

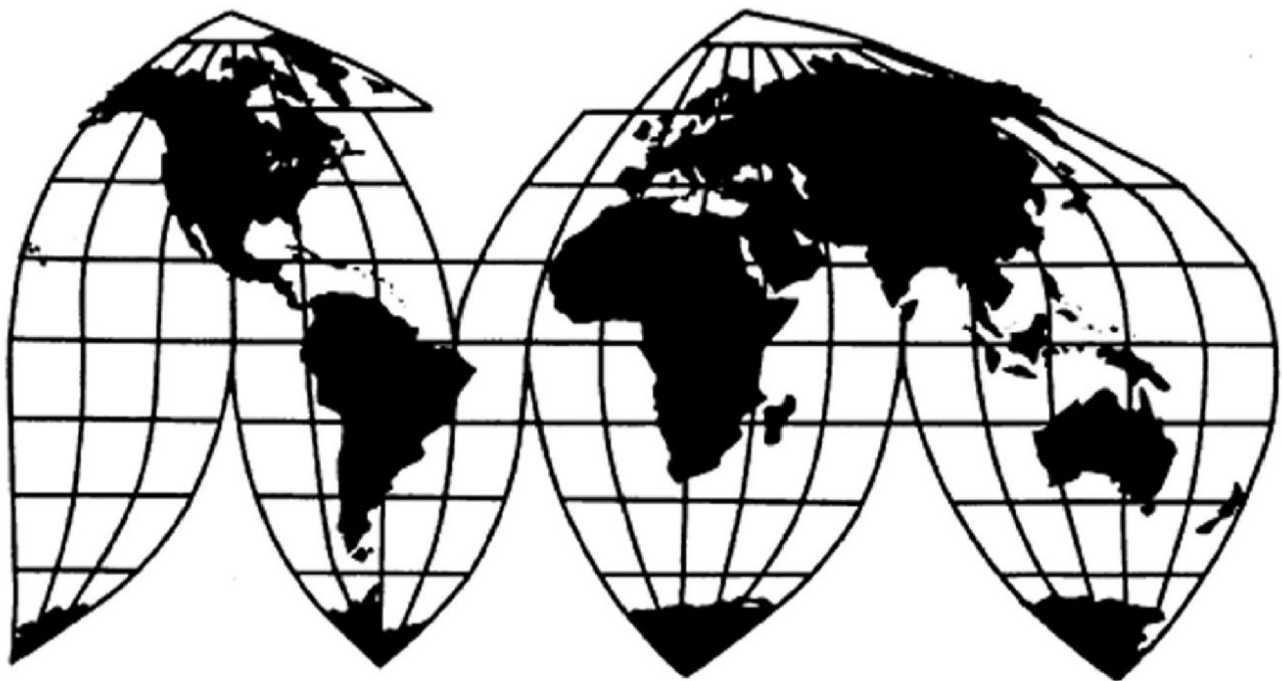
Certain Collated Steel Staples from China

Investigation Nos. 701-TA-626 and 731-TA-1452 (Review)

Publication 5698

February 2026

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Note.—Information that would reveal confidential operations of individual firms may not be published.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-626 and 731-TA-1452 (Review)

Certain collated steel staples from China

DETERMINATIONS

On the basis of the record¹ developed in the subject five-year reviews, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that revocation of the countervailing and antidumping duty orders on certain collated steel staples from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

BACKGROUND

The Commission instituted these reviews on June 2, 2025 (90 FR 23364) and determined on September 5, 2025, that it would conduct expedited reviews (90 FR 58308, December 16, 2025).

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

Views of the Commission

Based on the record in 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 certain collated steel staples (“CCS staples”) from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

I. Background

Original Investigations. On June 6, 2019, Kyocera Senco Industrial Tools, Inc. (“Senco” or “Petitioner”), filed petitions concerning imports of CCS staples from China.¹ On July 17, 2020, the Commission determined that a domestic industry was materially injured by reason of imports of CCS staples from China that the U.S. Department of Commerce (“Commerce”) determined were being sold at less than fair value (“LTFV”) and subsidized by the Government of China.² Commerce issued countervailing and antidumping duty orders on CCS staples from China on July 20, 2020.³

Current Reviews. On June 2, 2025, the Commission instituted these first five-year reviews of the antidumping and countervailing duty orders on CCS staples from China.⁴ U.S. producer Senco filed the sole response to the Commission’s notice of institution.⁵ On September 5, 2025, the Commission determined that the domestic industry party group response was adequate and

¹ *Certain Collated Steel Staples from China*, Inv. Nos. 701-TA-626 and 731-TA-1452 (Final), USITC Pub. 5085 (July 2020) (“*Original Determinations*”) at I-1.

² *Original Determinations* at 1; *Certain Collated Steel Staples From China; Determinations*, 85 Fed. Reg. 43603 (July 17, 2020). The Commission also found that imports subject to Commerce’s affirmative critical circumstances determinations were not likely to undermine seriously the remedial effect of the orders on China. Confidential Commission Views – Certain Collated Steel Staples from China, EDIS Doc. 858662 (July 14, 2020) (“Conf. Original Determinations”) at 1, 29; *Original Determinations*, USITC Pub. 5085 (July 2020) at 3, 39.

³ *Certain Collated Steel Staples from China: Countervailing Duty Order*, 85 Fed. Reg. 43813 (July 20, 2020) (“*CVD Order CCS Staples China*”); *Certain Collated Steel Staples from China: Antidumping Duty Order*, 85 Fed. Reg. 43815 (July 20, 2020) (“*AD Order CCS Staples China*”).

⁴ *Certain Collated Steel Staples From China: Institution of Five-Year Reviews*, 90 Fed. Reg. 23364 (June 2, 2025).

⁵ Confidential Staff Report: Certain Collated Steel Staples, INV-XX-113, EDIS Doc. 860323 at 1.15 (Aug. 25, 2025) (“CR”); Public Report (“PR”), *Certain Collated Steel Staples from China*, Inv. Nos. 701-TA-626 and 731-TA-1452 (Review), USITC Pub. 5698 (Feb. 2026) at 1.15, B.3; Senco’s Response to the Notice of Institution, EDIS Doc. Nos. 855820 (confidential version) & 850822 (public version) (July 2, 2025) (“Senco’s NOI Response”).

that the respondent interested party group response was inadequate.⁶ Finding no other circumstances that would warrant conducting full reviews, the Commission determined that it would conduct expedited reviews of the orders.⁷ Senco submitted final comments pursuant to 19 C.F.R. § 207.61(d) arguing that the Commission should reach an affirmative determination.⁸

U.S. industry data in these reviews are based on information provided in response to the notice of institution by Senco, which accounted for approximately *** percent of production of CCS staples in the United States in 2024, and publicly available information compiled by the Commission.⁹ U.S. import data and related information are based on official Commerce statistics.¹⁰ Foreign industry data and related information are based on information from the original investigations, information submitted by Senco in its response to the notice of institution, and publicly available information compiled by the Commission.¹¹

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.”¹² The Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this subtitle.”¹³ The Commission’s practice in five-

⁶ Explanation of Commission Determination on Adequacy, EDIS Doc. 861988 (Sept. 16, 2025) (“Commission Adequacy Determination”) at 1.

⁷ Commission Adequacy Determination at 1.

⁸ Senco’s Final Comments in the Five-Year Review, EDIS Doc. Nos. 867883 (confidential version) & 867884 (public version) (Jan. 5, 2026) (“Final Comments”).

⁹ CR/PR at 1.13, B.4, Table B.1. In the original investigations, Senco accounted for *** (*i.e.*, *** percent) of the U.S. production during the POI. Conf. Original Determinations at 11; *Original Determinations*, USITC Pub. 5085 at 10.

¹⁰ CR/PR at 1.16, 1.17, Tables 1.6 & 1.7. Official import statistics are for HTS statistical reporting number 8305.20.0000, which contains both in-scope and out-of-scope merchandise. *Id.* at 1.15, Tables 1.6, 1.7, 1.9 & 1.10. We note that in the original investigations, import data and U.S. shipments thereof, were based U.S. importer questionnaire responses representing four fifths of U.S. imports under this HTS statistical reporting number, supplemented with proprietary U.S. Customs and Border Protection data for missing importers of in-scope merchandise. *Original Determinations*, USITC Pub. 5085 at 3-4.

¹¹ See CR/PR at 1.13, 1.14. Additionally, the Commission sent purchaser questionnaires to four firms Senco identified as top purchasers of CCS staples from China but none responded. CR/PR at D-3.

¹² 19 U.S.C. § 1677(4)(A).

¹³ 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.* (Continued ...)

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.¹⁴

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

The merchandise covered by the scope of this *Order* is certain collated steel staples. Certain collated steel staples subject to this *Order* are made from steel wire having a nominal diameter from 0.0355 inch to 0.0830 inch, inclusive, and have a nominal leg length from 0.25 inch to 3.0 inches, inclusive, and a nominal crown width from 0.187 inch to 1.125 inch, inclusive. Certain collated steel staples may be manufactured from any type of steel, and are included in the scope of this *Order* regardless of whether they are uncoated or coated, and regardless of the type or number of coatings, including but not limited to coatings to inhibit corrosion.

Certain collated steel staples may be collated using any material or combination of materials, including but not limited to adhesive, glue, and adhesive film or adhesive or paper tape.

Certain collated steel staples are generally made to American Society for Testing and Materials (ASTM) specification ASTM F1667-18a, but can also be made to other specifications.

Excluded from the scope of this order are any carton-closing staples covered by the scope of the existing antidumping duty *Order* on Carton-Closing Staples from the People's Republic of China.¹⁵

United States, 19 CIT 450, 455 (1995); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int'l Trade 1990), *aff'd*, 938 F.2d 1278 (Fed. Cir. 1991); *see also* S. Rep. No. 249, 96th Cong., 1st Sess. 90-91 (1979).

¹⁴ *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).

¹⁵ *See Carton-Closing Staples from the People's Republic of China: Antidumping Duty Order*, 83 Fed. Reg. 20792 (May 8, 2018) (the citation to the antidumping duty order appears as footnote 10 to the accompanying Issues and Decision Memorandum ("IDM") at pg. 2). In July 2020, the Commission (Continued ...)

Also excluded are collated fasteners commonly referred to as “C-ring hog rings” and “D-ring hog rings” produced from stainless or carbon steel wire having a nominal diameter of 0.050 to 0.081 inches, inclusive. C-ring hog rings are fasteners whose legs are not perpendicular to the crown, but are curved inward resulting in the fastener forming the shape of the letter “C”. D-ring hog rings are fasteners whose legs are straight but not perpendicular to the crown, instead intersecting with the crown at an angle ranging from 30 degrees to 75 degrees. The hog rings subject to the exclusion are collated using glue, adhesive, or tape. The hog rings subject to this exclusion have either a 90 degree blunt point or 15-75 degree divergent point.

