

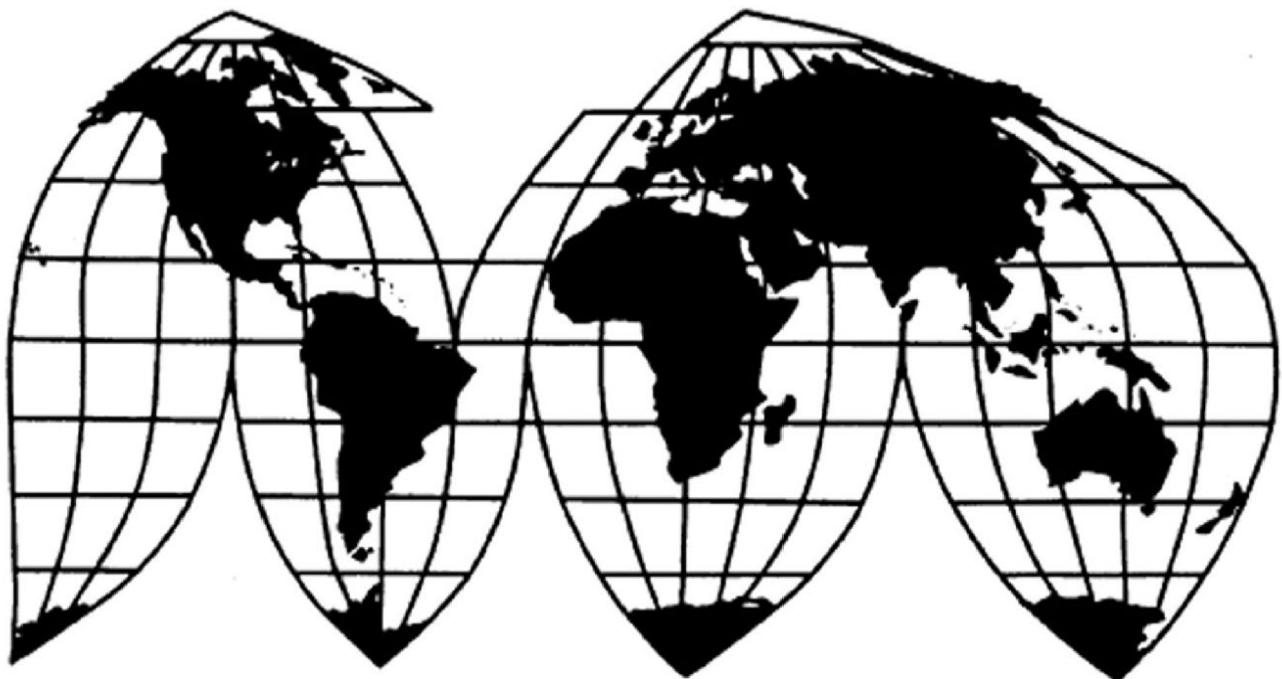
Small Diameter Graphite Electrodes from China

Investigation No. 731-TA-1143 (Third Review)

Publication 5657

August 2025

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual firms may not be published. Such information is identified by brackets (***) in confidential reports and is deleted and replaced with asterisks (***) in public reports. Zeroes, null values, and undefined calculations are suppressed and shown as em dashes (—) in tables. If using a screen reader, we recommend increasing the verbosity setting.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation No. 731-TA-1143 (Third Review)

Small Diameter Graphite Electrodes from China

DETERMINATION

On the basis of the record¹ developed in the subject five-year review, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that revocation of the antidumping duty order on small diameter graphite electrodes from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

BACKGROUND

The Commission instituted this review on March 3, 2025 (90 FR 11056) and determined on June 6, 2025, that it would conduct an expedited review (90 FR 36452, August 4, 2025).

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

Views of the Commission

Based on the record in this five-year review, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the antidumping duty order on small diameter graphite electrodes (“SDGEs”) from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

I. Background

Original Investigation. On January 17, 2008, SGL Carbon LLC (“SGL Carbon”) and Superior Graphite Company (“Superior”) filed an antidumping duty petition on SDGEs from China. On February 19, 2009, the Commission determined that an industry in the United States was materially injured by reason of subject imports.¹ Subsequently, the U.S. Department of Commerce (“Commerce”) issued an antidumping duty order covering SDGEs from China.²

First Review. In January 2014, the Commission instituted its first five-year review of the antidumping duty order.³ After conducting an expedited review, the Commission determined that revocation of the order would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.⁴ In June 2014, Commerce issued a continuation of the order.⁵

Second Review. In May 2019, the Commission instituted its second five-year review.⁶ After conducting a full review, the Commission determined that revocation of the order would

¹ *Small Diameter Graphite Electrodes from China*, Inv. No. 731-TA-1143 (Final), USITC Pub. 4062 (Feb. 2009) (“*Original Determination*”); see also *Final Determination of Sales at Less Than Fair Value and Affirmative Determination of Critical Circumstances: Small Diameter Graphite Electrodes from the People’s Republic of China*, 74 Fed. Reg. 2049 (Jan. 14, 2009).

² *Antidumping Duty Order: Small Diameter Graphite Electrodes from the People’s Republic of China*, 74 Fed. Reg. 8775 (Feb. 26, 2009).

³ *Small Diameter Graphite Electrodes From China; Institution of a Five-Year Review*, 79 Fed. Reg. 145 (Jan. 2, 2014).

⁴ *Small Diameter Graphite Electrodes from China*, Inv. No. 731-TA-1143 (Review), USITC Pub. 4469 (June 2014) (“*First Review Determination*”).

⁵ *Small Diameter Graphite Electrodes From the People’s Republic of China: Continuation of Antidumping Duty Order*, 79 Fed. Reg. 35523 (June 23, 2014).

⁶ *Small Diameter Graphite Electrodes From China; Institution of a Five-Year Review*, 84 Fed. Reg. 18580 (May 1, 2019). Tokai Carbon GE LLC (“Tokai Carbon”), a domestic producer of SDGE, filed the sole response to the notice of institution. Confidential Commission Views, *Small Diameter Graphite Electrodes from China*, Inv. No. 731-TA-1143 (Second Review), EDIS Doc. 706018 (“Confidential Second (Continued...)”).

be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.⁷ In April 2020, Commerce issued a continuation of the order.⁸

Current Review. The Commission instituted this third five-year review on March 3, 2025.⁹ It received a single response to the notice of institution filed jointly by GrafTech International Ltd. (“GrafTech”) and Tokai Carbon GE LLC (“Tokai Carbon”), domestic producers of SDGEs (“domestic producers”).^{10 11} The Commission did not receive a response to the notice of institution from any respondent interested party.¹² It determined that the domestic interested party group response was adequate and that the respondent interested party group response was inadequate. Finding no other circumstances that would warrant conducting a full review, the Commission determined on June 6, 2025, that it would conduct an expedited review.¹³ The domestic producers filed comments on July 31, 2025, pursuant to 19 C.F.R. §

Review Determination”), at 4. On August 15, 2019, the Commission determined that the response to its notice of institution was adequate with respect to the domestic interested party group and inadequate with respect to the respondent interested party group. *Small Diameter Graphite Electrodes from China; Notice of Commission Determination to Conduct a Full Five-Year Review*, 84 Fed. Reg. 43615 (Aug. 21, 2019). It nevertheless determined to conduct a full review in light of changes in the conditions of competition in the U.S. SDGE market. Confidential Second Review Determination, at 4.

⁷ *Small Diameter Graphite Electrodes from China*, Inv. No. 731-TA-1143 (Second Review), USITC Pub. 5035 (Mar. 2020) (“Second Review Determination”).

⁸ *Small Diameter Graphite Electrodes from China: Continuation of Antidumping Duty Order*, 85 Fed. Reg. 19134 (Apr. 6, 2020).

⁹ *Initiation of Five-Year Reviews*, 90 Fed. Reg. 11039 (Mar. 3, 2025).

¹⁰ Domestic Producers’ Response to the Notice of Institution, EDIS Doc. 847596 (Apr. 2025) (“Domestic Producers’ NOI Response”) at 1. GrafTech entered the SDGE market during the first review period, but did not participate in the second review because it idled production at its St. Marys, Pennsylvania facility in 2016. *Id.* at 2 n.2. Although GrafTech resumed production of SDGEs in 2018 it subsequently idled production at its St. Marys facility in 2024. *Id.* See also Confidential Report, Memorandum INV-XX-071, EDIS Doc. 852133 (May 27, 2025) (“CR”), Public Report, *Small Diameter Graphite Electrodes from China*, Inv. No. 731-TA-1143 (Third Review), USITC Pub. 5657 (Aug. 2025) (“PR”) at Table 1.2 (recent developments in the U.S. industry).

¹¹ Tokai Carbon was previously known as SGL Carbon LLC. Domestic Producers’ NOI Response at 2 n.3. SGL Carbon LLC was a petitioner in the original investigation. *Id.* SGL Carbon LLC changed its corporate name on in November 2017, to Tokai Carbon GE LLC as the result of a 100 percent share acquisition by Tokai Carbon Co., Ltd. *Id.*

¹² CR/PR at 1.15, 1.18; see also *id.* at B.3, Table B.1; Domestic Producers’ Comments on Adequacy, EDIS Doc. 852918 (May 14, 2025) (“Adequacy Comments”) at 2.

¹³ *Small Diameter Graphite Electrodes; Scheduling of an Expedited Five-Year Review*, 90 Fed. Reg. 36452 (Aug. 4, 2025) (“Notice of Scheduling of Expedited Review”); Explanation of Commission’s Determination on Adequacy Vote, EDIS Doc. 857841 (July 28, 2025) at 1.

207.62(d), arguing that the Commission should reach an affirmative determination in this expedited review.¹⁴

In this review, U.S. industry data are based on the information provided in the response to the notice of institution by the domestic producers, which are estimated to have accounted for 100 percent of domestic production of SDGEs in 2024.¹⁵ U.S. import data and related information are based on Commerce’s official import statistics.¹⁶ Foreign industry data and related information are based on information from the original investigation and prior reviews, as well as information submitted by the domestic producers in this current review and publicly available information gathered by the Commission.¹⁷ Two U.S. purchasers of SDGEs, *** and ***, responded to the Commission’s adequacy phase questionnaire.¹⁸

II. Domestic Like Product and Industry

A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the “domestic like product” and the “industry.”¹⁹ The Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this subtitle.”²⁰ The Commission’s practice in five-year reviews is to examine the domestic like product definition from the original

¹⁴ Domestic Producers’ Final Comments, EDIS Doc. 858210 (July 31, 2025) (“Final Comments”).

¹⁵ CR/PR at 1.11; *see also* Domestic Producers’ NOI Response at 23-24.

¹⁶ CR/PR at Table 1.4. Import data are primarily based on HTS statistical reporting number 8545.11.0010. *Id.* Certain graphite electrodes may also be entered under HTS statistical reporting number 8545.11.0020 (graphite electrodes, exceeding 425 mm in diameter, of a kind used for furnaces), while unfinished graphitized small diameter graphite electrodes (SDGEs) may enter under HTS subheading 3801.10.50 (other artificial graphite) (See Commerce’s scope language below). The general rate of duty is “free” for HTS subheadings 8545.11.00 and 3801.10.50. CR/PR at 1.5. Imports entering the United States under HTS statistical reporting number 8545.11.0010 may also include items that are greater than 400 mm in nominal or actual diameter and equal to or less than 425 mm, which are out-of-scope for purposes of this review. *Id.* at 1.5 n.22. As a result, the volume of subject and nonsubject imports may be overstated.

¹⁷ *See* CR/PR at Tables 1.4 & 1.7.

¹⁸ CR/PR at D.3.

¹⁹ 19 U.S.C. § 1677(4)(A).

²⁰ 19 U.S.C. § 1677(10); *see, e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748–49 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991); *see also* S. Rep. No. 249, 96th Cong., 1st Sess. 90–91 (1979).

investigation and consider whether the record indicates any reason to revisit the prior findings.²¹

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

The merchandise covered by the order includes all small diameter graphite electrodes of any length, whether or not finished, of a kind used in furnaces, with a nominal or actual diameter of 400 millimeters (16 inches) or less, and whether or not attached to a graphite pin joining system or any other type of joining system or hardware. The merchandise covered by the order also includes graphite pin joining systems for small diameter graphite electrodes, of any length, whether or not finished, of a kind used in furnaces, and whether or not the graphite pin joining system is attached to, sold with, or sold separately from, the small diameter graphite electrode. Small diameter graphite electrodes and graphite pin joining systems for small diameter graphite electrodes are most commonly used in primary melting, ladle metallurgy, and specialty furnace applications in industries including foundries, smelters, and steel refining operations. Small diameter graphite electrodes and graphite pin joining systems for small diameter graphite electrodes that are subject to the order are currently classified under the Harmonized Tariff Schedule of the United States (HTSUS) subheadings 8545.11.0010,* 3801.10,** and 8545.11.0020.*** The HTSUS numbers are provided for convenience and customs purposes, but the written description of the scope is dispositive.²²

²¹ See, e.g., *Internal Combustion Industrial Forklift Trucks from Japan*, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8–9 (Dec. 2005); *Crawfish Tail Meat from China*, Inv. No. 731-TA-752 (Review), USITC Pub. 3614 at 4 (July 2003); *Steel Concrete Reinforcing Bar from Turkey*, Inv. No. 731-TA-745 (Review), USITC Pub. 3577 at 4 (Feb. 2003).

²² *Commerce's Third Review Final Results*, 90 Fed. Reg. 28996 and accompanying Issues and Decision Memorandum, EDIS Doc. 858211 ("IDM") at 2-3. See also CR/PR at 1.4-1.5.

As indicated in footnotes to its scope definition, Commerce has issued two anticircumvention rulings since the original antidumping duty order was issued. In the first, Commerce found that electrodes finished in the United Kingdom by UKCG from Chinese-origin artificial graphite/unfinished SDGE components and sold in the United States circumvented the antidumping duty order. See *First Circumvention*, 77 Fed. Reg. 47596. In the second ruling, Commerce concluded that imports from China of certain graphite electrodes, produced and/or exported by Jilin Carbon, with a diameter of 17 inches, (Continued...)

* The scope described in the Order refers to the HTSUS subheading 8545.11.0000. ... starting in 2010, imports of small diameter graphite electrodes are classified in the HTSUS under subheading 8545.11.0010 and imports of large diameter graphite electrodes are classified under subheading 8545.11.0020.

** HTSUS subheading 3801.10 was added to the scope of the graphite electrodes order based on a determination in *Small Diameter Graphite Electrodes from the People's Republic of China: Affirmative Final Determination of Circumvention of the Antidumping Duty Order*, 77 FR 47596 (August 9, 2012) (*First Circumvention*). The products covered by the first circumvention determination are graphite electrodes (or graphite pin joining systems) that were: (1) produced by UK Carbon and Graphite Co., Ltd. (UKCG) from China-manufactured artificial/synthetic graphite forms, of a size and shape (e.g., blanks, rods, cylinders, billets, blocks, etc.), (2) which required additional machining processes (i.e., tooling and shaping) that UKCG performed in the United Kingdom (UK), and (3) were re-exported to the United States as UK-origin merchandise.

*** HTSUS subheading 8545.11.0020 was added to the scope of the graphite electrodes order based on a determination in *Small Diameter Graphite Electrodes from the People's Republic of China: Affirmative Final Determination of Circumvention of the Antidumping Duty Order and Rescission of Later-Developed Merchandise Anticircumvention Inquiry*, 78 FR 56864 (September 16, 2013) (*Second Circumvention*). The products covered by the second circumvention determination are graphite electrodes produced and/or exported by Jilin Carbon Import and Export Company with an actual or nominal diameter of 17 inches.

