

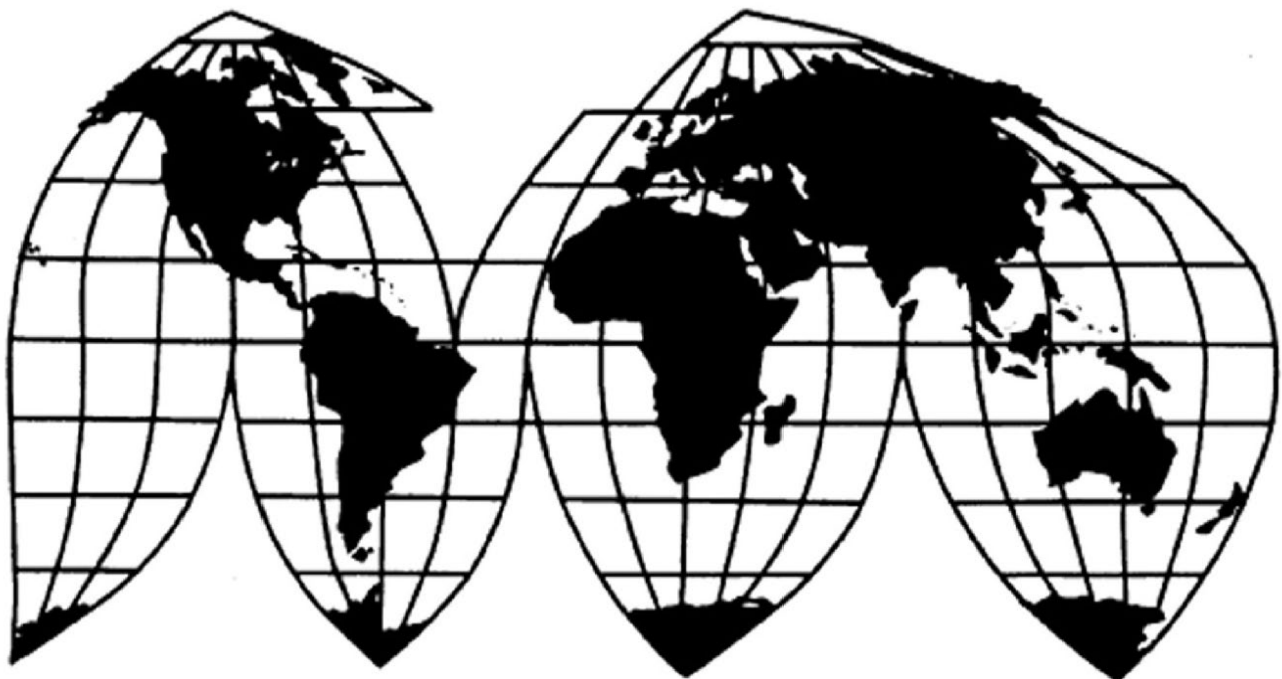
# Quartz Surface Products from India and Turkey

Investigation Nos. 701-TA-624–625 and 731-TA-1450–1451 (Review)

Publication 5691

December 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Note.—Information that would reveal confidential operations of individual firms may not be published.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 Nos. 701-TA-624-625 and 731-TA-1450-1451 (Review)

Quartz Surface Products from India and Turkey

### DETERMINATIONS

On the basis of the record<sup>1</sup> developed in the subject five-year reviews, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that revocation of the antidumping and countervailing duty orders on quartz surface products from India and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

### BACKGROUND

The Commission instituted these reviews on May 1, 2025 (90 FR 18697) and determined on August 4, 2025, that it would conduct expedited reviews (90 FR 45245, September 19, 2025).<sup>2</sup>

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

<sup>2</sup> Due to the lapse in appropriations and ensuing cessation of Commission operations, the Commission tolled its schedule for this proceeding. The schedule was revised in a subsequent notice published in the Federal Register on November 28, 2025 (90 FR 54744).



## Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the antidumping and countervailing duty orders on quartz surface products (“QSP”) from India and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

### I. Background

*Original Investigations.* Cambria Company LLC (“Cambria”) filed antidumping and countervailing duty petitions with the Department of Commerce (“Commerce”) and the Commission on May 8, 2019, concerning imports of QSP from India and Turkey.<sup>1</sup> Commerce determined on May 1, 2020, that imports of QSP from India and Turkey were being sold at less than fair value (“LTFV”) and subsidized by the governments of India and Turkey.<sup>2</sup> The Commission determined in June 2020 that an industry in the United States was materially injured by reason of imports of QSP from India and Turkey that had been found by Commerce to be sold in the United States at LTFV and subsidized by the governments of India and Turkey.<sup>3</sup> Commerce issued antidumping and countervailing duty orders on QSP from India and Turkey on June 22, 2020.<sup>4</sup>

*Current Reviews.* The Commission instituted these first five-year reviews on May 1, 2025, to determine whether revocation of the antidumping and countervailing duty orders on QSP from

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<sup>1</sup> Confidential Report, Memorandum INV-XX-095 (July 23, 2025) (“CR”); Public Report, *Quartz Surface Products from India and Turkey*, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451 (Review), USITC Pub. 5691 (Dec. 2025) (“PR”) at 1.2.

<sup>2</sup> CR/PR at 1.2; *Certain Quartz Surface Products From the Republic of Turkey: Final Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances*, 85 Fed. Reg. 25389 (May 1, 2020); *Certain Quartz Surface Products From India: Final Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances*, 85 Fed. Reg. 25391 (May 1, 2020); *Certain Quartz Surface Products From the Republic of Turkey: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, In Part*, 85 Fed. Reg. 25400 (May 1, 2020); *Certain Quartz Surface Products From India: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, In Part*, 85 Fed. Reg. 25398 (May 1, 2020).

<sup>3</sup> CR/PR at 1.2; *Quartz Surface Products from India and Turkey*, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451 (Final), USITC Pub. 5061 (June 2020) (“*Original Determinations*”).

<sup>4</sup> CR/PR at 1.2; *Certain Quartz Surface Products From India and Turkey: Antidumping Duty Orders*, 85 Fed. Reg. 37422 (June 22, 2020); *Certain Quartz Surface Products From India and Turkey: Countervailing Duty Orders*, 85 Fed. Reg. 37431 (June 22, 2020).

India and Turkey would likely lead to the continuation or recurrence of material injury to a domestic industry.<sup>5</sup> The Commission received a single joint response to its notice of institution from Cambria, Dal-Tile LLC (“Dal-Tile”), and Guidoni USA (“Guidoni”) (collectively, “domestic interested parties”), which are domestic producers of QSP.<sup>6</sup> The Commission did not receive a response from any respondent interested party. The Commission determined on August 4, 2025, that the domestic industry party group response was adequate and that the respondent interested party group response was inadequate.<sup>7</sup> Finding no other circumstances that would warrant conducting full reviews, the Commission determined that it would conduct expedited reviews of the orders.<sup>8</sup>

U.S. industry data in this review are based on information supplied by the domestic interested parties, accounting for an estimated \*\*\* percent of domestic production of QSP in 2024, in their response to the notice of institution.<sup>9</sup> U.S. import data and related information are based on Commerce’s official import statistics.<sup>10</sup> Foreign industry data are based on information from the original investigations, information submitted by the domestic interested parties in these expedited reviews, and publicly available information compiled by the Commission.<sup>11</sup>

## **II. Domestic Like Product and Industry**

### **A. Domestic Like Product**

In making its determination under section 751(c) of the Tariff Act, the Commission defines the “domestic like product” and the “industry.”<sup>12</sup> The Tariff Act defines “domestic like product”

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<sup>5</sup> CR/PR at 1.1; *Quartz Surface Products from India and Turkey: Institution of a Five-Year Reviews*, 90 Fed. Reg. 18697 (May 1, 2025).

<sup>6</sup> CR/PR at B.3; Cambria, Dal-Tile, and Guidoni Response to Notice of Institution, EDIS Doc. 852542 (June 2, 2025) (“Domestic Interested Parties’ Response”); *see also* Cambria, Dal-Tile, and Guidoni Final Comments, EDIS Doc. 863894 (Nov. 17, 2025) (“Domestic Interested Parties’ Final Comments”).

<sup>7</sup> *Explanation of Commission Determination on Adequacy*, EDIS Doc. 859116 (Aug. 8, 2025).

<sup>8</sup> *Explanation of Commission Determination on Adequacy*, EDIS Doc. 859116 (Aug. 8, 2025).

<sup>9</sup> CR/PR at 1.12 & Table B.1. The three U.S. producers that provided data were Cambria, Dal-Tile, and Guidoni. *See* Domestic Interested Parties’ Response at Exh. 1. The responding firms did not provide any data related to the production of fabricated quartz surface products. CR/PR at 1.12 n.22.

<sup>10</sup> CR/PR at Table 1.5. Import data are compiled from official Commerce statistics for Harmonized Tariff Schedule (“HTS”) statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040. *Id.*

<sup>11</sup> CR/PR at Tables 1.7, 1.8, 1.9 & 1.10.

<sup>12</sup> 19 U.S.C. § 1677(4)(A).

as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this subtitle.”<sup>13</sup> The Commission’s practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.<sup>14</sup>

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

. . . {C}ertain quartz surface products. Quartz surface products consist of slabs and other surfaces created from a mixture of materials that includes predominately silica (e.g., quartz, quartz powder, cristobalite, glass powder) as well as a resin binder (e.g., an unsaturated polyester). The incorporation of other materials, including, but not limited to, pigments, cement, or other additives does not remove the merchandise from the scope of these Orders. However, the scope of these Orders only includes products where the silica content is greater than any other single material, by actual weight. Quartz surface products are typically sold as rectangular slabs with a total surface area of approximately 45 to 60 square feet and a nominal thickness of one, two, or three centimeters. However, the scope of these Orders includes surface products of all other sizes, thicknesses, and shapes. In addition to slabs, the scope of these Orders includes, but is not limited to, other surfaces such as countertops, backsplashes, vanity tops, bar tops, work tops, tabletops, flooring, wall facing, shower surrounds, fire place surrounds, mantels, and tiles. Certain quartz surface products are covered by these Orders whether polished or unpolished, cut or uncut, fabricated or not fabricated, cured or uncured, edged or not edged, finished or unfinished, thermoformed or not thermoformed, packaged or unpackaged, and regardless of the type of surface finish. In addition, quartz surface

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<sup>13</sup> 19 U.S.C. § 1677(10); *see, e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. 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, 96<sup>th</sup> Cong., 1<sup>st</sup> Sess. 90-91 (1979).

<sup>14</sup> *See, e.g., Internal Combustion Industrial Forklift Trucks from Japan*, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8-9 (Dec. 2005); *Crawfish Tail Meat from China*, Inv. No. 731-TA- 752 (Review), USITC Pub. 3614 at 4 (July 2003); *Steel Concrete Reinforcing Bar from Turkey*, Inv. No. 731- TA-745 (Review), USITC Pub. 3577 at 4 (Feb. 2003).

products are covered by these Orders whether or not they are imported attached to, or in conjunction with, non-subject merchandise such as sinks, sink bowls, vanities, cabinets, and furniture. If quartz surface products are imported attached to, or in conjunction with, such non-subject merchandise, only the quartz surface product is covered by the scope.

Subject merchandise includes material matching the above description that has been finished, packaged, or otherwise fabricated in a third country, including by cutting, polishing, curing, edging, thermoforming, attaching to, or packaging with another product, or any other finishing, packaging, or fabrication that would not otherwise remove the merchandise from the scope of these Orders if performed in the country of manufacture of the quartz surface products. The scope of these Orders does not cover quarried stone surface products, such as granite, marble, soapstone, or quartzite. Specifically excluded from the scope of these Orders are crushed glass surface products. Crushed glass surface products must meet each of the following criteria to qualify for this exclusion: (1) The crushed glass content is greater than any other single material, by actual weight; (2) there are pieces of crushed glass visible across the surface of the product; (3) at least some of the individual pieces of crushed glass that are visible across the surface are larger than 1 centimeter wide as measured at their widest cross-section (Glass Pieces); and (4) the distance between any single Glass Piece and the closest separate Glass Piece does not exceed three inches.

The products subject to the scope are currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) under the following subheading: 6810.99.0010. Subject merchandise may also enter under subheadings 6810.11.0010, 6810.11.0070, 6810.19.1200, 6810.19.1400, 6810.19.5000, 6810.91.0000, 6810.99.0080, 6815.99.4070, 2506.10.0010, 2506.10.0050, 2506.20.0010, 2506.20.0080, and 7016.90.1050. The HTSUS subheadings set forth above are provided for convenience and U.S.

Customs purposes only. The written description of the scope is dispositive.<sup>15</sup>

Quartz surface products are compacted stone composite building materials used for countertop surfaces or aesthetic accents in residential, commercial, and industrial properties.<sup>16</sup> Quartz surface products compete with quarried natural stone products, such as granite or marble.<sup>17</sup> The scope of these reviews covers both raw material slabs and finished products.<sup>18</sup>

In its original determinations, the Commission defined a single domestic like product consisting of quartz slabs and fabricated QSP coextensive with Commerce's scope.<sup>19</sup> In the current reviews, the record does not contain any new information suggesting that the relevant facts have changed since the original investigations so as to warrant revisiting the Commission's domestic like product definition.<sup>20</sup> The domestic interested parties agree with the Commission's definition of the domestic like product from the original investigations.<sup>21</sup> Consequently, based

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<sup>15</sup> *Quartz Surface Products From India and the Republic of Türkiye: Final Results of the Expedited First Sunset Reviews of the Countervailing Duty Orders*, 90 Fed. Reg. 40340 (Aug. 19, 2025) and accompanying Issues and Decision Memorandum at 2-3; *Quartz Surface Products From India: Final Results of the Expedited First Sunset Review of the Antidumping Duty Order*, 90 Fed. Reg. 41993 (Aug. 28, 2025) and accompanying Issues and Decision Memorandum at 2-3; *Certain Quartz Surface Products From the Republic of Türkiye: Final Results of the Expedited First Sunset Review of the Antidumping Duty Order*, 90 Fed. Reg. 42384 (Sep. 2, 2025) and accompanying Issues and Decision Memorandum at 2-3; see also CR/PR at 1.4-1.5.

<sup>16</sup> CR/PR at 1.7.

<sup>17</sup> CR/PR at 1.7.

<sup>18</sup> CR/PR at 1.7.

<sup>19</sup> *Original Determinations*, USITC Pub. 5061, at 7-8. In its preliminary and final determinations, the Commission defined a single domestic like product after considering whether fabricated QSP ("fabs") or quartz glass should be separate domestic like products. *Quartz Surface Products from India and Turkey*, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451 (Preliminary), USITC Pub. 4919, at 8-11 (July 2019); *Original Determinations*, USITC Pub. 5061 at 8 n.26. With respect to whether fabs and slabs should be defined to be separate domestic like products, in the preliminary determinations, the Commission observed that it had previously addressed this issue in investigations regarding imports from China ("*QSP from China*"), which involved the same product and scope and an overlapping period of investigation. *Quartz Surface Products from India and Turkey*, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451 (Preliminary), USITC Pub. 4919, at 8 (July 2019); see also *Quartz Surface Products from China*, Inv. Nos. 701-TA-606 & 731-TA-1416 (Preliminary), USITC Pub. 4794, at 9-10 (June 2018); *Quartz Surface Products from China*, Inv. Nos. 701-TA-606 & 731-TA-1416 (Final), USITC Pub. 4913, at 9 (June 2019).

<sup>20</sup> See generally CR/PR at 1.7-1.12.

<sup>21</sup> Domestic Interested Parties' Response at 22.

on the limited record of these expedited reviews, we again define a single domestic like product consisting of all QSP coextensive with the scope of the reviews.