Certain collated steel staples subject to this *Order* are currently classifiable under subheading 8305.20.0000 of the Harmonized Tariff Schedule of the United States (HTSUS). While the HTSUS subheading and ASTM specification are provided for convenience and for customs purposes, the written description of the subject merchandise is dispositive.¹⁶

A CCS staple is a type of fastener made from steel wire consisting of two same-size pointed or pointless legs connected by a crown located opposite from the staple-point ends. They can be produced using any type of steel, whether coated or uncoated.¹⁷ The principal use of a CCS staple is to fasten two or more pieces of material, including but not limited to wood or other solid building materials. CCS staples are typically used in structural applications, such as

determined that imports of CCS staples from Korea and Thailand were negligible and therefore terminated the investigations concerning imports of CCS staples from those countries. CR/PR at 1.2, citing *Certain Collated Steel Staples From China, Korea, and Taiwan; Determinations*, 84 Fed. Reg. 35884 (July 25, 2020).

¹⁶ *Collated Steel Staples From the People’s Republic of China: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order*, 90 Fed. Reg. 51642 (Nov. 18, 2025) (“*Commerce’s Final Results First Review CVD Order*”) and accompanying Issues and Decision Memorandum (Sept. 30, 2025) (“*CVD IDM*”) at 2-3; *Collated Steel Staples From the People’s Republic of China: Final Results of the Expedited First Sunset Review of the Antidumping Duty Order*, 90 Fed. Reg. 51648 (Nov. 18, 2025) (“*Commerce’s Final Results First Review AD Order*”) and accompanying IDM (“*AD IDM*”) (Sept. 30, 2025) at 2-3.

¹⁷ CR/PR at 1.8. Two common forms of CCS staples are galvanized staples and stainless-steel staples. *Id.* Galvanized staples are coated in zinc, providing corrosion resistance as long as the coating remains intact. *Id.* Alternatively, stainless steel is typically more expensive but provides greater corrosion resistance, durability, and strength, and maintains a bright appearance over time. *Id.*

furniture and building construction. They are made from a thicker steel wire than most other forms of staples to attain the necessary strength and holding power to fasten wood and other solid building materials.¹⁸ CCS staples are often classified by their diameter into gauges (“ga.”). A CCS staple gauge range includes 14 to 19 ga. (as the number of the gauge increases, the diameter of the wire decreases). A heavy wire CCS staple is associated with a gauge range of 14 to 17 and a medium wire staple is typically associated with a gauge range of 18 to 19.¹⁹ CCS staples are produced to certain industry specifications, notably those of the ICC Evaluation Service (“ICC-ES”) and the American Society for Testing and Materials (“ASTM”).^{20 21}

In its original determinations, the Commission defined a single domestic like product consisting of all CCS staples, coextensive with Commerce’s scope.²²

In the current reviews, the record does not contain any new information suggesting that the pertinent characteristics and uses of CCS staples have changed since the original investigations so as to warrant revisiting the Commission’s domestic like product definition.²³ Senco agrees with the Commission’s definition of the domestic like product from the original investigations.²⁴ Consequently, we again define a single domestic like product consisting of all CCS staples, coextensive with Commerce’s scope.

¹⁸ CR/PR at 1.9. CCS staples for the purpose of these investigations have a nominal diameter ranging from 0.0355 inch to 0.0830 inch, inclusive, a length ranging from 0.25 inch to 3.0 inches, inclusive, and a nominal crown width from 0.187 inch to 1.125 inches, inclusive. *Id.*

¹⁹ CR/PR at 1.9. Light wire, which is not in the scope of these investigations, is typically used to fasten paper and upholstery. Carton closing staples, used to secure the flaps of corrugated and solid paperboard cartons and boxes, are specifically excluded from the scope. *Id.*

²⁰ CR/PR at 1.9. The ASTM is an international standards organization, and ASTM F1667M-21a includes the technical specification for CCS staples. *Id.* ASTM F1667M-21a supersedes historical versions of the ASTM 1667 specification for driven nails, spikes, and staples. *Id.* at 1.9 & n.21, *citing* ASTM International, Steel Standards, Standard Specification for Driven Fasteners: Nails, Spikes, and Staples (Feb. 7, 2022), https://store.astm.org/f1667_f1667m-21a.html, retrieved July 28, 2025.

²¹ CR/PR at 1.9. CCS staples are packaged for shipment solely in a collated form, that is, joined by using a single material or combination of materials, including, but not limited to, adhesive, glue, adhesive film paper, or tape. *Id.* CCS staples can also be packaged with pneumatic, electric, and gas-powered stapling tools as well as household tool kits and other devices designed for the CCS staples applications (tools are generally gauge-specific and used to join hard and dense surfaces). *Id.* U.S. producers typically use an automated process for packaging CCS staples, while producers in the subject countries typically pack the boxes by hand. *Id.* at 1.9—1.10. The Petitioner noted that the quantity of packaged CCS staples varies and can be made to order. *Id.* at 1.10.

²² *Original Determinations*, USITC Pub. 5085 at 7-8; Conf. *Original Determinations* at 8-10; *see also* CR/PR at 1.15.

²³ *See* CR/PR at 1.15; Senco’s NOI Response at 26.

²⁴ *See* Senco’s NOI Response at 26.

B. Domestic Industry

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”²⁵ In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

1. Related Parties

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.²⁶ 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.²⁷ Exclusion of such a producer is within the Commission’s discretion based upon the facts presented in each investigation.²⁸

²⁵ 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.

²⁶ See 19 U.S.C. § 1677(4)(B).

²⁷ 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).

²⁸ 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.

a. Original Investigations

In the original investigations the Commission determined that U.S. producers Senco and Stanley Black & Decker (“SBD”) were related parties because they imported subject merchandise during the POI, but it did not find that appropriate circumstances existed to exclude either firm from the domestic industry.²⁹ Accordingly, the Commission defined the domestic industry to include all domestic producers of CCS staples during the POI.³⁰

b. Current Reviews

Senco remains a related party in these reviews due to its common ownership with an importer of subject merchandise, ***.³¹ However, Senco is the largest U.S. producer of CCS staples, accounting for approximately *** percent of the domestic production in 2024,³² and there is no indication that its relationship allowed it to benefit from, or be shielded from the effects of subject imports during the POR.³³ To the contrary, Senco supports the continuation of the orders. Accordingly, and in the absence of any argument to the contrary, we conclude that appropriate circumstances do not exist to exclude Senco from the domestic industry. We therefore define the domestic industry to include all domestic producers of CCS staples.

III. 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

²⁹ Conf. Original Determinations at 10-15; *Original Determinations*, USITC Pub. 5085 at 8-12. Senco was also under common ownership with importer SouthernCarlson, Inc. (“SouthernCarlson”) during the POI. *Original Determinations*, USITC Pub. 5085 at 10 n.35, Conf. Original Determinations at 12 n.35. Conf. Original Determinations at 11; *Original Determinations*, USITC Pub. 5085 at 9-10.

³⁰ Conf. Original Determinations at 11, 15; *Original Determinations*, USITC Pub. 5085 at 10, 12.

³¹ Senco’s NOI Response at 22 and 26; CR/PR at 1.13 and 1.15.

³² Notably, as the only provider of domestic industry data in these reviews, its exclusion from the domestic industry would result in the Commission having no industry data to analyze in determining whether revocation of the orders would likely lead to continuation of recurrence of material injury within a reasonably foreseeable time.

³³ Any negative effects of unfairly traded subject imports on the domestic industry during the POR is presumably limited to the subject merchandise that Commerce found to have circumvented the orders during the period, as discussed below.

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.”³⁴ 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.”³⁵ Thus, the likelihood standard is prospective in nature.³⁶ 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.³⁷

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.”³⁸ According to the SAA, a “‘reasonably foreseeable time’ will vary from case-to-case, but normally will exceed the ‘imminent’ timeframe applicable in a threat of injury analysis in original investigations.”³⁹

³⁴ 19 U.S.C. § 1675a(a).

³⁵ 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.

³⁶ 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.

³⁷ 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’”).

³⁸ 19 U.S.C. § 1675a(a)(5).

³⁹ 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.*

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.”⁴⁰ 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).⁴¹ 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.⁴²

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.⁴³ In doing so, the Commission must consider “all relevant economic factors,” including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.⁴⁴

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

⁴⁰ 19 U.S.C. § 1675a(a)(1).

⁴¹ 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings. *See Common Alloy Aluminum Sheet from the People’s Republic of China: Final Results of the Expedited First Sunset Review of the Antidumping Duty Order*, 89 Fed. Reg. 38096 (May 7, 2024).

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

⁴³ 19 U.S.C. § 1675a(a)(2).

⁴⁴ 19 U.S.C. § 1675a(a)(2)(A-D).

like product.⁴⁵

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.⁴⁶ 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.⁴⁷

No respondent interested party participated in these expedited reviews.⁴⁸ The record, therefore, contains limited new information with respect to the CCS staples industry in China. There is also limited information on the CCS staples market in the United States during the POR. 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 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

⁴⁵ 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.

⁴⁶ 19 U.S.C. § 1675a(a)(4).

⁴⁷ The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, the Commission “considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.” SAA at 885.

⁴⁸ Commission’s Adequacy Explanation at 1.

affected industry.”⁴⁹ The following conditions of competition inform our determinations.

1. Demand Conditions

Original Investigations. The Commission observed in the original investigations that CCS staples are sold to distributors, builders/contractors, retailers, and other end users.⁵⁰ It also observed that U.S. demand for CCS staples is driven by demand for U.S.-produced downstream products in which they are used and is primarily influenced by conditions in the home construction market and the economy more broadly.⁵¹ The Commission further noted that several market participants indicated that the market for CCS staples is subject to business cycles.⁵² Apparent U.S. consumption for CCS staples increased from *** pounds in 2017 to *** pounds in 2018, and then decreased to *** pounds in 2019, a decrease of *** percent over the POI.⁵³

Current Reviews. There is no new information on the record of these reviews indicating that the factors influencing demand for CCS staples have changed since the original investigations.⁵⁴ The record indicates that demand for CCS staples continues to be driven mainly by demand for U.S.-produced downstream products in which CCS staples are used and is primarily influenced by conditions in the home construction market and the economy more broadly.⁵⁵ According to Senco, the U.S. Census Bureau, Historical Time Series indicates that the quantity of new privately-owned housing units under construction since the original investigations rapidly increased in 2022 and 2023, but decreased in 2024.⁵⁶ Senco maintains that this decreasing trend

⁴⁹ 19 U.S.C. § 1675a(a)(4).

⁵⁰ Conf. Original Determinations at 20; *Original Determinations*, USITC Pub. 5085 at 16.

⁵¹ Conf. Original Determinations at 20; *Original Determinations*, USITC Pub. 5085 at 16. The Commission further observed that market participants generally did not perceive that other products could be substituted for CCS staples; *** responding U.S. producers, 14 of 22 responding importers, and *** responding purchasers reported there were no substitutes for CCS staples. Conf. Original Determinations at 20-21; *Original Determinations*, USITC Pub. 5085 at 16.