SDGEs are cylindrical in shape and are produced in a variety of diameters and lengths. They conduct electricity at very high currents to generate the heat necessary to melt and/or further refine steel. SDGEs vary in current carrying capacity, depending on the grade of the petroleum coke – ranging from low grade anode coke to high grade needle coke – used to produce them, and are characterized as regular (“RP”), high (“HP”), or ultra-high power (“UHP”).²³ Graphite electrodes, including SDGEs, also vary in size.²⁴ They are used primarily

and otherwise meeting the description of in-scope merchandise, “constitute merchandise altered in form or appearance in such minor respects that it is properly subject to the Order.” See *Second Circumvention*, 78 Fed. Reg. 56864. Also, the Department of Justice (“DOJ”) announced that it had reached a settlement agreement with Ameri-Source Specialty Products (“Ameri-Source”) based on a False Claims Act case on imports of SDGEs. See Domestic Producers’ NOI Response at 10, Exh. 4.

²³ CR/PR at 1.7-1.8.

²⁴ CR/PR at 1.9.

in ladle metallurgy, specialty furnace applications, and primary low-duty melting.²⁵ Typically, electrodes are joined in columns with a threaded graphite pin joining system (also known as a pinning or connecting system). Because of the intensity of the melting process in steel production, the electrodes are continuously consumed.²⁶

In the prior proceedings, the Commission defined a single domestic like product consisting of SDGEs, coextensive with Commerce's scope definition.²⁷ In the original investigation, the Commission considered and rejected respondents' request to define the domestic like product to include large diameter graphite electrodes ("LDGEs") that were not within the scope definition.²⁸

In the first review, the Commission determined that the record did not indicate that there had been any significant changes in the characteristics or uses of SDGEs since the original investigation and defined a single domestic like product corresponding to the scope of the order.²⁹ In the second review, the domestic producers agreed with the Commission's determination of the domestic like product from the prior proceedings.³⁰ The Commission found that there was no information on the record indicating that there were any significant

²⁵ CR/PR at 1.8.

²⁶ CR/PR at 1.8-1.9.

²⁷ *Original Determination*, USITC Pub. 4062 at 10; *First Review Determination*, USITC Pub. 4469 at 5-6; *Second Review Determination*, USITC Pub. 5035 at 7.

²⁸ *Original Determination*, USITC Pub. 4062 at 9-10. The Commission found the issue to be a close one. It recognized that there were a number of ways in which SDGEs and LDGEs might be viewed as forming a continuum, including that price, current carrying capacity, and premium needle coke content all tended to increase with the size of the electrode, and that electrodes of adjacent sizes were most comparable with respect to these attributes. The Commission concluded, however, that, on balance, the record supported limiting the domestic like product to SDGEs. It found that the features of graphite electrodes established a clear dividing line between SDGEs and LDGEs at 16 inches in diameter. First, there was very little overlap in end uses. SDGEs were used generally in foundry, specialty furnace applications, and steel mill ladle applications, whereas the great majority of LDGEs were used for primary melting of steel scrap in minimill electric arc furnaces. Second, the Commission found very limited overlap in manufacturing facilities and equipment used to produce SDGEs and LDGEs: of the four domestic producers of graphite electrodes during the original investigation, during the period of investigation ("POI") only one, SGL Carbon, was able to produce both products on the same equipment using the same employees. Third, although interchangeability of all graphite electrodes was generally limited to adjacent diameter sizes, the Commission found that SDGEs could not be substituted for LDGEs in heavy melting applications due to coke content and other physical characteristics. Finally, the Commission found that purchasers did not use SDGE and LDGE for the same applications, often purchasing them in separate transactions, and the level of technical support and service for SDGEs and LDGEs varied. *Id.*

²⁹ *First Review Determination*, USITC Pub. 4469 at 5-6.

³⁰ *Second Review Determination*, USITC Pub. 5035 at 7.

changes in the physical characteristics or uses of SDGEs since the prior proceedings.³¹ Consequently, it again defined a single domestic like product consisting of all domestically produced SDGEs corresponding to the scope of the review.

In the current review, the domestic producers state that they agree with the domestic like product definition adopted by the Commission in the original investigation and prior reviews.³² The record contains no new information suggesting the pertinent characteristics and uses of domestically produced SDGEs have changed since the prior proceedings so as to warrant revisiting the Commission's domestic like product definition.³³ Accordingly, we again define a single domestic like product consisting of all domestically produced SDGEs, coextensive with the scope of the order under review.

B. Domestic Industry

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."³⁴ 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.

The Commission must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise

³¹ *Second Review Determination*, USITC Pub. 5035 at 7. In the second review the Commission determined that the record indicated that there is a greater overlap in manufacturing facilities between SDGEs and LDGEs than was the case in the prior proceedings, as *** domestic producers of SDGEs also produce LDGEs on the same equipment. Confidential *Second Review Determination*, at 9 n.25; *see also Second Review Determination*, USITC Pub. 5035 at 7 n.25. However, because the record did not indicate any other changes to the characteristics or uses of the product since the prior proceedings, and in the absence of contrary argument, the Commission determined not to revisit its like product analysis. *Id.*

³² Domestic Producers' NOI Response at 25; *see also* Final Comments at 4.

³³ *See generally* CR/PR at 1.14; *see also id.* at 1.7-1.10; Domestic Producers' NOI Response at 25.

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

or which are themselves importers.³⁵ Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.³⁶

In the original investigation, the Commission defined the domestic industry to consist of all domestic producers of SDGEs and did not identify any domestic industry issues.³⁷ In the prior reviews, the Commission again did not identify any domestic industry or related party issues. Accordingly, the Commission defined the domestic industry as consisting of all domestic producers of SDGEs.³⁸

In the current review, the domestic producers assert that the Commission should define the domestic industry as it did in the original investigation and in prior reviews.³⁹ There are no related party issues in the current review.⁴⁰ In sum, consistent with our definition of the domestic like product, we define the domestic industry as consisting of all domestic producers of SDGEs.

³⁵ See *Torrington Co v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int'l Trade 1992), *aff'd without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int'l Trade 1989), *aff'd mem.*, 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int'l Trade 1987).

³⁶ The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

- (1) the percentage of domestic production attributable to the importing producer;
- (2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);
- (3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;
- (4) the ratio of import shipments to U.S. production for the imported product; and
- (5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int'l. Trade 2015); see also *Torrington*, 790 F. Supp. at 1168.

³⁷ *Original Determination*, USITC Pub. 4062 at 10.

³⁸ *First Review Determination*, USITC Pub. 4469 at 6; *Second Review Determination*, USITC Pub. 5035 at 8.

³⁹ Domestic Producers' NOI Response at 25; Final Comments, at 4.

⁴⁰ See CR/PR at 1.14. The record indicates that neither domestic producer imported or purchased subject merchandise during the period of review or is related to an importer and exporter of subject merchandise. *Id.*; Domestic Producers' NOI Response at 23, Exh. 1; see also Domestic Producers' Supplemental Response to NOI, EDIS Doc. 850180 (May 1, 2025) ("Supplemental Response to NOI") at 2, Exh. Supp-1 (clarifying that neither GrafTech nor Tokai Carbon are U.S. importers of the subject merchandise).

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

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”⁴¹ The SAA states that “under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports.”⁴² Thus, the likelihood standard is prospective in nature.⁴³ The U.S. Court of International Trade has found that “likely,” as used in the five-year review provisions of the Act, means “probable,” and the Commission applies that standard in five-year reviews.⁴⁴

The statute states that “the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of

⁴¹ 19 U.S.C. § 1675a(a).

⁴² SAA at 883–84. The SAA states that “{t}he likelihood of injury standard applies regardless of the nature of the Commission’s original determination (material injury, threat of material injury, or material retardation of an industry). Likewise, the standard applies to suspended investigations that were never completed.” *Id.* at 883.

⁴³ While the SAA states that “a separate determination regarding current material injury is not necessary,” it indicates that “the Commission may consider relevant factors such as current and likely continued depressed shipment levels and current and likely continued {sic} prices for the domestic like product in the U.S. market in making its determination of the likelihood of continuation or recurrence of material injury if the order is revoked.” SAA at 884.

⁴⁴ See *NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int’l Trade 2003) (“‘likely’ means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)”), *aff’d mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) (“more likely than not” standard is “consistent with the court’s opinion;” “the court has not interpreted ‘likely’ to imply any particular degree of ‘certainty’”); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) (“standard is based on a likelihood of continuation or recurrence of injury, not a certainty”); *Usinor v. United States*, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

time.”⁴⁵ According to the SAA, a “‘reasonably foreseeable time’ will vary from case-to-case, but normally will exceed the ‘imminent’ timeframe applicable in a threat of injury analysis in original investigations.”⁴⁶

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to “consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated.”⁴⁷ It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).⁴⁸ The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission’s determination.⁴⁹

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.⁵⁰ In doing so, the Commission must consider “all relevant economic factors,” including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign

⁴⁵ 19 U.S.C. § 1675a(a)(5).

⁴⁶ SAA at 887. Among the factors that the Commission should consider in this regard are “the fungibility or differentiation within the product in question, the level of substitutability between the imported and domestic products, the channels of distribution used, the methods of contracting (such as spot sales or long-term contracts), and lead times for delivery of goods, as well as other factors that may only manifest themselves in the longer term, such as planned investment and the shifting of production facilities.” *Id.*

⁴⁷ 19 U.S.C. § 1675a(a)(1).

⁴⁸ 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings with respect to the order under review. See *Commerce’s Third Review Final Results*, 90 Fed. Reg. at 28997 (Appendix: list of issues addressed in IDM).

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

⁵⁰ 19 U.S.C. § 1675a(a)(2).

country, which can be used to produce the subject merchandise, are currently being used to produce other products.⁵¹

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.⁵²

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.⁵³ All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the order under review and whether the industry is vulnerable to material injury upon revocation.⁵⁴

As discussed above, no respondent interested party participated in this expedited review. The record, therefore, contains limited new information with respect to the SDGE industry in China. There also is limited information on the SDGE market in the United States during the period of review (“POR”). Accordingly, for our determination, we rely as appropriate

⁵¹ 19 U.S.C. § 1675a(a)(2)(A–D).

⁵² See 19 U.S.C. § 1675a(a)(3). The SAA states that “{c}onsistent with its practice in investigations, in considering the likely price effects of imports in the event of revocation and termination, the Commission may rely on circumstantial, as well as direct, evidence of the adverse effects of unfairly traded imports on domestic prices.” SAA at 886.

⁵³ 19 U.S.C. § 1675a(a)(4).

⁵⁴ The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, the Commission “considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.” SAA at 885.

on the facts available from the original investigation and the prior reviews and the limited new information on the record in this review.

B. Conditions of Competition and the Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”⁵⁵ The following conditions of competition inform our determination.

1. Demand Conditions

Prior Proceedings. In the original investigation and prior reviews, the Commission found that demand for SDGEs is largely determined by demand for steel.⁵⁶ The Commission characterized the original period of investigation as mostly “a boom period for domestic steel production.”⁵⁷ Apparent U.S. consumption rose from *** metric tons in 2005 to *** metric tons in 2006, and then declined to *** metric tons in 2007, an increase from the 2005 level.⁵⁸

In the first review, domestic producers reported that U.S. steel production declined more than 40 percent between 2007 and 2009, and, although it increased after 2009, had not fully recovered to pre-recession levels by 2013. Apparent U.S. consumption of SDGEs was *** metric tons in 2013, or *** percent lower than the *** metric tons in 2007.⁵⁹

In the second review, steel production declined in early 2014 to late 2015, and then grew (with some fluctuations) from late 2015 to the end of 2019. Apparent U.S. consumption of SDGEs declined from *** metric tons in 2014 to *** metric tons in 2015 and *** metric tons in 2016, and then rose to *** metric tons in 2017 and a period peak of *** metric tons in 2018; it was *** metric tons in interim 2018 and lower, at *** metric tons, in interim 2019.⁶⁰

⁵⁵ 19 U.S.C. § 1675a(a)(4).

⁵⁶ *Original Determination*, USITC Pub. 4062 at 14; *First Review Determination*, USITC Pub. 4469 at 9; *Second Review Determination*, USITC Pub. 5035 at 11.

⁵⁷ *Original Determination*, USITC Pub. 4062 at 14.

⁵⁸ *Original Determination*, USITC Pub. 4062 at 14; *Confidential Original Determination*, EDIS Doc. 319694 (Feb. 23, 2009) (“Confidential Original Determination”) at 19.

⁵⁹ *First Review Determination*, USITC Pub. 4469 at 9; *Confidential First Review Determination*, EDIS Doc. 680171 (June 2, 2014) (“Confidential First Review Determination”) at 12.

⁶⁰ *Second Review Determination*, USITC Pub. 5035 at 11; *Confidential Second Review Determination*, at 16.

Current Review. Apparent U.S. consumption was *** metric tons in 2024, down from *** metric tons in 2018, a decline of *** percent.⁶¹

The record in the current review indicates that the drivers of demand for SDGEs in the U.S. market have not changed since the last review – demand for SDGEs is largely determined by the demand for steel.⁶² According to the domestic producers, demand for SDGEs is expected to stay relatively flat over the next couple of years.⁶³ Similarly, responding purchaser *** reports that ***.⁶⁴ In contrast, responding purchaser *** reports that ***.⁶⁵

2. Supply Conditions

Prior Proceedings. In the original investigation and prior reviews, the Commission found that the U.S. market was supplied by the domestic industry, subject imports, and nonsubject imports.⁶⁶

In the prior proceedings, the Commission found that there were several changes to the composition of the domestic industry. The domestic industry in the original investigation consisted of petitioners SGL Carbon and Superior Graphite Company (“Superior”).⁶⁷ In the first review, a third domestic producer, GrafTech, entered the SDGE market.⁶⁸ In the review period covered by the second review, original petitioner Superior ceased production in

⁶¹ CR/PR at Table 1.5. While subject and nonsubject import volumes and U.S. producers’ U.S. shipments were all lower in 2024 than in 2018, a significantly lower volume of nonsubject imports in 2024 than in 2018 largely accounts for the lower apparent U.S. consumption in 2024 compared to 2018. CR/PR at Table 1.5. The record contains limited information about the decline in nonsubject imports during the period of review.

⁶² Domestic Producers’ NOI Response at 25; *see also* CR/PR at 1.8-1.9.

⁶³ Domestic Producers’ NOI Response at 25. The domestic producers observed that total domestic steel production, the main driver for SDGE demand, fluctuated from 2020 to 2023, before decreasing to 80 million tons in 2024, from 81 million tons in 2023. *Id.* at 25, Exh 11 (world steel association statistics).

⁶⁴ CR/PR at D.3.

⁶⁵ CR/PR at D.3.

⁶⁶ *Original Determination*, USITC Pub. 4062 at 15; Confidential *Original Determination*, at 20; *First Review Determination*, USITC Pub. 4469 at 10; Confidential *First Review Determination*, at 12-13; *Second Review Determination*, USITC Pub. 5035 at 10; Confidential *Second Review Determination*, at 18-19.

⁶⁷ *Original Determination*, USITC Pub. 4062 at 16.

⁶⁸ *First Review Determination*, USITC Pub. 4469 at 10.

