103,075	129,223	201,976	113,498	73,403
Not subject to chapter 99 provisions	Quantity	488	552	232	61	---
All duty statuses	Quantity	103,563	129,775	202,208	113,559	73,403
Subject to chapter 99 provisions, dutied	Share	84.5	89.8	86.8	87.9	99.8
Subject to chapter 99 provisions, not dutied	Share	15.0	9.8	13.0	12.1	0.2
Subject to chapter 99 provisions	Share	99.5	99.6	99.9	99.9	100.0
Not subject to chapter 99 provisions	Share	0.5	0.4	0.1	0.1	---
All duty statuses	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.50.0020, 7210.50.0090, and 7212.10.0000, accessed November 22, 2023. Imports are based on the imports for consumption data series.

Note: Shares shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive) and greater than “(0.05)” percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as “---“. Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table D-3
Tin mill products: U.S. imports from Germany, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Subject to chapter 99 provisions, dutied	Quantity	189,387	97,527	7,785	7,724	---
Subject to chapter 99 provisions, not dutied	Quantity	1,024	842	84	67	75
Subject to chapter 99 provisions	Quantity	190,411	98,369	7,868	7,791	75
Not subject to chapter 99 provisions	Quantity	8,763	140,675	260,830	132,083	139,429
All duty statuses	Quantity	199,175	239,045	268,699	139,875	139,504
Subject to chapter 99 provisions, dutied	Share	95.1	40.8	2.9	5.5	---
Subject to chapter 99 provisions, not dutied	Share	0.5	0.4	0.0	0.0	0.1
Subject to chapter 99 provisions	Share	95.6	41.2	2.9	5.6	0.1
Not subject to chapter 99 provisions	Share	4.4	58.8	97.1	94.4	99.9
All duty statuses	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.50.0020, 7210.50.0090, and 7212.10.0000, accessed November 22, 2023. Imports are based on the imports for consumption data series.

Note: Shares shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive) and greater than “(0.05)” percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as “---“. Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table D-4
Tin mill products: U.S. imports from subject sources, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Subject to chapter 99 provisions, dutied	Quantity	276,893	214,004	183,388	107,535	73,227
Subject to chapter 99 provisions, not dutied	Quantity	16,593	13,588	26,456	13,754	250
Subject to chapter 99 provisions	Quantity	293,486	227,592	209,845	121,289	73,478
Not subject to chapter 99 provisions	Quantity	277,562	382,118	536,483	308,381	259,043
All duty statuses	Quantity	571,048	609,710	746,328	429,670	332,521
Subject to chapter 99 provisions, dutied	Share	48.5	35.1	24.6	25.0	22.0
Subject to chapter 99 provisions, not dutied	Share	2.9	2.2	3.5	3.2	0.1
Subject to chapter 99 provisions	Share	51.4	37.3	28.1	28.2	22.1
Not subject to chapter 99 provisions	Share	48.6	62.7	71.9	71.8	77.9
All duty statuses	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.50.0020, 7210.50.0090, and 7212.10.0000, accessed November 22, 2023. Imports are based on the imports for consumption data series.

Note: Shares shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive) and greater than “(0.05)” percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as “---“. Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table D-5
Tin mill products: U.S. imports from the Netherlands, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Subject to chapter 99 provisions, dutied	Quantity	204,719	61,775	445	311	---
Subject to chapter 99 provisions, not dutied	Quantity	103	4,768	19	---	---
Subject to chapter 99 provisions	Quantity	204,822	66,543	464	311	---
Not subject to chapter 99 provisions	Quantity	36,793	190,713	287,324	133,849	125,010
All duty statuses	Quantity	241,615	257,256	287,787	134,160	125,010
Subject to chapter 99 provisions, dutied	Share	84.7	24.0	0.2	0.2	---
Subject to chapter 99 provisions, not dutied	Share	0.0	1.9	0.0	---	---
Subject to chapter 99 provisions	Share	84.8	25.9	0.2	0.2	---
Not subject to chapter 99 provisions	Share	15.2	74.1	99.8	99.8	100.0
All duty statuses	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.50.0020, 7210.50.0090, and 7212.10.0000, accessed November 22, 2023. Imports are based on the imports for consumption data series.

Note: Shares shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive) and greater than “(0.05)” percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as “---“. Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table D-6
Tin mill products: U.S. imports from South Korea, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Subject to chapter 99 provisions, dutied	Quantity	---	---	---	---	---
Subject to chapter 99 provisions, not dutied	Quantity	---	---	---	---	---
Subject to chapter 99 provisions	Quantity	---	---	---	---	---
Not subject to chapter 99 provisions	Quantity	82,370	79,363	79,877	41,081	36,735
All duty statuses	Quantity	82,370	79,363	79,877	41,081	36,735
Subject to chapter 99 provisions, dutied	Share	---	---	---	---	---
Subject to chapter 99 provisions, not dutied	Share	---	---	---	---	---
Subject to chapter 99 provisions	Share	---	---	---	---	---
Not subject to chapter 99 provisions	Share	100.0	100.0	100.0	100.0	100.0
All duty statuses	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.50.0020, 7210.50.0090, and 7212.10.0000, accessed November 22, 2023. Imports are based on the imports for consumption data series.

Note: Shares shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive) and greater than “(0.05)” percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as “---“. Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table D-7
Tin mill products: U.S. imports from Taiwan, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Subject to chapter 99 provisions, dutied	Quantity	38,089	54,461	66,336	35,242	49,671
Subject to chapter 99 provisions, not dutied	Quantity	---	---	1,671	1,671	881
Subject to chapter 99 provisions	Quantity	38,089	54,461	68,007	36,913	50,551
Not subject to chapter 99 provisions	Quantity	7,660	21,080	17,224	14,553	---
All duty statuses	Quantity	45,749	75,541	85,231	51,466	50,551
Subject to chapter 99 provisions, dutied	Share	83.3	72.1	77.8	68.5	98.3
Subject to chapter 99 provisions, not dutied	Share	---	---	2.0	3.2	1.7
Subject to chapter 99 provisions	Share	83.3	72.1	79.8	71.7	100.0
Not subject to chapter 99 provisions	Share	16.7	27.9	20.2	28.3	---
All duty statuses	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.50.0020, 7210.50.0090, and 7212.10.0000, accessed November 22, 2023. Imports are based on the imports for consumption data series.