## **B. Domestic Industry and Related Parties**

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”<sup>22</sup> In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.<sup>23</sup> Exclusion of such a producer is within the Commission’s discretion based upon the facts presented in each investigation.<sup>24</sup>

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<sup>22</sup> 19 U.S.C. § 1677(4)(A). The definitions in 19 U.S.C. § 1677 are applicable to the entire subtitle containing the antidumping and countervailing duty laws, including 19 U.S.C. §§ 1675 and 1675a. See 19 U.S.C. § 1677.

<sup>23</sup> 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).

<sup>24</sup> The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

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

*Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int’l. Trade 2015), *aff’d*, 879 F.3d 1377 (Fed. Cir. 2018); see also *Torrington Co. v. United States*, 790 F. Supp. at 1168.

In the original investigations, the Commission did not exclude any related parties.<sup>25</sup> The Commission defined a single domestic industry comprised of all domestic producers of QSP, including stand-alone fabricators.<sup>26</sup>

In the current reviews, the domestic interested parties agree with the Commission's definition of the domestic industry from the original investigations.<sup>27</sup> According to the domestic interested parties, domestic producer Elite Quartz may qualify as a related party because it is a joint venture between U.S. importer M. S. International and Chinese producer Spectrum Quartz.<sup>28</sup> There is no information on the record, however, that M. S. International imported QSP from India or Turkey, or that Spectrum Quartz exported QSR from India or Turkey to the United States, during the period of review, as would be necessary for Elite Quartz to qualify as a related party.<sup>29</sup> Furthermore, because Elite Quartz did not respond to the notice of institution, there is no information on its domestic operations on the record that could be excluded from domestic industry data.

In sum, consistent with our definition of the domestic like product, and based on the limited record of these expedited reviews, we again define the domestic industry as all domestic producers of QSP, including stand-alone fabricators.

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<sup>25</sup> In its original determinations, the Commission found that two fabricators qualified as related parties but that appropriate circumstances did not exist to exclude either firm from the domestic industry. *Original Determinations*, USITC Pub. 5061, at 12-14.

<sup>26</sup> *Original Determinations*, USITC Pub. 5061, at 9-12. In addition to examining whether to exclude any domestic producers under the related parties provision, in its original determinations the Commission also addressed whether stand-alone fabricators were engaged in sufficient production-related operations to be included in the domestic industry definition along with slab producers. *Id.* at 9-12. The Commission defined the domestic industry as all producers of QSP, including both slab producers and fabricators. *Id.* at 12. There is no new information or argument on the record of these expedited reviews to suggest that we should reach a different conclusion in these reviews. Accordingly, based on the limited record of these expedited reviews, we again find that stand-alone fabricators qualify as domestic producers.

<sup>27</sup> Domestic Interested Parties' Response at 22.

<sup>28</sup> Domestic Interested Parties' Response at 20, Exhs. 13 & 26.

<sup>29</sup> See Domestic Interested Parties' Response at Exh. 1 (not listing M. S. International as an importer of subject merchandise or Spectrum Quartz as a foreign producer or exporter of subject merchandise during the period of review). Based on his reading of the statute, Commissioner Kearns believes the Commission has the authority to find a domestic producer to be a related party in an administrative review if the producer was deemed a related party in the original investigation or if there is evidence that, absent the order, there would be imports or purchases of subject merchandise by this producer or exports by affiliated foreign producers. In any event, in this review, Commissioner Kearns does not find appropriate circumstances exist to exclude Elite Quartz from the domestic industry.

### III. Cumulation

#### A. Legal Standard

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

the Commission may cumulatively assess the volume and effect of imports of the subject merchandise from all countries with respect to which reviews under section 1675(b) or (c) of this title were initiated on the same day, if such imports would be likely to compete with each other and with domestic like products in the United States market. The Commission shall not cumulatively assess the volume and effects of imports of the subject merchandise in a case in which it determines that such imports are likely to have no discernible adverse impact on the domestic industry.<sup>30</sup>

Cumulation therefore is discretionary in five-year reviews, unlike original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.<sup>31</sup> The Commission may exercise its discretion to cumulate, however, only if the reviews are initiated on the same day, the Commission determines that the subject imports are likely to compete with each other and the domestic like product in the U.S. market, and imports from each such subject country are not likely to have no discernible adverse impact on the domestic industry in the event of revocation. Our focus in five-year reviews is not only on present conditions of competition, but also on likely conditions of competition in the reasonably foreseeable future.

#### B. Prior Proceedings and Arguments of the Parties

*Original Investigations.* The Commission cumulated subject imports from India and Turkey for its material injury analysis. It found that subject imports from each subject country and the domestic like product were fungible with each other, sold in similar channels of distribution and geographic markets, and simultaneously present in the U.S. market.<sup>32</sup> With respect to fungibility,

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<sup>30</sup> 19 U.S.C. § 1675a(a)(7).

<sup>31</sup> 19 U.S.C. § 1677(7)(G)(i); *see also, e.g., Nucor Corp. v. United States*, 601 F.3d 1291, 1293 (Fed. Cir. 2010) (Commission may reasonably consider likely differing conditions of competition in deciding whether to cumulate subject imports in five-year reviews); *Allegheny Ludlum Corp. v. United States*, 475 F. Supp. 2d 1370, 1378 (Ct. Int'l Trade 2006) (recognizing the wide latitude the Commission has in selecting the types of factors it considers relevant in deciding whether to exercise discretion to cumulate subject imports in five-year reviews); *Nucor Corp. v. United States*, 569 F. Supp. 2d 1328, 1337-38 (Ct. Int'l Trade 2008).

<sup>32</sup> *Original Determinations*, USITC Pub. 5061, at 19.

the Commission concluded that a large majority of responding U.S. producers and purchasers, and at least half of importers, reported products from the different sources to be always or frequently interchangeable.<sup>33</sup> It also found substantial overlap in channels of distribution and geographic overlap in U.S. shipments of QSP from each subject source and the domestic like product.<sup>34</sup> Further, the Commission found that the domestic like product and subject imports from each source were present in the U.S. market every month of the period of investigation.<sup>35</sup> The Commission accordingly found a reasonable overlap of competition between and among the domestic like product and imports from India and Turkey,<sup>36</sup> and analyzed subject imports from India and Turkey on a cumulated basis in evaluating whether the domestic industry was materially injured by reason of subject imports.<sup>37</sup>

*Current Reviews.* Although they do not explicitly argue that the Commission should cumulate subject imports from India and Turkey, domestic interested parties analyze the volume, price, and impact effects of subject imports on a cumulated basis.<sup>38</sup>

### **C. Analysis**

The statutory threshold for cumulation is satisfied as all reviews were instituted on the same day, May 1, 2025.<sup>39</sup> We consider the following issues in deciding whether to exercise our discretion to cumulate the subject imports: (1) whether imports from any of the subject countries are precluded from cumulation because they are likely to have no discernible adverse impact on the domestic industry; (2) whether there is a likelihood of a reasonable overlap of competition among subject imports and the domestic like product; and (3) whether subject imports are likely to compete in the U.S. market under different conditions of competition.

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

The statute precludes cumulation if the Commission finds that subject imports from a country are likely to have no discernible adverse impact on the domestic industry.<sup>40</sup> Neither the

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<sup>33</sup> *Original Determinations*, USITC Pub. 5061, at 18.

<sup>34</sup> *Original Determinations*, USITC Pub. 5061, at 18-19.

<sup>35</sup> *Original Determinations*, USITC Pub. 5061, at 19.

<sup>36</sup> *Original Determinations*, USITC Pub. 5061, at 19.

<sup>37</sup> *Original Determinations*, USITC Pub. 5061, at 19.

<sup>38</sup> *See, generally*, Domestic Interested Parties' Response at 13-19.

<sup>39</sup> *Quartz Surface Products from India and Turkey; Institution of Five-Year Reviews*, 90 Fed. Reg. 18697 (May 1, 2025).

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

statute nor the Uruguay Round Agreements Act (“URAA”) Statement of Administrative Action (“SAA”) provides specific guidance on what factors the Commission is to consider in determining that imports “are likely to have no discernible adverse impact” on the domestic industry.<sup>41</sup> With respect to this provision, the Commission generally considers the likely volume of subject imports and the likely impact of those imports on the domestic industry within a reasonably foreseeable time if the orders are revoked. Our analysis for each of the subject countries takes into account, among other things, the nature of the product and the behavior of subject imports in the original investigations.

Based on the record, we do not find that subject imports from India or Turkey are likely to have no discernible adverse impact on the domestic industry in the event of revocation of the respective countervailing and antidumping duty orders.

*India.* In the original investigations, the volume of subject imports from India increased from \*\*\* square feet in 2017 to \*\*\* square feet in 2018 and \*\*\* square feet in 2019.<sup>42</sup> Their share of U.S. imports increased from \*\*\* percent in 2017 to \*\*\* percent in 2018 and \*\*\* percent in 2019.<sup>43</sup>

The Commission received foreign producer/exporter questionnaire responses from 23 firms in India in the original investigations.<sup>44</sup> These firms’ exports to the United States accounted for \*\*\* percent of U.S. imports of QSP from India in 2019 and \*\*\* percent of production of QSP in India in 2019.<sup>45</sup> Responding Indian producers’ QSP production and capacity increased from 2017 to 2019 (by \*\*\* percent and \*\*\* percent, respectively).<sup>46</sup> The responding firms’ capacity utilization rate ranged from \*\*\* to \*\*\* percent throughout the period of investigation.<sup>47</sup> The responding Indian producers’ exports to the United States increased by \*\*\* percent from 2017 to 2019.<sup>48</sup>

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

<sup>42</sup> *Confidential Report*, Memorandum INV-SS-058 (May 18, 2020), EDIS Doc. 855393, at Table IV-2.

<sup>43</sup> *Confidential Report*, Memorandum INV-SS-058 (May 18, 2020), EDIS Doc. 855393, at Table IV-2.

<sup>44</sup> CR/PR at 1.20; *Original Determinations*, USITC Pub. 5061 at VII-3 & n.2.

<sup>45</sup> CR/PR at 1.20; *Confidential Report*, Memorandum INV-SS-058 (May 18, 2020), EDIS Doc. 855393, at VII-3.

<sup>46</sup> *Confidential Report*, Memorandum INV-SS-058 (May 18, 2020), EDIS Doc. 855393, at VII-9 & Table VII-4.

<sup>47</sup> *Confidential Report*, Memorandum INV-SS-058 (May 18, 2020), EDIS Doc. 855393, at Table VII-4.

<sup>48</sup> *Confidential Report*, Memorandum INV-SS-058 (May 18, 2020), EDIS Doc. 855393, at VII-9 & Table VII-4.

In the current reviews, there is limited information on the QSP industry in India, as no subject foreign producer responded to the notice of institution. However, the information available indicates that the subject industry in India remains large and is a leading global exporter. The domestic interested parties identified 92 firms as possible producers of QSP in India.<sup>49</sup> According to record evidence, a number of Indian firms related to the production of QSP announced future production expansions and openings during the period of review.<sup>50</sup>

Global Trade Atlas (“GTA”) data for Harmonized Schedule (“HS”) subheading 6810.99, a category that includes QSP and out-of-scope products, shows that India was the third or fourth largest global exporter, by value, in every year of the period of review.<sup>51</sup> According to GTA data, the value of Indian global exports of merchandise under HS subheading 6810.99 fluctuated upward over the period of review, increasing from \$139.1 million in 2020 to \$257.1 million in 2021 and \$287.4 million in 2022, before briefly decreasing to \$276.9 million in 2023, and increasing again to \$316.8 million 2024.<sup>52</sup> The United States was by far the largest destination market for Indian exports of merchandise under HS subheading 6810.99, with GTA data showing that the value of such exports to the United States increased from \$123.7 million in 2020 to \$229.5 million in 2021 and \$265.6 million 2022, before briefly decreasing to \$248.0 million in 2023, and increasing again to \$281.0 million in 2024.<sup>53</sup>

During the period of review, subject imports from India fluctuated upward, increasing from 28.0 million square feet in 2020 to 55.5 million square feet in 2021 and 70.5 million square feet in 2022, before briefly decreasing to 57.3 million square feet in 2023, and increasing again to 85.2 million square feet in 2024.<sup>54</sup> In 2024, subject imports from India accounted for \*\*\* percent of apparent U.S. consumption by quantity,<sup>55</sup> thereby retaining customers and distribution networks in the United States and indicating the continued attractiveness of the U.S. market to Indian producers.

During the original investigations, the average prices of subject imports from India were lower than the average sales prices for the domestically produced product in all 72 quarterly comparisons involving \*\*\* square feet of QSP imported from India, with price differentials

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<sup>49</sup> CR/PR at 1.20; Domestic Interested Parties’ Response at Exh. 1.

<sup>50</sup> See CR/PR at Table 1.7.

<sup>51</sup> See CR/PR at Table 1.11.

<sup>52</sup> CR/PR at Table 1.11.

<sup>53</sup> CR/PR at Table 1.8.

<sup>54</sup> CR/PR at Table 1.5.

<sup>55</sup> CR/PR at Table 1.6.

ranging from \*\*\* to \*\*\* percent.<sup>56</sup> No pricing data for subject imports from India were available in the current reviews.

Based on the record, including the significant and increasing volume and market share of subject imports from India in the original investigations, the continued presence of subject imports from India in the U.S. market notwithstanding the orders, the large size of the Indian industry and its substantial exports of QSP, and the underselling by subject imports from India in the original investigations, we do not find that subject imports from India would likely have no discernible adverse impact on the domestic industry if the orders covering these imports were to be revoked.

*Turkey.* In the original investigations, the volume of subject imports from Turkey increased from \*\*\* square feet in 2017 to \*\*\* square feet in 2018 and \*\*\* square feet in 2019.<sup>57</sup> Their share of U.S imports increased from \*\*\* percent in 2017 to \*\*\* percent in 2018 and \*\*\* percent in 2019.<sup>58</sup>

The Commission received foreign producer/exporter questionnaire responses from three firms in Turkey in the original investigations.<sup>59</sup> Those firms' exports to the United States accounted for approximately \*\*\* percent of U.S. imports of QSP from Turkey in 2019 and approximately \*\*\* percent of production of QSP in Turkey in 2019.<sup>60</sup> Responding Turkish producers' QSP production and capacity increased from 2017 to 2019 (by \*\*\* percent and \*\*\* percent, respectively).<sup>61</sup> The responding firms' capacity utilization rate ranged from \*\*\* to \*\*\* percent throughout the period of investigation.<sup>62</sup> Their exports to the United States increased by \*\*\* percent from 2017 to 2019.<sup>63</sup>

In the current reviews, there is limited information on the QSP industry in Turkey, as no

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<sup>56</sup> *Confidential Report*, Memorandum INV-SS-058 (May 18, 2020), EDIS Doc. 855393, at V-22.

<sup>57</sup> *Confidential Report*, Memorandum INV-SS-058 (May 18, 2020), EDIS Doc. 855393, at Table IV-2.

<sup>58</sup> *Confidential Report*, Memorandum INV-SS-058 (May 18, 2020), EDIS Doc. 855393, at Table IV-2.

<sup>59</sup> CR/PR at 1.20; *Original Determinations*, USITC Pub. 5061, at VII-13.

<sup>60</sup> CR/PR at 1.20; *Confidential Report*, Memorandum INV-SS-058 (May 18, 2020), EDIS Doc. 855393, at VII-13.

<sup>61</sup> *Confidential Report*, Memorandum INV-SS-058 (May 18, 2020), EDIS Doc. 855393, at VII-15 & Table VII-8.

<sup>62</sup> *Confidential Report*, Memorandum INV-SS-058 (May 18, 2020), EDIS Doc. 855393, at Table VII-8.