2016,⁶⁹ and the other petitioner in the original investigation, SGL Carbon, was acquired by Tokai Carbon in 2017.⁷⁰

There were also changes to the domestic industry's operations. In the period covered by the second review, GrafTech ***.⁷¹ GrafTech resumed production of SDGEs in 2018 and idled production again in the last year of the current review (2024).⁷²

The domestic industry's share of apparent U.S. consumption fluctuated in the prior proceedings; it increased from *** percent in 2007 to *** percent in 2013, and decreased to *** percent in 2018.⁷³ By contrast, subject imports' share of apparent U.S. consumption continuously decreased from *** percent in 2007 to *** percent in 2013 and to *** percent in 2018.⁷⁴ Nonsubject imports were the largest source of supply, and their share of apparent U.S. consumption continuously increased from *** percent in 2007, to *** percent in 2013, and *** percent in 2018.⁷⁵

Current Review. The domestic industry was the second largest source of supply of SDGEs in the U.S. market in 2024, accounting for *** percent of apparent U.S. consumption that year.⁷⁶ As discussed in section II.B above, the two domestic producers account for all known domestic production of SDGEs.⁷⁷

Subject imports were the smallest source of supply in the U.S. market in 2024, accounting for *** percent of apparent U.S. consumption that year.⁷⁸ Nonsubject imports

⁶⁹ *Second Review Determination*, USITC Pub. 5035 at 13; Confidential Second Review Determination, at 17.

⁷⁰ *Second Review Determination*, USITC Pub. 5035 at 13; Confidential Second Review Determination, at 17.

⁷¹ *Second Review Determination*, USITC Pub. 5035 at 13; Confidential Second Review Determination, at 17-18. Specifically, GrafTech, ***. *Id.*

⁷² Domestic Producers' NOI Response at 25; Supplemental Response to NOI at 2 (GrafTech resumed production in March 2018 and idled production in June 2024.); *see also Second Review Determination*, USITC Pub. 5035 at 13 (In the first quarter of 2018, GrafTech's St. Marys, Pennsylvania facility began graphitizing a limited volume of SDGEs sourced from its facility in Monterrey, Mexico); Confidential Second Review Determination, at 18.

⁷³ CR/PR at Table 1.5.

⁷⁴ CR/PR at Table 1.5.

⁷⁵ CR/PR at Table 1.5.

⁷⁶ CR/PR at Table 1.5.

⁷⁷ CR/PR at 1.11 & Table B.1; *see also* Domestic Producers' NOI Response at 24.

⁷⁸ CR/PR at Table 1.5. The subject imports' share of apparent U.S. consumption was *** percent in 2007, *** percent in 2013, and *** percent in 2018. *Id.*

were the largest source of supply, accounting for *** percent of apparent U.S. consumption in 2024,⁷⁹ with India and Austria being the largest individual sources.⁸⁰

3. Substitutability and Other Conditions

Prior Proceedings. The Commission found in the original investigation that the domestic like product and subject imports were at least moderately interchangeable and that price was an important consideration in purchasing decisions.⁸¹ In the first review, it found that there was no new evidence that warranted modification of its previous findings on these issues.⁸²

In the second review the Commission found that “there is a moderately high degree of substitutability between the domestic like product and subject imports from China.”⁸³ The Commission noted that the vast majority of market participants reported that the domestic like product and subject imports were always or frequently interchangeable. Further, most purchasers reported that SDGEs made in the United States and China always or usually meet minimum quality specifications.⁸⁴ In addition, the Commission found that “price remains an important factor in purchasing decisions.”⁸⁵

Current Review. The record in this review indicates that there continues to be a moderately high degree of substitutability between the domestic like product and subject imports from China.⁸⁶ In addition, the record indicates that price remains an important factor in purchasing decisions.⁸⁷

⁷⁹ CR/PR at Table 1.5. Nonsubject imports’ share of apparent U.S. consumption was *** percent in 2007, *** percent in 2013, and *** percent in 2018. *Id.*

⁸⁰ CR/PR at Table 1.4. With the exception of 2020, India was the top source of nonsubject imports throughout the review period. *Id.* Austria was one of the top two sources of nonsubject imports from 2022 to 2024. *Id.*

⁸¹ *Original Determination*, USITC Pub. 4062 at 15, 17; Confidential *Original Determination*, at 21.

⁸² *First Review Determination*, USITC Pub. 4469 at 10; Confidential *First Review Determination*, at 14.

⁸³ *Second Review Determination*, USITC Pub. 5035 at 14; Confidential *Second Review Determination*, at 20.

⁸⁴ *Second Review Determination*, USITC Pub. 5035 at 14-15; Confidential *Second Review Determination*, at 20-21. The Commission also noted that majorities or pluralities of purchasers reported that domestically produced SDGEs were comparable in ten out of 15 factors, including quality meets industry standards, availability, and product consistency. *Id.*

⁸⁵ *Second Review Determination*, USITC Pub. 5035 at 15; Confidential *Second Review Determination*, at 21.

⁸⁶ *See generally* Domestic Producers’ NOI Response at 19-20; Final Comments at 3-4.

⁸⁷ Domestic Producers’ NOI Response at 20; Final Comments at 3.

Effective September 24, 2018, SDGEs originating in China were subject to an additional 10 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective May 10, 2019, the section 301 duty for SDGEs was increased to 25 percent.⁸⁸ Moreover, effective February 4, 2025, SDGEs originating in China were subject to an additional 10 percent ad valorem duty under the International Emergency Economic Powers Act (“IEEPA”).⁸⁹

Market participants were asked to comment on the effect, if any, of changes in the supply and demand conditions including the additional duties. Purchaser *** indicated that ***.⁹⁰

C. Likely Volume of Subject Imports

1. The Prior Proceedings

In the original investigation, the volume of subject imports, which was already sizeable at the beginning of the investigation, increased by 36.7 percent from 2005 to 2007, rising from 10,082 metric tons to 13,784 metric tons. The market share of subject imports rose from ***

⁸⁸ CR/PR at 1.6 (tariffs); *see also* Revision Memo to Staff Report, EDIS Doc. 852918 (June 5, 2025) (“Revision Memo”), at 1.6. Goods exported from China to the United States prior to May 10, 2019, and entering the United States prior to June 1, 2019, were not subject to the escalated 25 percent duty. *Implementing Modification to Section 301 Action: China’s Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 Fed. Reg. 21892 (May 15, 2019). *See also* Revision Memo, at 1.6 n.24.

⁸⁹ Revision Memo, at 1.6. On March 4, 2025, that additional duty increased to 20 percent ad valorem. *Id.* Effective April 5, 2025, SDGEs originating in China were subject to an additional 10 percent ad valorem reciprocal duty under IEEPA (“April 2025 duty”). *Id.* The April 2025 duty rose to 84 percent ad valorem effective April 9, 2025, and rose again to 125 percent effective April 10, 2025. *Id.* However, effective May 14, 2025, the duty rate for April 2025 duty on products originating in China was reduced to 10 percent. *Id.* This duty is in addition to the 20 percent ad valorem duty under IEEPA that went into effect on March 4, 2025, for China. *See Regulating Imports With a Reciprocal Tariff to Rectify Trade Practices that Contribute to Large and Persistent Annual United States Trade Deficits*, 90 Fed. Reg. 15041 (Apr. 7, 2025) (Executive Order 14257, Apr. 2, 2025); *Amendment to Reciprocal Tariffs and Updated Duties as Applied to Low-Value Imports From the People’s Republic of China*, 90 Fed. Reg. 15509 (Apr. 14, 2025) (Executive Order 14259, Apr. 8, 2025); *Modifying Reciprocal Tariff Rates to Reflect Trading Partner Retaliation and Alignment*, 90 Fed. Reg. 15625 (Apr. 15, 2025) (Executive Order 14266, Apr. 9, 2025); *Modifying Reciprocal Tariff Rates to Reflect Discussions with the People’s Republic of China*, 90 Fed. Reg. 21831 (May 21, 2025) (Executive Order 14298, May 12, 2025). *See also* HTS headings 9903.01.25 and 9903.01.63 and U.S. note 2(v) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 13, Pub. 5627 (May 2025), pp. 99.3.5 to 99.3.14, 99.3.299, 99.3.306. *See* Revision Memo, at 1.6 n.26.

⁹⁰ CR/PR at D.3 (*** purchaser questionnaire response addressing anticipated changes in the supply and demand conditions).

percent in 2005 to *** percent in 2007. In addition, the ratio of subject imports to U.S. production rose *** from *** percent in 2005 to *** percent in 2007.⁹¹ The Commission found that subject imports captured market share from the domestic industry notwithstanding the increase in demand from 2005 to 2007.⁹² Consequently, it found that the volume of subject imports and the increase in that volume was significant, both in absolute terms and relative to consumption and production in the United States.⁹³

In the prior reviews the Commission found that the antidumping duty order had a disciplining effect on the volume of subject imports.⁹⁴ It also found that China was the world's largest producer and exporter of all graphite electrodes, and that the graphite electrode industry in China likely had excess capacity that exceeded apparent U.S. consumption of SDGEs. Additionally, the Commission found that United States remained an attractive market to subject producers in China in light of their continued participation in the market and attempts to circumvent the order.⁹⁵ It found that subject producers in China were likely, absent the restraining effects of the order, to direct substantial and increasing volumes of SDGEs to the U.S. market. Consequently, the Commission found that the likely volume of subject imports both in absolute terms and relative to production and consumption in the United States would be significant if the order were revoked.⁹⁶

⁹¹ *Original Determination*, USITC Pub. 4062 at 16; Confidential *Original Determination*, at 22-23.

⁹² *Original Determination*, USITC Pub. 4062 at 16. The domestic industry's market share, by quantity, declined from *** percent in 2005 to *** percent in 2007. *Id.*

⁹³ *Original Determination*, USITC Pub. 4062 at 16.

⁹⁴ In the first review, the Commission found that the subject import volume was substantially lower in 2013 than in 2007. *First Review Determination*, USITC Pub. 4469 at 11; Confidential *First Review Determination*, at 15. In the second review, the Commission found that the subject import volume was substantially lower in 2018 than in 2014. *Second Review Determination*, USITC Pub. 5035 at 16; Confidential *Second Review Determination*, at 23.

⁹⁵ *First Review Determination*, USITC Pub. 4469 at 11; *Second Review Determination*, USITC Pub. 5035 at 17-18. See section II.A. above for a discussion of Commerce's anticircumvention rulings. In the second review, the Commission observed that notwithstanding the section 301 tariffs in effect, U.S. producer *** and purchaser *** predicted that if the order were revoked, there would be increased availability of SDGEs in the U.S. market. *Second Review Determination*, USITC Pub. 5035 at 18; Confidential *Second Review Determination*, at 26.

⁹⁶ *First Review Determination*, USITC Pub. 4469 at 11-12; Confidential *First Review Determination*, at 15-17; *Second Review Determination*, USITC Pub. 5035 at 16-18; Confidential *Second Review Determination*, at 23-26.

2. The Current Review

Under the discipline of the antidumping duty order, subject import volume remained at lower levels than prior to the imposition of the order.⁹⁷ The volume of subject imports declined irregularly during the POR, decreasing from 984 metric tons in 2019 to 465 metric tons in 2020 and 251 metric tons in 2021, before increasing to 1,419 metric tons in 2022, and then decreasing to 885 metric tons in 2023, and increasing to 923 metric tons in 2024.⁹⁸ Subject imports' share of apparent consumption was *** percent in 2024, significantly below the *** percent share in 2007, the last year of the original POI, and lower than at the end points of the prior periods of review.⁹⁹

The record in this expedited review contains limited information on the subject industry in China. However, the information available indicates that subject producers have the ability and incentive to export subject merchandise to the U.S. market in significant volumes within a reasonably foreseeable time if the order were revoked.¹⁰⁰

The information available indicates that subject producers continued to have substantial production capacity during the POR.¹⁰¹ Although no subject producer responded to the Commission's notice of institution in this review, the domestic producers identified 120 possible producers of SDGEs in China.¹⁰² Based on information from 28 company websites submitted by the domestic producers, China maintains a large amount of production capacity that could be used to produce SDGEs for export to the United States.¹⁰³ Further, the

⁹⁷ CR/PR at Tables 1.4 & 1.5.

⁹⁸ CR/PR at Tables 1.4 & 1.5.

⁹⁹ CR/PR at Table 1.5. Subject imports' share of apparent consumption was *** percent in 2007, *** percent in 2013, and *** percent in 2018. *Id.*

¹⁰⁰ For example, the domestic producers assert that the relatively higher pricing in the U.S. market makes it more attractive to subject producers. Domestic Producers' NOI Response at 15-16 (In 2024, Chinese exports of graphite electrodes to the U.S. had an average unit value ("AUV") of \$2,505 per metric ton as compared to Chinese exports of all graphite electrodes to other major export markets averaged \$2,244 per metric ton; meaning that U.S. prices were on average 10.4 percent higher than China's other export markets.). We recognize that AUV comparisons may be influenced by differences in product mix and changes in product mix over time, but they are the best information available for import pricing during the POR.

¹⁰¹ Domestic Producers' NOI Response at 10-15, Exhs. 5 to 8; Final Comments at 6, 8.

¹⁰² CR/PR at 1.18; Domestic Producers' NOI Response at 10, Exh. 5; Final Comments at 10.

¹⁰³ Domestic Producers' NOI Response at 10-15, Exhs. 5 to 8. For example, Fangda Carbon New Material Co., Ltd. has a total annual production capacity of 190,000 metric tons for graphite electrodes. *Id.*, at 12, citing Exh. 7. According to its website, the company's products are sold to more than 60 (Continued...)

information on record indicates that the major Chinese producers and exporters have expanded their capacity during the current review.¹⁰⁴ The domestic producers' contend that the reported capacity data of just 26 Chinese producers (accounting for 1.4 million metric tons) represent volumes about *** the estimated apparent U.S. consumption of SDGEs in 2024 (*** metric tons).¹⁰⁵ Although these data include capacity for both subject SDGEs and out-of-scope

countries and regions on five continents around the world. *Id.* Shanxi Juxian Graphite New Material Co., Ltd. produces 150,000 tons of graphite electrodes per year and exports products globally, including the United States. *Id.*, at 13, *citing* Exh. 7. Similarly, Sinosteel Jilin Carbon Co., Ltd. has an annual graphite electrodes production capacity of 150,000 metric tons. The producer exports its products to 40 countries and regions including the United States. *Id.*, at 13, *citing* Exh. 7. Liaoning Dantan New Materials Co., Ltd. produces 120,000 tons of graphite electrodes per year and exports products globally, including to the United States. *Id.*, at 13, *citing* Exh. 7. Further, CIMM Group Co., Ltd. advertises a production capacity of 100,000 tons of graphite electrodes annually. *Id.*, at 12, *citing* Exh. 7. Nantong Yangtze Carbon Corp., Ltd. has an annual production capacity of 60,000-100,000 metric tons of graphite electrodes. *Id.*, at 13, *citing* Exh. 7. The company exports graphite electrodes globally including to North America. *Id.*, at 13, *citing* Exh. 7. Jiangsu Jianglong New Energy produces 60,000 tons of graphite electrodes annually. *Id.*, at 12, *citing* Exh. 7. The company exports products globally including to the United States. *Id.* Similarly, Xinghe County Muzi Carbon Co., Ltd. has an annual production capacity of 60,000 metric tons of graphite electrodes. *Id.*, at 13, *citing* Exh. 7. The company exports globally including to the United States. *Id.* Xuzhou Jianglong Carbon Products Co., Ltd. has an annual capacity of 60,000 metric tons of graphite electrodes and exports to multiple international markets, including the United States. *Id.*, at 14, *citing* Exh. 7. Jilin City Songjiang Carbon Co., Ltd. has an annual production capacity of 50,000 metric tons for graphite electrodes. *Id.*, at 12, *citing* Exh. 7. The company has exported an accumulated 220,000 metric tons of carbon products to more than 30 countries and regions. *Id.* Guanghan Shida Carbon Co., has an annual production capacity of 50,000 metric tons of graphite products. *Id.*, at 12, *citing* Exh. 7. Dalian LST Metallurgy Co., Ltd. has an annual capacity to produce 48,000 metric tons of graphite electrodes. *Id.*, at 12, *citing* Exh. 7. The company advertises itself as a "leading manufacturer and exporter of graphite electrodes." *Id.*, at 12, *citing* Exh. 7. Moreover, Shandong Basan Carbon Co., Ltd. has an annual production capacity of 45,000 metric tons of graphite electrodes. *Id.*, at 13, *citing* Exh. 7. The company's products are exported globally. *Id.*

¹⁰⁴ CR/PR at 1.19; Domestic Producers' NOI Response at 11-14; Final Comments at 3, 8-9. For example, East Carbon expanded and opened a new factory in November 2024, increasing production by 66 percent. Domestic Producers' NOI Response at Exh. 2; Final Comments at 8. Further, CNBM Heilongjiang Graphite announced an expansion of its production expansions in November 2023 and opened a new plant at its existing production plant. *Id.* In addition, China Hongzhou opened a new plant for a 100,000 metric ton ultra-high power graphite electrodes project. *Id.*

¹⁰⁵ Domestic Producers' NOI Response at 14 & n.7, Exhs. 1-2, *citing* Table 1.5; *id.* at 14 n.7 (estimated U.S. apparent domestic consumption of *** metric tons in 2024 was derived by adding U.S. producer's 2024 domestic shipments of *** metric tons with U.S. imports of 923 metric tons in 2024). The domestic producers provided an alternative calculation of the capacity-to-demand ratio based on the staff report's estimate of apparent U.S. consumption (2024). Pursuant to this alternative methodology, they assert that Chinese SDGE producers alone account for production capacity that is nearly *** apparent U.S. consumption of SDGEs in 2024 (*** metric tons). Final Comments at 9 n. 8, *calculated from* CR/PR at Table 1.5 & Domestic Producers' NOI Response at Exh. 8.