⁵² Conf. Original Determinations, at 21; *Original Determinations*, USITC Pub. 5085 at 16. Most of the firms responding affirmatively to this question indicated that there is a seasonality to demand, noted by some to be specific to construction projects, which is highest in spring and early summer. *See id.*

⁵³ Conf. Original Determinations at 21; *Original Determinations*, USITC Pub. 5085 at 16.

⁵⁴ *See Senco's NOI Response* at 25.

⁵⁵ *Senco's NOI Response* at 7-8, 25; Final Comments at 5. *See generally* CR/PR at 1.9–1.10, 1.17.

⁵⁶ *Senco's NOI Response* at 7, Exh. 2, *citing* United States Census Bureau, Historical Time Series for new, privately-owned, residential housing units (housing units under construction at end of period), available at <https://www.census.gov/construction/nrc/data/series.html>; Final Comments at 5. Senco further notes that monthly shipments of manufactured housing increased in 2022 to 11.4 thousand units before decreasing in 2023 and 2024 - a decrease since March 2020 (the last date of the original investigations) of approximately 14 percent. *Senco's NOI Response* at 7-8.

for the housing market will continue - and result in decreased demand for CCS staples in the future.⁵⁷

In 2024, apparent U.S. consumption of CCS staples was *** pounds, *** percent higher than the *** pounds recorded in 2019, the last year of the POI.⁵⁸

2. Supply Conditions

Original Investigations. The domestic industry was the second largest source of supply in the U.S. market, accounting for *** percent of apparent U.S. consumption in the last full year of the POI (2019).⁵⁹ Subject imports from China were the largest individual source of import supply in the U.S. market during the POI, accounting for *** percent of apparent U.S. consumption in 2019.⁶⁰ Nonsubject imports were the smallest source of supply in the market, with a collective *** percent share of apparent U.S. consumption in 2019.⁶¹

Current Reviews. The domestic industry was the smallest source of supply in the U.S. market during the POR, with a *** percent share of apparent U.S. consumption by quantity in 2024, down from *** percent in 2019.⁶² Senco was one of three known U.S. producers during the POR, and Senco renovated and optimized the CCS Staples manufacturing space at its facility in Ohio during the POR.⁶³ The domestic industry's capacity and production in 2024, at *** pounds and *** pounds, respectively, were lower than the industry's capacity and production in each

⁵⁷ Senco's NOI Response at 7-8.

⁵⁸ Calculated from CR/PR at 1.17, Table 1.7. We note that apparent U.S. consumption in 2024 may be overstated given that it is based, in part, on official Commerce import data for imports under an HTSUS statistical reporting number 8305.20.0000, a category that includes in-scope and out-of-scope imports.

⁵⁹ Conf. Original Determinations, at 22; *Original Determinations*, USITC Pub. 5085 at 17. The domestic industry accounted for *** and *** percent of apparent U.S. consumption in 2019 regarding the heavier 14-17 gauge range and the lighter 18-19 gauge range, respectively. Confidential Staff Report Original Investigation, EDIS Doc. 858661 (June 11, 2020) ("Conf. Inv. Staff Report") at IV-18, Table IV-8.

⁶⁰ Conf. Original Determinations, at 22; *Original Determinations*, USITC Pub. 5085 at 17. Subject imports accounted for *** and *** percent of apparent U.S. consumption in 2019 regarding the heavier 14-17 gauge range and the lighter 18-19 gauge range, respectively. Conf. Inv. Staff Report at Table IV-8.

⁶¹ Conf. Original Determinations, at 22; *Original Determinations*, USITC Pub. 5085 at 17. Nonsubject imports accounted for *** and *** percent of apparent U.S. consumption in 2019 regarding the heavier 14-17 gauge range and the lighter 18-19 gauge range, respectively. Conf. Inv. Staff Report at Table IV-8. Germany was one of the leading sources of nonsubject imports in 2019, the last year of the POI. See Conf. Inv. Staff Report at IV-1 n.2; see also *id.* at IV-2, Table IV-1 n.1.

⁶² CR/PR at 1.17, Table 1.7. The domestic industry's volume was *** pounds in 2024. *Id.* We note that the domestic industry's market share in 2024 may be understated given that U.S. shipments of imports are based on official Commerce import data for imports under an HTSUS statistical reporting number 8305.20.0000, a category that includes in-scope and out-of-scope imports.

⁶³ CR/PR at 1.13; Senco's NOI Response at 22.

year of the POI.⁶⁴

Subject imports continued to have a significant presence in the U.S. market notwithstanding the orders; their volume was 37.0 million pounds in 2024 (**% percent of apparent U.S. consumption), a **% percentage point decline since 2019.⁶⁵ In 2024, Commerce determined that Chinese producers circumvented the orders by finishing CCS staples in Thailand and Vietnam from Chinese inputs (*i.e.*, steel wire and wire band), and entered the finished product into the United States as nonsubject Thai and Vietnamese CCS staples.⁶⁶

Nonsubject imports were the largest supplier of CCS staples to the U.S. market.⁶⁷ Nonsubject import volume was 104 million pounds in 2024, a **% percent increase since 2019; with a market share of **% percent in 2024, up from only **% percent in 2019.⁶⁸ The leading sources of nonsubject imports during the POR were South Korea and Oman.⁶⁹

3. Substitutability and Other Conditions

Original Investigations. The Commission found a high degree of substitutability between domestically produced CCS staples and subject imports from China in the original investigations.⁷⁰ It also found that price was among the most important factors in purchasing decisions.⁷¹

The Commission observed that additional duties of 15 percent were placed on CCS staples

⁶⁴ CR/PR at Table 1.5.

⁶⁵ CR/PR at 1.17, Table 1.7. We note that U.S. import data in 2024 may be overstated given that it is based on official Commerce import data for imports under an HTSUS statistical reporting number 8305.20.0000, a category that includes in-scope and out-of-scope imports.

⁶⁶ *Antidumping and Countervailing Duty Orders on Certain Collated Steel Staples from the People's Republic of China: Final Affirmative Determinations of Circumvention With Respect to the Kingdom of Thailand and the Socialist Republic of Vietnam*, 89 Fed. Reg. 5855 (Jan. 30, 2024) and accompanying Thailand Issues and Decision Memorandum and Vietnam Issues and Decision Memorandum; *see also* *Antidumping and Countervailing Duty Orders on Certain Collated Steel Staples from the People's Republic of China: Preliminary Affirmative Determinations of Circumvention With Respect to the Kingdom of Thailand and the Socialist Republic of Vietnam*, 88 Fed. Reg. 57931 (Aug. 24, 2023), and accompanying Thailand Preliminary Decision Memorandum and Vietnam Preliminary Decision Memorandum; Senco's NOI Response at 15 n.41, 25.

⁶⁷ CR/PR at Table 1.7. As noted, nonsubject imports were followed by subject imports and the domestic industry. *See id.*

⁶⁸ CR/PR at Table 1.7.

⁶⁹ CR/PR at 1.16, Table 1.6. South Korea and Oman were the largest and second largest sources of nonsubject imports, respectfully, in 2023 and 2024. *Id.*

⁷⁰ Conf. Original Determinations at 23; *Original Determinations*, USITC Pub. 5085 at 17.

⁷¹ Conf. Original Determinations at 23-24; *Original Determinations*, USITC Pub. 5085 at 18.

from China in September 2019 pursuant to Section 301 of the Trade Act.⁷² These additional duties were reduced to 7.5 percent in February 2020.⁷³

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 subject imports, or the importance of price in purchasing decisions, have changed since the original investigations. Accordingly, we find that there is a high degree of substitutability between subject imports and the domestic like product and that price remains very important in purchasing decisions.

The 7.5 percent Section 301 duty remains in place.⁷⁴ Effective February 4, 2025, CCS staples originating in China were subject to an additional 10 percent ad valorem duty under the International Emergency Economic Powers Act (“IEEPA”), and the additional duty was increased to 20 percent ad valorem on March 4, 2025.⁷⁵ In addition, effective May 14, 2025, CCS staples originating in China were subject to an additional 10 percent ad valorem reciprocal duty under the IEEPA.⁷⁶ Consequently, under IEEPA and Section 301, a total additional ad valorem rate of 37.5 percent is in effect on imports of CCS staples from China.⁷⁷

C. Likely Volume of Subject Imports

1. Original Investigations

The Commission found that subject imports had a significant and increasing presence in the U.S. market during the POI and captured market share directly at the domestic industry’s expense.⁷⁸ The volume of subject imports increased by 24.9 percent, from 98.4 million pounds in 2017 to 122.9 million pounds in 2018 before declining to 98.1 million pounds in 2019.⁷⁹ Subject

⁷² 19 U.S.C. § 2411. Conf. Original Determinations at 24; *Original Determinations*, USITC Pub. 5085 at 18.

⁷³ Conf. Original Determinations at 24; *Original Determinations*, USITC Pub. 5085 at 18. By contrast, the Commission noted that CCS staples themselves were not subject to section 232 duties. Conf. Original Determinations at 25; *Original Determinations*, USITC Pub. 5085 at 19.

⁷⁴ CR/PR at 1.7—1.8, Table 1.3.

⁷⁵ CR/PR at 1.7—1.8, Table 1.3.

⁷⁶ CR/PR at 1.7. More specifically, the reciprocal duty rose to 84 percent ad valorem effective April 9, 2025, and rose again to 125 percent effective April 10, 2025, and was reduced to 10 percent effective May 14, 2025. *Id.* at 1.7.

⁷⁷ CR/PR at 1.8, Table 1.3.

⁷⁸ Conf. Original Determinations at 25-26; *Original Determinations*, USITC Pub. 5085 at 19. The volume of subject imports increased from 98.4 million pounds in 2017 to 122.9 million pounds in 2018, and then declined to 98.1 million pounds in 2019, which was slightly lower than in 2017. *Id.*

⁷⁹ Conf. Original Determinations at 25; *Original Determinations*, USITC Pub. 5085 at 19.

imports' market share increased *** percentage points from 2017 to 2019, while the domestic industry's market share declined *** percentage points.⁸⁰ The Commission further observed that the ratio of subject imports to the domestic industry's production increased from *** percent in 2017 to *** percent in 2019, an increase of *** percentage points.⁸¹

Consequently, the Commission found that the volume of subject imports and the increase in volume during the POI was significant in both absolute terms and relative to U.S. production and consumption.⁸²

2. Current Reviews

Subject imports maintained a significant presence in the U.S. market during the POR, albeit at lower volumes than during the original investigations, indicating that the orders had some disciplining effect.⁸³ Subject imports were 95.3 million pounds in 2019, 39.0 million pounds in 2020, 47.7 million pounds in 2021, 41.7 million pounds in 2022, 27.7 million pounds in 2023, and 37.0 million pounds in 2024.⁸⁴

The record in these five-year reviews contains limited information on the industry producing CCS staples in China. The available information indicates that subject producers have the ability and incentive to export significant volumes of subject merchandise to the U.S. market if the orders were revoked.⁸⁵

The information available, including that collected in the original investigations and submitted by Senco in these reviews, indicates that the subject foreign industry possesses substantial capacity and excess capacity.⁸⁶ Although information for the subject industry were

⁸⁰ Conf. Original Determinations at 25; *Original Determinations*, USITC Pub. 5085 at 19. Subject imports' total U.S. market share increased from *** percent in 2017, to *** percent in 2018, before slightly decreasing to *** percent in 2019. The domestic industry's total U.S. market share decreased from *** percent in 2017, to *** percent in 2018, but increased to *** percent in 2019. *Id.*

⁸¹ Conf. Original Determinations at 25; *Original Determinations*, USITC Pub. 5085 at 19.