<sup>63</sup> *Confidential Report*, Memorandum INV-SS-058 (May 18, 2020), EDIS Doc. 855393, at VII-15 & Table VII-8.

subject foreign producer responded to the notice of institution. However, the information available indicates that the subject industry in Turkey remains large and is a leading global exporter. The domestic interested parties identified 25 firms as possible producers of QSP in Turkey.<sup>64</sup> At least one Turkish firm related to the production of QSP announced a future production expansion during the period of review.<sup>65</sup>

According to GTA data, the value of Turkish global exports of merchandise under HS subheading 6810.99 fluctuated upward over the period of review, increasing from \$60.5 million in 2020 to \$103.8 million in 2021 before decreasing to \$101.6 million in 2022, \$84.8 million in 2023, and \$84.6 million in 2024.<sup>66</sup> The United States was by far the largest destination market for Turkish exports of merchandise under HS subheading 6810.99, with GTA data showing that the value of such exports to the United States increased from \$41.4 million in 2020 to \$73.5 million in 2021, before decreasing to \$67.8 million in 2022, \$44.7 million in 2023, and \$41.4 million in 2024.<sup>67</sup>

During the period of review, subject imports from Turkey fluctuated upward, increasing from 5.2 million square feet in 2020 to 10.4 million square feet in 2021, before decreasing to 9.5 million square feet in 2022, 6.6 million square feet in 2023, and 6.2 million square feet in 2024.<sup>68</sup> In 2024, subject imports from Turkey accounted for \*\*\* percent of apparent U.S. consumption by quantity,<sup>69</sup> thereby retaining customers and distribution networks in the United States and indicating the continued attractiveness of the U.S. market to Turkish producers.

During the original investigations, the average prices of subject imports from Turkey were lower than the average sales prices for the domestically produced product in all 57 quarterly comparisons involving \*\*\* square feet of QSP imported from Turkey, with price differentials ranging from \*\*\* to \*\*\* percent.<sup>70</sup> No pricing data for subject imports from Turkey were available in the current reviews.

Based on the record, including the significant and increasing volume and market share of subject imports from Turkey in the original investigations, the continued presence of subject imports from Turkey in the U.S. market notwithstanding the orders, the size of the Turkish industry and its substantial exports of QSP to the United States, and the underselling by subject imports from Turkey in the original investigations, we do not find that subject imports from

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<sup>64</sup> CR/PR at 1.22; Domestic Interested Parties' Response at Exh. 1.

<sup>65</sup> See CR/PR at Table 1.7.

<sup>66</sup> CR/PR at Table 1.10.

<sup>67</sup> CR/PR at Table 1.10.

<sup>68</sup> CR/PR at Table 1.5.

<sup>69</sup> CR/PR at Table 1.6.

<sup>70</sup> *Confidential Report*, Memorandum INV-SS-058 (May 18, 2020), EDIS Doc. 855393, at V-

Turkey would likely have no discernible adverse impact on the domestic industry if the orders covering these imports were to be revoked.

## 2. Likelihood of a Reasonable Overlap of Competition

The Commission generally has considered four factors intended to provide a framework for determining whether subject imports compete with each other and with the domestic like product.<sup>71</sup> Only a “reasonable overlap” of competition is required.<sup>72</sup> In five-year reviews, the relevant inquiry is whether there likely would be competition even if none currently exists because the subject imports are absent from the U.S. market.<sup>73</sup>

*Fungibility.* In the original investigations the Commission found that QSP from domestic and subject sources is fungible, as a large majority of responding U.S. producers and purchasers, and at least half of importers, reported products from the different sources to be always or frequently interchangeable.<sup>74</sup> In comparisons between products from different sources concerning 20 purchasing factors, pluralities or majorities of purchasers found that that the domestic product and subject imports from India were comparable with respect to 18 factors, and

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<sup>71</sup> The four factors generally considered by the Commission in assessing whether imports compete with each other and with the domestic like product are as follows: (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality-related questions; (2) the presence of sales or offers to sell in the same geographical markets of imports from different countries and the domestic like product; (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and (4) whether subject imports are simultaneously present in the market with one another and the domestic like product. *See, e.g., Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

<sup>72</sup> *See Mukand Ltd. v. United States*, 937 F. Supp. 910, 916 (Ct. Int’l Trade 1996); *Wieland Werke*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”); *United States Steel Group v. United States*, 873 F. Supp. 673, 685 (Ct. Int’l Trade 1994), *aff’d*, 96 F.3d 1352 (Fed. Cir. 1996). We note, however, that there have been investigations where the Commission has found an insufficient overlap in competition and has declined to cumulate subject imports. *See, e.g., Live Cattle from Canada and Mexico*, Inv. Nos. 701-TA-386 and 731-TA-812-13 (Preliminary), USITC Pub. 3155 at 15 (Feb. 1999), *aff’d sub nom, Ranchers-Cattlemen Action Legal Foundation v. United States*, 74 F. Supp. 2d 1353 (Ct. Int’l Trade 1999); *Static Random Access Memory Semiconductors from the Republic of Korea and Taiwan*, Inv. Nos. 731-TA-761-62 (Final), USITC Pub. 3098 at 13-15 (Apr. 1998).

<sup>73</sup> *See generally, Cheflene Corp. v. United States*, 219 F. Supp. 2d 1313, 1314 (Ct. Int’l Trade 2002).

<sup>74</sup> *Original Determinations*, USITC Pub. 5061, at 18.

that the domestic product and subject imports from Turkey and subject imports from India and Turkey were comparable with respect to all 20 factors.<sup>75</sup> Majorities of purchasers found that subject imports from India and Turkey were comparable with respect to all 20 factors.<sup>76</sup>

In these current reviews, the domestic interested parties claim that QSP from domestic and subject sources continues to be substitutable.<sup>77</sup> Given the general substitutability reported for all products in the prior proceedings and the fact that there is no new information on the record of these reviews to indicate that the fungibility between and among subject imports from India and Turkey and the domestic like product has changed since the original investigations, we find that the QSP from India and Turkey would likely be fungible with each other and with the domestic like product in the event of revocation of the orders.

*Channels of Distribution.* In the original investigations, the Commission found that the domestic like product and subject imports from India and Turkey were predominately shipped to, and competed for sales with, fabricators/retailers with appreciable quantities also shipped to distributors, contractors/builders, and end users.<sup>78</sup> In these current reviews, there is no new information on the record indicating that the channels of distribution have changed since the prior proceedings or are likely to do so upon revocation.

*Geographic Overlap.* In the original investigations, the Commission found that U.S. producers and importers of subject merchandise from India and Turkey reported selling QSP in all regions of the contiguous United States.<sup>79</sup> In these current reviews, the largest share of subject imports from India and Turkey entered the U.S. market through eastern borders of entry followed by southern borders of entry.<sup>80</sup>

*Simultaneous Presence in Market.* In the original investigations, the Commission found that the domestic like product and subject imports from India and Turkey were present in the U.S. market in every month of the period of investigation.<sup>81</sup> In these current reviews, imports from India and Turkey were both reported in all of the 60 months between 2020 and 2024.<sup>82</sup>

*Conclusion.* The record in these expedited reviews contains limited information concerning subject imports in the U.S. market during the period of review and no information suggesting a change in the considerations that led the Commission to conclude that there was a

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<sup>75</sup> *Original Determinations*, USITC Pub. 5061, at 18.

<sup>76</sup> *Original Determinations*, USITC Pub. 5061, at 18-19.

<sup>77</sup> Domestic Interested Parties' Response at 11-12.

<sup>78</sup> *Original Determinations*, USITC Pub. 5061, at 19.

<sup>79</sup> *Original Determinations*, USITC Pub. 5061, at 19.

<sup>80</sup> CR/PR at 1.18.

<sup>81</sup> *Original Determinations*, USITC Pub. 5061, at 19.

<sup>82</sup> CR/PR at 1.18.

likely reasonable overlap of competition between and among subject imports from India and Turkey and the domestic like product in the original investigations. Accordingly, and in the absence of any contrary argument, we find that there would likely be a reasonable overlap of competition among subject imports from India and Turkey and between the domestic like product and subject imports from each source if the orders were revoked.

### **3. Likely Conditions of Competition**

In determining whether to exercise our discretion to cumulate the subject imports, we assess whether subject imports from the subject countries are likely to compete under similar or different conditions in the U.S. market after revocation of the orders.

The record in these expedited reviews contains limited current information about the U.S. market for QSP and the QSP industries in India and Turkey. The available information shows that imports of QSP from each of the subject countries were present in the U.S. market throughout the period of review, that the subject countries export substantial volumes of QSP, and that imports for each of the subject countries undersold the U.S. product in all comparisons during the original investigations. Based on the information available, and in the absence of any argument to the contrary, we do not find any significant difference in likely conditions of competition that would warrant not cumulating subject imports from India and Turkey.

#### **D. Conclusion**

In sum, we determine that subject imports of QSP from India and Turkey, considered individually, would not likely have no discernible adverse impact on the domestic industry if the corresponding orders were revoked. We also find a likely reasonable overlap of competition between subject imports from India and Turkey and between the subject imports from each subject country and the domestic like product. Finally, we find that subject imports from each of the subject countries are likely to compete in the U.S. market under similar conditions of competition should the orders be revoked. We therefore exercise our discretion to cumulate subject imports from India and Turkey.

## **IV. Revocation of the Antidumping and Countervailing Duty Orders Would Likely Lead to Continuation or Recurrence of Material Injury Within a Reasonably**

## Foreseeable Time

### A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”<sup>83</sup> The SAA states that “under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports.”<sup>84</sup> Thus, the likelihood standard is prospective in nature.<sup>85</sup> 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.<sup>86</sup>

The statute states that “the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time.”<sup>87</sup> According to the SAA, a “‘reasonably foreseeable time’ will vary from case-to-case, but

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<sup>83</sup> 19 U.S.C. § 1675a(a).

<sup>84</sup> SAA, H.R. Rep. No. 103-316 vol. I at 883-84. The SAA states that “{t}he likelihood of injury standard applies regardless of the nature of the Commission’s original determination (material injury, threat of material injury, or material retardation of an industry). Likewise, the standard applies to suspended investigations that were never completed.” *Id.* at 883.

<sup>85</sup> While the SAA states that “a separate determination regarding current material injury is not necessary,” it indicates that “the Commission may consider relevant factors such as current and likely continued depressed shipment levels and current and likely continued {sic} prices for the domestic like product in the U.S. market in making its determination of the likelihood of continuation or recurrence of material injury if the order is revoked.” SAA at 884.

<sup>86</sup> See *NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int’l Trade 2003) (“‘likely’ means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)”), *aff’d mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) (“more likely than not” standard is “consistent with the court’s opinion;” “the court has not interpreted ‘likely’ to imply any particular degree of ‘certainty’”); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) (“standard is based on a likelihood of continuation or recurrence of injury, not a certainty”); *Usinor v. United States*, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

<sup>87</sup> 19 U.S.C. § 1675a(a)(5).

normally will exceed the ‘imminent’ timeframe applicable in a threat of injury analysis in original investigations.”<sup>88</sup>

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to “consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated.”<sup>89</sup> It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).<sup>90</sup> The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission’s determination.<sup>91</sup>

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.<sup>92</sup> In doing so, the Commission must consider “all

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<sup>88</sup> SAA at 887. Among the factors that the Commission should consider in this regard are “the fungibility or differentiation within the product in question, the level of substitutability between the imported and domestic products, the channels of distribution used, the methods of contracting (such as spot sales or long-term contracts), and lead times for delivery of goods, as well as other factors that may only manifest themselves in the longer term, such as planned investment and the shifting of production facilities.” *Id.*

<sup>89</sup> 19 U.S.C. § 1675a(a)(1).

<sup>90</sup> 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings. See *Quartz Surface Products from India: Final Results of the Expedited First Sunset Review of the Antidumping Duty Order*, 90 Fed. Reg. 41993 (Aug. 28, 2025); *Certain Quartz Surface Products From the Republic of Türkiye: Final Results of Expedited First Sunset Review of the Antidumping Duty Order*, 90 Fed. Reg. 42384 (Sep. 2, 2025); see also Department of Commerce Memorandum from Scott Fullerton to Abdelali Elouaradia, Issues and Decision Memorandum for the Final Results of the Expedited Sunset Review of the Antidumping Duty Order on Quartz Surface Products from India, Aug. 22, 2025, at 4; Department of Commerce Memorandum from Scott Fullerton to Abdelali Elouaradia, Issues and Decision Memorandum for the Final Results of the First Expedited Sunset Review of the Antidumping Duty Order on Certain Quartz Surface Products from the Republic of Türkiye, Aug. 27, 2025, at 3.

<sup>91</sup> 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

<sup>92</sup> 19 U.S.C. § 1675a(a)(2).

relevant economic factors,” including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.<sup>93</sup>

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.<sup>94</sup>

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.<sup>95</sup> All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to 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.<sup>96</sup>

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<sup>93</sup> 19 U.S.C. § 1675a(a)(2)(A-D).

<sup>94</sup> See 19 U.S.C. § 1675a(a)(3). The SAA states that “{c}onsistent with its practice in investigations, in considering the likely price effects of imports in the event of revocation and termination, the Commission may rely on circumstantial, as well as direct, evidence of the adverse effects of unfairly traded imports on domestic prices.” SAA at 886.

<sup>95</sup> 19 U.S.C. § 1675a(a)(4).

<sup>96</sup> The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, the Commission “considers, in addition to imports, other factors that may be (Continued ...)

No respondent interested party participated in these expedited reviews. The record, therefore, contains limited new information with respect to the QSP industries in India and Turkey. There is also limited information on the QSP market in the United States during the review period. Accordingly, for our determinations, we rely as appropriate on the facts available from the original investigations, and the limited new information on the record in these five-year reviews.

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

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”<sup>97</sup> The following conditions of competition inform our determination.

### **1. Demand Conditions**

*Original Investigations.* The Commission found that U.S. demand for QSP in slab form depends on the demand for fabricated QSP products, which have a variety of end uses, including kitchen, bathroom, and commercial countertops, vanities, flooring, tiles, shower walls and pans, window sills, thresholds, basins, chairs, and cabinets.<sup>98</sup> It found that there were multiple types of end users of fabricated QSP, including builders and contractors engaged in new construction and remodeling of homes and commercial properties, as well as homeowners engaged in remodeling projects.<sup>99</sup> It noted that U.S. demand for fabricated QSP products was driven by remodeling and construction activity.<sup>100</sup> It found that, although half of U.S. producers, more than half of U.S. importers, and most U.S. purchasers reported that the U.S. market for QSP is not subject to business cycles, some market participants indicated that the market was affected by construction or renovation cycles or consumer preferences for alternative products, including porcelain, marble, granite, and stone.<sup>101</sup> It found that the vast majority of market participants reported that U.S. demand for QSP had increased since January 1, 2017, consistent with data indicating that

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contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.” SAA at 885.

<sup>97</sup> 19 U.S.C. § 1675a(a)(4).

<sup>98</sup> *Original Determinations*, USITC Pub. 5061, at 22.

<sup>99</sup> *Original Determinations*, USITC Pub. 5061, at 23.

<sup>100</sup> *Original Determinations*, USITC Pub. 5061, at 22-23.