LDGEs, as noted by the Commission in the original investigation, the petitioners testified that it was possible to shift to adjacent sizes of graphite electrodes.¹⁰⁶

The information available also indicates that subject producers in China are significant exporters.¹⁰⁷ Global Trade Atlas (“GTA”) data show that Chinese exports of carbon electrodes under HS subheading 8545.11, which includes both subject merchandise and out-of-scope products, were 337,845 metric tons in 2024.¹⁰⁸ These data also show that China was by far the world’s largest exporter of such merchandise (carbon electrodes) in every year of the POR.¹⁰⁹ Based on the GTA data, the Chinese producers exported between \$761.4 million and \$1.1 billion worth of SDGEs and related products during the 2020-2024 period.¹¹⁰

The record also indicates that the Chinese industry remains interested in supplying the U.S. market.¹¹¹ Notwithstanding the order, subject imports maintained a presence in the U.S. market during the POR, accounting for *** percent of apparent U.S. consumption in 2024, thereby retaining customers and distribution networks in the United States.¹¹² Moreover, the GTA data indicate that the United States remained among the Chinese industry’s top ten export

¹⁰⁶ *Original Determination*, USITC Pub. 4062 at 7; Confidential *Original Determination*, at 10. Moreover, as discussed in context of defining the domestic like product, in the second review the Commission found that the record indicated that there is a greater overlap in manufacturing facilities between SDGEs and LDGEs than was the case in the prior proceedings, as *** domestic producers of SDGEs also produce LDGEs on the same equipment. *Second Review Determination*, USITC Pub. 5035 at 7 n.25 Confidential *Second Review Determination*, at 9 n.25. See section II.A., above.

¹⁰⁷ Domestic Producers’ NOI Response at 15-16; see also *id.* at 10-14; Final Comments at 3 (China is the largest global exporter of SDGEs), at 15-16 (Chinese producers are export oriented and export a significant volume).

¹⁰⁸ CR/PR at Table 1.7.

¹⁰⁹ CR/PR at Table 1.9; see also Final Comments at 9.

¹¹⁰ CR/PR at Table 1.9.

¹¹¹ The domestic producers assert that the history of circumvention and duty evasion by the Chinese subject producers and exporters indicated that the continued interest of Chinese exporters and U.S. in exporting significant quantities of SDGEs to the U.S. market. Final Comments at 10 & n.10 (Commerce, Customs and Border Protection (“CBP”), and DOJ have each investigated and acted on prior instances of intentional evasion of the order through three primary schemes: (1) third country finishing or minor machining of SDGEs, (2) misclassification of graphite electrodes size, and (3) transshipment); see also Domestic Producers’ NOI Response at 7-10.

¹¹² CR/PR at Table 1.5; see also Domestic Producers’ NOI Response at 6-7 (Chinese producers have continued to maintain a significant interest in the U.S. market); Final Comments at 6-8 (the U.S. remains a very attractive market for the subject imports as illustrated by the subject imports continued presence in the U.S. market).

markets for carbon electrodes, including SDGEs and out-of-scope products, during the review period.¹¹³

The information available also indicates that a number of third countries have imposed antidumping duties on graphite electrodes from China.¹¹⁴

Given the foregoing, including the significant and increasing volume of subject imports in the original investigation, the level of subject imports during the POR, the subject industry's large capacity and exports, the attractiveness of the U.S. market to subject producers, Commerce's anticircumvention determinations, and the third country antidumping duty measures on graphite electrodes from China, we find that the likely volume of subject imports, both in absolute terms and relative to consumption and production in the United States, would be significant if the order were revoked.¹¹⁵

D. Likely Price Effects

1. The Prior Proceedings

In the original investigation, the Commission found that price was an important factor in purchasing decisions. It indicated that domestic producers and a majority of importers

¹¹³ See CR/PR at Table 1.7. As previously indicated, the available export data include both subject merchandise (SDGEs) and out-of-scope merchandise. *Id.*

¹¹⁴ Domestic Producers' NOI Response at 16-17 (noting that three major export markets have imposed antidumping duty measures on graphite electrodes from China, *i.e.*, the Eurasian Economic Union (EAEU), the European Union (EU), and Japan). Antidumping duty measures make these third-country markets less attractive and available for Chinese SDGE exports and provide an additional incentive for subject producers to export SDGEs from China to the U.S. market if the order is revoked. *Id.* at 17; *see also* Final Comments 10-11.

¹¹⁵ Although subject imports from China are currently subject to a 25 percent ad valorem duty under section 301, the record does not indicate that this duty would prevent subject imports from entering the U.S. market at significant levels if the order were revoked. *See* Revision Memo at 1.6. Notably, after imposition of the section 301 duties (at rates ranging from 10 to 25 percent ad valorem), subject imports significantly increased from 251,000 metric tons in 2021 to 1.4 million metric tons in 2022, before declining to 885,000 metric tons in 2023 and then increasing to 923,000 metric tons in 2024 (when they accounted for *** percent of apparent consumption). CR/PR at Table 1.5; Revision Memo at 1.6. Given the Chinese industry's large capacity and exports, the continued presence of subject imports in the U.S. market, and the attractiveness of the U.S. market to subject producers, we find that the section 301 duties would not likely prevent subject imports from increasing to significant levels if the order were revoked.

The record in the current review does not contain any current information about inventories of the subject merchandise.

reported that non-price differences between subject imports and the domestic like product were only *** in purchasing decisions.

The pricing data showed pervasive underselling, with subject imports underselling the domestic like product in 54 of 60 comparisons (90 percent) by margins ranging from 2.3 to 36.2 percent.¹¹⁶ The Commission found that the effects of underselling on the domestic industry differed with respect to the two domestic producers. Superior, which competed head to head with subject imports for sales across most SDGE sizes, submitted evidence of substantial lost sales to low-priced subject imports. SGL Carbon, on the other hand, rather than lowering its prices to meet subject import prices and maintain customers for 10- and 12-inch diameter SDGEs, made a business decision to cede its market share for those products and to focus only on customers for which the quality of subject imports was not yet acceptable.¹¹⁷

The Commission found that there was significant underselling by subject imports and that this underselling led to lost sales in 2006 and 2007. This underselling allowed subject imports to gain market share at the expense of the domestic industry, and the domestic industry's U.S. shipments to decline throughout the POI, despite generally rising demand. The Commission therefore determined that subject imports had significant price effects on the domestic industry.¹¹⁸

There was no product-specific pricing information in the prior reviews.¹¹⁹ In each review, the Commission found that price continued to play an important role in purchasing decisions. The Commission concluded in the prior reviews that, if the order were revoked, subject imports would likely increase U.S. sales by underselling the domestic like product, which would likely lead to adverse effects on the domestic industry.¹²⁰

¹¹⁶ *Original Determination*, USITC Pub. 4062 at 17.

¹¹⁷ *Original Determination*, USITC Pub. 4062 at 17.

¹¹⁸ *Original Determination*, USITC Pub. 4062 at 19. The Commission did not find that subject imports had a depressive effect on domestic prices or prevented domestic price increases that would have otherwise occurred. *Id.* at 17-18.

¹¹⁹ The record in the first review did not contain current pricing comparisons due to the failure of respondent interested parties to participate and the expedited nature of the review. *First Review Determination*, USITC Pub. 4469 at 14; Confidential First Review Determination, at 19. Although the second review was a full review, the record did not contain current pricing comparisons because respondent interested parties failed to provide questionnaire responses including pricing data. *Second Review Determination*, USITC Pub. 5035 at 20; Confidential Second Review Determination, at 30.

¹²⁰ *First Review Determination*, USITC Pub. 4469 at 14; Confidential First Review Determination, at 19; *Second Review Determination*, USITC Pub. 5035 at 20; Confidential Second Review Determination, at 30.

2. The Current Review

The record in this expedited review does not contain new product-specific pricing information.

Based on the available information, including the substitutability between the domestic like product and subject imports, the importance of price in purchasing decisions, the attractiveness of the U.S. market to subject producers, and third-country antidumping measures on graphite electrodes from China, we find that if the order were revoked, the likely significant volume of subject imports would likely undersell the domestic like product to a significant degree, as occurred in the original investigation.¹²¹ Absent the discipline of the order, the significant volumes of low-priced subject imports would likely take sales and market share from domestic producers and/or force the domestic industry to cut prices or restrain price increases necessary to cover any increasing costs, thereby depressing or suppressing prices for the domestic like product. Consequently, we find that if the order were revoked, significant volumes of subject imports would likely have significant price effects.

E. Likely Impact¹²²

1. The Prior Proceedings

In the original investigation, the Commission found that the domestic industry's performance indicators showed declining overall trends despite strong demand conditions, and that these declines corresponded to increases in subject imports' volume and market share.¹²³ U.S. producers' production, capacity utilization, and U.S. shipments all declined steadily from 2005 to 2007, but experienced some improvement when the interim periods were compared. Employment-related indicators generally declined, although hourly wages rose.¹²⁴

¹²¹ In 2024, the AUV of the Chinese imports of SDGEs to the United States was *** percent lower than the AUV of the domestic industry's U.S. shipments. *Calculated from* CR/PR at Tables 1.3 (domestic AUVs were *** per metric ton) & 1.4 (subject import (Chinese) AUVs were *** per metric ton).

¹²² In its expedited third review of the antidumping duty order, Commerce determined that revocation of the antidumping duty order on imports from China would likely result in the continuation or recurrence of dumping with margins of up to 159.64 percent. *Commerce's Third Review Final Results*, 90 Fed. Reg. at 28997, and accompanying IDM at 11.

¹²³ *Original Determination*, USITC Pub. 4062 at 19. The Commission recognized that some indicators fluctuated during the POI before recovering *** during interim 2008, after filing of the petition. *Id.*; Confidential *Original Determination*, at 28.

¹²⁴ *Original Determination*, USITC Pub. 4062 at 20.

The Commission found that the domestic industry's financial indicators were lackluster, despite rising prices and very strong demand throughout the POI. The industry's net sales quantities declined from 2005 to 2007. Net sales, by value, declined from 2005 to 2006, and then increased from 2006 to 2007. The domestic industry's operating income improved from *** in 2005 to *** in 2006, but declined in 2007. Its operating income margin increased from 2005 to 2006, and then fell in 2007.¹²⁵

The Commission examined the role of nonsubject imports in the U.S. market during the POI. It found that SDGEs were not a commodity product because they were produced to individual customer specifications. The Commission observed that nonsubject imports were generally priced higher than subject imports, particularly later in the POI, and although nonsubject imports were present in substantial quantities, nonsubject import volume and market share fluctuated following the trends in apparent U.S. consumption. Moreover, nonsubject imports' market share declined significantly in 2007 when the domestic industry's condition worsened. Consequently, the Commission concluded that adverse changes to the domestic industry's condition could not be attributed to nonsubject imports.¹²⁶

In the first review, the Commission concluded that the limited record was insufficient for it to make a finding as to whether the domestic industry was vulnerable to the continuation or recurrence of material injury in the event of the revocation of the order. However, based on the information on that record, it found that should the order be revoked, the likely significant volume and price effects of the subject imports would likely have a significant impact on the production, shipments, sales, market share, and revenues of the industry. The Commission found that these declines would likely cause the domestic industry's profitability to fall.¹²⁷

In its non-attribution analysis, the Commission acknowledged that although nonsubject imports remained present after the order was imposed, and in fact had increased their market

¹²⁵ *Original Determination*, USITC Pub. 4062 at 20-21; Confidential *Original Determination*, at 29-30.

¹²⁶ *Original Determination*, USITC Pub. 4062 at 21-23. The Commission also addressed and rejected arguments by respondents that any adverse changes to the domestic industry's condition were not caused by subject imports, but rather by the poor performance of one of the two domestic producers (specifically by that producer's inability to control its direct labor, and selling, general and administrative costs) or by a *** in the domestic industry's export shipments. *Id.* at 22; Confidential *Original Determination*, at 31-32. Further, the Commission addressed and rejected arguments that there was no adverse impact on the domestic industry because its profitability increased during the POI, or because it allegedly could not supply the entire SDGE market. *Id.*

¹²⁷ *First Review Determination*, USITC Pub. 4469 at 15-16; Confidential *First Review Determination*, at 21-22.

share, no party argued that nonsubject imports or any other factor was likely to be an alternative cause of material injury to the domestic industry. It found that upon revocation, the significant volume of subject imports would again likely take market share from the industry through significant underselling and impair the industry's performance. Accordingly, the Commission concluded that, if the order were revoked, subject imports would likely have a significant impact on the domestic industry within a reasonably foreseeable time.¹²⁸

In the second review, the Commission observed that the domestic industry's performance indicators fluctuated with demand. As apparent U.S. consumption rose *** percent between 2016 and 2018, output, employment, and financial performance improved.¹²⁹ The domestic industry's capacity increased by *** percent from 2016 to 2018 and remained stable in interim 2018 and interim 2019.¹³⁰ The industry's production increased by *** percent from 2016 and 2018, but it was *** percent lower in interim 2019 than interim 2018.¹³¹ Capacity utilization for SDGEs increased by *** percentage points from 2016 to 2018, and was *** percentage points lower in interim 2019 than in interim 2018.¹³² The quantity of the industry's U.S. shipments of SDGEs increased by *** percent from 2016 to 2018, and was ***

¹²⁸ *First Review Determination*, USITC Pub. 4469 at 16; Confidential First Review Determination, at 23.

¹²⁹ *Second Review Determination*, USITC Pub. 5035 at 22; Confidential Second Review Determination, at 33. Apparent U.S. consumption was *** percent lower in interim 2019 than in interim 2018. Confidential Second Review Determination, at 33 n.128.