Note: Shares shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive) and greater than “(0.05)” percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as “---“. Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table D-8
Tin mill products: U.S. imports from Turkey, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Subject to chapter 99 provisions, dutied	Quantity	308	11,281	43,068	25,234	5,686
Subject to chapter 99 provisions, not dutied	Quantity	---	3	2,998	2,998	---
Subject to chapter 99 provisions	Quantity	308	11,284	46,066	28,232	5,686
Not subject to chapter 99 provisions	Quantity	---	5,141	5,681	2,447	---
All duty statuses	Quantity	308	16,425	51,747	30,679	5,686
Subject to chapter 99 provisions, dutied	Share	100.0	68.7	83.2	82.3	100.0
Subject to chapter 99 provisions, not dutied	Share	---	0.0	5.8	9.8	---
Subject to chapter 99 provisions	Share	100.0	68.7	89.0	92.0	100.0
Not subject to chapter 99 provisions	Share	---	31.3	11.0	8.0	---
All duty statuses	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.50.0020, 7210.50.0090, and 7212.10.0000, accessed November 22, 2023. Imports are based on the imports for consumption data series.

Note: Shares shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive) and greater than “(0.05)” percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as “---“. Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table D-9
Tin mill products: U.S. imports from the United Kingdom, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Subject to chapter 99 provisions, dutied	Quantity	22,103	3,857	259	259	11
Subject to chapter 99 provisions, not dutied	Quantity	58	122	61	58	16
Subject to chapter 99 provisions	Quantity	22,162	3,978	319	317	27
Not subject to chapter 99 provisions	Quantity	7,700	35,221	44,760	11,146	11,328
All duty statuses	Quantity	29,862	39,200	45,080	11,463	11,356
Subject to chapter 99 provisions, dutied	Share	74.0	9.8	0.6	2.3	0.1
Subject to chapter 99 provisions, not dutied	Share	0.2	0.3	0.1	0.5	0.1
Subject to chapter 99 provisions	Share	74.2	10.1	0.7	2.8	0.2
Not subject to chapter 99 provisions	Share	25.8	89.9	99.3	97.2	99.8
All duty statuses	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.50.0020, 7210.50.0090, and 7212.10.0000, accessed November 22, 2023. Imports are based on the imports for consumption data series.

Note: Shares shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive) and greater than “(0.05)” percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as “---“. Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table D-10
Tin mill products: U.S. imports from investigated sources, by duty status and period

Quantity in short tons; Share in percent

Duty status	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Subject to chapter 99 provisions, dutied	Quantity	542,112	345,377	293,495	168,580	128,594
Subject to chapter 99 provisions, not dutied	Quantity	16,754	18,482	31,206	18,482	1,148
Subject to chapter 99 provisions	Quantity	558,867	363,858	324,701	187,062	129,742
Not subject to chapter 99 provisions	Quantity	412,086	713,636	971,348	511,457	432,117
All duty statuses	Quantity	970,952	1,077,495	1,296,049	698,519	561,859
Subject to chapter 99 provisions, dutied	Share	55.8	32.1	22.6	24.1	22.9
Subject to chapter 99 provisions, not dutied	Share	1.7	1.7	2.4	2.6	0.2
Subject to chapter 99 provisions	Share	57.6	33.8	25.1	26.8	23.1
Not subject to chapter 99 provisions	Share	42.4	66.2	74.9	73.2	76.9
All duty statuses	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0000, 7210.50.0020, 7210.50.0090, and 7212.10.0000, accessed November 22, 2023. Imports are based on the imports for consumption data series.

Note: Shares shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive) and greater than “(0.05)” percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as “---“. Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

APPENDIX E

DETAILED PURCHASE DATA BY WIDTH AND PRODUCT TYPE

As noted in Part II, detailed data regarding purchases of the four product types by width and sources for each full year and the first half of 2023 were collected in the Commission's questionnaires. Data for tin-free steel are presented in tables E-1 to E-3, data for electrolytic tin plate are presented in tables E-4 to E-6, and data for all product types combined are presented in table E-7.

In addition to quantitative trends seen in the data, a number of other market characteristics are present. Very little non-laminated tin-free steel is purchased that is greater than 39 inches wide (table E-2), and the only laminated tin-free steel produced domestically was less than 39 inches wide, and this amounted to *** in any period. Purchases of laminated tin-free steel accounted for less than half of the purchases of other tin-free steel in any period. Also as noted in Part II, certain respondents indicated that one important characteristic of the market is the domestic availability of wide-width D&I electrolytic tin plate. As seen in table E-4, domestic shipments of this type (at least 41 inches wide) decreased over the period and accounted for *** in 2022 and the first half of 2023 combined. Purchases of domestically produced D&I steel were concentrated in widths of less than 41 inches and reached a peak market share in 2021 of *** percent; in 2020 and the first half of 2023, domestic market share of D&I tin plate was less than *** percent of D&I tin plate purchases. The largest proportion of purchases of tin mill products were for electrolytic tin plate other than D&I tin plate. As seen in table E-6, though most purchases of this type were for product that was less than 39 inches wide and was manufactured in the United States. The proportion of this type of tin mill product purchased decreased over the periods, from *** percent in 2020 to *** percent in 2022.

Table E-1
Tin mill products: United States purchasers' purchases and imports of laminated tin-free steel, by width, source, and period

Quantity in short tons, share in percent.

Width (inches)	Source	Measure	2020	2021	2022	Jan-Jun 2023
< 39	United States	Quantity	***	***	***	***
< 39	Investigated imports	Quantity	***	***	***	***
< 39	All other imports	Quantity	***	***	***	***
< 39	All sources	Quantity	***	***	***	***
≥ 39 and < 41	United States	Quantity	***	***	***	***
≥ 39 and < 41	Investigated imports	Quantity	***	***	***	***
≥ 39 and < 41	All other imports	Quantity	***	***	***	***
≥ 39 and < 41	All sources	Quantity	***	***	***	***
≥ 41 and < 45	United States	Quantity	***	***	***	***
≥ 41 and < 45	Investigated imports	Quantity	***	***	***	***
≥ 41 and < 45	All other imports	Quantity	***	***	***	***
≥ 41 and < 45	All sources	Quantity	***	***	***	***
≥ 45	United States	Quantity	***	***	***	***
≥ 45	Investigated imports	Quantity	***	***	***	***
≥ 45	All other imports	Quantity	***	***	***	***
≥ 45	All sources	Quantity	***	***	***	***
All widths	United States	Quantity	***	***	***	***
All widths	Investigated imports	Quantity	***	***	***	***
All widths	All other imports	Quantity	***	***	***	***
All widths	All sources	Quantity	***	***	***	***
< 39	United States	Share	***	***	***	***
< 39	Investigated imports	Share	***	***	***	***
< 39	All other imports	Share	***	***	***	***
< 39	All sources	Share	***	***	***	***
≥ 39 and < 41	United States	Share	***	***	***	***
≥ 39 and < 41	Investigated imports	Share	***	***	***	***
≥ 39 and < 41	All other imports	Share	***	***	***	***
≥ 39 and < 41	All sources	Share	***	***	***	***
≥ 41 and < 45	United States	Share	***	***	***	***
≥ 41 and < 45	Investigated imports	Share	***	***	***	***
≥ 41 and < 45	All other imports	Share	***	***	***	***
≥ 41 and < 45	All sources	Share	***	***	***	***
≥ 45	United States	Share	***	***	***	***
≥ 45	Investigated imports	Share	***	***	***	***
≥ 45	All other imports	Share	***	***	***	***
≥ 45	All sources	Share	***	***	***	***
All widths	United States	Share	***	***	***	***
All widths	Investigated imports	Share	***	***	***	***
All widths	All other imports	Share	***	***	***	***
All widths	All sources	Share	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-2
Tin mill products: United States purchasers' purchases and imports of other tin-free steel, by width, source, and period