<sup>101</sup> *Original Determinations*, USITC Pub. 5061, at 23.

apparent U.S. consumption for QSP had increased over the POI.<sup>102</sup> Apparent U.S. consumption, as measured by quantity, had increased from \*\*\* square feet in 2017, to \*\*\* square feet in 2018, an increase of \*\*\* percent, but then declined by \*\*\* percent to \*\*\* square feet in 2019.<sup>103</sup>

*Current Reviews.* There is no new information on the record of these reviews indicating that the factors influencing demand have changed since the original investigations. The record indicates that demand for QSP continues to be driven by construction and remodeling of homes and commercial properties.<sup>104</sup> The domestic interested parties state that after peaking in 2021 and 2022, U.S. demand declined moderately and then flattened out.<sup>105</sup> The domestic interested parties argue that new residential construction peaked in April 2022, declined somewhat in 2022 and 2023, and remained flat in 2024 and 2025.<sup>106</sup> They also maintain that home remodeling activity showed declines in 2022 and 2023 before flattening out in 2024.<sup>107</sup> They claim that, while housing construction and renovation activity have declined or been flat over the last five years, demand for QSP has shown sustained growth as consumers continue to switch to QSP over other alternatives due to its superior aesthetic and performance characteristics.<sup>108</sup>

Apparent U.S. consumption of QSP, as measured by quantity, was \*\*\* square feet in 2024, which was higher than in 2019, the last year examined in the original investigations, when apparent U.S. consumption was \*\*\* square feet.<sup>109</sup>

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<sup>102</sup> *Original Determinations*, USITC Pub. 5061, at 23.

<sup>103</sup> *Confidential Original Determinations*, EDIS Doc. 855395, at 32. In the original investigations, the Commission relied on quantity data for its assessment of apparent U.S. consumption and market shares. To ensure no double counting, only U.S. producers' quantity data, excluding independent fabricators data, was relied on. U.S. producers' U.S. shipment value also did not include the value added by independent fabricators due to (1) the dearth of useable questionnaire data received from independent fabricators, (2) technical issues with the data received from independent fabricators, and (3) the lack of materiality and representativeness of the data received from independent fabricators. See Confidential Report, Memorandum INV-SS-058 (May 18, 2020), EDIS Doc. 855393, at Table IV-11, Note.

<sup>104</sup> Domestic Interested Parties' Response at 7; Domestic Interested Parties' Final Comments at 3.

<sup>105</sup> Domestic Interested Parties' Response at 9; Domestic Interested Parties' Final Comments.

<sup>106</sup> See Domestic Interested Parties' Response at 7-8; Domestic Interested Parties' Final Comments at 3.

<sup>107</sup> Domestic Interested Parties' Response at 8-9; Domestic Interested Parties' Final Comments at 3.

<sup>108</sup> Domestic Interested Parties' Final Comments at 3.

<sup>109</sup> CR/PR at Table 1.6. Domestic industry data in these reviews are based upon the (Continued ...)

## 2. Supply Conditions

*Original Investigations.* The Commission found that the domestic industry was the second largest source of supply to the U.S. market in 2017 and 2018 and the smallest source of supply in 2019.<sup>110</sup> The domestic industry's share of apparent U.S. consumption declined from \*\*\* percent of apparent U.S. consumption in 2017 to \*\*\* percent in 2018 and then increased to \*\*\* percent in 2019.<sup>111</sup>

Cumulated subject imports were the smallest source of supply during the period of investigation until 2019, when they became the second largest source of supply to the U.S. market.<sup>112</sup> Cumulated subject imports' share of apparent U.S. consumption increased from \*\*\* percent of apparent U.S. consumption in 2017 to \*\*\* percent in 2018 and \*\*\* percent in 2019.<sup>113</sup>

Nonsubject imports were the largest source of supply to the U.S. market throughout the period of investigation.<sup>114</sup> Nonsubject imports' market share decreased from \*\*\* percent of apparent U.S. consumption in 2017 to \*\*\* percent in 2018 and \*\*\* percent in 2019.<sup>115</sup> In 2017 and 2018, China was the largest source of nonsubject imports, until rapidly declining in 2019 after QSP imports from China became subject to cash deposits of antidumping and countervailing duties in September 2018.<sup>116</sup> Other leading nonsubject sources of QSP were Spain, Israel, and Vietnam, with imports from Spain, Vietnam, and other nonsubject sources increasing in 2019 with the exit of nonsubject imports from China.<sup>117</sup>

*Current Reviews.* U.S. producers were the smallest source of QSP in the U.S. market in

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responses of domestic producers that accounted for an estimated \*\*\* percent of domestic production of QSP in slab form in 2024, whereas domestic industry data in the original investigations were based on the responses of domestic producers that accounted for the vast majority of domestic production of QSP in slab form in 2019. Therefore, our data on apparent U.S. consumption in these reviews may be understated in comparison with data for the original investigations. *Original Determinations*, USITC Pub. 5061 at 3 & CR/PR at 1.12.

<sup>110</sup> *Original Determinations*, USITC Pub. 5061, at 23.

<sup>111</sup> *Confidential Original Determinations*, EDIS Doc. 855395, at 33.

<sup>112</sup> *Original Determinations*, USITC Pub. 5061, at 24.

<sup>113</sup> *Confidential Original Determinations*, EDIS Doc. 855395, at 34.

<sup>114</sup> *Original Determinations*, USITC Pub. 5061, at 24.

<sup>115</sup> *Confidential Original Determinations*, EDIS Doc. 855395, at 34.

<sup>116</sup> *Original Determinations*, USITC Pub. 5061, at 24. Commerce issued antidumping and countervailing duty orders on QSP from China on July 11, 2019, with final weighted-average dumping margins ranging from 295.02 to 336.69 percent and net subsidy rates ranging from 45.32 to 190.99 percent. See *Certain Quartz Surface Products From the People's Republic of China: Antidumping and Countervailing Duty Orders*, 84 Fed. Reg. 33053 (July 11, 2019).

<sup>117</sup> *Original Determinations*, USITC Pub. 5061, at 24.

2024, accounting for \*\*\* percent of apparent U.S. consumption that year.<sup>118</sup> There were several changes to the domestic industry during the period of review, including three plant openings, two expansions, and plans by two domestic producers to build new manufacturing facilities by 2026 and 2028.<sup>119</sup>

Cumulative subject imports were the second largest source of QSP in the U.S. market in 2024, accounting for \*\*\* percent of apparent U.S. consumption that year.<sup>120</sup> The domestic interested parties contend that, even with antidumping and countervailing orders in place, subject producers have the ability to increase exports exponentially as they did before the discipline of the orders was imposed.<sup>121</sup>

Nonsubject imports were the largest source of QSP in the U.S. market in 2024, accounting for \*\*\* percent of apparent U.S. consumption that year.<sup>122</sup> The largest sources of nonsubject imports of QSP in 2024 were Vietnam, Spain, and Thailand.<sup>123</sup>

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

*Original Investigations.* The Commission found that there is a moderate-to-high degree of substitutability between subject imports from India and Turkey and the domestic like product, and that price was an important factor in purchasing decisions for QSP.<sup>124</sup>

*Current Reviews.* The record in these five-year reviews contains no new information to indicate that the degree of substitutability between the domestic like product and cumulated subject imports, or the importance of price in purchasing decisions, have changed since the original investigations. The domestic interested parties argue that the U.S. market remains characterized by a moderate-to-high degree of substitutability between cumulated subject imports and domestically produced QSP, and that price continues to be a primary consideration in

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<sup>118</sup> CR/PR at Table 1.6. The data for the domestic industry's market share may be understated in these reviews compared to the original investigations due to the lower coverage of the domestic industry, as discussed in section IV.B.1 above. As explained above, the Commission relied primarily on quantity data in the original investigations for apparent U.S. consumption and market shares. Accordingly, we continue to rely primarily on quantity data for apparent U.S. consumption and market shares in the current reviews.

<sup>119</sup> CR/PR at Table 1.3.

<sup>120</sup> CR/PR at Table 1.6.

<sup>121</sup> Domestic Interested Parties' Response at 14.

<sup>122</sup> CR/PR at Table 1.6.

<sup>123</sup> CR/PR at Table 1.5.

<sup>124</sup> *Original Determinations*, USITC Pub. 5061, at 25-26.

purchasing decisions.<sup>125</sup> Based on the available information in these expedited reviews, we again find that there is a moderate-to-high degree of substitutability between cumulated subject imports and the domestic like product and that price remains an important factor in purchasing decisions.

Quartz surface products from India and Turkey became subject to a 10 percent *ad valorem* additional duty under the International Emergency Economic Powers Act on April 5, 2025. On April 9, 2025, QSP from India became subject to an individualized country additional duty of 26 percent *ad valorem*, but this duty was suspended on April 10, 2025, and the additional duty rate for QSP from India was returned to 10 percent *ad valorem*.<sup>126</sup> Suspension of the individualized country additional duty was subsequently lifted and QSP from India became subject to a 25 percent *ad valorem* individualized country additional duty rate on August 7, 2025.<sup>127</sup> QSP from India also became subject to a 25 percent *ad valorem* additional duty under the International Emergency Economic Powers Act on August 27, 2025, relating to India's importation of Russian oil.<sup>128</sup>

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

#### **1. Original Investigations**

The Commission found that the volume of cumulated subject imports increased over the period of investigation, from \*\*\* square feet in 2017 to \*\*\* square feet in 2018 and \*\*\* square feet in 2019.<sup>129</sup> The Commission noted that the volume of cumulated subject imports rose at a much faster rate than apparent U.S. consumption, and that cumulated subject imports therefore gained market share rapidly.<sup>130</sup> The Commission found that cumulated subject imports accounted for \*\*\* percent of apparent U.S. consumption in 2017, \*\*\* percent in 2018, and \*\*\* percent in 2019.<sup>131</sup> The ratio of cumulated subject imports to U.S. production increased from \*\*\* percent in

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<sup>125</sup> Domestic Interested Parties' Response at 11-12; Domestic Interested Parties' Final Comments at 2.

<sup>126</sup> CR/PR at 1.6.

<sup>127</sup> See Executive Order 14326 of July 31, 2025, *Further Modifying the Reciprocal Tariff Rates*, 90 Fed. Reg. 37963 (Aug. 6, 2025).

<sup>128</sup> See Notice of Implementation of Additional Duties on Products of India Pursuant to the President's Executive Order 14329, *Addressing Threats to the United States by the Government of the Russian Federation*, 90 Fed. Reg. 41837 (Aug. 27, 2025).

<sup>129</sup> Confidential Original Determinations, EDIS Doc. 855395, at 37.

<sup>130</sup> Confidential Original Determinations, USITC Pub. 5061, at 26.

<sup>131</sup> Confidential Original Determinations, EDIS Doc. 855395, at 38.

2017 to \*\*\* percent in 2018 and then to \*\*\* percent in 2019.<sup>132</sup> The Commission concluded that the volume of cumulated subject imports and the increase in that volume were significant in both absolute terms and relative to U.S. production and consumption.<sup>133</sup>

## 2. Current Reviews

The record in these reviews indicates that the orders initially had a disciplining effect on the volume of cumulated subject imports. The volume of cumulated subject imports was lower in 2020, when the orders were imposed, than in 2019.<sup>134</sup> However, cumulated subject import volume then increased irregularly from 33.2 million square feet in 2020, to 65.9 million square feet in 2021, 80.0 million square feet in 2022, 64.0 million square feet in 2023, and 91.2 million square feet in 2024, equivalent to \*\*\* percent of apparent U.S. consumption that year.<sup>135</sup>

As reviewed in section III.C., above, the record in these expedited reviews contains limited information on the subject industries in India and Turkey. The information available, however, indicates that subject foreign producers have the ability and incentive to increase their exports of QSP to the U.S. market if the orders were revoked, having an already significant presence in the U.S. market during the period of review. The domestic interested parties have identified 92 possible producers of QSP in India and 25 possible producers of QSP in Turkey.<sup>136</sup> Although data concerning the subject foreign industries' capacity during the period of review is unavailable, the volume of cumulated subject imports in 2024 (91.2 million square feet) well exceeded the subject industries' capacity recorded in 2019 (\*\*\* square feet), reflecting that the subject foreign industries' capacity has grown substantially since the period of investigation.<sup>137</sup> According to information submitted by the domestic interested parties, QSP producers in both countries have further increased or announced plans to increase capacity since the original investigations.<sup>138</sup>

The information available also indicates that the subject industries remain large exporters. GTA data concerning Indian exports of manmade stone products under HS subheading 6810.99, which include QSP and out-of-scope products, indicate that the value of such exports increased from \$139.1 million in 2020 to \$257.1 million in 2021 and \$287.4 million in 2022, before declining

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<sup>132</sup> *Confidential Original Determinations*, EDIS Doc. 855395, at 38.

<sup>133</sup> *Original Determinations*, USITC Pub. 5061, at 27.

<sup>134</sup> CR/PR at Tables 1.5 & 1.6.

<sup>135</sup> CR/PR at Tables 1.5 & 1.6.

<sup>136</sup> Domestic Interested Parties' Response at Exh. 1; CR/PR at 1.20 & 1.22.

<sup>137</sup> *See Confidential Report*, Memorandum INV-SS-058 (May 18, 2020), EDIS Doc. 855393, at Tables VII-4 and VII-8.

<sup>138</sup> Domestic Interested Parties' Response at 14-15; CR/PR at Tables 1.7 & 1.9.

to \$276.9 million in 2023, and increasing again to \$316.8 million in 2024.<sup>139</sup> India was the world's third-largest exporter of such merchandise in 2024.<sup>140</sup> GTA data concerning Turkish exports of manmade stone products under HS subheading 6810.99, which include QSP and out-of-scope products, indicate that the value of such exports increased from \$60.5 million in 2020 to \$103.8 million in 2021, before decreasing to \$101.6 million in 2022, \$84.8 million in 2023, and \$84.6 million in 2024.<sup>141</sup>

The information available further indicates that the U.S. market remains attractive to subject producers. GTA data show that the United States was, by value, by far the largest destination market throughout the period of review for both Indian and Turkish exports of merchandise under HS subheading 6810.99.<sup>142</sup> This information together with available import data indicate that subject producers in India and Turkey remain interested in serving the U.S. market and have maintained U.S. distribution networks and customers that would enable them to quickly increase their exports to the U.S. market for QSP after revocation. As further evidence of the attractiveness of the U.S. market to subject producers, the domestic interested parties maintain that Indian QSP producer Marudhar Rocks International Pvt. Ltd. stated in a 2024 press release that "100 per-cent of its revenue comes from exports to countries including the USA."<sup>143</sup>

Given the foregoing, including the significant and increasing volume and market share of cumulated subject imports during the original investigations, the Indian and Turkish industries' large capacity and exports, the continued attractiveness of the U.S. market, and the substantial presence of subject imports in the U.S. market during the period of review, we find that the volume of subject imports from India and Turkey would likely be significant, both in absolute terms and relative to consumption in the United States, if the orders were revoked.

## **D. Likely Price Effects**

### **1. Original Investigations**

In the original investigations, the Commission found that cumulated subject imports had significant adverse price effects on the domestic industry.<sup>144</sup> The Commission found a moderate-to-high degree of substitutability between the domestic like product and cumulated subject

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<sup>139</sup> CR/PR at Table 1.8.

<sup>140</sup> CR/PR at Table 1.11.

<sup>141</sup> CR/PR at Table 1.10.

<sup>142</sup> CR/PR at Tables 1.8 & 1.10.

<sup>143</sup> Domestic Interested Parties' Response at 16 & Exh. 25.

<sup>144</sup> *Original Determinations*, USITC Pub. 5061, at 30.

imports and that price was an important factor in purchasing decisions.<sup>145</sup> The Commission found that cumulated subject imports universally undersold the domestic like product over the period of investigation, in all 129 quarterly comparisons corresponding to 18.2 million square feet of cumulated subject imports, at high and often increasing margins.<sup>146</sup> The Commission found that the significant subject import underselling had enabled subject imports to capture significant market share and hold domestic producers to a market share that was less than at the beginning of the period of investigation, despite nonsubject imports from China exiting the market in 2019 in response to new antidumping and countervailing duties.<sup>147</sup> As cumulated subject imports gained market share, the domestic industry lost \*\*\* percentage points of market share overall (declining from \*\*\* percent in 2017 to \*\*\* percent in 2019), after having entered the period of investigation with an already reduced share due to Chinese imports previously determined to be injurious by the Commission.<sup>148</sup> The Commission found that, given the retreat of imports from China, the domestic industry would reasonably have been expected to gain greater market share in 2019 absent significant underselling by subject imports.<sup>149</sup>

## 2. Current Reviews

As discussed in Section IV.B.3 above, we have found that there is a moderate-to-high degree of substitutability between the domestic like product and cumulated subject imports and that price remains important in purchasing decisions.