¹³⁰ *Second Review Determination*, USITC Pub. 5035 at 22; Confidential Second Review Determination, at 33. The domestic industry's production capacity was *** metric tons in 2016, *** metric tons in 2017, and *** metric tons in 2018; it was *** metric tons in both interim 2018 and interim 2019. Confidential Second Review Determination, at 33 n.129.

¹³¹ *Second Review Determination*, USITC Pub. 5035 at 22; Confidential Second Review Determination, at 33. The domestic industry's production was *** metric tons in 2016, *** metric tons in 2017, and *** metric tons in 2018; it was *** metric tons in interim 2018 and *** metric tons in interim 2019. Confidential Second Review Determination, at 33 n.130.

¹³² *Second Review Determination*, USITC Pub. 5035 at 22; Confidential Second Review Determination, at 33. The industry's capacity utilization rate was *** percent in 2016, *** percent in 2017, and *** percent in 2018; it was *** percent in interim 2018 and *** percent in interim 2019. Confidential Second Review Determination, at 33 n.131.

percent lower in interim 2019 than in interim 2018.¹³³ The domestic industry's share of the U.S. market fluctuated over the POR.¹³⁴

The Commission found that the domestic industry's financial performance also improved during the POR.¹³⁵ It also observed that the industry's employment-related indicators also showed improvement from 2016 to 2018, and more modest reductions in interim 2019 compared to interim 2018.¹³⁶ On the basis of the domestic industry's improved performance and positive financial performance during the latter portion of the POR, the Commission did not find the domestic industry to be in a vulnerable condition.¹³⁷

The Commission found that if the order were revoked, the likely significant volume of subject imports would likely undersell the domestic like product, and likely cause the domestic industry to lose sales or lower prices leading to lost revenue, and stop or deter the contemplated investments to expand production activities. Consequently, it concluded that any increase in subject import volume would likely lead to adverse trends in the domestic industry's production, shipments, market share, employment indicators, and financial performance within a reasonably foreseeable time.¹³⁸

The Commission also considered factors other than subject imports in the U.S. market, including the presence of nonsubject imports, so as not to attribute injury from other factors to the subject imports. It noted that nonsubject imports continued to be present in the U.S.

¹³³ *Second Review Determination*, USITC Pub. 5035 at 22-23; Confidential Second Review Determination, at 33. U.S. shipments were *** metric tons in 2016, *** metric tons in 2017, and *** metric tons in 2018; they were *** metric tons in interim 2018 and *** metric tons in interim 2019. Confidential Second Review Determination, at 33 n.132.

¹³⁴ *Second Review Determination*, USITC Pub. 5035 at 23; Confidential Second Review Determination, at 33. The domestic industry's share of the U.S. market was *** percent in 2014, *** percent in 2015, *** percent in 2016, *** percent in 2017, and *** percent in 2018; it was *** percent in interim 2018 and *** percent in 2019. Confidential Second Review Determination, at 33 n.133.

¹³⁵ *Second Review Determination*, USITC Pub. 5035 at 23-24; Confidential Second Review Determination, at 34-35.

¹³⁶ *Second Review Determination*, USITC Pub. 5035 at 23; Confidential Second Review Determination, at 34.

¹³⁷ *Second Review Determination*, USITC Pub. 5035 at 24; Confidential Second Review Determination, at 35-36. The Commission also noted that output, employment, and financial performance all improved during the POR, notwithstanding negative trends in trade and employment indicators in interim 2019. *Id.*

¹³⁸ *Second Review Determination*, USITC Pub. 5035 at 24; Confidential Second Review Determination, at 36. The Commission noted that ***. It reasoned that this could limit the impact that subject imports would have on the domestic industry, to the extent subject imports were limited to that smaller size range. However, *** Confidential Second Review Determination, at 36 n.147.

market in large quantities during the POR and accounted for *** percent of apparent U.S. consumption in 2018.¹³⁹ The Commission stated that despite nonsubject imports' large market share, the domestic industry was able to improve its performance over the POR. In light of the general substitutability of SDGEs from all sources, it found that upon revocation the significant volume of low-priced subject imports would likely take market share from the domestic industry. Thus, the Commission found that subject imports would likely have adverse effects distinct from any that may be caused by nonsubject imports. Accordingly, the Commission concluded that revocation of the order would likely have a significant impact on domestic producers of SDGEs within a reasonably foreseeable time.¹⁴⁰

2. The Current Review

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

The information available indicates that the domestic industry's trade indicators were generally weaker in 2024 than in the last years examined in the prior proceedings.¹⁴¹ In 2024, the domestic industry's production capacity was *** metric tons, its production was *** metric tons, its U.S. shipments were *** metric tons, and its capacity utilization rate was *** percent, which were all lower than in the prior proceedings.¹⁴² In 2024, the value of its U.S. shipments was \$***, which was lower than in the prior proceeding.¹⁴³ The domestic industry's share of apparent U.S. consumption was *** percent, which was lower than the last year of the first

¹³⁹ *Second Review Determination*, USITC Pub. 5035 at 25; Confidential Second Review Determination, at 37. The Commission also noted that the nonsubject imports' presence fluctuated during the POR, from *** percent in 2014, *** percent in 2015, *** percent in 2016, *** percent in 2017, and *** percent in 2018; it was *** percent in interim 2018 and *** percent in interim 2019. Confidential Second Review Determination, at 37 n.148.

¹⁴⁰ *Second Review Determination*, USITC Pub. 5035 at 25; Confidential Second Review Determination, at 37.

¹⁴¹ CR/PR at Table 1.3.

¹⁴² CR/PR at Table 1.3. The domestic industry's capacity was *** metric tons in 2007, *** metric tons in 2013, and *** metric tons in 2018. *Id.* The industry's production quantity was *** metric tons in 2007, *** metric tons in 2013, and *** metric tons in 2018. *Id.* Its U.S. shipments were *** metric tons in 2007, *** metric tons in 2013, and *** metric tons in 2018. *Id.* The domestic industry's capacity utilization irregularly decreased since the original investigation; it was *** percent in 2007, *** percent in 2013, and *** percent in 2018. *Id.*

¹⁴³ CR/PR at Table 1.3. The value of its U.S. shipments was \$*** in 2007, \$*** in 2013, and \$*** in 2018. *Id.*

review (2013) but higher than the last years of the original investigation (2007) and the second review (2018).¹⁴⁴

Similarly, the information available indicates that the domestic industry's financial indicators were generally weaker in 2024 compared to the prior proceedings.¹⁴⁵ Notably, the industry's net sales at \$***, gross profits, at \$***, operating income, at ***, and operating income-to-net-sales ratio, at *** percent, were all lower in 2024 than in any prior proceeding.¹⁴⁶ Further, the domestic industry's COGS-to-net-sales ratio was *** percent in 2024, a level higher than in the last years of the original investigation (2007) and second review (2018) but lower than the last year of the first review (2013).¹⁴⁷ The AUV of its U.S. shipments, at \$*** metric tons, was lower than the last year of the second review (2018) but higher than the last years of the original investigation (2007) and first review (2013).¹⁴⁸ We find the domestic industry to be vulnerable in light of its *** percent capacity utilization in 2024, which is lower than at the end of the POI and prior periods of review, as well as its *** percent operating margin in that year.¹⁴⁹

Based on the information available in this review, we find that revocation of the order would likely result in a significant increase in subject import volume that would likely undersell the domestic like product to a significant degree. Given the substitutability between the domestic like product and subject imports and the importance of price to purchasers, significant volumes of low-priced subject imports would likely significantly undersell the domestic like product and capture sales and market share from the domestic industry and/or significantly depress or suppress prices for the domestic like product. The likely significant volume of imports and their significant price effects would likely have a significant adverse impact on the domestic industry's production, shipments, sales, market share, and revenues,

¹⁴⁴ CR/PR at Table 1.5. The domestic industry's share of apparent U.S. consumption was *** percent in 2007, *** percent in 2013, and *** percent in 2018. *Id.*

¹⁴⁵ See CR/PR at Table 1.3.

¹⁴⁶ CR/PR at Table 1.3. The domestic industry's net sales value was \$*** in 2007, \$*** in 2013, and \$*** in 2018. *Id.* The industry's gross profits were \$*** in 2007, \$*** in 2013, and \$*** in 2018. *Id.* Its operating income was \$*** in 2007, \$*** in 2013, and \$*** in 2018. *Id.* The domestic industry's operating income to net sales ratio was *** percent in 2007, *** percent in 2013, and *** percent in 2018. *Id.*

¹⁴⁷ CR/PR at Table 1.3. The industry's COGS to net sales ratio was *** percent in 2007, *** percent in 2013, and *** percent in 2018. *Id.*

¹⁴⁸ CR/PR at Table 1.3. The AUVs of U.S. producers' U.S. shipments were \$*** metric tons in 2007, \$*** metric tons in 2013, and \$*** metric tons in 2018. *Id.*

¹⁴⁹ CR/PR at Table 1.3.

which in turn would have a direct adverse impact on the domestic industry's profitability and employment, as well as its ability to raise capital and make and maintain necessary capital investments.

We have also considered the role of factors other than subject imports, including the presence of nonsubject imports, so as not to attribute likely injury from other factors to the subject imports. Although nonsubject imports are present in the U.S. market and are the largest source of supply, the record provides no indication that the presence of nonsubject imports would prevent subject imports from entering the U.S. market in significant quantities or adversely affecting domestic prices after revocation of the order. Indeed, the volume of nonsubject imports decreased irregularly during the POR from 19,920 metric tons in 2019 to 9,501 metric tons in 2024, equivalent to *** percent of apparent U.S. consumption that year.¹⁵⁰ Given the moderately high degree of substitutability between subject imports and the domestic like product and the importance of price in purchasing decisions, the significant increase in low-priced subject imports that is likely after revocation would likely take market share from the domestic industry, as well as from nonsubject imports, and/or force domestic producers to lower their prices or forgo price increases in order to retain market share. Consequently, we find that any future effects of nonsubject imports would be distinct from the likely effects attributable to subject imports and that nonsubject imports would not prevent subject imports from having a significant impact on the domestic industry.

We recognize that apparent U.S. consumption was *** percent lower in 2024 than in 2018.¹⁵¹ As discussed in section III.B.1 above, however, the domestic producers and purchaser *** claim that U.S. demand for SDGEs is expected to remain relatively flat in the foreseeable future.¹⁵² To the extent that demand remains flat or declines, the significant volume of low-priced subject imports that is likely after revocation would exacerbate the effects of weak or declining demand on the domestic industry.

In sum, we find that revocation of the antidumping duty order on SDGEs from China would likely have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

¹⁵⁰ CR/PR at Tables 1.4 & 1.5. Nonsubject import market share was higher in 2024 than in the original investigation and first review but lower than the second review. *Id.* at Table 1.5. Their share of apparent U.S. consumption increased from *** percent in 2007, to *** percent in 2013, and to *** percent in 2018. *Id.*

¹⁵¹ CR/PR at Table 1.5. Apparent U.S. consumption was *** metric tons in 2018 and *** metric tons in 2024. *Id.*

¹⁵² In contrast, purchaser *** reports that ***. CR/PR at D.3. *See also* section III.B.1., above.

IV. Conclusion

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

Information obtained in this review

Background

On March 3, 2025, the U.S. International Trade Commission (“Commission”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),¹ that it had instituted a review to determine whether revocation of the antidumping order on small diameter graphite electrodes (“SD graphite electrodes”) from China would likely lead to continuation or recurrence of material injury to a domestic industry.² All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.³ ⁴ Table 1.1 presents information relating to the background and schedule of this proceeding:

Table 1.1 SD graphite electrodes: Information relating to the background and schedule of this proceeding

Effective date	Action
March 3, 2025	Notice of initiation by Commerce (90 FR 11039, March 3, 2025)
March 3, 2025	Notice of institution by Commission (90 FR 11056, March 3, 2025)
June 6, 2025	Commission’s vote on adequacy
July 2, 2025	Commerce’s results of its expedited review
August 26, 2025	Commission’s determination and views

¹ 19 U.S.C. 1675(c).

² 90 FR 11056, March 3, 2025. In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of a five-year review of the subject antidumping duty order. 90 FR 11039 March 3, 2025. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission’s website (www.usitc.gov).

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

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

The original investigation

The original investigation resulted from a petition filed on January 17, 2008, with Commerce and the Commission by SGL Carbon LLC (“SGL Carbon”), Charlotte, North Carolina, and Superior Graphite Co. (“Superior Graphite”), Chicago, Illinois.⁵ On January 14, 2009, Commerce determined that imports of SD graphite electrodes from China were being sold at less than fair value (“LTFV”) and subsidized by the Government of China.⁶ The Commission determined on February 19, 2009, that the domestic industry was materially injured by reason of LTFV of SD graphite electrodes from China.⁷ On February 26, 2009, Commerce issued its antidumping duty order with final weighted-average dumping margins ranging from 132.90 to 159.64 percent.⁸

The first five-year review

On April 7, 2014, the Commission determined that it would conduct an expedited review of the antidumping duty orders on SD graphite electrodes from China.⁹ On May 7, 2014, Commerce determined that revocation of the antidumping duty orders on SD graphite electrodes from China would be likely to lead to continuation or recurrence of dumping.¹⁰ On June 3, 2014, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.¹¹ Following affirmative determinations in the five-year review by Commerce and the Commission, effective June 23, 2014, Commerce issued a continuation of the antidumping orders on imports of SD graphite electrodes from China.¹²

⁵ Small Diameter Graphite Electrodes from China, Inv. No. 731-TA-1143 (Final), USITC Publication 4062, February 2009 (“Original publication”), p. 1.1.

⁶ 74 FR 2049, January 14, 2009.

⁷ 74 FR 8568, February 25, 2009. The Commission also found that imports subject to Commerce’s affirmative critical circumstances determination were not likely to undermine seriously the remedial effect of the order on China.

⁸ 74 FR 8775 February 26, 2009.

⁹ 79 FR 22531, April 22, 2014.

¹⁰ 79 FR 26208, May 7, 2014.

¹¹ 79 FR 32750, June 6, 2014.

¹² 79 FR 35523, June 23, 2014.

The second five-year review

On September 23, 2019, the Commission determined that it would conduct a full review of the antidumping duty order on SD graphite electrodes from China.¹³ On August 27, 2019, Commerce determined that revocation of the antidumping order on SD graphite electrodes from China would be likely to lead to continuation or recurrence of dumping.¹⁴ On March 23, 2020, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.¹⁵ Following affirmative determinations in the five-year review by Commerce and the Commission, effective April 6, 2020, Commerce issued a continuation of the antidumping order on imports of SD graphite electrodes from China.¹⁶

Previous and related investigations

SD graphite electrodes have not been the subject of any prior related antidumping or countervailing duty investigations in the United States.

Commerce's five-year review

Commerce announced that it would conduct an expedited review with respect to the order on imports of SD graphite electrodes from China with the intent of issuing the final results of this review based on the facts available not later than July 1, 2025.¹⁷ Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at <https://access.trade.gov/public/FRNoticesListLayout.aspx> and subsequently on the Commission's Electronic Document Information System ("EDIS"). Issues and Decision Memoranda contain complete and up-to-date information regarding the background and history of the order, including scope rulings, duty absorption, changed circumstances reviews, and anticircumvention, as well as any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping duty order on imports of SD graphite electrodes from China are noted in the sections titled "The original investigation" and "U.S. imports," if applicable.

¹³ 84 FR 51619, September 30, 2019.

¹⁴ 84 FR 44852, August 27, 2019.

¹⁵ 85 FR 17363, March 27, 2020.

¹⁶ 85 FR 19134, April 6, 2020.

¹⁷ Letter from Alex Villanueva, Senior Director, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, April 22, 2025.