Quantity in short tons, share in percent.

Width (inches)	Source	Measure	2020	2021	2022	Jan-Jun 2023
< 39	United States	Quantity	***	***	***	***
< 39	Investigated imports	Quantity	***	***	***	***
< 39	All other imports	Quantity	***	***	***	***
< 39	All sources	Quantity	***	***	***	***
≥ 39 and < 41	United States	Quantity	***	***	***	***
≥ 39 and < 41	Investigated imports	Quantity	***	***	***	***
≥ 39 and < 41	All other imports	Quantity	***	***	***	***
≥ 39 and < 41	All sources	Quantity	***	***	***	***
≥ 41 and < 45	United States	Quantity	***	***	***	***
≥ 41 and < 45	Investigated imports	Quantity	***	***	***	***
≥ 41 and < 45	All other imports	Quantity	***	***	***	***
≥ 41 and < 45	All sources	Quantity	***	***	***	***
≥ 45	United States	Quantity	***	***	***	***
≥ 45	Investigated imports	Quantity	***	***	***	***
≥ 45	All other imports	Quantity	***	***	***	***
≥ 45	All sources	Quantity	***	***	***	***
All widths	United States	Quantity	***	***	***	***
All widths	Investigated imports	Quantity	***	***	***	***
All widths	All other imports	Quantity	***	***	***	***
All widths	All sources	Quantity	***	***	***	***
< 39	United States	Share	***	***	***	***
< 39	Investigated imports	Share	***	***	***	***
< 39	All other imports	Share	***	***	***	***
< 39	All sources	Share	***	***	***	***
≥ 39 and < 41	United States	Share	***	***	***	***
≥ 39 and < 41	Investigated imports	Share	***	***	***	***
≥ 39 and < 41	All other imports	Share	***	***	***	***
≥ 39 and < 41	All sources	Share	***	***	***	***
≥ 41 and < 45	United States	Share	***	***	***	***
≥ 41 and < 45	Investigated imports	Share	***	***	***	***
≥ 41 and < 45	All other imports	Share	***	***	***	***
≥ 41 and < 45	All sources	Share	***	***	***	***
≥ 45	United States	Share	***	***	***	***
≥ 45	Investigated imports	Share	***	***	***	***
≥ 45	All other imports	Share	***	***	***	***
≥ 45	All sources	Share	***	***	***	***
All widths	United States	Share	***	***	***	***
All widths	Investigated imports	Share	***	***	***	***
All widths	All other imports	Share	***	***	***	***
All widths	All sources	Share	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-3
Tin mill products: United States purchasers' purchases and imports of all tin free steel, by width, source, and period

Quantity in short tons, share in percent.

Width (inches)	Source	Measure	2020	2021	2022	Jan-Jun 2023
< 39	United States	Quantity	***	***	***	***
< 39	Investigated imports	Quantity	***	***	***	***
< 39	All other imports	Quantity	***	***	***	***
< 39	All sources	Quantity	***	***	***	***
≥ 39 and < 41	United States	Quantity	***	***	***	***
≥ 39 and < 41	Investigated imports	Quantity	***	***	***	***
≥ 39 and < 41	All other imports	Quantity	***	***	***	***
≥ 39 and < 41	All sources	Quantity	***	***	***	***
≥ 41 and < 45	United States	Quantity	***	***	***	***
≥ 41 and < 45	Investigated imports	Quantity	***	***	***	***
≥ 41 and < 45	All other imports	Quantity	***	***	***	***
≥ 41 and < 45	All sources	Quantity	***	***	***	***
≥ 45	United States	Quantity	***	***	***	***
≥ 45	Investigated imports	Quantity	***	***	***	***
≥ 45	All other imports	Quantity	***	***	***	***
≥ 45	All sources	Quantity	***	***	***	***
All widths	United States	Quantity	***	***	***	***
All widths	Investigated imports	Quantity	***	***	***	***
All widths	All other imports	Quantity	***	***	***	***
All widths	All sources	Quantity	***	***	***	***
< 39	United States	Share	***	***	***	***
< 39	Investigated imports	Share	***	***	***	***
< 39	All other imports	Share	***	***	***	***
< 39	All sources	Share	***	***	***	***
≥ 39 and < 41	United States	Share	***	***	***	***
≥ 39 and < 41	Investigated imports	Share	***	***	***	***
≥ 39 and < 41	All other imports	Share	***	***	***	***
≥ 39 and < 41	All sources	Share	***	***	***	***
≥ 41 and < 45	United States	Share	***	***	***	***
≥ 41 and < 45	Investigated imports	Share	***	***	***	***
≥ 41 and < 45	All other imports	Share	***	***	***	***
≥ 41 and < 45	All sources	Share	***	***	***	***
≥ 45	United States	Share	***	***	***	***
≥ 45	Investigated imports	Share	***	***	***	***
≥ 45	All other imports	Share	***	***	***	***
≥ 45	All sources	Share	***	***	***	***
All widths	United States	Share	***	***	***	***
All widths	Investigated imports	Share	***	***	***	***
All widths	All other imports	Share	***	***	***	***
All widths	All sources	Share	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-4
Tin mill products: United States purchasers' purchases and imports of drawn and ironed (D&I) electrolytic tin plate, by width, source, and period

Quantity in short tons, share in percent.