The record in these expedited reviews does not contain new product-specific pricing information. Given that the domestic like product and cumulated subject imports are moderately-to-highly substitutable and that price is an important factor in purchasing decisions, we find that the likely significant volume of cumulated subject imports would likely undersell the domestic like product to a significant degree as a means of gaining market share, as during the original investigations, and/or force the domestic industry to cut prices or restrain price increases necessary to cover any increasing costs.<sup>150</sup> Consequently, based on the limited record of these

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<sup>145</sup> *Original Determinations*, USITC Pub. 5061, at 27.

<sup>146</sup> *Original Determinations*, USITC Pub. 5061, at 28. The Commission found that the underselling margins ranged from 11.4 to 53.9 percent and averaged 28.9 percent. *Id.* The data indicated that the underselling margins were in many instances higher in 2018 and 2019 than 2017. *Id.*

<sup>147</sup> *Original Determinations*, USITC Pub. 5061, at 28-29.

<sup>148</sup> *Confidential Original Determinations*, EDIS Doc. 855395, at 41.

<sup>149</sup> *Original Determinations*, USITC Pub. 5061, at 29.

<sup>150</sup> The domestic interested parties argue that the price-sensitive nature of the QSP market  
(Continued ...)

expedited reviews, we find that cumulated subject imports would likely have significant price effects on the domestic like product if the orders were revoked.

## **E. Likely Impact**

### **1. Original Investigations**

In the original investigations, the Commission found that the domestic industry's performance indicators generally increased during the period of investigation, but did so to a lesser degree than the growth in apparent U.S. consumption.<sup>151</sup> Notwithstanding the domestic industry's positive performance, however, the Commission found that the domestic industry would have had materially greater production, shipments, and revenues than it obtained, especially from 2018 to 2019 when nonsubject imports from China rapidly withdrew from the U.S. market, were it not for the increasing presence of low-priced cumulated subject imports.<sup>152</sup> The Commission found that cumulated subject imports' significant underselling of the domestic like product caused their market share to rise rapidly over the period of investigation, pushing domestic producers' market share lower than the already diminished level at which it began the investigation period in 2017, when the domestic industry was experiencing the injurious effects of dumped and subsidized nonsubject imports from China. The Commission found that the domestic industry performed materially worse during the period of investigation than it would have otherwise as a result of the increase in low-priced cumulated subject imports, as apparent U.S. consumption grew overall and nonsubject imports from China had already largely exited the U.S. market in 2019. Accordingly, the Commission found that cumulated subject imports had a significant adverse impact on the domestic industry.<sup>153</sup>

The Commission considered and rejected respondents' arguments regarding allegations of domestic capacity limitations and attenuated competition.<sup>154</sup> The Commission found that the domestic industry's capacity increased throughout the period of investigation and that record information also indicated that the domestic industry had ample unused capacity throughout the

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continues today, as does the likelihood of subject import underselling. Domestic Interested Parties' Response at 17. The average unit value ("AUV") of cumulated subject imports in 2024, at \$6.19 per 1,000 square feet, was far lower than the AUV of the domestic industry's U.S. shipments that same year, at \$\*\*\* per 1,000 square feet. CR/PR at Tables I.4 & 1.5.

<sup>151</sup> *Original Determinations*, USITC Pub. 5061, at 31-32.

<sup>152</sup> *Original Determinations*, USITC Pub. 5061, at 33.

<sup>153</sup> *Original Determinations*, USITC Pub. 5061, at 34.

<sup>154</sup> *Original Determinations*, USITC Pub. 5061, at 34-36.

period of investigation.<sup>155</sup> In rejecting respondents' argument that competition between the cumulated subject imports and the domestic product was attenuated because they allegedly served different parts of the QSP market, the Commission found that domestically produced QSP competed with subject imports for sales to various types of end users, including builders' residential projects and sales in the commercial portion of the market, rather than being focused only on the luxury portion of the market as respondents argued.<sup>156</sup>

In its non-attribution analysis, the Commission found that apparent U.S. consumption for QSP was robust throughout the period of investigation and remained elevated in 2019 and therefore could not explain the performance of the domestic industry.<sup>157</sup> It also examined the role of nonsubject imports and found that, because the volume and market share of cumulated subject imports increased sharply while nonsubject imports from China rapidly exited the U.S. market from 2018 to 2019, cumulated subject imports were a distinct cause of injury from nonsubject imports from China during this period. Moreover, although nonsubject imports from sources other than China also increased in 2019, the record indicated that they were generally higher priced than cumulated subject imports. Therefore, the Commission found that nonsubject imports cannot explain the magnitude of the domestic industry's inability to achieve materially greater output, market share, and revenues in 2019.<sup>158</sup>

## 2. Current Reviews<sup>159</sup>

The record in these expedited reviews contains limited information concerning the

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<sup>155</sup> *Original Determinations*, USITC Pub. 5061, at 34.

<sup>156</sup> *Original Determinations*, USITC Pub. 5061, at 35-36.

<sup>157</sup> *Original Determinations*, USITC Pub. 5061, at 35.

<sup>158</sup> *Original Determinations*, USITC Pub. 5061, at 35.

<sup>159</sup> In its expedited review of the antidumping duty order on QSP from India, Commerce determined that revocation of the order would result in the continuation or recurrence of dumping, with margins of up to 5.15 percent. *Quartz Surface Products From India: Final Results of the Expedited First Sunset Review of the Antidumping Duty Order*, 90 Fed. Reg. 41993, 41994 (Aug. 28, 2025). In its expedited review of the antidumping duty order on QSP from Turkey, Commerce determined that revocation of the order would result in the continuation or recurrence of dumping, with margins of up to 5.17 percent. *Certain Quartz Surface Products From the Republic of Türkiye: Final Results of the Expedited First Sunset Review of the Antidumping Duty Order*, 90 Fed. Reg. 42384, 42385 (Sep. 2, 2025). In its expedited reviews of the countervailing duty orders on QSP from India and Turkey, Commerce determined that revocation of the orders would result in continuation or recurrence of subsidization margins up to 2.34 percent for India and 2.43 percent for Turkey. *Quartz Surface Products From India and the Republic of Türkiye: Final Results of the Expedited First Sunset Reviews of the Countervailing Duty Orders*, 90 Fed. Reg. 40340, 40341 (Aug. 19, 2025).

domestic industry's performance since the original investigations.

The information available indicates differences in the domestic industry's performance in 2024 compared to 2019, the last full year examined in the original investigations.<sup>160</sup> The domestic industry's capacity, at \*\*\* square feet, production, at \*\*\* square feet, and capacity utilization, at \*\*\* percent, were all lower in 2024 than in 2019.<sup>161</sup> The domestic industry's U.S. shipments in 2024, at \*\*\* square feet valued at \$\*\*\*, were lower in 2024 than in 2019.<sup>162</sup> Its net sales (by value), at \$\*\*\* were lower in 2024 than in 2019 at \$\*\*\*.<sup>163</sup> On the other hand, the domestic industry's COGS-to-net-sales ratio (\*\*\* percent) was lower in 2024 than in 2019 (\*\*\* percent),<sup>164</sup> while its operating income-to-net sales ratio (\*\*\* percent) was higher in 2024 than in 2019 (\*\*\* percent).<sup>165</sup> Nevertheless, the domestic industry's gross profit, at \$\*\*\*, and operating income, at \$\*\*\*, were both lower in 2024 than in 2019.<sup>166</sup> The limited information available in these expedited reviews is insufficient for us to make a finding on whether the domestic industry is vulnerable to the continuation or recurrence of material injury if the orders were revoked.

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<sup>160</sup> The domestic industry's performance may be understated in these reviews compared to the original investigations due to the lower data coverage of the domestic industry in these reviews, as discussed in section IV.B.1 above, limiting the utility of direct comparisons. In addition, financial data in the original investigations was for production of quartz slabs and fabricated QSP combined, while financial data in these reviews is limited to quartz slab production. See CR/PR at Table 1.4, Note.

<sup>161</sup> CR/PR at Table 1.4. U.S. producers' production capacity totaled \*\*\* square feet in 2019. *Id.* U.S. producers' production totaled \*\*\* square feet in 2019. *Id.* U.S. slab producers' capacity utilization was \*\*\* percent in 2019. *Id.*

<sup>162</sup> CR/PR at Table 1.4. U.S. producers' U.S. shipments totaled \*\*\* square feet in 2019, valued at \$\*\*\*. *Id.*

<sup>163</sup> CR/PR at Table 1.4.

<sup>164</sup> CR/PR at Table 1.4.

<sup>165</sup> CR/PR at Table 1.4.

<sup>166</sup> CR/PR at Table 1.4. The domestic industry's gross profit was \$\*\*\* in 2019 and its operating income was \$\*\*\* in 2019. *Id.*

Based on the limited record in these expedited reviews, we find that revocation of the orders would likely result in a significant volume of cumulated subject imports that likely would undersell the domestic like product to a significant degree. Given the moderate-to-high degree of substitutability between the domestic like product and cumulated subject imports and the importance of price in purchasing decisions, significant volumes of low-priced cumulated subject imports would likely undersell the domestic like product to a significant degree as a means of gaining market share, as during the original investigations, and/or significantly depress or suppress prices for the domestic like product. The likely significant volume of low-priced cumulated subject imports and their adverse price effects would likely have a significant adverse impact on the production, shipments, sales, market share, and revenues of the domestic industry, which, in turn, would have a direct adverse impact on the industry's profitability and employment, as well as its ability to raise capital and make and maintain necessary capital investments.

We have also considered the role of factors other than cumulated subject imports, including the presence of nonsubject imports. Nonsubject imports have held their presence in the U.S. market since the original investigations, accounting for \*\*\* percent of apparent U.S. consumption in 2024 as compared to \*\*\* percent in 2019.<sup>167</sup> The record provides no indication, however, that the presence of nonsubject imports would prevent subject imports from India and Turkey from lowering their prices to increase their presence in the U.S. market after revocation, as nonsubject imports did not prevent subject imports from India and Turkey from sharply increasing their market share through low prices in the original investigations, after nonsubject imports from China withdrew from the U.S. market. In light of the moderate-to-high degree of substitutability between cumulated subject imports and the domestic like product and the importance of price to purchasers, the increase in low-priced cumulated subject imports that we have found likely after revocation would likely come, at least in part, at the expense of the domestic industry. Consequently, we find that any future effects of nonsubject imports would be distinct from the likely effects attributable to cumulated subject imports and that nonsubject imports would not prevent cumulated subject imports from having a significant impact on the domestic industry.

We recognize that the domestic interested parties claim that U.S. demand for QSP has begun to decline and is expected to weaken further in the reasonably foreseeable future, due to the slowing housing market and weakening home remodeling activity.<sup>168</sup> Nevertheless, the

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<sup>167</sup> CR/PR at Table 1.6.

<sup>168</sup> Domestic Interested Parties' Response at 7-9 & 18.

information available shows that apparent U.S. consumption was \*\*\* percent higher in 2024 than in 2019, indicating that demand for QSP has grown substantially since the original investigations.<sup>169</sup> However, given the moderate-to-high degree of substitutability between cumulated subject imports and the domestic like product, as well as the importance of price in purchasing decisions, increased demand is unlikely to insulate the domestic industry from the adverse effects of the likely significant volume of cumulated subject imports if the orders were revoked. To the extent that demand for QSP weakens within a reasonably foreseeable time, the increase in low-priced cumulated subject imports that is likely after revocation would exacerbate the effects of declining demand on the domestic industry.

In sum, we conclude that if the orders were revoked, subject imports of QSP from India and Turkey would likely have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

## **V. Conclusion**

For the foregoing reasons, we determine that revocation of the antidumping and countervailing duty orders on QSP from India and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

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<sup>169</sup> *Calculated from CR/PR at Table 1.6.* Growth in apparent U.S. consumption since the original investigations is likely understated due to the lower data coverage of the domestic industry in these reviews as compared to in the original investigations, as discussed in section IV.B.1 above.

# Information obtained in these reviews

## Background

On May 1, 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”),<sup>1</sup> that it had instituted reviews to determine whether revocation of the antidumping and countervailing duty orders on certain quartz surface products (“quartz surface products”) from India and Tukey would likely lead to the continuation or recurrence of material injury to a domestic industry.<sup>2</sup> All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.<sup>3</sup> <sup>4</sup> Table 1.1 presents information relating to the background and schedule of this proceeding:

**Table 1.1 Quartz surface products: Information relating to the background and schedule of this proceeding**

Effective date	Action
May 1, 2025	Notice of initiation by Commerce (90 FR 18642, May 1, 2025)
May 1, 2025	Notice of institution by Commission (90 FR 18697, May 1, 2025)
August 4, 2025	Commission’s vote on adequacy
August 19, 2025	Commerce’s results of its expedited CVD reviews (90 FR 42384, August 19, 2025)
August 28, 2025	Commerce’s results of its expedited AD review from India (90 FR 41993, August 28, 2025)
September 2, 2025	Commerce’s results of its expedited AD review from Turkey (90 FR 42384, September 2, 2025)
December 16, 2025	Commission’s determinations and views

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

<sup>2</sup> 90 FR 18697, May 1, 2025. In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders, 90 FR 18642, May 1, 2025. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission’s website ([www.usitc.gov](http://www.usitc.gov)).

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

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

## The original investigations

The original investigations resulted from petitions filed on May 8, 2019 with Commerce and the Commission by Cambria Company LLC (“Cambria”), Le Sueur, Minnesota.<sup>5</sup> On May 1, 2020, Commerce determined that imports of quartz surface products from India and Turkey were being sold at less than fair value (“LTFV”) and subsidized by the Governments of India and Turkey.<sup>6</sup> The Commission determined on June 15, 2020 that the domestic industry was materially injured by reason of LTFV and subsidized imports of quartz surface products from India and Turkey.<sup>7</sup> On June 22, 2020, Commerce issued its antidumping and countervailing duty orders for imports from India with final weighted-average dumping margins ranging from 2.67 to 5.15 percent and net subsidy rates ranging from 1.57 to 2.34 percent.<sup>8</sup> On June 22, 2020, Commerce also issued its antidumping and countervailing duty orders for imports from Turkey with a final weighted-average dumping margin of 5.17 percent and net subsidy rate of 2.43 percent.<sup>9</sup>

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<sup>5</sup> Quartz Surface Products from India and Turkey, Inv. Nos. 701-TA-624–625 and 731-TA-1450–1451 (Final), USITC Publication 5061, June 2020 (“Original publication”), p. 1.1.

<sup>6</sup> 85 FR 25389, 25391, 25398, and 25400, May 1, 2020.

<sup>7</sup> 85 FR 37108, June 19, 2020. 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 countervailing duty orders on quartz surface products from India and Turkey.

<sup>8</sup> 85 FR 37422 and 37431, June 22, 2020.

<sup>9</sup> 85 FR 37422 and 37431, June 22, 2020. Commerce determined that the estimated weighted-average dumping margin for Turkish producer/exporter Ermas Madencilik Turizm Sanayi Ve Ticaret Anonim Sirketi (Ermas) was zero. 85 FR 25389, May 1, 2020 and 85 FR 37422, June 22, 2020.

## Previous and related investigations

Quartz surface products or similar merchandise have been the subject of two Section 337 investigations and one previous import relief investigation, as presented in table 1.2.