The product

Commerce's scope

Commerce has defined the scope as follows (with cited footnotes as per Commerce's scope language):

The merchandise covered by the order includes all small diameter graphite electrodes of any length, whether or not finished, of a kind used in furnaces, with a nominal or actual diameter of 400 millimeters (16 inches) or less, and whether or not attached to a graphite pin joining system or any other type of joining system or hardware. The merchandise covered by the order also includes graphite pin joining systems for small diameter graphite electrodes, of any length, whether or not finished, of a kind used in furnaces, and whether or not the graphite pin joining system is attached to, sold with, or sold separately from, the small diameter graphite electrodes. Small diameter graphite electrodes and graphite pin joining systems for small diameter graphite electrodes are most commonly used in primary melting, ladle metallurgy, and specialty furnace applications in industries including foundries, smelters, and steel refining operations. Small diameter graphite electrodes and graphite pin joining systems for small diameter graphite electrodes that are subject to the order are currently classified under the Harmonized Tariff Schedule of the United States (HTSUS) subheadings 8545.11.0010¹⁸, 3801.10¹⁹, and

¹⁸ The scope described in the order refers to the HTSUS subheading 8545.11.0000. We note that, starting in 2010, imports of small diameter graphite electrodes are classified in the HTSUS under subheading 8545.11.0010 and imports of large diameter graphite electrodes are classified under subheading 8545.11.0020.

¹⁹ HTSUS subheading 3801.10 was added to the scope of the graphite electrodes order based on a determination in Small Diameter Graphite Electrodes from the People's Republic of China: Affirmative Final Determination of Circumvention of the Antidumping Duty Order, 77 FR 47596 (August 9, 2012) (first circumvention determination). The products covered by the first circumvention determination are graphite electrodes (or graphite pin joining systems) that were 1) produced by UK Carbon and Graphite Co., Ltd. (UKCG) from China-manufactured artificial/ synthetic graphite forms, of a size and shape (e.g., blanks, rods, cylinders, billets, blocks, etc.), 2) which required additional machining processes (i.e., tooling and shaping) that UKCG performed in the United Kingdom (UK), and 3) were re-exported to the United States as UK-origin merchandise.

8545.11.0020²⁰. The HTSUS numbers are provided for convenience and customs purposes, but the written description of the scope is dispositive.²¹

U.S. tariff treatment

SD graphite electrodes are currently imported under Harmonized Tariff Schedule of the United States (“HTS”) statistical reporting number 8545.11.0010 (graphite electrodes, not exceeding 425 mm in diameter, of a kind used for furnaces).²² Certain graphite electrodes may also be entered under HTS statistical reporting number 8545.11.0020 (graphite electrodes, exceeding 425 mm in diameter, of a kind used for furnaces), while unfinished graphitized SD graphite electrodes may enter under HTS subheading 3801.10.50 (other artificial graphite) (See Commerce’s scope language). The general rate of duty is “free” for HTS subheadings 8545.11.00 and 3801.10.50.²³ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

²⁰ HTSUS subheading 8545.11.0020 was added to the scope of the graphite electrodes order based on a determination in Small Diameter Graphite Electrodes from the People’s Republic of China: Affirmative Final Determination of Circumvention of the Antidumping Duty Order and Rescission of Later-Developed Merchandise Anticircumvention Inquiry, 78 FR 56864 (September 16, 2013) (second circumvention determination). The products covered by the second circumvention determination are graphite electrodes produced and/or exported by Jilin Carbon Import and Export Company with an actual or nominal diameter of 17 inches.

²¹ 85 FR 19134, April 6, 2020.

²² Imports entering the United States under HTS statistical reporting number 8545.11.0010 may also include items that are greater than 400 mm in nominal or actual diameter and equal to or less than 425 mm. Graphite electrodes exceeding 425 mm in diameter are imported under HTS statistical reporting number 8545.11.0020 (graphite electrodes, exceeding 425 mm in diameter, of a kind used for furnaces).

²³ Notice of Modification of Section 301 Action: China’s Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation, 83 FR 47974, September 21, 2018.

Effective September 24, 2018, SD graphite electrodes originating in China were subject to an additional 10 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective May 10, 2019, the section 301 duty for SD graphite electrodes was increased to 25 percent.²⁴ Effective February 4, 2025, SD graphite electrodes originating in China were subject to an additional 10 percent ad valorem duty under the International Emergency Economic Powers Act (“IEEPA”), and on March 4, 2025, that additional duty increased to 20 percent ad valorem.²⁵ Effective April 5, 2025, SD graphite electrodes originating in China were subject to an additional 10 percent ad valorem reciprocal duty under IEEPA. That reciprocal duty rose to 84 percent ad valorem effective April 9, 2025, and rose again to 125 percent effective April 10, 2025. However, effective May 14, 2025, the duty rate for reciprocal tariffs on products originating in China was reduced to 10 percent.²⁶

²⁴ 83 FR 47974, September 21, 2018; 84 FR 20459, May 9, 2019. See also HTS headings 9903.88.03 and 9903.88.04 and U.S. notes 20(3), 20 (f), and 20 (g) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 8, Publication 5613, April 2025, pp. 99.3.46 to 99.3.71, 99.3.352. Goods exported from China to the United States prior to May 10, 2019, and entering the United States prior to June 1, 2019, were not subject to the escalated 25 percent duty (84 FR 21892, May 15, 2019).

²⁵ 90 FR 9121, February 7, 2025; 90 FR 11426, March 6, 2025; 90 FR 11463, March 7, 2025,

²⁶ The reciprocal duty is in addition to the 20 percent ad valorem duty under IEEPA that went into effect on March 4, 2025, for China. 90 FR 15041, April 7, 2025; 90 FR 15509, April 14, 2025; 90 FR 15625, April 15, 2025; 90 FR 21831, May 21, 2025. See also HTS headings 9903.01.25 and 9903.01.63 and U.S. note 2(v) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 13, Publication 5627, May 2025, pp. 99.3.5 to 99.3.14, 99.3.299, 99.3.306.

Description and uses²⁷

SD graphite electrodes are cylindrical in shape, produced from various grades of petroleum coke, and used primarily in ladle metallurgy, specialty furnace applications, and primary low-duty melting, such as electric arc furnaces (“EAFs”) (figure 1.1). SD graphite electrodes are used in steelmaking to generate the heat necessary to melt and further refine steel.

Figure 1.1 SD graphite electrodes: Electrode and connecting pin

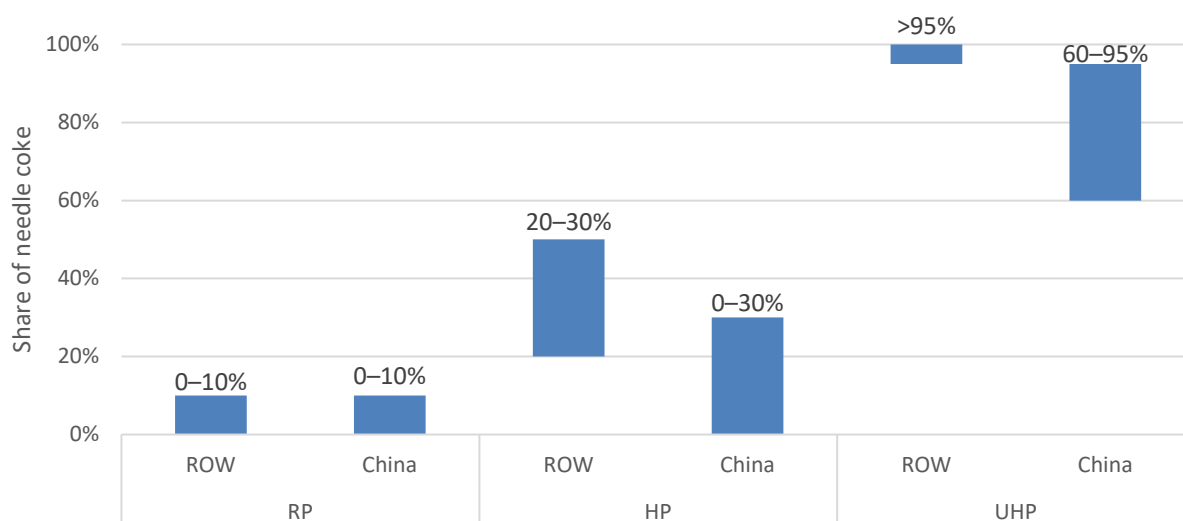


Source: Tokai Carbon Website,
https://www.tokaicarbon.co.jp/en/products/graphite/images/img_intro03_sp.jpg, retrieved April 30, 2025.

²⁷ Unless otherwise noted, this information is based on Small Diameter Graphite Electrodes from China, Investigation No. 731-TA-1143 (Second Review), USITC Publication 5035, March 2020 (“Second review publication”), pp. 1.16 to 1.21.

SD graphite electrodes typically are fabricated from a range of different grades of petroleum coke, from low grade anode coke to premium high grade needle coke or a blend of the two. Anode coke is used in low intensity applications such as refining operations (ladle) and medium- to low-duty melting applications (foundries). As a result of the different raw materials used, SD graphite electrodes are produced in a variety of grades, including regular power (“RP”), high power (“HP”), and ultra-high power (“UHP”). In general, firms located outside of China typically use a higher proportion of needle coke (figure 1.2). Some Chinese producers also substitute lower quality coal-based needle coke for higher quality petroleum needle coke. The type and proportion of needle coke used impacts the quality of the electrode.²⁸

Figure 1.2 SD Graphite Electrodes: Share of needle coke used in graphite electrodes (including large diameter), by producers in China and in the rest of the world (ROW)



Source: Second review publication, p. 1.17.

SD graphite electrodes conduct electricity, generating the heat necessary to melt scrap metal, iron ore, or other raw materials used to produce steel or other metals. Electricity at very high amperes passes through the SD graphite electrodes and creates an electric arc between the electrodes and the raw material. Typically, electrodes are joined in columns by a threaded connecting system, most commonly a graphite connecting pin that is tapered and threaded at both ends. Alternating current EAFs generally use three columns of electrodes and direct current furnaces use one column. The electrodes are fed through holes in the top of the EAFs and held in place by electrical current carrying holders and arms designed for the specific size of electrode to be used.

²⁸ Second review publication, p. 1.17.

Because of the intensity of the melting process, the electrodes are consumed continuously during the production of metal. The consumption rate for SD graphite electrodes in ladle furnace and foundry applications ranges from 0.2 to 1.5 pounds of electrodes per ton of steel processed. Larger graphite electrodes' ratio of consumption in large steel mill EAFs range from 1.5 to 12 pounds of electrodes per ton of steel processed. The rate of consumption is affected by the characteristics of the electrode, including the current carrying capacity, coefficient of thermal expansion, flexural strength, and specific electrical resistance.²⁹

Applications for graphite electrodes, including SD graphite electrodes, vary with size of electrode. According to respondents in the original investigation, the foundry segment uses 3 to 24 inch in diameter SD graphite electrodes and is the primary user of electrodes 8 inches and under. Direct current furnaces use electrodes ranging from 22 to 32 inches in diameter; alternating current furnaces primarily use 16 to 28-inch electrodes; and refining furnaces use 10 to 18-inch electrodes.³⁰ Other applications for 8 to 24-inch electrodes and above include refining slag, making abrasives, fusing silica, and producing iron and titanium.

The grade of coke, along with other characteristics such as size, determines the amount of current an electrode can carry. SD graphite electrodes typically have a current carrying capacity ranging from 15,000 to 70,000 amps. Large diameter graphite electrodes have a current carrying capacity ranging from 60,000 to 160,000 amps.³¹

²⁹ Application characteristics, such as heat, volume of steel, mechanical stress, and processing time also affect the rate of consumption.

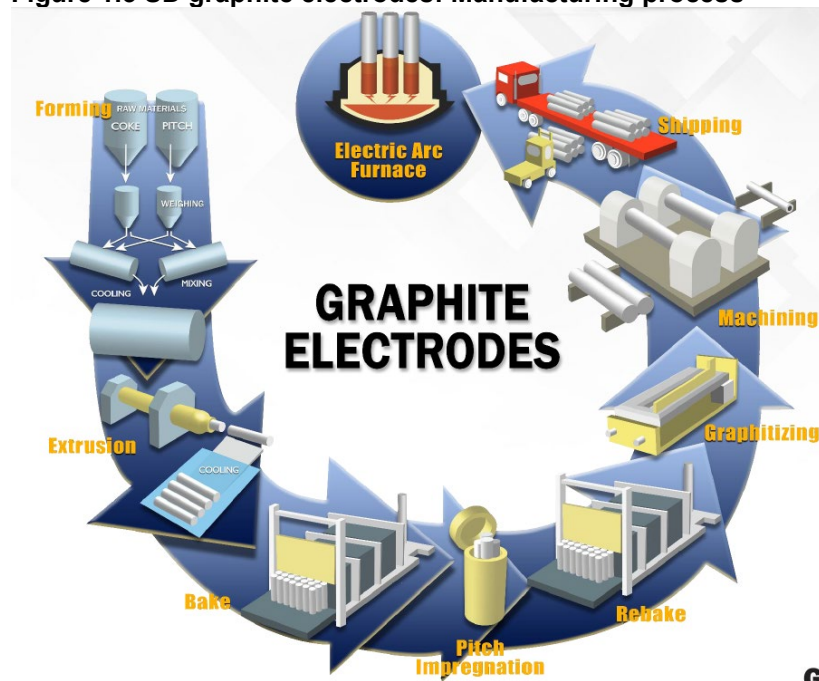
³⁰ NGN, "Graphite Electrode," retrieved April 30, 2025, <https://www.ngnir.com/import/metal/steel/graphite-electrode>.

³¹ M. Brashem, Inc., "An Overview of Graphite Electrode Standard Grades," May 12, 2017, <https://www.mbrashem.com/an-overview-of-graphite-electrode-standard-grades/>.

Manufacturing process³²

The production of graphite electrodes begins with the high temperature blending of crushed and screened petroleum coke with coal or petroleum tar pitch (figure 1.3). The mix is then charged into a ram type hydraulic press from which a cylindrical column is extruded and cooled. These “green electrodes” then enter an oven to undergo a baking process. The heating process follows a predetermined and gradually increasing heating curve, reaching a final temperature of approximately 900 degrees Centigrade. During this stage, the petroleum pitch is converted into hard coke, and impurities are removed. After the baking process, the electrode forms may be impregnated with a special pitch and rebaked, filling pores to increase density and strength and lowering the electrical resistivity.³³ The electrode forms are packed in electric furnaces surrounded by carbon particles to form a solid mass for graphitization. An electric current is passed through the furnace, raising the temperature to approximately 3,000 degrees Centigrade (5,000 degrees Fahrenheit).

Figure 1.3 SD graphite electrodes: Manufacturing process



Second review publication, p. 1.23.

³² Unless otherwise noted, this information is based on the Second review publication, p. 1.22.

³³ SD graphite electrodes are not always impregnated, in contrast to larger graphite electrodes.

The industry in the United States

U.S. producers

During the final phase of the original investigation, petitioners SGL Carbon and Superior Graphite estimated that they accounted for virtually all of production of SD graphite electrodes in the United States during 2007.³⁴ During the first five-year review, the three domestic interested parties, Graftech International Ltd. (“Graftech”), SGL Carbon, and Superior Graphite, estimated that they accounted for virtually all production of SD graphite electrodes in the United States during 2013.³⁵ During the second five-year review, the two domestic interested parties, Graftech and Tokai Carbon GE LLC. (“Tokai Carbon”), estimated that they accounted for virtually all of production of SD graphite electrodes in the United States during 2018.³⁶

In response to the Commission’s notice of institution in this current review, the domestic interested parties, Graftech and Tokai Carbon, reported that they are the only known and currently operating U.S. producers of SD graphite electrodes. Thus, the domestic interested parties, providing U.S. industry data in response to the Commission’s notice of institution, accounted for 100 percent of production of SD graphite electrodes in the United States during 2024.³⁷

³⁴ Original publication, p. 3.1.