Width (inches)	Source	Measure	2020	2021	2022	Jan-Jun 2023
< 39	United States	Quantity	***	***	***	***
< 39	Investigated imports	Quantity	***	***	***	***
< 39	All other imports	Quantity	***	***	***	***
< 39	All sources	Quantity	***	***	***	***
≥ 39 and < 41	United States	Quantity	***	***	***	***
≥ 39 and < 41	Investigated imports	Quantity	***	***	***	***
≥ 39 and < 41	All other imports	Quantity	***	***	***	***
≥ 39 and < 41	All sources	Quantity	***	***	***	***
≥ 41 and < 45	United States	Quantity	***	***	***	***
≥ 41 and < 45	Investigated imports	Quantity	***	***	***	***
≥ 41 and < 45	All other imports	Quantity	***	***	***	***
≥ 41 and < 45	All sources	Quantity	***	***	***	***
≥ 45	United States	Quantity	***	***	***	***
≥ 45	Investigated imports	Quantity	***	***	***	***
≥ 45	All other imports	Quantity	***	***	***	***
≥ 45	All sources	Quantity	***	***	***	***
All widths	United States	Quantity	***	***	***	***
All widths	Investigated imports	Quantity	***	***	***	***
All widths	All other imports	Quantity	***	***	***	***
All widths	All sources	Quantity	***	***	***	***
< 39	United States	Share	***	***	***	***
< 39	Investigated imports	Share	***	***	***	***
< 39	All other imports	Share	***	***	***	***
< 39	All sources	Share	***	***	***	***
≥ 39 and < 41	United States	Share	***	***	***	***
≥ 39 and < 41	Investigated imports	Share	***	***	***	***
≥ 39 and < 41	All other imports	Share	***	***	***	***
≥ 39 and < 41	All sources	Share	***	***	***	***
≥ 41 and < 45	United States	Share	***	***	***	***
≥ 41 and < 45	Investigated imports	Share	***	***	***	***
≥ 41 and < 45	All other imports	Share	***	***	***	***
≥ 41 and < 45	All sources	Share	***	***	***	***
≥ 45	United States	Share	***	***	***	***
≥ 45	Investigated imports	Share	***	***	***	***
≥ 45	All other imports	Share	***	***	***	***
≥ 45	All sources	Share	***	***	***	***
All widths	United States	Share	***	***	***	***
All widths	Investigated imports	Share	***	***	***	***
All widths	All other imports	Share	***	***	***	***
All widths	All sources	Share	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-5
Tin mill products: United States purchasers' purchases and imports of other electrolytic tin plate, by width, source, and period

Quantity in short tons, share in percent.

Width (inches)	Source	Measure	2020	2021	2022	Jan-Jun 2023
< 39	United States	Quantity	***	***	***	***
< 39	Investigated imports	Quantity	***	***	***	***
< 39	All other imports	Quantity	***	***	***	***
< 39	All sources	Quantity	***	***	***	***
≥ 39 and < 41	United States	Quantity	***	***	***	***
≥ 39 and < 41	Investigated imports	Quantity	***	***	***	***
≥ 39 and < 41	All other imports	Quantity	***	***	***	***
≥ 39 and < 41	All sources	Quantity	***	***	***	***
≥ 41 and < 45	United States	Quantity	***	***	***	***
≥ 41 and < 45	Investigated imports	Quantity	***	***	***	***
≥ 41 and < 45	All other imports	Quantity	***	***	***	***
≥ 41 and < 45	All sources	Quantity	***	***	***	***
≥ 45	United States	Quantity	***	***	***	***
≥ 45	Investigated imports	Quantity	***	***	***	***
≥ 45	All other imports	Quantity	***	***	***	***
≥ 45	All sources	Quantity	***	***	***	***
All widths	United States	Quantity	***	***	***	***
All widths	Investigated imports	Quantity	***	***	***	***
All widths	All other imports	Quantity	***	***	***	***
All widths	All sources	Quantity	***	***	***	***
< 39	United States	Share	***	***	***	***
< 39	Investigated imports	Share	***	***	***	***
< 39	All other imports	Share	***	***	***	***
< 39	All sources	Share	***	***	***	***
≥ 39 and < 41	United States	Share	***	***	***	***
≥ 39 and < 41	Investigated imports	Share	***	***	***	***
≥ 39 and < 41	All other imports	Share	***	***	***	***
≥ 39 and < 41	All sources	Share	***	***	***	***
≥ 41 and < 45	United States	Share	***	***	***	***
≥ 41 and < 45	Investigated imports	Share	***	***	***	***
≥ 41 and < 45	All other imports	Share	***	***	***	***
≥ 41 and < 45	All sources	Share	***	***	***	***
≥ 45	United States	Share	***	***	***	***
≥ 45	Investigated imports	Share	***	***	***	***
≥ 45	All other imports	Share	***	***	***	***
≥ 45	All sources	Share	***	***	***	***
All widths	United States	Share	***	***	***	***
All widths	Investigated imports	Share	***	***	***	***
All widths	All other imports	Share	***	***	***	***
All widths	All sources	Share	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-6
Tin mill products: United States purchasers' purchases and imports of all electrolytic tin plate, by width, source, and period

Quantity in short tons, share in percent.

Width (inches)	Source	Measure	2020	2021	2022	Jan-Jun 2023
< 39	United States	Quantity	***	***	***	***
< 39	Investigated imports	Quantity	***	***	***	***
< 39	All other imports	Quantity	***	***	***	***
< 39	All sources	Quantity	***	***	***	***
≥ 39 and < 41	United States	Quantity	***	***	***	***
≥ 39 and < 41	Investigated imports	Quantity	***	***	***	***
≥ 39 and < 41	All other imports	Quantity	***	***	***	***
≥ 39 and < 41	All sources	Quantity	***	***	***	***
≥ 41 and < 45	United States	Quantity	***	***	***	***
≥ 41 and < 45	Investigated imports	Quantity	***	***	***	***
≥ 41 and < 45	All other imports	Quantity	***	***	***	***
≥ 41 and < 45	All sources	Quantity	***	***	***	***
≥ 45	United States	Quantity	***	***	***	***
≥ 45	Investigated imports	Quantity	***	***	***	***
≥ 45	All other imports	Quantity	***	***	***	***
≥ 45	All sources	Quantity	***	***	***	***
All widths	United States	Quantity	***	***	***	***
All widths	Investigated imports	Quantity	***	***	***	***
All widths	All other imports	Quantity	***	***	***	***
All widths	All sources	Quantity	***	***	***	***
< 39	United States	Share	***	***	***	***
< 39	Investigated imports	Share	***	***	***	***
< 39	All other imports	Share	***	***	***	***
< 39	All sources	Share	***	***	***	***
≥ 39 and < 41	United States	Share	***	***	***	***
≥ 39 and < 41	Investigated imports	Share	***	***	***	***
≥ 39 and < 41	All other imports	Share	***	***	***	***
≥ 39 and < 41	All sources	Share	***	***	***	***
≥ 41 and < 45	United States	Share	***	***	***	***
≥ 41 and < 45	Investigated imports	Share	***	***	***	***
≥ 41 and < 45	All other imports	Share	***	***	***	***
≥ 41 and < 45	All sources	Share	***	***	***	***
≥ 45	United States	Share	***	***	***	***
≥ 45	Investigated imports	Share	***	***	***	***
≥ 45	All other imports	Share	***	***	***	***
≥ 45	All sources	Share	***	***	***	***
All widths	United States	Share	***	***	***	***
All widths	Investigated imports	Share	***	***	***	***
All widths	All other imports	Share	***	***	***	***
All widths	All sources	Share	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-7
Tin mill products: U.S. purchasers' purchases and imports of all product types, by width, source, and period