**Table 1.2 Quartz surface products: Previous and related Commission proceedings and current status**

Date	Number	Country	ITC original determination	Current status
2016	337-TA-996	---	Terminated	---
2016	337-TA-1017	---	Terminated	---
2018	701-TA-606 and 731-TA-1416	China	Affirmative	Order continued after first review, effective January 24, 2025

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

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

## Commerce's five-year reviews

Commerce announced that it would conduct expedited reviews with respect to the orders on imports of quartz surface products from India and Turkey with the intent of issuing the final results of these reviews based on the facts available not later than August 29, 2025.<sup>10</sup> 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 and countervailing duty orders on imports of quartz surface products from India and Turkey are noted in the sections titled "The original investigations" and "U.S. imports," if applicable.

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<sup>10</sup> Letter from Eric Greynolds, Director, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, June 20, 2025.

## The product

### Commerce's scope

Commerce has defined the scope as follows:

*The merchandise covered by these Orders is certain quartz surface products. Quartz surface products consist of slabs and other surfaces created from a mixture of materials that includes predominately silica (e.g., quartz, quartz powder, cristobalite, glass powder) as well as a resin binder (e.g., an unsaturated polyester). The incorporation of other materials, including, but not limited to, pigments, cement, or other additives does not remove the merchandise from the scope of these Orders. However, the scope of these Orders only includes products where the silica content is greater than any other single material, by actual weight. Quartz surface products are typically sold as rectangular slabs with a total surface area of approximately 45 to 60 square feet and a nominal thickness of one, two, or three centimeters. However, the scope of these Orders includes surface products of all other sizes, thicknesses, and shapes. In addition to slabs, the scope of these Orders includes, but is not limited to, other surfaces such as countertops, backsplashes, vanity tops, bar tops, work tops, tabletops, flooring, wall facing, shower surrounds, fire place surrounds, mantels, and tiles. Certain quartz surface products are covered by these Orders whether polished or unpolished, cut or uncut, fabricated or not fabricated, cured or uncured, edged or not edged, finished or unfinished, thermoformed or not thermoformed, packaged or unpackaged, and regardless of the type of surface finish. In addition, quartz surface products are covered by these Orders whether or not they are imported attached to, or in conjunction with, non-subject merchandise such as sinks, sink bowls, vanities, cabinets, and furniture. If quartz surface products are imported attached to, or in conjunction with, such non-subject merchandise, only the quartz surface product is covered by the scope.*

*Subject merchandise includes material matching the above description that has been finished, packaged, or otherwise fabricated in a third*

*country, including by cutting, polishing, curing, edging, thermoforming, attaching to, or packaging with another product, or any other finishing, packaging, or fabrication that would not otherwise remove the merchandise from the scope of these Orders if performed in the country of manufacture of the quartz surface products. The scope of these Orders does not cover quarried stone surface products, such as granite, marble, soapstone, or quartzite. Specifically excluded from the scope of these Orders are crushed glass surface products. Crushed glass surface products must meet each of the following criteria to qualify for this exclusion: (1) The crushed glass content is greater than any other single material, by actual weight; (2) there are pieces of crushed glass visible across the surface of the product; (3) at least some of the individual pieces of crushed glass that are visible across the surface are larger than 1 centimeter wide as measured at their widest cross-section (Glass Pieces); and (4) the distance between any single Glass Piece and the closest separate Glass Piece does not exceed three inches.<sup>11</sup>*

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

Quartz surface products are currently imported under Harmonized Tariff Schedule of the United States (“HTS”) statistical reporting numbers 6810.99.0020 and 6810.99.0040.<sup>12</sup> The general rate of duty is “free” for HTS subheading 6810.99.00.<sup>13</sup> Decisions on the tariff

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<sup>11</sup> 85 FR 37422 and 85 FR 37431, June 22, 2020.

<sup>12</sup> Effective January 1, 2023, HTS statistical reporting number 6810.99.0010 (agglomerated quartz slabs of the type used for countertops) was discontinued and two new HTS statistical reporting number: 6810.99.0020 (in slabs of rectangular shape, with a length of 3 m or more and a width of 1.25 m or more) and 6810.99.0040 (other) were established. See HTS Change Record (Basic Edition), 2023.

<sup>13</sup> The merchandise subject to these reviews may also be imported under HTS statistical reporting numbers: 2506.10.0010, 2506.10.0050, 2506.20.0010, 2506.20.0080, 6810.11.0010, 6810.11.0070, 6810.19.1200, 6810.19.1400, 6810.19.5000, 6810.91.0000, 6810.99.0080, 6815.99.4170, and HTS subheading 7016.90.10. The first two subheadings cover quartz that is in the form of a basic material; the provisions in chapter 68 cover building and flooring materials and other made-up articles in which quartz predominates by weight. The general rate of duty is “free” for HTS subheadings 2506.10.00, 2506.20.00, 6810.91.00, 6810.99.00 and 6815.99.41; 3.2 percent ad valorem for HTS subheading 6810.11.00; 3.9 percent for HTS subheading 6810.19.50; 4.9 percent for HTS subheading 6810.19.12; 9 percent for HTS subheading 6810.19.14; and 8 percent for HTS subheading 7016.90.10. USITC, HTS (2025) Revision 16, Publication 5644, July 2025, pp. 25-2, 68-7, 68-10, 70-24.

(continued...)

classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Effective April 5, 2025, quartz surface products originating in India were subject to an additional 10 percent ad valorem reciprocal duty under the International Emergency Economic Powers Act. Effective April 9, 2025, India was instead assigned an individualized country reciprocal duty of 26 percent ad valorem. However, effective April 10, 2025, individualized country reciprocal duties were suspended and the reciprocal duty rate for quartz surface products originating in India was returned to 10 percent.<sup>14</sup>

Effective April 5, 2025, quartz surface products originating in Turkey are subject to an additional 10 percent ad valorem reciprocal duty under the International Emergency Economic Powers Act.<sup>15</sup>

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Effective January 27, 2022, HTS subheading 6815.99.40 (Containing by weight more than 70 percent magnesia, expressed as MgO, with carbon content ranging from trace amounts to less than 30 percent, and chemically bonded by resin or pitch) was deleted and 6815.99.41(Containing by weight more than 70 percent magnesia, expressed as MgO, with carbon content ranging from trace amounts to less than 30 percent, and chemically bonded by resin or pitch) was added. See HTS Change Record (Basic Edition), 2022.

<sup>14</sup> Individualized country reciprocal duties for all countries other than China were suspended until August 1, 2025. 90 FR 15041, April 7, 2025. 90 FR 15625, April 15, 2025. 90 FR 30823, July 10, 2025. See also HTS headings 9903.01.25 and 9903.01.55 and U.S. note 2(v) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 16, Publication 5644, July 2025, pp. 99.3.1 to 99.3.14, 99.3.307, 99.3.312.

<sup>15</sup> 90 FR 15041, April 7, 2025. See also HTS heading 9903.01.25 and U.S. note 2(v) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 16, Publication 5644, July 2025, pp. 99.3.1 to 99.3.14, 99.3.307.

## Description and uses<sup>16</sup>

Quartz surface products are compacted stone composite building materials used for countertop surfaces or aesthetic accents in residential, commercial, and industrial properties. Quartz surface products compete with quarried natural stone products, such as granite or marble. Demand for quartz surface products has grown due to its improved aesthetic appeal, durability, stain and scratch resistance, heat tolerance, and anti-microbial properties compared to granite and marble surface products. The visual appearance of quartz surface products has improved from a monochromatic surface to a surface that imitates natural stone patterns. The scope of these orders covers both raw material slabs and finished products.

Finished products include fabricated countertop surfaces, cut-to-size slabs used in the hospitality industry, and various other decorative products. Quartz surface products are utilized in commercial, residential, or industrial properties as countertops, tiles, bar surfaces, shower and tub surrounds, fireplace surrounds, walls, floors, bathroom vanities, and furniture surfaces. Quartz surface products may be further worked to meet customer specifications.

Producers of quartz surface products invest in the development of new collections and designs to attract customers. These patterns require specialized machinery and design by teams of engineers whose end products are copyrighted as intellectual property. Figure 1.1 shows several designed aesthetic and color options available to consumers of quartz surface products. Certain design patterns can be created by hand.

The scope of the subject orders includes surface products made from recycled glass, which are referred to as glass slabs. Glass slabs are composed of 75 percent recycled glass and the remainder is a mixture of Portland cement and non-toxic pigment. Glass and quartz are both composed of silicon oxide. Glass slabs share similar physical characteristics and properties as quartz slabs, but glass slabs are more susceptible to breakage and staining.

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<sup>16</sup> Unless otherwise noted, information in this section is based on the original publication, pp. 1.13-to 1.14.

Figure 1.1 Quartz surface products: Samples of quartz surface products surface patterns



Source: Original publication, p. 1.14.

## Manufacturing processes<sup>17</sup>

Most domestically produced quartz surface products are made by using a patented production process and machinery developed by Breton S.p.A. of Italy (“Breton”).<sup>18</sup> There is mixed usage of Breton and Chinese quartz slab production technology in Turkey and India. Chinese manufacturing processes have a greater reliance upon manual labor to produce quartz slabs with “marble-like” appearances. In contrast, Breton manufacturing uses robotic arms with attached sprays to create the intended aesthetic effects.

Quartz surface products are composed of three input ingredients: aggregates, binding agents, and additives. Aggregates account for 93 percent of the mass in a quartz surface. The aggregate materials are quartz and silica minerals. The quartz and silica come from siliceous natural stone materials or man-made materials, such as glass or ceramic materials.<sup>19</sup> The binding agent used in quartz surface products is a polymer resin. Additives are other stone materials for pigmentation or larger particles of glass or metal flecks for visual effect. Additives make surfaces more aesthetically appealing by allowing quartz surface products to exhibit various colors or patterns.

As shown in figure 1.2, non-fabricated slabs of quartz surface products are manufactured in a nine-step process. Slabs are then transformed into fabricated quartz surface products through the fabrication process.

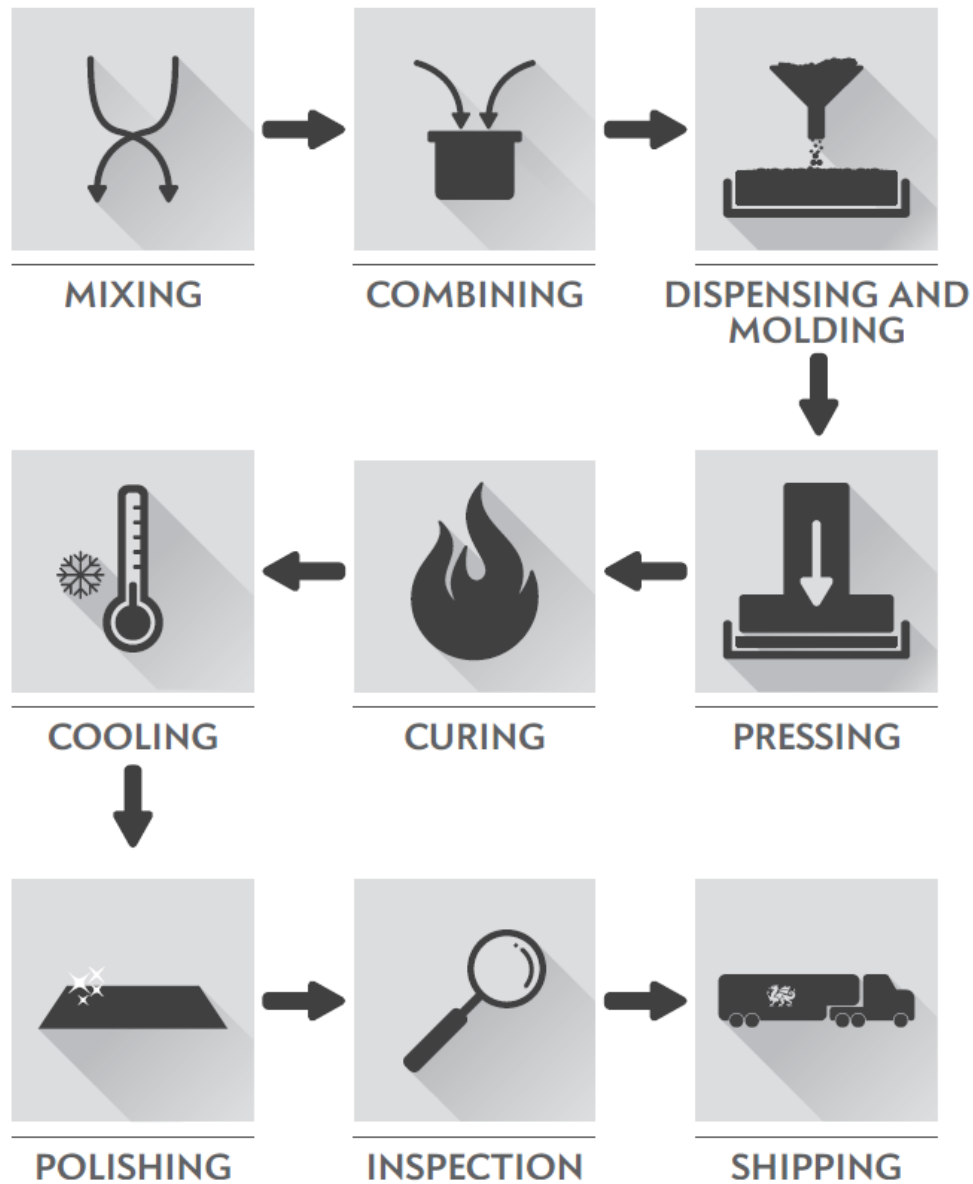
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<sup>17</sup> Unless otherwise noted, information in this section is based on the original publication, pp. 1.15 to 1.18.

<sup>18</sup> Several U.S. quartz slab producers do not use Breton technology. Some have imported quartz manufacturing machinery from China.

<sup>19</sup> Quartz and silica materials are plentiful, constituting 12 percent of the Earth’s crust.

Figure 1.2 Quartz surface products: Non-fabricated slab manufacturing process schematic



Source: Original publication, p. 1.16

### Mixing and combining

Before use, the aggregate materials are crushed down to various particle sizes. Particle size impacts the aesthetic texture of the end-product. Fine particles create a smooth quartz surface whereas large particles create a surface with visible crystal structures.

Each end-product has a unique formula that is pre-programmed into the production line. The automated system then extracts the raw materials from storage and transports them to the mixing system. The mixing system blends all the ingredients into a consistent mixture, resembling damp sand.

## **Dispensing, molding, and pressing**

Next, the blended mixture is dispensed into a rubber mold. The rubber mold is passed through a distributing mechanism that shapes and forms the mixture into the desired dimensions. The distributing mechanism utilizes continuous weight control to ensure an even distribution. Robotic arms are used to render designed patterns onto molds. A spray creates a top layer visual effect. A pressurized spray creates the veining effects.

The shaped mixture is then transported to the pressing operations. The material is placed into a vacuum-sealed chamber with a vibration system. Shaking the mixture removes gases from the slab that would otherwise weaken the structural integrity of the finished slab. The material is simultaneously compacted and shaken to the desired density to form a slab.

## **Curing and cooling**

After compression, the slab is then baked at 90 degrees Celsius for 45 minutes. The baking process hardens the slab to form the solid quartz surface. After being baked, the slab is inserted into a damper system to control the rate of cooling. Once cooled to a stable temperature, the slab is air cooled in a storage area for 24 hours.

## **Polishing and inspection**

After cooling, the slabs are measured, calibrated, and further worked to ensure they meet the desired dimensions. Disk and milling drills sand off excess material. The company's logo and other identifying information are then stamped onto the bottom of the slab. After the slab is machine polished, the final product is examined for quality-control purposes. The final inspection checks for condition, shine, tone, color, aspect, and size. After final inspection, the finished slabs are sent either to a warehouse for storage or to a workshop to be cut to customer specifications.