³⁵ Small Diameter Graphite Electrodes from China, Investigation No. 731-TA-1143 (Second Review), USITC Publication 5035 (“second review publication”), June 2014, p. 1.25.

³⁶ Second review publication, p. 1.25.

³⁷ Domestic interested parties’ response to the notice of institution, April 2, 2025, p. 23.

Recent developments

Table 1.2 presents events in the U.S. industry since the Commission’s last five-year review.³⁸

Table 1.2 SD graphite electrodes: Developments in the U.S. industry

Item	Firm	Event
Acquisition	GrafTech	In October 2024, an 8.23 percent share of GrafTech was acquired by Hindustan Electro-Graphite, India’s leading graphite electrode manufacturer
Expansion	Tokai Carbon GE	In January 2020, Tokai Carbon GE invested \$25 million in a Fulton, KY expansion.
Merger	Tokai Carbon	In December 2024, Tokai Carbon acquired KBR (formerly Kellogg Brown & Root, a provider of technology, engineering and construction services) and MWI (an acronym for Mor-Wear Industries, a provider of comprehensive carbon and graphite solutions).

Sources: Lane Report, “Tokai Carbon GE,” January 31, 2023, <https://www.lanereport.com/121433/2020/01/tokai-carbon-ge/>; PRNewswire, “USD 6.3 Billion Growth,” September 26, 2021, <https://www.prnewswire.com/news-releases/usd-6-3-billion-growth-expected-in-graphite-electrodes-market-by-2024--sourcing-and-procurement-report--spendedge-301385151.html>; TIPRANKS, “Tokai Carbon Completes,” December 18, 2024, [Tokai Carbon Completes US Graphite Firms Acquisition - TipRanks.com](https://www.tipranks.com/news/tokai-carbon-completes-us-graphite-firms-acquisition); Ventura, “HEG Strengthens Position,” October 8, 2024, <https://www.venturasecurities.com/news/stocks/heg-strengthens-position-with-823-graftech-acquisition-for-24862-crore/>.

Note: Tokai Carbon and Tokai Carbon GE LLC are two different entities. Tokai Carbon Co., Ltd., the parent company, is a Japanese company based in Tokyo, and Tokai Carbon GE LLC, a subsidiary, is located in the United States.

³⁸ For recent developments, if any, in tariff treatment, please see “U.S. tariff treatment” section.

U.S. producers' trade and financial data

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year review. Table 1.3 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigation and subsequent five-year reviews.

Table 1.3 SD graphite electrodes: Trade and financial data submitted by U.S. producers, by period

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

Item	Measure	2007	2013	2018	2024
Capacity	Quantity	***	***	***	***
Production	Quantity	***	***	***	***
Capacity utilization	Ratio	***	***	***	***
U.S. shipments	Quantity	***	***	***	***
U.S. shipments	Value	***	***	***	***
U.S. shipments	Unit value	***	***	***	***
Net sales	Value	***	***	***	***
COGS	Value	***	***	***	***
COGS to net sales	Ratio	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***
SG&A expenses	Value	***	***	***	***
Operating income or (loss)	Value	***	***	***	***
Operating income or (loss) to net sales	Ratio	***	***	***	***

Source: For the years 2007 to 2018, data are compiled using data submitted in the Commission's original investigation/first five-year reviews. For the year 2024, data are compiled using data submitted by domestic interested parties. Domestic interested parties' response to the notice of institution, April 2, 2025, exhibit 1.

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

Note: For U.S. producer capacity in 2024, Graftech idled production in June 2024. Domestic interested parties' supplemental response, May 1, 2025.

Definitions of the domestic like product and domestic industry

The domestic like product is defined as the domestically produced product or products which are like, or in the absence of like, most similar in characteristics and uses with, the subject merchandise. The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like product constitutes a major proportion of the total domestic production of the product. Under the related parties provision, the Commission may exclude a U.S. producer from the domestic industry for purposes of its injury determination if “appropriate circumstances” exist.³⁹

In its original determination, its expedited first five-year review determination, and its full second five-year review determination, the Commission defined the domestic like product as all small diameter graphite electrodes coextensive with Commerce’s scope. In its original determination, its expedited first five-year review determination, and its full second five-year review determination, the Commission defined the domestic industry as all U.S. producers of small diameter graphite electrodes.⁴⁰

³⁹ Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

⁴⁰ 90 FR 11056, March 3, 2025.

U.S. importers

During the final phase of the original investigation, the Commission received U.S. importer questionnaires from 12 firms, which accounted for approximately 58.3 percent of total imports of SD graphite electrodes from China under HTS subheading 8545.11.00, a category that includes out-of-scope merchandise, during January 2005 through September 2008. Import data presented in the original investigation are based on questionnaire responses for data from China and nonsubject source Mexico, and on estimates of official Commerce statistics as provided in the petition for data from all other sources.

Although the Commission did not receive responses from any respondent interested parties in its first five-year review, the domestic interested parties provided a list of 26 firms that may have imported SD electrodes from China.⁴¹ Import data presented in the first review are based on official Commerce statistics. During the second five-year review, the Commission received U.S. importer questionnaires from 12 firms, which accounted for *** percent of total U.S. imports of SD graphite electrodes from China during 2018.⁴² Import data presented in the second review are based on questionnaire responses.

Although the Commission did not receive responses from any respondent interested parties in this current review, in its response to the Commission's notice of institution, the domestic interested parties provided a list of 84 potential U.S. importers of SD graphite electrodes.⁴³

⁴¹ Small Diameter Graphite Electrodes from China, Investigation No. 731-TA-1143 (Review), USITC Publication 4469 ("first review publication"), June 2014, p. 1.11.

⁴² Investigation No. 731-TA-1143 (Second Review): SD Graphite Electrodes from China, Staff Report INV-SS-014 ("Second review confidential report"), February 20, 2020, p. 1.27.

⁴³ Domestic interested parties' response to the notice of institution, April 2, 2025, exhibit 10.

U.S. imports

Table 1.4 presents the quantity, value, and unit value of U.S. imports from China as well as the other top sources of U.S. imports (shown in descending order of 2024 imports by quantity).

Table 1.4 SD graphite electrodes: U.S. imports, by source and period

Quantity in metric tons; value in 1,000 dollars; unit value in dollars per metric ton

U.S. imports from	Measure	2019	2020	2021	2022	2023	2024
China	Quantity	984	465	251	1,419	885	923
India	Quantity	7,579	2,760	5,115	7,805	6,325	3,544
Austria	Quantity	1,422	1,482	2,037	2,505	2,105	1,716
Japan	Quantity	2,193	517	182	447	641	1,200
Mexico	Quantity	5,230	4,518	2,910	297	602	1,084
All other sources	Quantity	3,496	2,361	4,626	3,110	2,277	1,956
Nonsubject sources	Quantity	19,920	11,637	14,870	14,164	11,949	9,501
All import sources	Quantity	20,904	12,102	15,122	15,583	12,833	10,423
China	Value	6,440	1,493	876	6,836	4,590	3,419
India	Value	19,626	7,093	9,344	17,433	13,861	7,586
Austria	Value	15,880	14,601	9,275	14,259	12,620	7,160
Japan	Value	26,235	4,762	1,210	3,874	4,597	9,584
Mexico	Value	21,545	16,594	11,683	1,338	3,583	6,098
All other sources	Value	28,102	9,707	14,023	14,966	10,682	7,263
Nonsubject sources	Value	111,388	52,756	45,536	51,869	45,343	37,691
All import sources	Value	117,829	54,249	46,412	58,705	49,933	41,110
China	Unit value	6,542	3,210	3,485	4,818	5,189	3,705
India	Unit value	2,590	2,570	1,827	2,234	2,191	2,140
Austria	Unit value	11,169	9,853	4,553	5,692	5,995	4,172
Japan	Unit value	11,961	9,217	6,645	8,662	7,176	7,985
Mexico	Unit value	4,120	3,673	4,015	4,498	5,957	5,627
All other sources	Unit value	8,038	4,112	3,031	4,813	4,813	3,713
Nonsubject sources	Unit value	5,592	4,533	3,062	3,662	3,795	3,967
All import sources	Unit value	5,637	4,483	3,069	3,767	3,891	3,944

Source: Compiled from official Commerce statistics for HTS statistical reporting number 8545.11.0010, accessed March 26, 2025.

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

Apparent U.S. consumption and market shares

Table 1.5 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

Table 1.5 SD graphite electrodes: Apparent U.S. consumption and market shares, by source and period

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

Source	Measure	2007	2013	2018	2024
U.S. producers	Quantity	***	***	***	***
China	Quantity	***	***	2,899	923
Nonsubject sources	Quantity	***	***	21,508	9,501
All import sources	Quantity	***	***	24,406	10,423
Apparent U.S. consumption	Quantity	***	***	***	***
U.S. producers	Value	***	***	***	***
China	Value	***	***	34,435	3,419
Nonsubject sources	Value	***	***	90,039	37,691
All import sources	Value	***	***	124,474	41,110
Apparent U.S. consumption	Value	***	***	***	***
U.S. producers	Share of quantity	***	***	***	***
China	Share of quantity	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***
All import sources	Share of quantity	***	***	***	***
U.S. producers	Share of value	***	***	***	***
China	Share of value	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***
All import sources	Share of value	***	***	***	***

Source: For the years 2007, 2013, and 2018, data are compiled using data submitted in the Commission's original investigation and the first and second five-year reviews. For the year 2024, U.S. producers' U.S. shipments are compiled from the domestic interested parties' response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting number 8545.11.0010, accessed March 26, 2025.

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

Note: For 2007 and 2018, apparent U.S. consumption is derived from U.S. shipments of imports, rather than U.S. imports.

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

The industry in China

Producers in China

During the final phase of the original investigation, the Commission received foreign producer/exporter questionnaires from 13 firms, which accounted for approximately *** percent of production of SD graphite electrodes in China during 2007, and approximately *** percent of SD graphite electrodes exports from China to the United States during 2007.⁴⁴

Although the Commission did not receive responses from any respondent interested parties in its first five-year review, the domestic interested parties provided a list of 112 possible producers of SD graphite electrodes in China in that proceeding.⁴⁵

Although the Commission did not receive responses from any respondent interested parties in its second five-year review, the domestic interested parties again provided a list of 112 possible producers of SD graphite electrodes in China in that proceeding.⁴⁶

Although the Commission did not receive responses from any respondent interested parties in this five-year review, the domestic interested parties provided a list of 120 possible producers of SD graphite electrodes in China.⁴⁷

⁴⁴ Inv. No. 731-TA-1143 (Final), Small Diameter Graphite Electrodes from China, Staff Report INV-GG-004, January 23, 2009 (“Original confidential report”), p. 7.1.

⁴⁵ First review publication, p. 1.16.

⁴⁶ Second review publication, p. 4.12.

⁴⁷ Domestic interested parties’ response to the notice of institution, April 2, 2025, exhibit 5.

Recent developments

Table 1.6 presents events in the Chinese industry since the Commission's last five-year review.

Table 1.6 SD graphite electrodes: Developments in the Chinese industry

Item	Firm	Event
Expansion	East Carbon	In November 2024, East Carbon opened a new factory, increasing production by 66 percent.
Merger	Henan Yicheng	In April 2025, Henan Yichen New Energy acquired a 70% stake in Shanxi Meishan Lake Technology from Hainan Jinhaitang Technology.
Plant opening	CNBM	In November 2023, CNBM Heilongjiang Graphite New Materials ("CNBM") announced expansion of AAM production in Jixi, Heilongjiang Province by adding a beneficiation plant to its mines and existing production facilities.
Plant opening	China Hongzhou	In June 2022, a 100,000-ton ultra-high power graphite electrode project of Hongzhou carbon material was put into operation.

Sources: Calvino, "East Carbon Unveils New Graphite Factory," ChemAnalyst News, November 8, 2024, <https://www.chemanalyst.com/NewsAndDeals/NewsDetails/east-carbon-unveils-new-graphite-factory-in-china-boosting-production-by-67-31272>; China Hongzhou, "Hongzhou carbon material 100000 ton," June 6, 2022, <http://www.graphite-electrode.net/en/news/hyxw/66.html>; Market Screener, "A Consortium of Investors," June 17, 2024, <https://www.marketscreener.com/quote/stock/JILIN-OLED-MATERIAL-TECH--119082784/news/A-consortium-of-investors-acquired-a-3-stake-in-Jilin-OLED-Material-Tech-Co-Ltd-from-Changchun-J-46992468/>; Market Screener, "Henan Yicheng New Energy," April 22, 2025, <https://www.marketscreener.com/quote/stock/HENAN-YICHENG-NEW-ENERGY--7405259/news/Henan-Yicheng-New-Energy-Co-Ltd-completed-the-acquisition-of-70-stake-in-Shanxi-Meishan-Lake-Tec-49721921/>; USITC, "Active Anode Material from China," February 2025, p. 7.3, https://www.usitc.gov/publications/701_731/pub5585.pdf.

Note: In October 2023, China announced new export restrictions on certain graphite products. Effective December 1, 2023, Chinese exporters were required to apply for permits to "ship high-purity, high-hardness and high-density synthetic graphite material and natural flake graphite and its products. Reuters, "China Curbs Graphite Exports," October 20, 2023, <http://www.reuters.com/markets/commodities/china-curbs-graphite-exports-latest-critical-minerals-squeeze-2023-10-20>; Zou, "China Updates its Export Curbs," Lexology, October 24, 2023, <https://www.lexology.com/library/detail.aspx?g=540315b2-4429-4f7e-9f74-5d9f397160d4>.

Exports

Table 1.7 presents export data for carbon electrodes of a kind used for furnaces, a category that includes small diameter graphite electrodes as well as out-of-scope products, from China (by export destination in descending order of quantity for 2024).

Table 1.7 Carbon electrodes: Quantity of exports from China, by destination and period

Quantity in metric tons

Destination market	2020	2021	2022	2023	2024
Russia	30,823	43,406	41,303	33,664	32,156
South Korea	13,917	27,364	31,440	30,475	20,675
Malaysia	29,174	22,360	17,879	16,297	16,885
Turkey	24,644	41,863	26,273	16,934	16,280
India	2,166	6,939	11,742	16,365	14,335
Taiwan	15,182	20,894	15,536	11,084	13,513
Japan	13,265	16,184	15,213	12,959	13,387
Mexico	6,390	11,665	11,620	12,341	12,519
Brazil	5,506	11,533	12,537	10,226	11,877
United States	11,084	9,620	14,971	10,145	11,822
All other markets	181,706	214,077	145,069	166,170	174,396
All markets	333,857	425,907	343,583	336,661	337,845

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 8545.11, accessed April 29, 2025. These data may be overstated as HS subheading 8545.11 may contain products outside the scope of this review.