⁸² Conf. Original Determinations at 25-26; *Original Determinations*, USITC Pub. 5085 at 19.

⁸³ CR/PR at 1.16—1.17, Tables 1.6 & 1.7.

⁸⁴ CR/PR at Tables 1.6 & 1.7. Thus, subject import volume was 61.1 percent lower in 2024 than in the last year of the investigations (2019). *Id.* The subject imports share of apparent U.S. consumption was *** percent in 2019 and *** percent in 2024. *Id.* at Table 1.7. As noted above, subject imports are based on imports of HTSUS statistical reporting number 8305.20.0000, a category that includes in-scope and out-of-scope merchandise.

⁸⁵ See CR/PR at 1.19, 1.21, Tables 1.9 & 1.10 (quantity of exports from China); Senco's NOI Response at 10-16.

⁸⁶ Conf. Inv. Staff Report at VII-3; Senco's NOI Response at 13, *citing* Exh. 5.

limited to data for four producers in the original investigations,⁸⁷ the data indicated capacity of *** pounds and excess capacity of *** pounds during 2019.⁸⁸ The record contains no evidence as to Chinese producers' current overall capacity or capacity utilization. However, Senco identified 111 possible producers of CCS staples, and provided information indicating that Chinese producers continue to have substantial capacity and excess capacity, and are even increasing their capacity.⁸⁹

The information available also indicates that the subject industry is export oriented.⁹⁰ Global Trade Atlas ("GTA") data on Chinese exports of staples in strips, of base metal (HTS 8305.20), a category that includes both CCS staples and out-of-scope products, shows that the Chinese industry is by far the largest global exporter of this broader product category, accounting for more than half of total global exports.⁹¹ The GTA data also show that from 2020 to 2024, total Chinese exports of the broader product category that includes CCS staples increased 40.1 percent by quantity (from 203.7 million pounds to 285.6 million pounds).⁹²

Available information also indicates that the U.S. market remains attractive to subject producers. Subject imports maintained a significant presence in the U.S. market throughout the

⁸⁷ During the original investigations, four foreign producers in China provided information to the Commission. According to estimates provided by these producers, their exports to the United States were equivalent to approximately one-half of reported U.S. imports of CCS staples from China in 2019. Conf. Inv. Staff Report at VII-3.

⁸⁸ Conf. Inv. Staff Report at Table VII-2.

⁸⁹ Senco's NOI Response at 11-16, 26, *citing* Exhs. 4 (imports statistics 2016-2014) & 5 (Chinese producers' capacity expansion); CR/PR at 1.18, *citing* Senco's NOI Response at 23 & Exh. 7 (listing known Chinese producers and exporters that currently export or have exported CCS staples to the United States or other countries since July 2020). Specifically, Shanghai Yueda Nails Co., Ltd.'s ("Yueda Nails") Shanghai factory, which specializes in staples, has a capacity of 100 to 120 containers per month, and the producer is currently only using half of this capacity. *Id.* at 13, *citing* Exh. 5 (Shanghai Yueda Website – About US). Rise Time Industrial Ltd.'s ("Rise Time") "factory specializing in the production of industrial staples and brad nails" was estimated to reach an output value of "tons" and an operating revenue of a million yuan. *Id.*, *citing* Exh. 5 ("New equipment researched – Synchronous paralleling machine! – Rise Time Industrial Ltd."). Further, Rise Time purchased additional equipment to increase production for wire band, the substrate used in collated steel staple production, adding seven new machines, each of which can produce 12-15 metric tons of wire band per day. *Id.* Similarly, Zhejiang Best Industrial Co., Ltd. ("Zhejiang Best") maintains a high capacity for collated steel staples production, with 100 multi-wire staple-making machines and an annual capacity of 30,000 tons. *Id.* at 10-11, *citing* the Commission's official Dataweb import statistics for HTSUS subheading 8305.20.00.

⁹⁰ As for specific subject producers' export behavior during the POR, Rise Time sells 95 percent of its products abroad, according to information provided by Senco. Senco's NOI Response at 13, *citing* Exh. 5 ("New equipment researched – Synchronous paralleling machine! – Rise Time Industrial Ltd.").

⁹¹ See CR/PR at Table 1.10. Data from the original investigations also showed that the subject industry exported *** percent of its shipments in 2019. Conf. Inv. Staff Report at Table VII-2.

⁹² CR/PR at Tables 1.9 & 1.10.

POR, accounting for *** percent of apparent U.S. consumption in 2024,⁹³ reflecting both continued interest in the U.S. market on the part of Chinese producers and a distribution network that would enable them to increase shipments to the United States after revocation of the orders. According to the GTA, the United States was by far the largest destination market for Chinese exports of merchandise under HS subheading 8305.20 in 2024, and the nearby Mexican market was the second largest destination.⁹⁴ The fact that the United States remains the largest export market for certain staples from China even with the orders in place, makes it even more likely that subject producers will shift shipments to the United States and/or increase domestic production in the event of revocation.⁹⁵

The Chinese producers and exporters have taken steps to retain their presence in the U.S. market and their relationships with their U.S. customers.⁹⁶ As previously noted Commerce found that Chinese producers circumvented the orders by finishing CCS staples in Thailand and Vietnam from Chinese inputs (*i.e.*, steel wire and wire band), and entered the finished product into the United States as nonsubject Thai and Vietnamese CCS staples.⁹⁷ Such a shift of production to other countries demonstrates the length Chinese producers and exporters continued interest in selling CCS staples in the U.S. market.⁹⁸

Given the foregoing, including the significant and growing volume and market share of subject imports during the original investigations, the continued significant presence of subject imports in the U.S. market during the POR; the record evidence indicating the continued attractiveness of the U.S. market to subject producers; the Chinese industry's substantial and increasing capacity, including excess capacity; and the large volume of exports, we find that the

⁹³ CR/PR at 1.17, Table 1.7.

⁹⁴ CR/PR at 1.19 Table 1.9. As noted, HTS subheading 8305.20 includes out-of-scope products and, thus, may be overstated. *Id.* China's exports to Mexico increased from 10.7 million pounds in 2020 to 19.4 million pounds in 2024. *Id.* This further confirms the subject producers/exporters' interest in increasing exports to North America. *See id.*; *see also* Senco's NOI Response at 10-11 (imports for HTSUS 8305.20.00).

⁹⁵ *See* CR/PR at Table 1.9.

⁹⁶ *See, e.g.*, Senco's NOI Response at 10-11, 26.

⁹⁷ Senco's NOI Response at 14-15, 25-26. *See also* section III.B.2, above.

⁹⁸ *See, e.g., Cased Pencils from China*, Inv. No. 731-TA-669 (Fifth Review), USITC Pub. 5411 at 26 (March 2023) ("As further evidence of the Chinese producers' continued interest in the U.S. market, ... CBP ... determined that cased pencils from China were transshipped via the Philippines into the United States to evade the antidumping duty order"); *Steel Wire Garment Hangers from China*, Inv. No. 731-TA-1123 (Second Review), USITC Pub. 4945 at 14-15 (Aug. 2019) ("Indeed, Chinese exporters' repeated attempts to evade the antidumping duty order demonstrate the attractiveness of the U.S. market. ... CBP found that all of the SWG hangers imports from Malaysia actually originated in China, were transshipped through Malaysia, and were subject to the China-wide dumping rate of 187.25 percent ... Accordingly, the available data indicate that the Chinese industry has both the ability and the incentive to direct significant quantities of the subject merchandise to the U.S. market upon revocation.").

volume of subject imports from China would likely be significant, both in absolute terms and relative to U.S. consumption, if the orders were revoked.

D. Likely Price Effects

1. Original Investigations

The Commission determined that subject imports were having a significant adverse effect on U.S. prices in the original investigations.⁹⁹ It found a high degree of substitutability between subject imports and the domestic like product and that price was an important factor in purchasing decisions.¹⁰⁰ The Commission found significant underselling by the subject imports over the POI given that there was extensive underselling of the domestic like product,¹⁰¹ the purchase costs of subject imports were lower than the prices for the domestic like product, and there were a substantial number of confirmed lost sales, all of which resulted in a market share shift from the domestic industry to subject imports.¹⁰²

The Commission also found that the domestic industry was unable to increase prices commensurate with rising costs, including between 2017 and 2018 when apparent U.S. consumption increased. It observed that the domestic industry's ratio of cost of goods sold ("COGS") to net sales increased during the POI.¹⁰³ From 2017 to 2019 – at a time when apparent U.S. consumption decreased by *** percent and the volume of low-priced subject imports decreased by *** percent – the domestic industry's unit COGS increased by *** percent and its net sales unit values increased by only *** percent.¹⁰⁴ Consequently, the Commission found that the cost-price squeeze was caused by the significant volume of low-priced subject imports present in the U.S. market throughout the POI.¹⁰⁵

In light of the significant underselling and substantial lost sales that led to the domestic

⁹⁹ Conf. Original Determinations at 31; *Original Determinations*, USITC Pub. 5085 at 23.

¹⁰⁰ Conf. Original Determinations at 27; *Original Determinations*, USITC Pub. 5085 at 20.

¹⁰¹ Conf. Original Determinations at 27; *Original Determinations*, USITC Pub. 5085 at 20.

Specifically, the Commission found that subject imports undersold the domestic like product in all 72 quarterly pricing comparisons, involving 35.9 billion subject import staples, with underselling margins that ranged from 9.9 to 53.3 percentage. *Id.*

¹⁰² Conf. Original Determinations at 27-28; *Original Determinations*, USITC Pub. 5085 at 20-21.

¹⁰³ Conf. Original Determinations at 30; *Original Determinations*, USITC Pub. 5085 at 22.

¹⁰⁴ Conf. Original Determinations at 30; *Original Determinations*, USITC Pub. 5085 at 22; Conf. Inv. Staff Report at Table C-1.

¹⁰⁵ Conf. Original Determinations at 30; *Original Determinations*, USITC Pub. 5085 at 22. The domestic industry's ratio of COGS to net sales increased from *** percent in 2017 to *** percent in 2018, and further increased to *** percent in 2019. *Id.*

industry losing market share to the subject imports, and the role of the subject imports in preventing the domestic industry from increasing prices which otherwise would have occurred to a significant degree, the Commission concluded that the subject imports had significant adverse effects on prices for the domestic like product.¹⁰⁶

2. Current Reviews

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

The record in these expedited reviews does not contain recent product-specific pricing information.¹⁰⁷ Given that there is a high degree of substitutability between subject imports and the domestic like product and that price is an important factor in purchasing decisions, we find that the likely significant volume of subject imports would likely undersell the domestic like product to a significant degree, as during the original investigations, as a means of gaining market share.¹⁰⁸ Absent the discipline of the orders, the likely significant volume of low-priced subject imports would force the domestic industry to lower prices or forgo needed price increases, or else lose sales and market share to subject imports.¹⁰⁹ Consequently, we find that subject imports would likely have significant price effects on the domestic like product if the orders were revoked.¹¹⁰

¹⁰⁶ Conf. Original Determinations at 30; *Original Determinations*, USITC Pub. 5085 at 22.