## **Fabrication process**

The fabrication process transforms slabs of quartz surface products into products ready for installation. According to respondents in the original investigations, there are at least 10,000 fabricators operating in the United States. Independent fabricators contended that, taken together, the independent fabrication industry has substantial equipment, labor, and expertise. The following information details the transformation process from slab into fabricated products.

A field technician gathers the dimensional measurements to create the design. Design technicians adjust the design to meet customer specifications regarding features like the type of edge, desired configuration, various cutouts and openings, and the backsplash of the surface.

The file is then sent to the production facility. The design is imposed onto a quartz slab to fabricate pieces that match the desired end products.

Next, machines are programmed so that the tools are assigned paths for diamond-edged saw and water jet cutting. Computer networked control (“CNC”) routers are programmed to cut edges and cutouts for sinks and faucets. Quartz slabs are pulled from inventory and moved to the cutting operation. The diamond blade saw cuts straight lines and waterjets cut arcs and circles into the slab. Cut parts are removed. After the saw and waterjet cutting, the CNC router machining begins by utilizing a crane, lasers, and vacuum cups to position the section for grinding and finishing operations on the edges and cutouts. The finished product is polished and detailed to ensure readiness for installation. The fabricated product is then ready for transportation.

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

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

During the final phase of the original investigations, the Commission received U.S. producer questionnaires from nine firms, seven of which accounted for the vast majority of production of quartz slabs in the United States during 2019.<sup>20</sup> Three of the nine firms (one integrated producer and two independent fabricators) accounted for over \*\*\* percent of production of fabricated quartz surface products in the United States during 2019.<sup>21</sup>

In response to the Commission’s notice of institution in these current reviews, domestic interested parties provided a list of eight known and currently operating U.S. producers of quartz surface products. Three firms providing U.S. industry data in response to the Commission’s notice of institution accounted for approximately \*\*\* percent of production of quartz slabs in the United States during 2024.<sup>22</sup>

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<sup>20</sup> Original publication, pp. 3 and 3.1.

<sup>21</sup> Quartz Surface Products from India and Turkey (Final), Confidential Report, INV-SS-058, May 18, 2020, as revised in INV-SS-059, May 21, 2020, (“Original confidential report), p. 3.1.

<sup>22</sup> Domestic interested parties’ response to the notice of institution, June 2, 2025, exh. 1. The responding firms did not provide any data related to the production of fabricated quartz surface products.

## Recent developments

Table 1.3 presents events in the U.S. industry since the Commission’s original investigations.<sup>23</sup>

**Table 1.3 Quartz surface products: Developments in the U.S. industry**

Item	Firm	Event
Expansion	LX Hausys	In March 2020, LX Hausys announced it had completed its expansion of its quartz surface products facility in Adairsville, GA, adding a third production line. The new facility raised the company's quartz surface products capacity by 50 percent and led to the hiring of an additional 40 employees.
Plant opening	MSI/Elite Quartz Manufacturing	In September 2020, a partnership between U.S. producer MSI and the Chinese company, Elite Quartz Manufacturing, completed construction of a 360,000 square foot quartz surface products facility in Latta, SC. The partnership was able to hire 150 new employees upon opening the facility.
Plant opening	Guidoni	In December 2020, Guidoni completed construction of a new quartz surface products factory in McRae-Helena, GA. The cost of the investment was \$96 million. Upon opening, the facility was able to hire 455 new employees.
Expansion	Cambria	In November 2022, Cambria completed a factory expansion valued at \$130 million. The expansion added a sixth production line and the capacity to add 50 more employees.
Plant opening	Dal-Tile	In 2023, Dal-Tile opened its second facility in Dickson, TN. The new facility specializes in production of quartz surface products, expanding the company's capacity. The \$140 million investment to build the facility led to the creation of 142 jobs when it opened in 2023.
Planned plant opening	Cosentino	In April 2023, Cosentino, a Spanish company with facilities in the United States, announced plans to build a new quartz surface products production facility in Jacksonville, FL. With an initial investment of \$270 million, the new facility is scheduled to open in 2028. Upon opening, Cosentino expects to hire 180 employees.
Planned plant opening	OK Stone	In April 2024, OK Stone, a new company founded in Fort Worth, TX with the goal of producing high quality quartz surface products using Breton technology. The facility is expected to go into operation in the first quarter of 2026.

Notes continued.

<sup>23</sup> For recent developments, if any, in tariff treatment, please see “U.S. tariff treatment” section.

Source: Chris Gadd, "100 jobs at new Dickson Dal-Tile facility, company reps at Dickson Co. fair," The Tennessean, September 2018, <https://www.tennessean.com/story/news/local/dickson/2018/09/04/100-jobs-new-dickson-dal-tile-facility-company-reps-dickson-co-fair/1162202002/>; Albany Herald News, "Exporter Guidoni Group to locate facility in Telfair County," The Albany Herald, November 2019, <https://albanyherald.com/news/business-news-2/exporter-guidoni-group-to-locate-facility-in-telfair-county/>; The Penetron Group, "Penetron Adds Durability to Georgia (USA) Stone Manufacturing Plant," PRweb.com, May 2021, <https://www.prweb.com/releases/penetron-adds-durability-to-georgia-usa-stone-manufacturing-plant-808575439.html>; Countertop Resource, "LG Hausys Expands Viatera Operations," Countertopresource.com, March 2020, <https://countertopresource.com/lg-hausys-expands-viatera-operations/>; MSI Surfaces, "MSI's Lumaluxe Technology And Elite Quartz Manufacturing Collaboration," MSI Surfaces, September 2022, <https://www.msisurfaces.com/blogs/post/2022/09/09/msis-domestically-sourced-quartz-from-elite-quartz-manufacturing-facility.aspx>; MSI Surfaces, "MSI Announces Joint Venture with Spectrum Quartz to Build a Domestic State-of-the-Art Quartz Manufacturing Facility," MSISurfaces.com, December 2019, <https://www.msisurfaces.com/news/msi-announces-joint-venture-with-spectrum-quartz-to-build-a-domestic-state-of-the-art-quartz-manufacturing-facility/>; Elite Quartz Manufacturing, "Who We Are," Elitequartz.com, no date, <https://www.elitequartz.com/#:~:text=WHO%20WE%20ARE,quartz%20countertops%20in%20North%20America>; Dee DePass, "It's Hard But We Just Hustle," Star Tribune, November 2022, <https://www.startribune.com/cambria-known-for-its-luxury-countertops-expands-again/600227748>; Dan Macdonald, "Cosentino buys land at the Cecil Commerce Center megasite for \$20.39 million," Jaxdailyrecord.com, January 2025, <https://www.jaxdailyrecord.com/news/2025/jan/27/cosentino-buys-land-at-the-cecil-commerce-center-megasite-for-2039-million/>; Mike Mendenhall, "Plan to sell 330 acres of Cecil megasite to Spanish manufacturer Cosentino headed to City Council," Jaxdailyrecord.com, April, 2023, <https://www.jaxdailyrecord.com/news/2023/apr/24/plan-to-sell-330-acres-of-cecil-megasite-to-spanish-manufacturer-cosentino-headed-to-city-council/>; OK Stone, homepage, OKStoneinc.com, <https://okstoneinc.com/>

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

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year reviews. Table 1.4 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigations and these five-year reviews.

**Table 1.4 Quartz surface products: Trade and financial data submitted by U.S. producers, by period**

Quantity in 1,000 square feet; value in 1,000 dollars; unit value in dollars per square foot; ratio in percent

Item	Measure	2017	2018	2019	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 2017 to 2019, data are compiled using data submitted in the Commission’s original investigations. For the year 2024, data are compiled using data submitted by domestic interested parties. Domestic interested parties’ response to the notice of institution, June 2, 2025, exh. 1.

Note: For 2017 to 2019, trade data are for quartz slab production only and financial data are for production of quartz slabs and fabricated quartz surface products combined. For 2024, trade and financial data are for quartz slab production only. For a discussion of data coverage, please see “U.S. producers” section.

## Definitions of the domestic like product and domestic industry

The domestic like product is defined as the domestically produced product or products which are like, or in the absence of like, most similar in characteristics and uses with, the subject merchandise. The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like product constitutes a major proportion of the total domestic production of the product. Under the related parties provision, the Commission may exclude a U.S. producer from the domestic industry for purposes of its injury determination if “appropriate circumstances” exist.<sup>24</sup>

<sup>24</sup> Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

In its original determinations, the Commission defined the domestic like product as a single like product consisting of quartz slabs and fabricated quartz surface products coextensive with the scope and defined the domestic industry as producers of quartz surface products, including stand-alone fabricators.<sup>25</sup>

## **U.S. importers**

During the final phase of the original investigations, the Commission received U.S. importer questionnaires from 73 firms, which accounted for over 75.0 percent and nearly all U.S. imports of quartz surface products from India and Turkey, respectively, during 2019.<sup>26</sup> Import data presented in the original investigations are based on official Commerce statistics adjusted with questionnaire responses.

Although the Commission did not receive responses from any respondent interested parties in these current reviews, in its response to the Commission's notice of institution, the domestic interested parties provided a list of 69 potential U.S. importers of quartz surface products.<sup>27</sup>

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<sup>25</sup> 90 FR 18698, May 1, 2025.

<sup>26</sup> Original publication, pp. 1.6 and 4.1.

<sup>27</sup> Domestic interested parties' response to the notice of institution, June 2, 2025, exh. 1.

## U.S. imports

Table 1.5 presents the quantity, value, and unit value of U.S. imports from India and Turkey as well as the other top sources of U.S. imports (shown in descending order of 2024 imports by quantity).

**Table 1.5 Quartz surface products: U.S. imports, by source and period**

Quantity in 1,000 square feet; value in 1,000 dollars; unit value in dollars per square foot

U.S. imports from	Measure	2020	2021	2022	2023	2024
India	Quantity	27,970	55,463	70,473	57,318	85,167
Turkey	Quantity	5,242	10,388	9,494	6,634	6,165
Subject sources	Quantity	33,212	65,851	79,967	63,952	91,332
Vietnam	Quantity	19,318	33,041	34,511	38,348	42,009
Spain	Quantity	25,037	36,438	43,865	31,384	31,849
Thailand	Quantity	1,382	4,021	13,931	20,486	27,958
All other sources	Quantity	56,302	61,785	44,039	33,553	39,060
Nonsubject sources	Quantity	102,040	135,284	136,345	123,770	140,876
All import sources	Quantity	135,252	201,135	216,311	187,722	232,208
India	Value	185,056	383,092	567,021	373,260	517,266
Turkey	Value	43,647	87,717	84,072	55,987	48,051
Subject sources	Value	228,703	470,809	651,093	429,247	565,317
Vietnam	Value	200,266	348,429	359,009	335,861	353,236
Spain	Value	258,911	382,773	358,599	243,235	215,603
Thailand	Value	10,181	38,490	150,255	205,729	275,989
All other sources	Value	558,766	643,965	475,335	320,721	343,140
Nonsubject sources	Value	1,028,125	1,413,657	1,343,199	1,105,546	1,187,967
All import sources	Value	1,256,828	1,884,466	1,994,292	1,534,794	1,753,285
India	Unit value	6.62	6.91	8.05	6.51	6.07
Turkey	Unit value	8.33	8.44	8.86	8.44	7.79
Subject sources	Unit value	6.89	7.15	8.14	6.71	6.19
Vietnam	Unit value	10.37	10.55	10.40	8.76	8.41
Spain	Unit value	10.34	10.50	8.18	7.75	6.77
Thailand	Unit value	7.37	9.57	10.79	10.04	9.87
All other sources	Unit value	9.92	10.42	10.79	9.56	8.78
Nonsubject sources	Unit value	10.08	10.45	9.85	8.93	8.43
All import sources	Unit value	9.29	9.37	9.22	8.18	7.55

Source: Compiled from official Commerce statistics for HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, accessed July 21, 2025.

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

## Cumulation considerations<sup>28</sup>

In assessing whether imports should be cumulated in five-year reviews, the Commission considers, among other things, whether there is a likelihood of a reasonable overlap of competition among subject imports and the domestic like product. Additional information concerning geographical markets and simultaneous presence in the market is presented below.<sup>29</sup>

Imports from India and Turkey were reported in each of the 60 months between 2020 and 2024.

During 2020 to 2024, the largest share of imports from both India and Turkey entered through eastern borders of entry followed by southern borders of entry. The top Customs districts for imports of quartz surface products from both India and Turkey in 2024 were New York and Houston-Galveston, Texas.

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<sup>28</sup> Unless otherwise noted, this information is based on official U.S. import statistics for HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040.

<sup>29</sup> In addition, available information concerning subject country producers and the global market is presented in the next section of this report.

## Apparent U.S. consumption and market shares

Table 1.6 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

**Table 1.6 Quartz surface products: Apparent U.S. consumption and market shares, by source and period**

Quantity in 1,000 square feet; value in 1,000 dollars; shares in percent

Source	Measure	2017	2018	2019	2024
U.S. producers	Quantity	25,530	26,546	29,399	***
India	Quantity	***	***	***	85,167
Turkey	Quantity	***	***	***	6,165
Subject sources	Quantity	***	***	***	91,332
Nonsubject sources	Quantity	106,198	132,779	91,639	140,876
All import sources	Quantity	***	***	***	232,208
Apparent U.S. consumption	Quantity	***	***	***	***
U.S. producers	Value	530,588	568,777	635,492	***
India	Value	***	***	***	517,266
Turkey	Value	***	***	***	48,051
Subject sources	Value	***	***	***	565,317
Nonsubject sources	Value	993,137	1,153,072	915,812	1,187,967
All import sources	Value	***	***	***	1,753,285
Apparent U.S. consumption	Value	***	***	***	***
U.S. producers	Share of quantity	***	***	***	***
India	Share of quantity	***	***	***	***
Turkey	Share of quantity	***	***	***	***
Subject sources	Share of quantity	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***
All import sources	Share of quantity	***	***	***	***
U.S. producers	Share of value	***	***	***	***
India	Share of value	***	***	***	***
Turkey	Share of value	***	***	***	***
Subject sources	Share of value	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***
All import sources	Share of value	***	***	***	***

Notes continued.

Source: For the years 2017 to 2019, data are compiled using data submitted in the Commission's original investigations. 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 numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, accessed July 21, 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 all years, U.S. producers' U.S. shipments are for quartz slab production only. For a discussion of data coverage, please see "U.S. producers" and "U.S. importers" sections.

## **The industry in India**

### **Producers in India**

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from 23 firms, which accounted for approximately \*\*\* percent of production of quartz surface products in India, and approximately \*\*\* percent of quartz surface products exports from India to the United States during 2019.<sup>30</sup>

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of 92 possible producers of quartz surface products in India.<sup>31</sup>

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<sup>30</sup> Original confidential report, p. 7.3.

<sup>31</sup> Domestic interested parties' response to the notice of institution, June 2, 2025, exh. 1.

## Recent developments

Table 1.7 presents events in the Indian industry since the Commission’s original investigations.

**Table 1.7 Quartz surface products: Developments in the Indian industry**

Item	Firm	Event
Plant opening	Pacific Quartz Surfaces	In 2022, Pacific Quartz Surfaces, a subsidiary of Pacific Group, opened a new Breton stone facility. The company reported that the facility has the capacity to produce 1.1 million square meters of quartz surface products per year.
Plant expansion	Tab Surfaces	In January 2024, Tab Surfaces, a company operating out of Bangalore, India, announced that it was adding a new production line to its Hosur facility, expanding production capacity by an additional 10 to 11 thousand slabs per month.
Plant opening	Tab Surfaces	In March 2024, it was reported that Tab Surfaces was planning to build a new facility at its Hosur campus with an additional capacity of 53 million square feet. Information on the status of the project is limited.
Plant opening	StonePlus Enterprises/Raj Kesari Group (QROCKS)	In April 2024, a partnership between StonePlus and the Raj Kesari Group, operating under the name of QROCKS, announced it had begun operation of its new quartz surface products facility in Udaipur, Rajasthan, India. The facility uses advanced technology like full automation and high-tech machinery. The facility's capacity is reported to be over 21 thousand square feet per day.
Plant expansion	Pokarna Engineered Stone Limited (PESL)	In November 2024, PESL, announced plans to add an additional production line at its plant in Mekaguda, Telangana, India. The investment is expected to total over \$51 million and will increase capacity by 8.7 million square feet. The new production line is expected to become active in 2026.