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

Third-country trade actions

Many countries have imposed antidumping duties on SD graphite electrodes from China. In January 2022, the EurAsian Economic Union (EAEU) imposed antidumping measures on SD graphite electrodes from China, effective for a period of five years.⁴⁸ Four of its member states, Armenia, Kazakhstan, the Kyrgyz Republic, and the Russian Federation, imposed duties ranging from 14.04 percent to 28.02 percent. In April 2022, the European Union imposed antidumping duty measures on graphite electrodes from China, ranging from 25.5 percent to 79.4 percent, depending on the Chinese producer or exporter.⁴⁹ In February 2025, Japan issued a provisional determination that presumes dumping of graphite electrodes from China.⁵⁰ In March 2025, Japan imposed a 95.2 percent anti-dumping duty on imports of Chinese graphite electrodes; the provisional duties will be in effect from March 29 to July 28, 2025.⁵¹

⁴⁸ Applying to graphite electrodes with a diameter of no more than 520 mm, the anti-dumping measures encompass SD graphite electrodes (which are greater than 400 mm in nominal or actual diameter and equal to less than 425 mm). EEC, “EAEU introduces anti-dumping duty,” September 22, 2021, <https://eec.eaeunion.org/en/news/eaes-vvodit-antidempingovuyu-poshlinu-na-grafitirovannye-elektrody-iz-knr/#>; EurAsian Economic Commission, “Decision of the Eurasian Economic Commission No. 129,” January 10, 2022, <http://eec.eaeunion.org>

⁴⁹ European Commission, https://policy.trade.ec.europa.eu/news/eu-cpimters-dumped-imports-graphite-electrodes-china-2022-04-07_en, April 7, 2022.

⁵⁰ Suetomi, “Japan: The Japanese government,” Import and Trade Remedies Blog, May 5, 2025, <https://www.internationaltradeupdate.com/2025/05/05/japan-the-japanese-government>.

⁵¹ Jiya Carbonized, “Japan will impose a 95.2% import tariff,” [March 27, 2025](https://jiyaocarbon.com/index.php?m=home&c=View&a=index&aid=397), <https://jiyaocarbon.com/index.php?m=home&c=View&a=index&aid=397>.

The global market

The increasing use of SD graphite electrodes in industrial processes, energy storage applications, and electrical vehicle batteries is driving demand. While the global market has grown, it has also experienced closures and reductions in activity. Table 1.8 lists some of the noteworthy developments in recent years.

Table 1.8 SD graphite electrodes: Developments among major nonsubject suppliers

Item	Firm	Event
Acquisition	Showa Denko	In April 2023, Showa Denko acquired Graphite Electrodes (Xiamen) for \$300 million.
Acquisition	Graphite India	In 2023, Graphite India acquired equity shareholding of 31 percent of GODI India.
Acquisition	Cabot	In March 2022, Cabot acquired Tokai Carbon (Tianjin) Co. from Tokai Carbon Group.
Closure	Graphite India	In October 2022, Graphite India announced plans to shut its German graphite electrode production.
Expansion	HEG	In November 2022, HEG announced investment to manufacture graphite anode for Lithium-ion batteries.
Merger	TMS	In October 2023, TMS announced plans to merge with Nippon Carbon to become the exclusive North American distributor of graphite electrodes.
Reduction	Tokai Carbon	In July 2024, Tokai Carbon announced plans to reduce capacity in Japan and Europe from 56,000 tons to 32,000 tons by July 2025.

Sources: Business Wire, "Cabot Corporation Completes," March 1, 2022, <https://investor.cabot-corp.com/news-releases/news-release-details/cabot-corporation-completes-acquisition-tokai-carbon-tianjin-co>; ChemAnalyst, "Tokai Carbon Implements Reduction," July 16, 2024, <https://www.chemanalyst.com/NewsAndDeals/NewsDetails/tokai-carbon-implements-reduction-in-graphite-electrode-capacity-in-japan-29006#>; ETN, "HEG to invest," November 14, 2022, <https://etn.news/buzz/heg-advanced-carbons-company-graphite-anode-india>; Globe Newswire, "Graphite Electrode Market," July 17, 2023, <https://www.globenewswire.com/news-release/2023/07/17/2705781/0/en/Graphite-Electrode-Market-Set-to-Soar-Past-USD-5-85-Billion-by-2030-Uniting-Strength-and-Efficiency-in-Steel.html>; ICIDirect Research, "Graphite India Plans," October 3, 2022, <https://www.icidirect.com/research/equity/trending-news/graphite-india-plans-to-shut-down-its-german-graphite-electrode-production-as-of-now-due-to-rising>; PRNewswire, "TMS International Partnering with Nippon," October 23, 2023, <https://www.prnewswire.com/news-releases/tms-international-partnering-with-nippon-carbon-as-north-american-distributor-of-graphite-electrodes-301963252.html>.

Table 1.9 presents global export data for carbon electrodes of a kind used for furnaces, a category that includes SD graphite electrodes as well as out-of-scope products (by source in descending order of quantity for 2024).

Table 1.9 Carbon electrodes: Value of global exports by country and period

Value in 1,000 dollars

Exporting country	2020	2021	2022	2023	2024
China	789,480	1,034,47	1,144,264	962,351	761,450
India	185,113	236,887	289,175	267,257	221,846
Japan	283,989	206,147	217,113	259,185	234,134
United States	95,427	74,005	86,700	67,788	49,145
Malaysia	24,556	597,378	92,640	52,960	49,116
Ukraine	19,909	34,322	16,451	12,747	11,407
Turkey	1,778	2,283	7,237	1,267	9,288
United Kingdom	8,580	6,774	8,540	6,388	4,838
Canada	1,397	2,946	2,624	1,497	3,453
Mexico	—	—	1	11	2
All other exporters	1,343,070	971,560	1,385,421	1,002,947	737,170
All exporters	2,753,299	2,132,302	3,250,166	2,634,398	2,081,849

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 8545.11. These data may be overstated as HS subheadings 8545.11 may contain products outside the scope of this/these reviews.

Note: Because of rounding, figures may not add to total shown. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

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
90 FR 11056 March 3, 2025	Small Diameter Graphite Electrodes From China; Institution of a Five-Year Review	https://www.govinfo.gov/content/pkg/FR-2025-03-03/pdf/2025-03296.pdf
90 FR 11039 March 3, 2025	Initiation of Five-Year (Sunset) Reviews	https://www.govinfo.gov/content/pkg/FR-2025-03-03/pdf/2025-03376.pdf

APPENDIX B

RESPONSES TO THE NOTICE OF INSTITUTION

Responses to the Commission’s notice of institution

Individual responses

The Commission received one submission in response to its notice of institution in the subject review. It was filed on behalf of GrafTech International Ltd. and Tokai Carbon GE LLC, domestic producers of SD graphite electrodes (referred to herein as “domestic interested parties”).

A complete response to the Commission’s notice of institution requires that the responding interested party submit to the Commission all the information listed in the notice. Responding firms are given an opportunity to remedy or explain deficiencies in their responses and to provide clarifying details where appropriate. A summary of the number of responses and estimates of coverage for each is shown in table B.1.

Table B.1 SD graphite electrodes: Summary of responses to the Commission’s notice of institution

Interested party type	Number	Coverage
U.S. producer	2	100%

Note: The U.S. producer coverage figure presented is the domestic interested parties’ estimate of their share of total U.S. production of SD graphite electrodes during 2024. Domestic interested parties’ response to the notice of institution, April 2, 2025, p. 21.

Party comments on adequacy

The Commission received party comments on the adequacy of responses to the notice of institution and whether the Commission should conduct expedited or full reviews from the domestic interested parties. The domestic interested parties request that the Commission conduct an expedited review of the antidumping order on SD graphite electrodes.¹

¹ Domestic interested parties’ comments on adequacy, May 14, 2025, p. 2.

Company-specific information

Table B.2 SD graphite electrodes: Response checklist for U.S. producers

Yes = provided response; no = did not provide a response; NA = not available; not known = information was not known

Item	GrafTech International Ltd.	Tokai Carbon GE LLC
Nature of operation	Yes	Yes
Statement of intent to participate	Yes	Yes
Statement of likely effects of revoking the order	Yes	Yes
U.S. producer list	Yes	Yes
U.S. importer/foreign producer list	Yes	Yes
List of 3-5 leading purchasers	Yes	Yes
List of sources for national/regional prices	Not known	Not known
Trade/financial data	Yes	Yes
Changes in supply/demand	Yes	Yes
Complete response	Yes	Yes

APPENDIX C

SUMMARY DATA COMPILED IN PREVIOUS PROCEEDINGS

Table C-1

SD graphite electrodes: Summary data concerning the U.S. market, 2016-18, January to September 2018, and January to September 2019

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

	Reported data					Period changes			
	Calendar year		January to September			Comparison years			Jan-Sep
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▲***
All import sources.....	***	***	***	***	***	▼***	▼***	▼***	▲***
U.S. consumption value:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▲***
All import sources.....	***	***	***	***	***	▼***	▼***	▼***	▼***
U.S. imports from:									
China:									
Quantity.....	484	1,198	2,899	2,730	852	▲498.4	▲147.3	▲142.0	▼(68.8)
Value.....	1,165	9,037	34,435	32,322	5,934	▲2,856.1	▲675.8	▲281.1	▼(81.6)
Unit value.....	\$2,405	\$7,544	\$11,880	\$11,841	\$6,968	▲394.0	▲213.7	▲57.5	▼(41.2)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Nonsubject sources:									
Quantity.....	11,452	14,159	21,508	15,461	13,993	▲87.8	▲23.6	▲51.9	▼(9.5)
Value.....	31,662	36,857	90,039	59,291	76,002	▲184.4	▲16.4	▲144.3	▲28.2
Unit value.....	\$2,765	\$2,603	\$4,186	\$3,835	\$5,432	▲51.4	▼(5.8)	▲60.8	▲41.6
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources:									
Quantity.....	11,937	15,357	24,406	18,190	14,844	▲104.5	▲28.7	▲58.9	▼(18.4)
Value.....	32,827	45,894	124,474	91,613	81,937	▲279.2	▲39.8	▲171.2	▼(10.6)
Unit value.....	\$2,750	\$2,989	\$5,100	\$5,036	\$5,520	▲85.5	▲8.7	▲70.7	▲9.6
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. producers':									
Average 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.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Productivity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit labor costs.....	***	***	***	***	***	▼***	▼***	▼***	▼***

Table continued on next page.

Table C-1--Continued

SD graphite electrodes: Summary data concerning the U.S. market, 2016-18, January to September 2018, and January to September 2019

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

	Reported data					Period changes			
	Calendar year		January to September			Comparison years			Jan-Sep
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
U.S. producers.--Continued									
Net sales:									
Quantity.....	***	***	***	***	***	▲ ***	▲ ***	▲ ***	▼ ***
Value.....	***	***	***	***	***	▲ ***	▲ ***	▲ ***	▼ ***
Unit value.....	***	***	***	***	***	▲ ***	▲ ***	▲ ***	▲ ***
Cost of goods sold (COGS).....	***	***	***	***	***	▲ ***	▼ ***	▲ ***	▼ ***
Gross profit of (loss) (fn2).....	***	***	***	***	***	▲ ***	▲ ***	▲ ***	▲ ***
SG&A expenses.....	***	***	***	***	***	▲ ***	▲ ***	▲ ***	▼ ***
Operating income or (loss) (fn2)....	***	***	***	***	***	▲ ***	▲ ***	▲ ***	▲ ***
Net income or (loss) (fn2).....	***	***	***	***	***	▲ ***	▲ ***	▲ ***	▲ ***
Capital expenditures.....	***	***	***	***	***	▲ ***	▼ ***	▲ ***	▲ ***
Unit COGS.....	***	***	***	***	***	▲ ***	▼ ***	▲ ***	▲ ***
Unit SG&A expenses.....	***	***	***	***	***	▼ ***	▼ ***	▼ ***	▲ ***
Unit operating income or (loss) (fn2)	***	***	***	***	***	▲ ***	▲ ***	▲ ***	▲ ***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▲ ***	▲ ***	▲ ***	▲ ***
COGS/sales (fn1).....	***	***	***	***	***	▼ ***	▼ ***	▼ ***	▼ ***
Operating inc. or (loss)/sales (fn1).	***	***	***	***	***	▲ ***	▲ ***	▲ ***	▲ ***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▲ ***	▲ ***	▲ ***	▲ ***

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.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 8545.11.0010, accessed December 6th, 2019.

Table C-2

Small diameter graphite electrodes: Summary data concerning the U.S. market, 2005-07, January-September 2007, and January-September 2008

* * * * *

Table C-3
SDGE: U.S. producers' trade and financial data, 2005-07 and 2013

Item	2005	2006	2007	2013
Capacity	***	***	***	***
Production (<i>metric tons</i>)	***	***	***	***
Capacity utilization (<i>percent</i>)	***	***	***	***
U.S. shipments				
Quantity (<i>metric tons</i>)	***	***	***	***
Value (<i>1,000 dollars</i>)	***	***	***	***
Unit value (<i>dollars per metric ton</i>)	***	***	***	***
Net sales				
Quantity (<i>metric tons</i>)	***	***	***	***
Value (<i>1,000 dollars</i>)	***	***	***	***
Unit value (<i>dollars per metric ton</i>)	***	***	***	***
Cost of goods sold (COGS) (<i>\$1,000</i>)	***	***	***	***
Gross profit or (loss) (<i>\$1,000</i>)	***	***	***	***
SG&A (<i>\$1,000</i>)	***	***	***	***
Operating income or (loss) (<i>\$1,000</i>)	***	***	***	***
COGS/sales (<i>percent</i>)	***	***	***	***
Operating income or (loss)/sales (<i>percent</i>)	***	***	***	***

Source: Compiled from *Small Diameter Graphite Electrodes from China, Investigation No. 731-TA-1143 (Final)*, Memorandum INV-GG-004, January 23, 2009, p. C-3 (table C-1); and Response of GrafTech, SGL Carbon, and Superior Graphite to the notice of institution, February 3, 2014 (supplemented on February 28, 2014), exhibit 2.

Apparent U.S. consumption and market shares

Table I-4 presents U.S. shipments of domestic product, U.S. imports and apparent U.S. consumption in 2005-07 and 2013. Data on U.S. market shares during 2005-07 and 2013 are presented in Table I-5.

Table I-4

SDGE: U.S. shipments of domestic product, U.S. shipments of imports, and apparent U.S. consumption, 2005-07 and 2013

Item	2005	2006	2007	2013
Quantity (metric tons)				
U.S. producers' U.S. shipments	***	***	***	***
U.S. shipments of imports from.-- China	***	***	***	***
All other	***	***	***	***
Total imports	***	***	***	***
Apparent U.S. consumption	***	***	***	***
Value (1,000 dollars)				
U.S. producers' U.S. shipments	***	***	***	***
U.S. shipments of imports from.-- China	***	***	***	***
All other	***	***	***	***
Total imports	***	***	***	***
Apparent U.S. consumption	***	***	***	***

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

Note.--Data for 2013 are based on U.S. imports rather than U.S. shipments of imports.

Source: *Small Diameter Graphite Electrodes from China, Investigation No. 731-TA-1143 (Final)*, Memorandum INV-GG-004, January 23, 2009, pp. IV-7 (table IV-3); official statistics of Commerce for HTS statistical reporting number 8545.11.0010.

APPENDIX D

PURCHASER QUESTIONNAIRE RESPONSES

As part of their response to the notice of institution, interested parties were asked to provide a list of three to five leading purchasers in the U.S. market for the domestic like product. A response was received from domestic interested parties, and it provided contact information for the following three firms as top purchasers of small diameter graphite electrodes: ***. Purchaser questionnaires were sent to these three firms and two firms (***) submitted a response to the Commission's request for information.

1. Have there been any significant changes in the supply and demand conditions for small diameter graphite electrodes that have occurred in the United States or in the market for small diameter graphite electrodes in China since January 1, 2020?

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

2. Do you anticipate any significant changes in the supply and demand conditions for small diameter graphite electrodes in the United States or in the market for small diameter graphite electrodes in China within a reasonably foreseeable time?

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