¹⁰⁷ Senco asserts that the U.S. market remains highly price sensitive based on the continued substitutable nature of imported and domestically produced CCS staples, making price a very important factor in purchasing decisions. Senco's NOI Response at 8-9, 21.

¹⁰⁸ As noted, in the original investigations the Commission found pervasive underselling. Conf. Original Determinations at 27; *Original Determinations*, USITC Pub. 5085 at 20.

¹⁰⁹ The average unit value ("AUV") of subject imports was \$0.88 per pound in 2019; U.S. producers' AUV was \$*** per pound in 2019. Conf. Inv. Staff Report at Table C-3. In contrast, the AUV of subject imports was \$0.92 per pound in 2024 while U.S. producers' AUV was \$*** per pound in 2024. CR/PR at 1.14, 1.16, Tables 1.5 & 1.6.

¹¹⁰ Although subject imports from China are currently subject to additional duties under section 301, IEEPA China specific and IEEPA reciprocal tariffs, no party has argued and the record does not show that the Section 301 and IEEPA duties would prevent subject imports from entering the U.S. market at prices below the domestic like product, as they did in the original investigations. Indeed, while the import data may be influenced by the inclusion of out-of-scope merchandise in the HTS code, the available data show that the subject import average unit value ("AUV"), at \$0.92, was significantly lower than Senco's U.S. shipment AUV, at \$2.63, in 2024. *Compare* CR/PR at Table 1.6 with *id.* at Table 1.5.

E. Likely Impact

1. Original Investigations

The Commission found that despite increases in apparent U.S. consumption from 2017 to 2018, most of the domestic industry's production and output-related indicators declined throughout the POI. For example, from 2017 to 2019, the industry's capacity and total production decreased by *** percent and *** percent, respectively, its capacity utilization rate decreased by *** percentage points, its total U.S. shipments decreased by *** percent, its market share decreased by *** percentage points from 2017 to 2019, and its inventories decreased by *** percent.¹¹¹

The Commission also found that domestic industry's financial performance was generally poor throughout the POI. From 2017 to 2019, the industry's total net sales revenues decreased by *** percent, while *** decreased by *** percent.¹¹² The ratio of operating income to net sales decreased by *** percentage points from 2017 to 2019,¹¹³ while the domestic industry's net income decreased by *** percent and its ratio of net income to sales decreased by *** percentage points.¹¹⁴ The Commission also noted that two of the three domestic producers reported actual and potential negative effects on investment, growth, and development due to the subject imports.¹¹⁵

Further, the Commission noted that significant volumes of subject imports undersold and suppressed prices and took market share from the domestic industry, preventing the domestic industry from obtaining sales it otherwise would have had during the POI. It observed that due to its loss of market share, lost sales, and suppressed prices, the industry's output and revenues were lower than they would have otherwise been.¹¹⁶ This was reflected in declining domestic production, shipment and employment — including from 2018 to 2019, when the trends for the domestic industry were not affected by SBD ending domestic production in early 2018 — as well

¹¹¹ Conf. Original Determinations at 32; *Original Determinations*, USITC Pub. 5085 at 24; Conf. Inv. Staff Report at Table C-1.

¹¹² Conf. Original Determinations at 33; *Original Determinations*, USITC Pub. 5085 at 24-25; Conf. Inv. Staff Report at Table C-1.

¹¹³ Conf. Original Determinations at 33; *Original Determinations*, USITC Pub. 5085 at 24; Conf. Inv. Staff Report at Table C-1.

¹¹⁴ *Calculated from* Conf. Original Determinations at 33; *Original Determinations*, USITC Pub. 5085 at 24-25; Conf. Inv. Staff Report at Table C-1.

¹¹⁵ Conf. Original Determinations at 33; *Original Determinations*, USITC Pub. 5085 at 25. However, it noted that the domestic industry's capital expenditures increased *** percent from 2017 to 2019. *Id.*

¹¹⁶ Conf. Original Determinations at 33; *Original Determinations*, USITC Pub. 5085 at 25.

as the declining financial performance.¹¹⁷ Consequently, the Commission found that subject imports had a significant adverse impact on the domestic industry.¹¹⁸

The Commission also considered whether there were other factors that may have had an impact on the domestic industry during the POI to ensure that it was not attributing injury from such other factors to subject merchandise.¹¹⁹ While nonsubject imports were present in the U.S. market during the POI and gained some market share, they had a substantially smaller presence than the subject imports, accounting for less than *** percent of apparent U.S. consumption from during the POI.¹²⁰ Furthermore, nonsubject imports were sold at substantially higher AUVs than subject imports throughout the POI. Therefore, the Commission found that the presence of nonsubject imports in the U.S. market could not explain the magnitude of the domestic industry's loss of market share to the subject imports.¹²¹

2. Current Reviews¹²²

The record in these five-year reviews contains limited information concerning the domestic industry's performance since the original investigations.

The information available indicates that the domestic industry's trade performance in 2024 was poorer than its performance in 2019, the last year of the period examined in the original investigations. For example, the domestic industry's capacity, at *** pounds, production, at *** pounds, U.S. shipments, at *** pounds, and share of apparent consumption, at *** percent, were lower in 2024 than during the original investigations.¹²³ Notwithstanding the domestic industry's COGS-to-net-sales ratio being *** percent higher in 2024 than in 2019,¹²⁴ the industry was more

¹¹⁷ Conf. Original Determinations at 33-34; *Original Determinations*, USITC Pub. 5085 at 25.

¹¹⁸ Conf. Original Determinations at 34; *Original Determinations*, USITC Pub. 5085 at 25.

¹¹⁹ Conf. Original Determinations at 34; *Original Determinations*, USITC Pub. 5085 at 25.

¹²⁰ Conf. Original Determinations at 34; *Original Determinations*, USITC Pub. 5085 at 25.

Nonsubject imports accounted for *** percent in 2017, *** percent in 2018, and *** percent in 2019 of apparent U.S. consumption. Conf. Inv. Staff Report at Table C-1.

¹²¹ Conf. Original Determinations at 34; *Original Determinations*, USITC Pub. 5085 at 25; Conf. Inv. Staff Report at Table C-1.

¹²² In its expedited review of the antidumping duty order, Commerce determined that revocation of the order would result in the continuation or recurrence of dumping, with margins of up to 122.55 percent. *Commerce's Final Results First Review AD Order*, 90 Fed. Reg. at 51649 and accompanying IDM ("IDM AD") at 3. In its expedited review of the countervailing duty order, Commerce determined that revocation of the order would result in the continuation or recurrence of countervailable subsidies at net countervailable subsidy rates of up to 192.64 percent *ad valorem*. *Commerce's Final Results First Review CVD Order*, 90 Fed. Reg. at 51643 and accompanying IDM ("IDM CVD") at 3.

¹²³ CR/PR at 1.14, 1.17, Tables 1.5 & 1.7.

¹²⁴ CR/PR at Table 1.5.

profitable in 2024 than in 2019 (for example its operating income to net sales ratio increased to *** percent in 2024 compared *** percent in 2019). Regardless, its profitability remained low and its capacity utilization rate was only *** percent.¹²⁵ Based on the information above, we find the domestic industry vulnerable to the continuation or recurrence of material injury in the event of the revocation of the orders.

Based on the information available on the record, we find that revocation of the order would likely result in a significant volume of subject imports that likely would undersell the domestic like product to a significant degree. Given the high degree of substitutability between the domestic like product and subject imports and the importance of price in purchasing decisions, significant volumes of low-priced subject imports would likely capture sales and market share from the domestic industry and/or depress or suppress domestic prices to a significant degree. The likely significant volume of low-priced 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 thus conclude that, if the orders were revoked, subject imports from China would be likely to have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

We have also considered the role of factors other than subject imports, including nonsubject imports. Nonsubject imports have increased their presence in the U.S. market since the original investigation period, accounting for *** percent of apparent U.S. consumption in 2024 as compared to only *** percent in 2019, the last year of the original POI.¹²⁶ Nonetheless, some of the nonsubject imports from Thailand and Vietnam during the POR have been found by Commerce to be circumventing dumping duties imposed on subject Chinese merchandise.¹²⁷ Additionally, the record does not indicate that nonsubject imports would prevent subject imports from lowering their price to increase sales and market share in the U.S. market if the orders were revoked. Indeed, this record shows that subject import AUVs were lower than nonsubject import AUVs in 2023 and 2024.¹²⁸ In light of the high degree of substitutability between subject imports and the domestic like product and the importance of price to purchasers,¹²⁹ it is likely that the

¹²⁵ CR/PR at Table 1.5.

¹²⁶ CR/PR at 1.17, Table 1.7.

¹²⁷ See section III.C, above.

¹²⁸ CR/PR at Table 1.6. We recognize that the import AUV data may be influenced by out-of-scope merchandise.

¹²⁹ See Conf. Original Inv. Views at 23; *Original Determinations*, USITC Pub. 5085 at 17. See also section III.D, above.

increase in low-priced subject imports would come at least in part at the expense of the domestic industry and/or depress or suppress prices for the domestic like product. Consequently, we find that any future effects of nonsubject imports would be distinct from the likely effects attributable to subject imports and that nonsubject imports would not prevent subject imports from having a significant impact on the domestic industry.

We note that apparent U.S. consumption of CCS staples was *** percent higher in 2024 than in 2019, the last year of the original investigations.¹³⁰ As discussed above in Section III.B.2, Senco asserts demand for CCS staples is declining as a result of a weakening housing market.¹³¹ Given the high degree of substitutability between subject imports and the domestic like product and the importance of price to purchasers, the significant volume of low-priced subject imports that is likely after revocation would exacerbate any effects of decreasing demand on the domestic industry, by further reducing the industry's sales and placing additional downward pressure on domestic prices.

IV. Conclusion

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

¹³⁰ *Calculated from CR/PR at 1.17, Table 1.7.*

¹³¹ Senco's NOI Response at 8.

Information obtained in these reviews

Background

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

Table 1.1 CCS staples: Information relating to the background and schedule of this proceeding

Effective date	Action
June 2, 2025	Notice of initiation by Commerce (90 FR 23310, June 2, 2025)
June 2, 2025	Notice of institution by Commission (90 FR 23364, June 2, 2025)
September 6, 2025	Date for Commission’s vote on adequacy
September 30, 2025	Date for Commerce’s results of its expedited reviews
October 30, 2025	Commission’s determinations and views

¹ 19 U.S.C. 1675(c).
² 90 FR 23364, June 2, 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 23310, June 2, 2025. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission’s website (www.usitc.gov).
³ As part of their response to the notice of institution, interested parties were requested to provide company-specific information. Information regarding responses to the notice of institution is presented in app. B. Summary data compiled in the original investigations are presented in app. C.
⁴ Interested parties were also requested to provide a list of three to five leading purchasers in the U.S. market for the domestic like product and the subject merchandise. Presented in app. D are the responses received from purchaser surveys transmitted to the purchasers identified in this proceeding.