Quantity in short tons, share in percent.

Width (inches)	Source	Measure	2020	2021	2022	Jan-Jun 2023
< 39	United States	Quantity	***	***	***	***
< 39	Investigated imports	Quantity	***	***	***	***
< 39	All other imports	Quantity	***	***	***	***
< 39	All sources	Quantity	***	***	***	***
≥ 39 and < 41	United States	Quantity	***	***	***	***
≥ 39 and < 41	Investigated imports	Quantity	***	***	***	***
≥ 39 and < 41	All other imports	Quantity	***	***	***	***
≥ 39 and < 41	All sources	Quantity	***	***	***	***
≥ 41 and < 45	United States	Quantity	***	***	***	***
≥ 41 and < 45	Investigated imports	Quantity	***	***	***	***
≥ 41 and < 45	All other imports	Quantity	***	***	***	***
≥ 41 and < 45	All sources	Quantity	***	***	***	***
≥ 45	United States	Quantity	***	***	***	***
≥ 45	Investigated imports	Quantity	***	***	***	***
≥ 45	All other imports	Quantity	***	***	***	***
≥ 45	All sources	Quantity	***	***	***	***
All widths	United States	Quantity	***	***	***	***
All widths	Investigated imports	Quantity	***	***	***	***
All widths	All other imports	Quantity	***	***	***	***
All widths	All sources	Quantity	***	***	***	***
< 39	United States	Share	***	***	***	***
< 39	Investigated imports	Share	***	***	***	***
< 39	All other imports	Share	***	***	***	***
< 39	All sources	Share	***	***	***	***
≥ 39 and < 41	United States	Share	***	***	***	***
≥ 39 and < 41	Investigated imports	Share	***	***	***	***
≥ 39 and < 41	All other imports	Share	***	***	***	***
≥ 39 and < 41	All sources	Share	***	***	***	***
≥ 41 and < 45	United States	Share	***	***	***	***
≥ 41 and < 45	Investigated imports	Share	***	***	***	***
≥ 41 and < 45	All other imports	Share	***	***	***	***
≥ 41 and < 45	All sources	Share	***	***	***	***
≥ 45	United States	Share	***	***	***	***
≥ 45	Investigated imports	Share	***	***	***	***
≥ 45	All other imports	Share	***	***	***	***
≥ 45	All sources	Share	***	***	***	***
All widths	United States	Share	***	***	***	***
All widths	Investigated imports	Share	***	***	***	***
All widths	All other imports	Share	***	***	***	***
All widths	All sources	Share	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.
Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

APPENDIX F

PURCHASER CONTRACT DATA

Eighteen purchasers reported requested details regarding their three largest purchase contracts for tin mill products for 2020, 2021, 2022, and 2023.[1] Relevant data include the supplier; the dates that contract negotiations began and ended; the contract amounts requested, offered, and agreed upon; the tolerance above or below the contract amount that could be requested or supplied (typically 5-10 percent, but ranged from 0-25 percent); and the quantity delivered during the contract year (for 2020, 2021, and 2022). Also presented is a ratio of the delivered quantity to the contracted quantity for each contract. Tables F-1 to F-4 present these details for each year separately.

[1] Some purchasers also provided data for spot or non-contract purchases during the period.

Table F-1
Tin mill products: Details regarding purchasers' three largest contracts in 2020, by purchaser and supplier

Quantity in short tons, tolerance and ratio in percent.

Firm	Supplier	Date contract negotiations began	Date contract signed	Requested quantity	Offered quantity	Contract quantity	Contract supply tolerance	Delivered quantity	Delivered / contracted ratio
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***

Table continued.

Table F-1 Continued
Tin mill products: Details regarding purchasers' three largest contracts in 2020, by purchaser and supplier

Quantity in short tons, tolerance and ratio in percent.

Firm	Supplier	Date contract negotiations began	Date contract signed	Requested quantity	Offered quantity	Contract quantity	Contract supply tolerance	Delivered quantity	Delivered / contracted ratio
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
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***	***	***	***	***	***	***	***	***	***

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

Note: Some firms presented delivered quantities without having any information relating to contracts in their responses (e.g., contract dates, contract quantities, or delivered quantities) or having bought on the spot market. These responses are not presented. Purchasers listing as having purchased from the Weirton, WV, facility, which was owned by ArcelorMittal USA during 2020 were listed as having purchased from Cleveland Cliffs for consistency. For purchaser ***.

Table F-2
Tin mill products: Details regarding purchasers' three largest contracts in 2021, by purchaser and supplier

Quantity in short tons, tolerance and ratio in percent.

Firm	Supplier	Date contract negotiations began	Date contract signed	Requested quantity	Offered quantity	Contract quantity	Contract supply tolerance	Delivered quantity	Delivered / contracted ratio
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
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***	***	***	***	***	***	***	***	***	***
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***	***	***	***	***	***	***	***	***	***

Table continued.

Table F-2 Continued
Tin mill products: Details regarding purchasers' three largest contracts in 2021, by purchaser and supplier

Quantity in short tons, tolerance and ratio in percent.

Firm	Supplier	Date contract negotiations began	Date contract signed	Requested quantity	Offered quantity	Contract quantity	Contract supply tolerance	Delivered quantity	Delivered / contracted ratio
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
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***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***

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

Note: Some firms presented delivered quantities without having any information relating to contracts in their responses (e.g., contract dates, contract quantities, or delivered quantities) or having bought on the spot market. These responses are not presented. Purchaser *** noted that it operated without an agreement with ***. For purchaser ***.