Source: Pacific, “How it All Started,” The Pacific Group; undated, <https://www.thepacific.group/about>; Jennifer Richinelli, “A New Quartz Line Born from Experience and Technology,” Stone World, January 2024, <https://www.stoneworld.com/articles/93638-a-new-quartz-line-born-from-experience-and-technology>; Care Edge Ratings, “Tab India Granites Private Limited,” Careratings.com, undated, <https://www.careratings.com/search?Id=rrotp3zsz7wsnPOgK8Fgxw==>; Times of India, “Pokarna Engineered Stone Announces ₹440 Crore Investment to Expand Telangana Manufacturing Facility,” TimesofIndia.com, November 2024, <https://timesofindia.indiatimes.com/business/india-business/pokarna-to-invest-rs-440-crore-in-expanding-telangana-plant-capacity/articleshow/115227330.cms>; Stone Update, “New Production Line Slated for Quantra,” Stoneupdate.com, November 2024, <https://stoneupdate.com/new-production-line-slated-for-quantra/>; Stone Update, “Stone Plus Expands into Quartz Manufacturing with QROCKS in Udaipur, India,” Stoneupdate.com, April 2025, <https://stoneupdate.com/stone-plus-expands-into-quartz-manufacturing-with-qrocks-in-udaipur-india/>.

Table 1.8 presents export data for HS code 6810.99, a category that includes quartz surface products and out-of-scope products, from India (by export destination in descending order of value for 2024).

**Table 1.8 Articles of cement, concrete or artificial stone: Value of exports from India, by destination and period**

Value in 1,000 dollars

Destination market	2020	2021	2022	2023	2024
United States	123,734	229,545	265,612	248,006	280,980
Canada	2,587	4,764	4,211	6,340	8,098
United Kingdom	5,471	7,640	6,590	6,735	6,034
United Arab Emirates	275	522	1,187	2,433	3,207
Germany	42	6	511	2,345	3,110
Poland	67	175	141	268	2,004
Bangladesh	1,720	1,860	2,943	1,753	1,466
Czech Republic	0	0	126	355	1,421
France	15	20	4	316	1,090
Russia	0	6	110	423	923
All other destinations	5,181	12,544	5,926	7,964	8,503
Total	139,092	257,081	287,363	276,938	316,836

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 6810.99, accessed July 3, 2025.

Note: These data may be overstated as HS subheading 6810.99 contains products outside the scope of these reviews. Because of rounding, figures may not add to total shown.

## The industry in Turkey

### Producers in Turkey

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from three firms, which accounted for approximately \*\*\* percent of production of quartz surface products in Turkey during 2019, and approximately \*\*\* percent of quartz surface products exports from Turkey to the United States during 2019.<sup>32</sup>

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of 25 possible producers of quartz surface products in India.<sup>33</sup>

<sup>32</sup> Original confidential report, p. 7.13.

<sup>33</sup> Domestic interested parties' response to the notice of institution, June 2, 2025, exh. 1.

## Recent developments

Table 1.9 presents events in the Turkish industry since the Commission’s original investigations.

**Table 1.7 Quartz surface products: Developments in the Turkish industry**

Item	Firm	Event
Plant expansion	Belenco/Lotte	In January 2021, Belenco, owned by the South Korean company, Lotte Chemical, announced that it would begin operation of a third production line in Manisa, Turkey. The new production line expanded Belenco’s capacity by 120 thousand slabs per year, raising their total capacity to 350 thousand slabs per year.

Source: Stone Update, “Stone Plus Expands into Quartz Manufacturing with QROCKS in Udaipur, India,” Stoneupdate.com, January 2021, <https://stoneupdate.com/lotte-expands-belanco-quartz-production/>.

## Exports

Table 1.10 presents export data for HS code 6810.99, a category that includes quartz surface products and out-of-scope products, from Turkey (by export destination in descending order of value for 2024).

**Table 1.10 Articles of cement, concrete or artificial stone: Value of exports from Turkey, by destination and period**

Value in 1,000 dollars

Destination market	2020	2021	2022	2023	2024
United States	41,389	73,495	67,811	44,734	41,387
Japan	3,354	4,913	1,428	624	10,331
Greece	791	877	2,745	4,601	3,612
Iraq	1,211	1,573	2,493	2,876	3,384
Bulgaria	3,236	1,044	751	1,492	2,336
Republic of Cyprus	715	777	1,268	1,827	2,158
Georgia	434	695	1,290	1,487	1,491
Russia	204	366	569	879	1,324
Tanzania	355	1,800	234	264	1,258
United Kingdom	413	1,515	796	788	1,220
All other exporters	8,400	16,745	22,205	25,229	16,106
Total	60,501	103,801	101,590	84,801	84,607

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 6810.99, accessed July 3, 2025.

Note: These data may be overstated as HS subheading 6810.99 contains products outside the scope of these reviews. Because of rounding, figures may not add to total shown.

## Third-country trade actions

There are no known trade remedy actions on quartz surface products from India and Turkey in third-country markets.<sup>34</sup>

## The global market

Table 1.11 presents global export data for HS code 6810.99, a category that includes quartz surface products and out-of-scope products (by source in descending order of value for 2024).

**Table 1.11 Articles Of cement, concrete or artificial stone: Value of global exports by exporter**

Value in 1,000 dollars

Exporter	2020	2021	2022	2023	2024
China	2,342,657	2,798,937	2,938,716	1,876,137	1,236,341
Spain	556,331	817,627	833,999	715,921	639,132
India	139,092	257,081	287,363	276,938	316,836
Germany	360,672	472,263	451,697	314,668	292,695
Mexico	0	212,018	244,155	253,780	232,096
Malaysia	192,062	288,138	154,945	178,470	182,552
Poland	172,047	220,059	180,940	189,993	164,473
Canada	190,312	209,649	202,203	144,255	125,745
United States	117,897	163,022	147,920	130,202	119,613
Italy	107,251	162,363	150,646	130,973	117,386
All other exporters	1,333,808	1,737,219	1,519,003	1,449,310	1,000,235
Total	5,512,129	7,338,377	7,111,587	5,660,646	4,427,103

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 6810.99, accessed July 3, 2025.

Note: These data may be overstated as HS subheading 6810.99 contains products outside the scope of these reviews. Because of rounding, figures may not add to total shown.

<sup>34</sup> Based upon publicly available information from the WTO's dispute web portal.

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



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

Citation	Title	Link
90 FR 18642 May 1, 2025	Initiation of Five-Year (Sunset) Reviews	<a href="https://www.govinfo.gov/content/pkg/FR-2025-05-01/pdf/2025-07580.pdf">https://www.govinfo.gov/content/pkg/FR-2025-05-01/pdf/2025-07580.pdf</a>
90 FR 18697 May 1, 2025	Quartz Surface Products From India and Turkey; Institution of Five-Year Reviews	<a href="https://www.govinfo.gov/content/pkg/FR-2025-05-01/pdf/2025-07517.pdf">https://www.govinfo.gov/content/pkg/FR-2025-05-01/pdf/2025-07517.pdf</a>



**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 reviews. It was filed on behalf of Cambria Company LLC (“Cambria”), Dal-Tile LLC (“Dal-Tile”), and Guidoni USA (“Guidoni”), domestic producers of quartz surface products (collectively 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 Quartz surface products: Summary of responses to the Commission’s notice of institution**

Interested party type	Number	Coverage
U.S. producer	3	***%

Note: The U.S. producer coverage figure presented is the domestic interested parties’ estimate of their share of total U.S. production of quartz surface products during 2024. Domestic interested parties’ response to the notice of institution, June 2, 2025, exh. 1.

### Party comments on adequacy

The Commission received party comments on the adequacy of responses to the notice of institution and whether the Commission should conduct expedited or full reviews from the domestic interested parties. The domestic interested parties request that the Commission conduct expedited reviews of the antidumping and countervailing duty orders on quartz surface products.<sup>1</sup>

### Company-specific information

**Table B.2 Quartz surface products: 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	Cambria	Dal-Tile	Guidoni
Nature of operation	Yes	Yes	Yes
Statement of intent to participate	Yes	Yes	Yes
Statement of likely effects of revoking the order	Yes	Yes	Yes
U.S. producer list	Yes	Yes	Yes
U.S. importer/foreign producer list	Yes	Yes	Yes
List of 3-5 leading purchasers	Yes	Yes	Yes
List of sources for national/regional prices	not known	not known	not known
Trade/financial data	Yes	Yes	Yes
Changes in supply/demand	Yes	Yes	Yes
Complete response	Yes	Yes	Yes

<sup>1</sup> Domestic interested parties’ comments on adequacy, July 9, 2025, p. 2.

**APPENDIX C**

**SUMMARY DATA COMPILED IN PRIOR PROCEEDINGS**



# All producers

**Table C-1**

**Quartz surface products: Summary data concerning the U.S. market, 2017-19**

(Quantity=1,000 square feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per square foot; Productivity=square feet per hour; and Period changes=percent--exceptions noted)

	Reported data			Period changes		
	2017	2018	2019	2017-19	2017-18	2018-19
<b>U.S. consumption quantity:</b>						
Amount.....	***	***	***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	▼***	▼***	▲***
<b>Importers' share (fn1):</b>						
India.....	***	***	***	▲***	▲***	▲***
Turkey.....	***	***	***	▲***	▲***	▲***
Subject sources.....	***	***	***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	▼***	▼***	▼***
All import sources.....	***	***	***	▲***	▲***	▼***
<b>U.S. consumption value:</b>						
Amount.....	***	***	***	▲***	▲***	▲***
Producers' share (fn1).....	***	***	***	▼***	▼***	▲***
<b>Importers' share (fn1):</b>						
India.....	***	***	***	▲***	▲***	▲***
Turkey.....	***	***	***	▲***	▲***	▲***
Subject sources.....	***	***	***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	▼***	▲***	▼***
All import sources.....	***	***	***	▲***	▲***	▼***
<b>U.S. imports from:</b>						
<b>India:</b>						
Quantity.....	***	***	***	▲***	▲***	▲***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▼***	▼***	▼***
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
<b>Turkey</b>						
Quantity.....	***	***	***	▲***	▲***	▲***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▼***	▼***	▼***
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
<b>Subject sources:</b>						
Quantity.....	***	***	***	▲***	▲***	▲***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▼***	▼***	▼***
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
<b>Nonsubject sources:</b>						
Quantity.....	106,198	132,779	91,639	▼(13.7)	▲25.0	▼(31.0)
Value.....	993,137	1,153,072	915,812	▼(7.8)	▲16.1	▼(20.6)
Unit value.....	\$9.35	\$8.68	\$9.99	▲6.7	▼(7.1)	▲15.1
Ending inventory quantity.....	***	***	***	▲***	▲***	▼***
<b>All import sources:</b>						
Quantity.....	***	***	***	▲***	▲***	▼***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
<b>U.S. producers' and independent fabricators:</b>						
Producers: Capacity.....	***	***	***	▲***	▲***	▲***
Producers: Production.....	***	***	***	▲***	▲***	▼***
Producers: Capacity utilization.....	***	***	***	▼***	▲***	▼***
Independent fabricators: Capacity.....	***	***	***	▲***	▲***	▲***
Independent fabricators: Production.....	***	***	***	▼***	▲***	▼***
Independent fabricators: Capacity utilization....	***	***	***	▼***	▲***	▼***

Table continued.

**Table C-1--Continued**

**Quartz surface products: Summary data concerning the U.S. market, 2017-19**

(Quantity=1,000 square feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per square foot; Productivity=square feet per hour; and Period changes=percent--exceptions noted)

	Reported data			Period changes		
	Calendar year			Calendar year		
	2017	2018	2019	2017-19	2017-18	2018-19
U.S. producers' and independent fabricators:--Continued						
U.S. shipments (fn2):						
Producers: Quantity.....	***	***	***	▲***	▲***	▲***
Producers: Value.....	***	***	***	▲***	▲***	▲***
Producers: Unit value.....	***	***	***	▲***	▲***	▲***
Independent fabricators: Quantity.....	***	***	***	▲***	▲***	▲***
Independent fabricators: Value.....	***	***	***	▼***	▼***	▼***
Independent fabricators: Unit value.....	***	***	***	▼***	▼***	▼***
Export shipments:						
Quantity.....	***	***	***	▼***	▲***	▼***
Value.....	***	***	***	▼***	▲***	▼***
Unit value.....	***	***	***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Inventories/total shipments (fn1).....	***	***	***	▲***	▲***	▲***
Production workers.....	***	***	***	▲***	▼***	▲***
Hours worked (1,000s).....	***	***	***	▼***	▲***	▼***
Wages paid (\$1,000).....	***	***	***	▲***	▲***	▲***
Hourly wages (dollars per hour).....	***	***	***	▲***	▲***	▲***
Producers: Productivity (fn4).....	***	***	***	▲***	▲***	▲***
Producers: Unit labor costs.....	***	***	***	▲***	▼***	▲***
Independent fabricators: Productivity.....	***	***	***	▲***	▲***	▼***
Independent fabricators: Unit labor costs.....	***	***	***	▲***	▼***	▲***
Net sales:						
Quantity.....	***	***	***	▲***	▲***	▼***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▲***	▼***	▲***
Cost of goods sold (COGS).....	***	***	***	▲***	▲***	▲***
Gross profit or (loss) (fn3).....	***	***	***	▲***	▲***	▲***
SG&A expenses.....	***	***	***	▲***	▲***	▲***
Operating income or (loss) (fn3).....	***	***	***	▲***	▲***	▲***
Net income or (loss) (fn3).....	***	***	***	▲***	▲***	▲***
Capital expenditures.....	***	***	***	▼***	▲***	▼***
R&D expenses.....	***	***	***	▲***	▲***	▲***
Net assets.....	***	***	***	▲***	▲***	▲***
Unit COGS.....	***	***	***	▲***	▼***	▲***
Unit SG&A expenses.....	***	***	***	▲***	▼***	▲***
Unit operating income or (loss) (fn3).....	***	***	***	▲***	▲***	▲***
Unit net income or (loss) (fn3).....	***	***	***	▲***	▲***	▲***
COGS/sales (fn1).....	***	***	***	▼***	▲***	▼***
Operating income 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.--Since independent fabricators' U.S. shipments are already reported once either in U.S. producers' U.S. shipments or as an imported quartz surface product, they are not added into the calculation of overall apparent U.S. consumption so as to avoid doublecounting the same merchandise. For additional detail on the calculation of apparent consumption see part IV.

fn3.--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 import statistics under reporting number 6810.99.0010, accessed on March 10, 2020.

## **APPENDIX D**

### **PURCHASER QUESTIONNAIRE RESPONSES**



As part of their response to the notice of institution, interested parties were asked to provide a list of leading purchasers in the U.S. market for the domestic like product. A response was received from domestic interested parties, and it provided contact information for the following five firms as top purchasers of quartz surface products: \*\*\*. Purchaser questionnaires were sent to these five 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 quartz surface products that have occurred in the United States or in the market for quartz surface products in India and/or Turkey, since June 22, 2020?

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

2. Do you anticipate any significant changes in the supply and demand conditions for quartz surface products in the United States or in the market for quartz surface products in India and/or Turkey within a reasonably foreseeable time?

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