The original investigations

The original investigations resulted from petitions filed on June 6, 2019, with Commerce and the Commission by Kyocera Senco Industrial Tools, Inc., Cincinnati, Ohio.⁵ On June 2, 2020, Commerce determined that imports of CCS staples from China, Korea, and Taiwan were being sold at less than fair value (“LTFV”) and subsidized by the Government of China.⁶ The Commission determined on July 22, 2020, that the domestic industry was materially injured by reason of LTFV and subsidized imports of CCS staples from China.⁷ The Commission further determined that imports of CCS staples from Korea and Taiwan were negligible, and terminated the investigations of such imports.⁸ On July 20, 2020, Commerce issued its antidumping and countervailing duty orders on CCS staples from China with final weighted-average dumping margins ranging from 85.61 to 112.01 percent and net subsidy rates ranging from 12.32 to 192.64 percent.⁹

⁵ Collated Steel Staples from China, Inv. Nos. 701-TA-626 and 731-TA-1452 (Final), USITC Publication 5085, July 2020 (“Original publication”), p. 1.1.

⁶ 85 FR 33623, June 2, 2020; 85 FR 33626, June 2, 2020.

⁷ 84 FR 35884, July 25, 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 order on China.

⁸ *Ibid.*

⁹ 85 FR 43815, July 20, 2020; 85 FR 43813, July 20, 2020.

Previous and related investigations

The Commission has conducted six previous import relief investigations on CCS staples or similar merchandise, as presented in Table 1.2.

Table 1.2 CCS staples: Previous and related Commission proceedings and current status

Date	Number	Country and product	ITC original determination	Current status
1983	731-TA-116	Sweden; carton closing staples	Affirmative	Order revoked after second review, June 7, 1994
1983	731-TA-117	Sweden; carton closing staples	Affirmative	Order revoked after second review, June 7, 1994
2017	731-TA-1359	China; carton closing staples	Affirmative	Order revoked after first review, May 8, 2023
2019	731-TA-1453	Korea; CCS staples	Terminated	Terminated due to negligibility
2019	731-TA-1454	Taiwan; CCS staples	Terminated	Terminated due to negligibility

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 CCS staples from China with the intent of issuing the final results of these reviews based on the facts available not later than September 30, 2025.¹⁰ 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 CCS staples from China are noted in the sections titled "The original investigations" and "U.S. imports".

¹⁰ Letter from Alex Villanueva, Senior Director, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, July 21, 2025.

The product

Commerce's scope

Commerce has defined the scope as follows:

The merchandise covered by the scope of this order is certain collated steel staples. Certain collated steel staples subject to this order are made from steel wire having a nominal diameter from 0.0355 inch to 0.0830 inch, inclusive, and have a nominal leg length from 0.25 inch to 3.0 inches, inclusive, and a nominal crown width from 0.187 inch to 1.125 inch, inclusive. Certain collated steel staples may be manufactured from any type of steel, and are included in the scope of this order regardless of whether they are uncoated or coated, and regardless of the type or number of coatings, including but not limited to coatings to inhibit corrosion.

Certain collated steel staples may be collated using any material or combination of materials, including but not limited to adhesive, glue, and adhesive film or adhesive or paper tape.

Certain collated steel staples are generally made to American Society for Testing and Materials (ASTM) specification, but can also be made to other specifications.

Excluded from the scope of this order are any carton-closing staples covered by the scope of the existing antidumping duty order on Carton-Closing Staples from the People's Republic of China. See Carton-Closing Staples from the People's Republic of China: Antidumping Duty Order, 83 FR 20792 (May 8, 2018).¹¹

¹¹ On May 8, 2023, Commerce revoked the antidumping duty order on carton closing staples from China. 88 FR 40781, June 22, 2023.

Also excluded are collated fasteners commonly referred to as “C-ring hog rings” and “D-ring hog rings” produced from stainless or carbon steel wire having a nominal diameter of 0.050 to 0.081 inches, inclusive. C-ring hog rings are fasteners whose legs are not perpendicular to the crown, but are curved inward resulting in the fastener forming the shape of the letter “C”. D-ring hog rings are fasteners whose legs are straight but not perpendicular to the crown, instead intersecting with the crown at an angle ranging from 30 degrees to 75 degrees. The hog rings subject to the exclusion are collated using glue, adhesive, or tape. The hog rings subject to this exclusion have either a 90 degree blunt point or 15-75 degree divergent point.¹²

¹² 85 FR 43815, July 20, 2020.

U.S. tariff treatment

CCS staples are currently imported under Harmonized Tariff Schedule of the United States (“HTS”) statistical reporting number 8305.20.0000. The general rate of duty is “free” for HTS subheading 8305.20.00.¹³ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Effective September 1, 2019, CCS staples originating in China were subject to an additional 15 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective February 14, 2020, the section 301 duty for CCS staples was reduced to 7.5 percent.¹⁴

Effective February 4, 2025, CCS staples originating in China were subject to an additional 10 percent ad valorem duty under the International Emergency Economic Powers Act (“IEEPA”), and on March 4, 2025, that additional duty increased to 20 percent ad valorem.¹⁵

Effective April 5, 2025, CCS staples originating in China were subject to an additional 10 percent ad valorem reciprocal duty under the International Emergency Economic Powers Act (“IEEPA”). That reciprocal duty rose to 84 percent ad valorem effective April 9, 2025, and rose again to 125 percent effective April 10, 2025. However, effective May 14, 2025, the duty rate for reciprocal tariffs on products originating in China was reduced to 10 percent.¹⁶

¹³ USITC, HTS (2025) Revision 16, Publication 5644, July 2025, p. 83.8.

¹⁴ 84 FR 45821, August 30, 2019; 85 FR 3741, January 22, 2020. See also HTS heading 9903.88.15 and U.S. notes 20(r) and 20(s) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 16, Publication 5644, July 2025, pp. 99.3.111 to 99.3.121.

¹⁵ 90 FR 9121, February 7, 2025; 90 FR 11426, March 6, 2025; 90 FR 11463, March 7, 2025. See also HTS heading 9903.01.20 and U.S. note 2(s) and HTS heading 9903.01.24 and U.S. note 2(u) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 16, Publication 5644, July 2025, pp. 99.3.3 to 99.3.4, 99.3.306 to 99.3.307.

¹⁶ The reciprocal duty is in addition to the 20 percent ad valorem duty under IEEPA that went into effect on March 4, 2025, for China. 90 FR 15041, April 7, 2025; 90 FR 15509, April 14, 2025; 90 FR 15625, April 15, 2025; 90 FR 21831, May 21, 2025. See also HTS headings 9903.01.25 and 9903.01.63 and U.S. note 2(v) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 816, Publication 5644, July 2025, pp. 99.3.4 to 99.3.12, 99.3.307, 99.3.314.

Table 1.3 CCS staples: Additional tariffs on imports from China

Tariffs in percent ad valorem

Additional tariff	China
Section 301	7.5
IEEPA – China specific	20
IEEPA reciprocal tariffs	10
Total additional ad valorem rate	37.5

Source: Federal Register notices and other sources cited in this section (Tariff treatment).

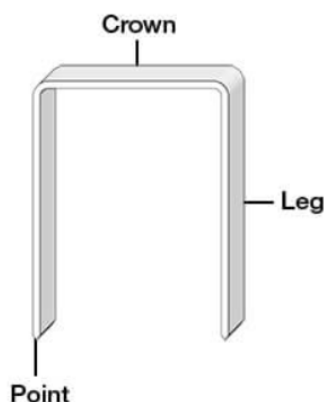
Note: Duty rates in the table reflect the duty rates as of the writing of this report. See the text above for historical changes to the additional tariffs.

Description and uses¹⁷

A CCS staple is a type of fastener made from steel wire consisting of two same-size pointed or pointless legs connected by a crown located opposite from the staple-point ends (figure 1.1). They can be produced using any type of steel, whether coated or uncoated. Two common forms of CCS staples are galvanized staples and stainless steel staples. Galvanized staples are coated in zinc, providing corrosion resistance as long as the coating remains intact. Alternatively, stainless steel is typically more expensive but provides greater corrosion resistance, durability, and strength, and maintains a bright appearance over time.¹⁸

Figure 1.1

CCS staples: Components of a staple



Source: Josef Kihlberg, “Staple Guide – All You Need to Know About Staples,” <https://kihlberg.com/en/staple-guide-all-you-need-to-know-about-staples/>, retrieved July 25, 2025.

¹⁷ Unless otherwise noted, this information is based on Original publication, pp. 1.13 to 1.16.

¹⁸ Salco, “All About Galvanized vs. Stainless-Steel Staples,” <https://www.stapleheadquarters.com/all-about-galvanized-vs-stainless-steel-staples>, retrieved August 5, 2025.

The principal use of a CCS staple is to fasten two or more pieces of material, including but not limited to wood or other solid building materials. CCS staples are typically used in structural applications, including for furniture and building construction. CCS staples are made from a thicker steel wire than most other forms of staples to attain the necessary strength and holding power for the aforementioned applications. CCS staples for the purpose of these investigations have a nominal diameter ranging from 0.0355 inch to 0.0830 inch, inclusive, a leg length ranging from 0.25 inch to 3.0 inches, inclusive, and a nominal crown width from 0.187 inch to 1.125 inches, inclusive.

CCS staples are often classified by their diameter into gauges (ga.). A CCS staple gauge range includes 14 to 19 ga. (as the number of the gauge increases, the diameter of the wire decreases). A heavy wire CCS staple is associated with a gauge range of 14 to 17 and a medium wire staple is typically associated with a gauge range of 18 to 19.¹⁹ Light wire, which is not in the scope of these investigations, is typically used to fasten paper and upholstery. Carton-closing staples, used to secure the flaps of corrugated and solid paperboard cartons and boxes, are specifically excluded from the scope.

CCS staples are produced to certain industry specifications, notably those of the ICC Evaluation Service (“ICC-ES”) and the American Society for Testing and Materials (“ASTM”). The ICC-ES does technical evaluation reports on building products, components, methods, and materials. The evaluation reports are used as evidence that the products and system are code-compliant.²⁰

The ASTM is an international standards organization, and ASTM F1667M-21a includes the technical specification for CCS staples.²¹

CCS staples are packaged for shipment solely in a collated form, that is, joined by using a single material or combination of materials, including, but not limited to, adhesive, glue, adhesive film paper, or tape. CCS staples can also be packaged with pneumatic, electric, and gas-powered stapling tools as well as household tool kits and other devices designed for the CCS staples applications (tools are generally gauge-specific and used to join hard and dense

¹⁹ Original publication, p. 1.14; Josef Kihlberg, “Staple Guide – All You Need to Know About Staples,” <https://kihlberg.com/en/staple-guide-all-you-need-to-know-about-staples/>, retrieved July 25, 2025.