Table F-3
Tin mill products: Details regarding purchasers' three largest contracts in 2022, by purchaser and supplier

Quantity in short tons, tolerance and ratio in percent.

Firm	Supplier	Date contract negotiations began	Date contract signed	Requested quantity	Offered quantity	Contract quantity	Contract supply tolerance	Delivered quantity	Delivered / contracted ratio
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
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***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***

Table continued.

Table F-3 Continued
Tin mill products: Details regarding purchasers' three largest contracts in 2022, by purchaser and supplier

Quantity in short tons, tolerance and ratio in percent.

Firm	Supplier	Date contract negotiations began	Date contract signed	Requested quantity	Offered quantity	Contract quantity	Contract supply tolerance	Delivered quantity	Delivered / contracted ratio
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
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***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***	***	***

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

Note: Some firms presented delivered quantities without having any information relating to contracts in their responses (e.g., contract dates, contract quantities, or delivered quantities) or having bought on the spot market. These responses are not presented. Purchaser *** noted that it operated without an agreement with ***. For purchaser ***.

Table F-4
Tin mill products: Details regarding purchasers' three largest contracts in 2023, by purchaser and supplier

Quantity in short tons, tolerance and ratio in percent.

Firm	Supplier	Date contract negotiations began	Date contract signed	Requested quantity	Offered quantity	Contract quantity	Contract supply tolerance (percent)
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
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***	***	***	***	***	***	***	***

Table continued.

Table F-4 Continued
Tin mill products: Details regarding purchasers' three largest contracts in 2023, by purchaser and supplier

Quantity in short tons, tolerance and ratio in percent.

Firm	Supplier	Date contract negotiations began	Date contract signed	Requested quantity (short tons)	Offered quantity (short tons)	Contract quantity (short tons)	Contract supply tolerance (percent)
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
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***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***

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

Note: Delivered quantities were not requested from purchasers for 2023, as deliveries would not have spanned over a full contract year. Some firms presented delivered quantities without having any information relating to contracts in their responses (e.g., contract dates or contract quantities) or having bought on the spot market. These responses are not presented. Purchaser *** noted that it operated without an agreement with ***. For purchaser ***.

Appendix G

SUBJECT SOUTH KOREAN AND

NONSUBJECT SOURCE PRICE DATA

Eight importers reported price data for imports from nonsubject sources. These importers reported price data for all four products imported from South Korea, for three products from the Netherlands and Taiwan, for two products from Turkey and the United Kingdom.[1] Reported data for these countries comprised a combined 18.9 percent of U.S. commercial shipments of nonsubject imports in 2022. These price items and accompanying data are comparable to those presented in tables V-5 to V-8. Price and quantity data for the nonsubject countries are shown in tables G-1 to G-4 and in figures G-1 to G-4 (with domestic and subject sources).

In comparing nonsubject country pricing data with U.S. producer pricing data, prices for product imported from nonsubject sources were lower than prices for U.S.-produced product in all 73 instances and higher than prices for U.S.-produced product in 78 instances.

In comparing nonsubject country pricing data with subject country pricing data, prices for product imported from the Netherlands were higher than prices for product imported from subject countries in 18 instances and lower in 43 instances. Prices for product imported from South Korea, nonsubject[2] were higher than prices for product imported from subject countries in 32 instances and lower in 87 instances. Prices for product imported from Taiwan were higher than prices for product imported from subject countries in 29 instances and lower in 67 instances. Prices for product imported from Turkey were higher than prices for product imported from subject countries in 19 instances and lower in 15 instances. Prices for product imported from the United Kingdom were higher than prices for product imported from subject countries in 16 instances and lower in 21 instances. A summary of price differentials is presented in table G-5. In terms of subject imports, imports from Canada were priced lower than nonsubject sources in 50 of 151 instances, imports from China were priced lower in 45 of 119 instances, imports from Germany were priced lower in 15 of 41 instances, and imports from South Korea, subject were priced lower in 14 of 46 instances.

[1] In all, pricing data were received from all nine subject and named nonsubject sources for product 1, from six sources for product 2 (two subject and four nonsubject), from seven sources for product 3 (three subject and four nonsubject), and five for product 4 (three subject and two nonsubject).

[2] Only data for imports of nonsubject South Korean product are presented in tables G-1 to G-4 and figures G-1 to G-4.

As noted in Part I of this report, one source from South Korea was found by the Department of Commerce to have de minimis dumping margins. Breakouts for pricing product data for imports of tin mill products from foreign producers/exporters not found to be de minimis are presented in table G-6. In 12 of 17 quarters (*** short tons), subject South Korean product oversold that from the United States, with margins ranging from *** percent (*** percent average). In the five quarters of underselling, margins ranged from *** percent (*** percent average, *** short tons). Instances, quantities, and margins of overselling and underselling for Canada, China, Germany, and South Korea, subject are provided in table G-7.

Table G-1
Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and nonsubject imported product 1 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Nether-lands price	Nether-lands quantity	Nether-lands margin	South Korea price	South Korea quantity	South Korea margin
2020 Q1	1,075	36,798	--	0	--	***	***	***
2020 Q2	1,060	49,190	--	0	--	***	***	***
2020 Q3	1,023	55,701	--	0	--	***	***	***
2020 Q4	1,033	53,707	--	0	--	***	***	***
2021 Q1	1,102	40,989	--	0	--	***	***	***
2021 Q2	1,151	43,734	***	***	***	***	***	***
2021 Q3	1,140	56,992	***	***	***	***	***	***
2021 Q4	1,251	64,954	***	***	***	***	***	***
2022 Q1	1,807	43,089	--	0	--	***	***	***
2022 Q2	2,011	53,639	--	0	--	***	***	***
2022 Q3	2,119	45,144	--	0	--	***	***	***
2022 Q4	1,954	37,260	--	0	--	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	1,802	28,181	***	***	***	--	0	--

Table continued.

Period	Taiwan price	Taiwan quantity	Taiwan margin	Turkey price	Turkey quantity	Turkey margin	United Kingdom price	United Kingdom quantity	United Kingdom margin
2020 Q1	***	***	***	***	***	***	--	0	--
2020 Q2	***	***	***	***	***	***	--	0	--
2020 Q3	***	***	***	***	***	***	--	0	--
2020 Q4	***	***	***	--	0	--	--	0	--
2021 Q1	***	***	***	***	***	***	--	0	--
2021 Q2	***	***	***	***	***	***	--	0	--
2021 Q3	***	***	***	***	***	***	--	0	--
2021 Q4	***	***	***	***	***	***	--	0	--
2022 Q1	***	***	***	***	***	***	--	0	--
2022 Q2	***	***	***	--	0	--	--	0	--
2022 Q3	***	***	***	***	***	***	--	0	--
2022 Q4	***	***	***	--	0	--	--	0	--
2023 Q1	***	***	***	--	0	--	--	0	--
2023 Q2	***	***	***	--	0	--	--	0	--

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

Note: Product 1: Single reduced, electrolytic tinplate with base box weights of 75–95 lbs. inclusive and less than 41 inches in width, in coils.

Table G-2
Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and nonsubject imported product 2 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Nether-lands price	Nether-lands quantity	Nether-lands margin	South Korea price	South Korea quantity	South Korea margin
2020 Q1	1,196	46,944	***	***	***	***	***	***
2020 Q2	1,185	64,808	***	***	***	***	***	***
2020 Q3	1,173	72,698	***	***	***	***	***	***
2020 Q4	1,157	69,631	***	***	***	***	***	***
2021 Q1	1,239	64,945	***	***	***	***	***	***
2021 Q2	1,181	64,136	***	***	***	***	***	***
2021 Q3	1,296	58,858	***	***	***	***	***	***
2021 Q4	1,340	61,943	***	***	***	***	***	***
2022 Q1	2,158	47,444	***	***	***	***	***	***
2022 Q2	2,336	56,520	***	***	***	***	***	***
2022 Q3	2,302	35,684	***	***	***	***	***	***
2022 Q4	2,166	31,831	***	***	***	***	***	***
2023 Q1	2,047	39,953	***	***	***	***	***	***
2023 Q2	2,047	38,102	--	0	--	***	***	***

Table continued.

Period	Taiwan price	Taiwan quantity	Taiwan margin	Turkey price	Turkey quantity	Turkey margin	United Kingdom price	United Kingdom quantity	United Kingdom margin
2020 Q1	***	***	***	--	0	--	--	0	--
2020 Q2	--	0	--	--	0	--	--	0	--
2020 Q3	***	***	***	--	0	--	--	0	--
2020 Q4	--	0	--	--	0	--	--	0	--
2021 Q1	***	***	***	***	***	***	--	0	--
2021 Q2	***	***	***	***	***	***	--	0	--
2021 Q3	***	***	***	***	***	***	--	0	--
2021 Q4	***	***	***	***	***	***	--	0	--
2022 Q1	***	***	***	***	***	***	--	0	--
2022 Q2	***	***	***	***	***	***	--	0	--
2022 Q3	***	***	***	--	0	--	--	0	--
2022 Q4	***	***	***	--	0	--	--	0	--
2023 Q1	***	***	***	--	0	--	--	0	--
2023 Q2	***	***	***	--	0	--	--	0	--

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

Note: Product 2: Double reduced, electrolytic tinplate with base box weights of 55–65 lbs. inclusive and less than 41 inches in width, in coils.

Table G-3
Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and nonsubject imported product 3 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Nether-lands price	Nether-lands quantity	Nether-lands margin	South Korea price	South Korea quantity	South Korea margin
2020 Q1	***	***	***	***	***	--	0	--
2020 Q2	***	***	***	***	***	--	0	--
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	--	0	--	***	***	***
2022 Q1	***	***	--	0	--	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	--	0	--
2023 Q2	***	***	--	0	--	--	0	--

Table continued.

Period	Taiwan price	Taiwan quantity	Taiwan margin	Turkey price	Turkey quantity	Turkey margin	United Kingdom price	United Kingdom quantity	United Kingdom margin
2020 Q1	--	0	--	--	0	--	***	***	***
2020 Q2	***	***	***	--	0	--	***	***	***
2020 Q3	***	***	***	--	0	--	***	***	***
2020 Q4	--	0	--	--	0	--	***	***	***
2021 Q1	***	***	***	--	0	--	***	***	***
2021 Q2	***	***	***	--	0	--	***	***	***
2021 Q3	***	***	***	--	0	--	***	***	***
2021 Q4	***	***	***	--	0	--	***	***	***
2022 Q1	***	***	***	--	0	--	***	***	***
2022 Q2	***	***	***	--	0	--	***	***	***
2022 Q3	***	***	***	--	0	--	***	***	***
2022 Q4	***	***	***	--	0	--	***	***	***
2023 Q1	***	***	***	--	0	--	***	***	***
2023 Q2	***	***	***	--	0	--	***	***	***

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

Note: Product 3: Single reduced, electrolytic chromium-coated steel with base box weights of 65–80 lbs. inclusive and less than 41 inches in width, in coils.

Table G-4
Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and nonsubject imported product 4 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Nether-lands price	Nether-lands quantity	Nether-lands margin	South Korea price	South Korea quantity	South Korea margin
2020 Q1	***	***	--	0	--	***	***	***
2020 Q2	***	***	--	0	--	***	***	***
2020 Q3	***	***	--	0	--	***	***	***
2020 Q4	***	***	--	0	--	***	***	***
2021 Q1	***	***	--	0	--	***	***	***
2021 Q2	***	***	--	0	--	***	***	***
2021 Q3	***	***	--	0	--	***	***	***
2021 Q4	***	***	--	0	--	***	***	***
2022 Q1	***	***	--	0	--	***	***	***
2022 Q2	***	***	--	0	--	***	***	***
2022 Q3	***	***	--	0	--	***	***	***
2022 Q4	***	***	--	0	--	***	***	***
2023 Q1	***	***	--	0	--	***	***	***
2023 Q2	***	***	--	0	--	***	***	***

Table continued.

Period	Taiwan price	Taiwan quantity	Taiwan margin	Turkey price	Turkey quantity	Turkey margin	United Kingdom price	United Kingdom quantity	United Kingdom margin
2020 Q1	--	0	--	--	0	--	--	0	--
2020 Q2	--	0	--	--	0	--	--	0	--
2020 Q3	--	0	--	--	0	--	***	***	***
2020 Q4	--	0	--	--	0	--	--	0	--
2021 Q1	--	0	--	--	0	--	***	***	***
2021 Q2	--	0	--	--	0	--	***	***	***
2021 Q3	--	0	--	--	0	--	--	0	--
2021 Q4	--	0	--	--	0	--	--	0	--
2022 Q1	--	0	--	--	0	--	--	0	--
2022 Q2	--	0	--	--	0	--	--	0	--
2022 Q3	--	0	--	--	0	--	--	0	--
2022 Q4	--	0	--	--	0	--	--	0	--
2023 Q1	--	0	--	--	0	--	--	0	--
2023 Q2	--	0	--	--	0	--	--	0	--

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

Note: Product 4: Double reduced, electrolytic chromium-coated steel with base box weights of 55–65 lbs. inclusive and less than 41 inches in width, in coils.