²⁰ The ICC-ES performed the evaluation of power-driven staples and nails, including CCS staples, in ICC-ES Evaluation Report ESR-1539P for the International Staple, Nail, and Tool Association (“ISANTA”). ICC Evaluation Service, ESR-1539P, reissued July 2024, pp. 1 to 3, <https://icc-es.org/report-listing/esr-1539/>, retrieved July 28, 2025.

²¹ ASTM F1667M-21a supersedes historical versions of the ASTM 1667 specification for driven nails, spikes, and staples. ASTM International, Steel Standards, Standard Specification for Driven Fasteners: Nails, Spikes, and Staples, February 7, 2022, https://store.astm.org/f1667_f1667m-21a.html, retrieved July 28, 2025.

surfaces). U.S. producers typically use an automated process for packaging CCS staples, while producers in the subject countries typically pack the boxes by hand. The Petitioner noted that the quantity of packaged CCS staples varies and can be made to order. Figure 1.2 shows some common forms of CCS staples.

Figure 1.2

CCS staples: Common forms of CCS staples excluding gauge 14 staples



19^{GA}
K

19 Ga. 1/4" Crown Medium Wire Staples



19^{GA}
R

19 Ga. 3/16" Crown Medium Wire Staples



18^{GA}
J

18 Ga. 7/16" Crown Fine Wire Staples



18^{GA}
L

18 Ga. 1/4" Crown Medium Wire Staples



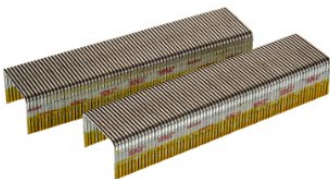
18^{GA}
M

18 Ga. 3/8" Crown Medium Wire Staples



16^{GA}
N

16 Ga. 7/16" Crown Heavy Wire Staples



16^{GA}
P

16 Ga. 1" Crown Heavy Wire Staples



15^{GA}
Q

15 Ga. 7/16" Crown Heavy Wire Staples

Source: Senco, "Staples," <https://www.senco.com/fastener-type/staples/?filter=1&gauge%5B%5D=15&gauge%5B%5D=16&gauge%5B%5D=18&gauge%5B%5D=19>, retrieved August 5, 2025.

Manufacturing process²²

CCS staples are produced from steel wire, whether coated or uncoated. Some producers of CCS staples use purchased steel wire or wire band as their starting raw material and are referred to as “nonintegrated producers,” whereas other producers utilize their own facilities to produce wire for CCS staples by using steel wire rod as their starting material. These producers are considered “integrated producers.” Domestic producer KYOCERA SENCO Industrial Tools, Inc. (“Senco”) produces from rod, while domestic producer Acme Staple Company, Inc. (“Acme”) produces from wire and domestic producer Prebena North American Fastener Corp. (“Prebena”) produces from wire or band.

For integrated producers, production of CCS staples begins by drawing steel wire rod into steel wire of the desired diameter. The wire is then wound into spools or the wire strands are glued together to produce wire band. For all producers, the wire or wire band are then fed into machines that produce collated strips of staples.

CCS staples can be produced by starting with a single strand of wire, multiple strands of wire, or wire band. A single-wire machine forms individual staples from wire and continuously collates the staples with glue, adhesive, or paper tape. The machine counts the number of staples needed for the collated strip, which is then severed, ejected, and packaged. By contrast, multiple strands of wire (with the number of wires equaling to the number of staples in the finish strip being produced) are pulled from a back stand (a large rack) holding multiple spools of wire. An adhesive or glue is applied that collates and bands the wires together to create a band which is dried using heat/and or infrared light. The wire band is coiled on a spool for processing through a staple-forming machine. The machine measures the number of staples needed to form a strip of finished staples, while simultaneously shearing and forming the strip of staples. Finally, the strip of staples is severed, ejected, and packaged.

²² Unless otherwise noted, this information is based on original publication, p. 1.17.

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 three firms, which accounted for all or virtually all of production of CCS staples in the United States during 2019.²³

In response to the Commission’s notice of institution in these current reviews, the domestic interested party Senco provided a list of three known and currently operating U.S. producers of CCS staples. In response to the Commission’s notice of institution, the domestic interested party estimated that it accounted for approximately *** percent of production of CCS staples in the United States during 2024.²⁴

Recent developments

Table 1.4 presents events in the U.S. industry since the Commission’s original investigations.²⁵

Table 1.4 CCS staples: Developments in the U.S. industry

Item	Firm	Event
Plant renovation	Senco	On May 4, 2021, Senco announced it was investing in an expansion of its Ohio facility’s office space to make it the company’s global headquarters. The project also included renovating and optimizing the facility’s existing 8,000 square foot manufacturing space used to make nails and staples. In May 2023, Senco announced that the site’s expansion and renovations were complete.

Source: Senco, “Senco to Create New Worldwide Headquarters Facility in Cincinnati,” May 4, 2021, <https://www.senco.com/senco-news/senco-to-create-new-worldwide-headquarters-facility-in-cincinnati/>, retrieved July 17, 2025; Senco, “Senco Opens Global Headquarters in Cincinnati,” May 25, 2023, <https://www.senco.com/senco-news/senco-opens-global-headquarters-in-cincinnati/>, retrieved July 17, 2025.

²³ Original publication, p. 3.1.

²⁴ Domestic interested party’s response to the notice of institution, July 2, 2025, exh. 9.

²⁵ For recent developments, if any, in tariff treatment, please see “U.S. tariff treatment” section.

U.S. producers' trade and financial data

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year reviews. Table 1.5 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigations and subsequent five-year reviews.

Table 1.5 CCS staples: Trade and financial data submitted by U.S. producers, by period

Quantity in 1,000s of pounds; value in 1,000 dollars; unit value in dollars per pound; 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 party. Domestic interested party's response to the notice of institution, July 2, 2025, exh. 1.

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

Note: For year 2017, data represent three U.S. producers. For the years 2018 to 2024, data represent one U.S. producer.

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.²⁶

The domestic like product is 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. In its original determinations, the Commission defined a single domestic like product consisting of certain collated steel staples, coextensive with Commerce’s scope.

The domestic industry is 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. In its original determinations, the Commission defined the domestic industry to include all domestic producers of certain collated steel staples.²⁷

U.S. importers

During the final phase of the original investigations, the Commission received U.S. importer questionnaires from 30 firms, which accounted for approximately 80 percent of total U.S. imports of CCS staples from China and from nonsubject sources in 2019 under HTS statistical reporting number 8305.20.0000, a broad subheading that includes multiple products during 2019.²⁸ Import data presented in the original investigations are based on 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 party provided a list of 253 potential U.S. importers of CSS staples.²⁹

²⁶ Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

²⁷ 90 FR 23364, June 2, 2025.

²⁸ Original publication, p. 4.1.

²⁹ Domestic interested party’s response to the notice of institution, July 2, 2025, exh. 6.

U.S. imports

Table 1.6 presents the quantity, value, and unit value of U.S. imports from China as well as the other top sources of U.S. imports (shown in descending order of 2024 imports by quantity, plus Thailand and Vietnam).

Table 1.6 CSS staples U.S. imports, by source and period

Quantity in 1,000s of pounds; value in 1,000 dollars; unit value in dollars per pound

U.S. imports from	Measure	2020	2021	2022	2023	2024
China	Quantity	39,092	47,685	41,729	27,701	37,064
South Korea	Quantity	15,789	23,916	23,980	24,918	29,475
Oman	Quantity	5,416	10,360	18,930	12,499	15,138
Taiwan	Quantity	13,719	13,495	15,711	9,340	14,563
Thailand	Quantity	9,651	22,706	21,203	7,579	7,975
Vietnam	Quantity	31,094	30,297	25,580	4,788	4,757
All other sources	Quantity	30,988	34,064	35,330	17,092	32,128
Nonsubject sources	Quantity	106,658	134,838	140,734	76,216	104,036
All import sources	Quantity	145,751	182,522	182,464	103,917	141,100
China	Value	34,412	49,272	51,630	26,751	34,271
South Korea	Value	15,470	28,693	32,407	23,542	27,395
Oman	Value	3,785	8,706	17,543	10,037	12,206
Taiwan	Value	12,276	15,305	19,993	10,044	13,164
Thailand	Value	6,331	18,663	20,212	6,498	6,518
Vietnam	Value	18,579	23,839	24,937	3,730	3,190
All other sources	Value	32,848	41,924	53,448	25,237	35,413
Nonsubject sources	Value	89,289	137,130	168,540	79,088	97,886
All import sources	Value	123,701	186,402	220,170	105,839	132,158
China	Unit value	0.88	1.03	1.24	0.97	0.92
South Korea	Unit value	0.98	1.20	1.35	0.94	0.93
Oman	Unit value	0.70	0.84	0.93	0.80	0.81
Taiwan	Unit value	0.89	1.13	1.27	1.08	0.90
Thailand	Unit value	0.66	0.82	0.95	0.86	0.82
Vietnam	Unit value	0.60	0.79	0.97	0.78	0.67
All other sources	Unit value	1.06	1.23	1.51	1.48	1.10
Nonsubject sources	Unit value	0.84	1.02	1.20	1.04	0.94
All import sources	Unit value	0.85	1.02	1.21	1.02	0.94

Source: Compiled from official Commerce statistics for HTS statistical reporting number 8305.20.0000, accessed July 8, 2025. These data may be overstated as HTS statistical reporting number 8305.20.0000 may contain products outside the scope of these reviews.

Note: Because of rounding, figure may not add to total shown. Thailand and Vietnam are included as relevant import sources considering Commerce's circumvention order regarding imports from these countries using inputs manufactured in China. 89 FR 5855, January 30, 2024.

Apparent U.S. consumption and market shares

Table 1.7 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

Table 1.7 CCS staples: Apparent U.S. consumption and market shares, by source and period

Quantity in 1,000s of pounds; value in 1,000 dollars; shares in percent

Source	Measure	2017	2018	2019	2024
U.S. producers	Quantity	***	***	***	***
China	Quantity	96,498	115,524	95,322	37,064
Nonsubject sources	Quantity	***	***	***	104,036
All import sources	Quantity	***	***	***	141,100
Apparent U.S. consumption	Quantity	***	***	***	***
U.S. producers	Value	***	***	***	***
China	Value	78,947	94,605	84,288	34,271
Nonsubject sources	Value	***	***	***	97,886
All import sources	Value	***	***	***	132,158
Apparent U.S. consumption	Value	***	***	***	***
U.S. producers	Share of quantity	***	***	***	***
China	Share of quantity	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***
All import sources	Share of quantity	***	***	***	***
U.S. producers	Share of value	***	***	***	***
China	Share of value	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***
All import sources	Share of value	***	***	***	***

Source: For the years 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 party's response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting number 8305.20.0000, accessed July 8, 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 2017 to 2019, apparent U.S. consumption is derived from U.S. shipments of imports, rather than U.S. imports. For 2024, apparent U.S. consumption is derived from U.S. imports. These data may be overstated as HTS statistical reporting number 8305.20.0000 may contain products outside the scope of these reviews.