Figure G-1
Tin mill products: Weighted-average prices and quantities of domestic and imported product 1, by source and quarter

Price of product 1

* * * * * * *

Volume of product 1

* * * * * * *

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

Note: Product 1: Single reduced, electrolytic tinplate with base box weights of 75–95 lbs. inclusive and less than 41 inches in width, in coils.

Figure G-2
Tin mill products: Weighted-average prices and quantities of domestic and imported product 2, by source and quarter

Price of product 2

* * * * * * *

Volume of product 2

* * * * * * *

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

Note: Product 2: Double reduced, electrolytic tinplate with base box weights of 55–65 lbs. inclusive and less than 41 inches in width, in coils.

Figure G-3
Tin mill products:: Weighted-average prices and quantities of domestic and imported product 3, by source and quarter

Price of product 3

* * * * * * *

Volume of product 3

* * * * * * *

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

Note: Product 3: Single reduced, electrolytic chromium-coated steel with base box weights of 65–80 lbs. inclusive and less than 41 inches in width, in coils.

Figure G-4
Tin mill products: Weighted-average prices and quantities of domestic and imported product 4, by source and quarter

Price of product 4

* * * * * * *

Volume of product 4

* * * * * * *

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

Note: Product 4: Double reduced, electrolytic chromium-coated steel with base box weights of 55–65 lbs. inclusive and less than 41 inches in width, in coils.

Table G-5
Tin mill products: Summary of higher/lower unit values of nonsubject sources, by source, January 2020-June 2023

Quantity in short tons

Comparison source	Benchmark source	Number of quarters lower	Quantity lower	Number of quarters higher	Quantity higher
Netherlands	United States	***	***	***	***
South Korea, nonsubject	United States	***	***	***	***
Taiwan	United States	***	***	***	***
Turkey	United States	***	***	***	***
United Kingdom	United States	***	***	***	***
Netherlands	Canada	***	***	***	***
South Korea, nonsubject	Canada	***	***	***	***
Taiwan	Canada	***	***	***	***
Turkey	Canada	***	***	***	***
United Kingdom	Canada	***	***	***	***
Netherlands	China	***	***	***	***
South Korea, nonsubject	China	***	***	***	***
Taiwan	China	***	***	***	***
Turkey	China	***	***	***	***
United Kingdom	China	***	***	***	***
Netherlands	Germany	***	***	***	***
South Korea, nonsubject	Germany	***	***	***	***
Taiwan	Germany	***	***	***	***
Turkey	Germany	***	***	***	***
United Kingdom	Germany	***	***	***	***
Netherlands	South Korea, subject	***	***	***	***
South Korea, nonsubject	South Korea, subject	***	***	***	***
Taiwan	South Korea, subject	***	***	***	***
Turkey	South Korea, subject	***	***	***	***
United Kingdom	South Korea, subject	***	***	***	***

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

Note: Number of quarters denotes the number of quarters the comparison source is lower/higher than the benchmark source.

Table G-6
Tin mill products: Weighted-average f.o.b. prices, quantities, and margins of underselling/ (overselling) for pricing products imported from subject foreign producers/exporters in South Korea, by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	Product 1 price	Product 1 quantity	Product 1 margin	Product 2 price	Product 2 quantity	Product 2 margin
2020 Q1	***	***	***	--	0	--
2020 Q2	***	***	***	--	0	--
2020 Q3	***	***	***	--	0	--
2020 Q4	***	***	***	--	0	--
2021 Q1	***	***	***	--	0	--
2021 Q2	***	***	***	--	0	--
2021 Q3	***	***	***	--	0	--
2021 Q4	***	***	***	--	0	--
2022 Q1	***	***	***	--	0	--
2022 Q2	***	***	***	--	0	--
2022 Q3	***	***	***	--	0	--
2022 Q4	--	0	--	--	0	--
2023 Q1	--	0	--	--	0	--
2023 Q2	--	0	--	--	0	--

Table continued.

Period	Product 3 price	Product 3 quantity	Product 3 margin	Product 4 price	Product 4 quantity	Product 4 margin
2020 Q1	--	0	--	--	0	--
2020 Q2	--	0	--	--	0	--
2020 Q3	--	0	--	***	***	***
2020 Q4	--	0	--	--	0	--
2021 Q1	--	0	--	--	0	--
2021 Q2	--	0	--	***	***	***
2021 Q3	--	0	--	***	***	***
2021 Q4	--	0	--	***	***	***
2022 Q1	--	0	--	--	0	--
2022 Q2	***	***	***	--	0	--
2022 Q3	--	0	--	--	0	--
2022 Q4	--	0	--	--	0	--
2023 Q1	--	0	--	--	0	--
2023 Q2	***	***	***	--	0	--

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

Note: Products 1-4 are defined in tables G-1 to G-4.

Table G-7
Tin mill products: Instances of underselling and overselling, and the range and average of margins, by product

Quantity in short tons; margin in percent

Products	Type	Number of quarters	Quantity	Average margin	Minimum margin	Maximum margin
Product 1	Underselling	6	***	***	***	***
Product 2	Underselling	4	***	***	***	***
Product 3	Underselling	10	***	***	***	***
Product 4	Underselling	6	***	***	***	***
All products	Underselling	26	***	***	***	***
Product 1	Overselling	45	***	***	***	***
Product 2	Overselling	17	***	***	***	***
Product 3	Overselling	20	***	***	***	***
Product 4	Overselling	21	***	***	***	***
All products	Overselling	103	***	***	***	***

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

APPENDIX H

APPENDIX FOR PART VI

Table H-1
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in short tons

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales value

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss)

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss)

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss)

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS to net sales ratio

Ratio in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss) to net sales ratio

Ratio in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses to net sales ratio

Ratio in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss) to net sales ratio

Ratio in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss) to net sales ratio

Ratio in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net sales value

Unit value in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit total raw materials cost

Unit value in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit direct labor cost

Unit value in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit other factory costs

Unit value in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit COGS

Unit value in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit gross profit or (loss)

Unit value in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit SG&A expenses

Unit value in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit operating income or (loss)

Unit value in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table H-1 Continued
Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net income or (loss)

Unit value in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Cleveland-Cliffs	***	***	***	***	***
Ohio Coatings	***	***	***	***	***
U.S. Steel	***	***	***	***	***
All firms	***	***	***	***	***

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

Note: ***. USITC auditor final phase notes.