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

The industry in China

Producers in China

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from four firms, which accounted for approximately *** percent of production of CSS staples in China during 2019, and approximately 50 percent of CSS staples exports from China to the United States during 2019.³⁰

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested party provided a list of 111 possible producers of CSS staples in China.³¹

Recent developments

There were no major developments in the Chinese industry since the imposition of the orders identified by interested parties in the proceeding and relevant information from outside sources was found.

³⁰ Collated Steel Staples from China (Final), Confidential Report, INV-SS-069, June 11, 2020 (“Original confidential report”), p. 7.3.

³¹ Domestic interested party’s response to the notice of institution, July 2, 2025, Exh. 7.

Exports

Table 1.9 presents export data for staples in strips, of base metal, a category that includes CCS staples and out-of-scope products, from China (by export destination in descending order of quantity for 2024).

Table 1.9 Staples in strips, of base metal: Quantity of exports from China, by destination and period

Quantity in 1,000 pounds

Destination market	2020	2021	2022	2023	2024
United States	50,443	55,987	43,329	35,668	45,865
Mexico	10,787	18,674	16,259	15,034	19,491
Poland	5,032	5,962	5,855	8,167	18,358
Indonesia	11,218	14,025	15,973	14,854	16,119
Germany	10,872	13,833	16,194	8,660	10,616
Brazil	3,550	7,070	6,785	7,681	10,565
Russia	5,382	6,591	6,779	7,587	9,707
Vietnam	4,556	6,754	4,923	5,757	9,384
Saudi Arabia	2,480	1,737	3,845	4,114	8,538
United Kingdom	5,828	8,532	7,596	6,840	8,471
All other markets	93,586	125,325	111,139	100,509	128,494
All markets	203,735	264,490	238,677	214,871	285,607

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 8305.20, accessed July 16, 2025. These data may be overstated as HS subheading 8305.20 may contain products outside the scope of these reviews.

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

Third-country trade actions

The European Union initiated an antidumping duty investigation in December 2019 concerning imports of pins and staples from China, including CCS staples. However, in August 2020, the European Union announced it was terminating the antidumping investigation without the imposition of measures.³² Based on available information, CCS staples from China have not been subject to any other antidumping or countervailing duty investigations outside the United States.

³² The termination followed the complainants withdrawing the complaint in June 2020 and the European Commission determining that there was no evidence of considerations showing that a continuation of the case would be in the European Union’s interest. Original publication p. 7.11; EC, “Notice of Initiation of an Anti-dumping Proceeding Concerning Imports of Pins and Staples Originating in the People’s Republic of China,” 2019/C 425/08, December 18, 2019, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:JOC_2019_425_R_0008&from=EN, retrieved July 28, 2025; EC, “Commission Implementing Decision (EU) 2020/1202 of 14 August 2020,” August 17, 2020, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32020D1202&from=EN>, retrieved July 28, 2025.

The global market

Table 1.10 presents global export data for staples in strips, of base metal, a category that includes CCS staples and out-of-scope products (by source in descending order of quantity for 2024).

Table 1.10 Staples in strips, of base metal: Quantity of global exports by country and period

Quantity in 1,000 pounds

Exporting country	2020	2021	2022	2023	2024
China	203,735	264,490	238,677	214,871	285,607
South Korea	15,082	24,825	21,566	27,929	29,732
Taiwan	19,060	20,246	18,693	13,981	18,312
Netherlands	21,108	23,309	20,807	15,866	14,572
Germany	25,082	27,142	22,630	16,556	14,195
Malaysia	4,239	7,246	8,389	5,831	13,087
Belgium	7,083	10,523	8,700	14,241	11,139
Thailand	13,697	29,796	17,084	8,858	11,096
India	7,499	8,753	9,221	7,460	8,894
Austria	8,240	11,990	9,324	4,218	8,381
All other exporters	77,494	96,369	72,725	67,544	61,320
All exporters	402,319	524,688	447,816	397,354	476,335

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 8305.20, accessed July 16, 2025. These data may be overstated as HS subheading 8305.20 may contain products outside the scope of these reviews.

Note: Because of rounding, figures may not add to total shown. Data suppressed for Colombia and Peru, which report data for HS subheading 8305.20 in a quantity that cannot be converted to pounds (number of units). Both countries accounted for less than 0.5 percent of global exports by value in 2024.

APPENDIX A
FEDERAL REGISTER NOTICES

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

Citation	Title	Link
90 FR 23364 June 2, 2025	Certain Collated Steel Staples From China; Institution of Five-Year Reviews	https://www.govinfo.gov/content/pkg/FR-2025-06-02/pdf/2025-09825.pdf
90 FR 23310 June 2, 2025	Initiation of Five-Year (Sunset) Reviews	https://www.govinfo.gov/content/pkg/FR-2025-06-02/pdf/2025-09939.pdf

APPENDIX B
RESPONSES TO THE NOTICE OF INSTITUTION

Responses to the Commission’s notice of institution

Individual responses

The Commission received one submission in response to its notice of institution in the subject reviews. It was filed on behalf of the following entity:

1. KYOCERA SENCO Industrial Tools, Inc. (“Senco”), domestic producer of CCS staples (referred to herein as “domestic interested party”).

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 CCS staples: Summary of responses to the Commission’s notice of institution

Interested party type	Number	Coverage
U.S. producer	1	***0%

Note: The U.S. producer coverage figure presented is the domestic interested party’s estimate of its share of total U.S. production of CCS staples during 2024. Domestic interested party’s response to the notice of institution, July 2, 2025, exh. 9.

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 Senco. Senco requests that the Commission conduct expedited reviews of the antidumping and countervailing duty orders on CCS staples.¹

Company-specific information

Table B.2 CCS staples: 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	Senco
Nature of operation	Yes
Statement of intent to participate	Yes
Statement of likely effects of revoking the order	Yes
U.S. producer list	Yes
U.S. importer/foreign producer list	Yes
List of 3-5 leading purchasers	Yes
List of sources for national/regional prices	Not known
Trade/financial data	Yes
Changes in supply/demand	Yes
Complete response	Yes

¹ Domestic interested party’s comments on adequacy, August 13, 2025, p. 2.

APPENDIX C

SUMMARY DATA COMPILED IN PREVIOUS PROCEEDINGS

All producers

Table C-1

CCS staples: Summary data concerning the U.S. market, 2017-19

(Quantity=1,000s of pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Productivity=pounds 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. consumption quantity:						
Amount.....	***	***	***	▼***	▲***	▼***
Producers' share (fn1).....	***	***	***	▼***	▼***	▲***
Importers' share (fn1):						
China.....	***	***	***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	▲***	▼***	▲***
All import sources.....	***	***	***	▲***	▲***	▼***
U.S. consumption value:						
Amount.....	***	***	***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	▼***	▼***	▲***
Importers' share (fn1):						
China.....	***	***	***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	▲***	▼***	▲***
All import sources.....	***	***	***	▲***	▲***	▼***
U.S. importers' U.S. shipments of imports from.--						
China:						
Quantity.....	96,498	115,524	95,322	▼(1.2)	▲19.7	▼(17.5)
Value.....	78,947	94,605	84,288	▲6.8	▲19.8	▼(10.9)
Unit value.....	\$0.82	\$0.82	\$0.88	▲8.1	▲0.1	▲8.0
Ending inventory quantity.....	21,179	24,511	26,139	▲23.4	▲15.7	▲6.6
Nonsubject sources:						
Quantity.....	***	***	***	▲***	▼***	▲***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▼***	▲***	▼***
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
All import sources:						
Quantity.....	***	***	***	▲***	▲***	▼***
Value.....	***	***	***	▲***	▲***	▼***
Unit value.....	***	***	***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
U.S. producers'--						
Average capacity quantity.....	***	***	***	▼***	▼***	▲***
Production quantity.....	***	***	***	▼***	▼***	▼***
Capacity utilization (fn1).....	***	***	***	▼***	▼***	▼***
U.S. shipments:						
Quantity.....	***	***	***	▼***	▼***	▼***
Value.....	***	***	***	▼***	▼***	▼***
Unit value.....	***	***	***	▲***	▲***	▼***

Table continued on next page.

Table C-1--Continued

CCS staples: Summary data concerning the U.S. market, 2017-19

(Quantity=1,000s of pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Productivity=pounds 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. producer's.--Continued						
Export shipments:						
Quantity.....	***	***	***	▼***	▼***	▼***
Value.....	***	***	***	▼***	▼***	▼***
Unit value.....	***	***	***	▼***	▼***	▼***
Ending inventory quantity.....	***	***	***	▼***	▼***	▼***
Inventories/total shipments (fn1).....	***	***	***	▼***	▼***	▼***
Production workers.....	***	***	***	▼***	▼***	▼***
Hours worked (1,000s).....	***	***	***	▼***	▼***	▼***
Wages paid (\$1,000).....	***	***	***	▼***	▼***	▼***
Hourly wages (dollars per hour).....	***	***	***	▲***	▲***	▼***
Productivity.....	***	***	***	▼***	▼***	▲***
Unit labor costs.....	***	***	***	▲***	▲***	▼***
Net sales:						
Quantity.....	***	***	***	▼***	▼***	▼***
Value.....	***	***	***	▼***	▼***	▼***
Unit value.....	***	***	***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	▼***	▼***	▼***
Gross profit or (loss) (fn2).....	***	***	***	▼***	▼***	▼***
SG&A expenses.....	***	***	***	▼***	▼***	▼***
Operating income or (loss) (fn2).....	***	***	***	▼***	▼***	▼***
Net income or (loss) (fn2).....	***	***	***	▼***	▼***	▼***
Capital expenditures.....	***	***	***	▲***	▲***	▼***
R&D expenses.....	***	***	***	***	***	***
Net assets.....	***	***	***	▲***	▼***	▲***
Unit COGS.....	***	***	***	▲***	▲***	▲***
Unit SG&A expenses.....	***	***	***	▲***	▲***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	▼***	▼***	▼***
Unit net income or (loss) (fn2).....	***	***	***	▼***	▲***	▼***
COGS/sales (fn1).....	***	***	***	▲***	▲***	▲***
Operating income or (loss)/sales (fn1).....	***	***	***	▼***	▼***	▼***
Net income or (loss)/sales (fn1).....	***	***	***	▼***	▼***	▼***

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

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

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

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

APPENDIX D

PURCHASER QUESTIONNAIRE RESPONSES

As part of their response to the notice of institution, interested parties were asked to provide a list of three to five leading purchasers in the U.S. market for the domestic like product. A response was received from domestic interested parties, and it provided contact information for the following two firms as top purchasers of collated steel staples: ***. Purchaser questionnaires were sent to these four firms and none responded.

