

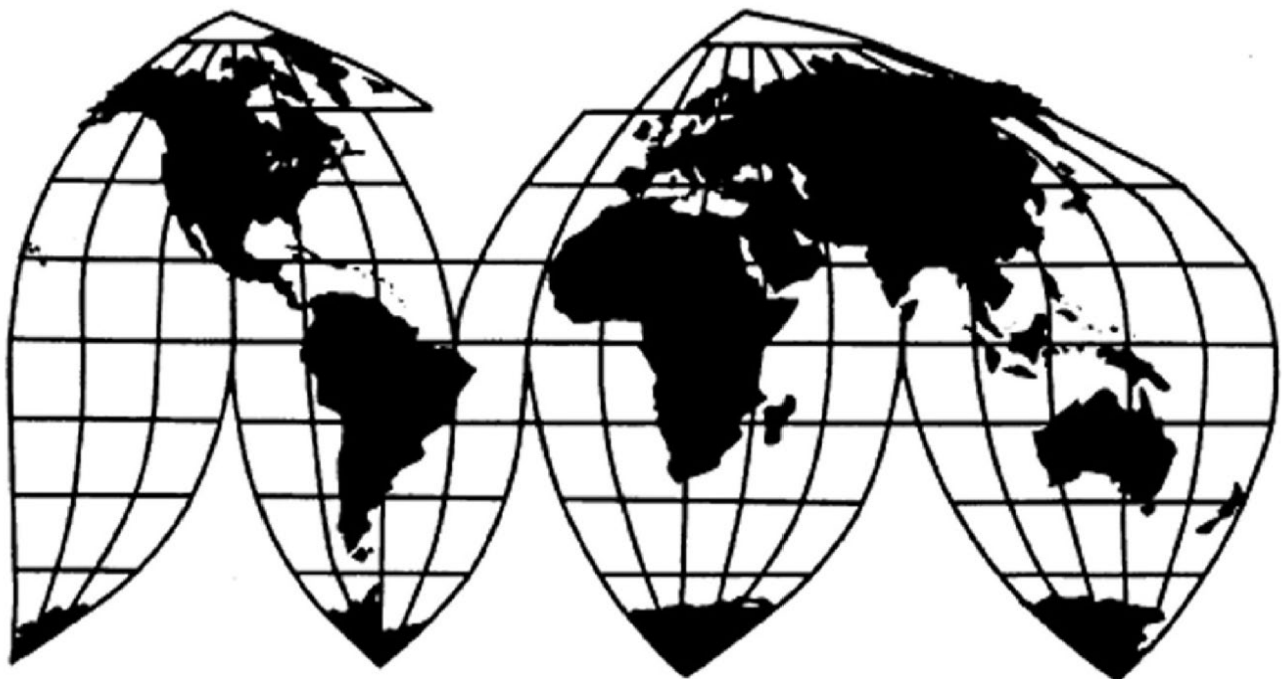
Non-Oriented Electrical Steel from China, Germany, Japan, South Korea, Sweden, and Taiwan

Investigation Nos. 701-TA-506 and 508 and 731-TA-1238-1243 (Second Review)

Publication 5736

May 2026

U.S. International Trade Commission



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Note.—Information that would reveal confidential operations of individual firms may not be published.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-506 and 508 and 731-TA-1238-1243 (Second Review)

Non-Oriented Electrical Steel from China, Germany, Japan, South Korea, Sweden, and Taiwan

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 duty orders on non-oriented electrical steel (“NOES”) from China and Taiwan and revocation of the antidumping duty orders on NOES from China, Germany, Japan, South Korea, Sweden, and Taiwan 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 November 3, 2025 (90 FR 55159, December 1, 2025) and determined on March 6, 2026 that it would conduct expedited reviews (91 FR 17306, April 6, 2026).

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 countervailing duty orders on non-oriented electrical steel (“NOES”) from China and Taiwan and revocation of the antidumping duty orders on NOES from China, Germany, Japan, South Korea, Sweden, and Taiwan 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

A. The Prior Proceedings

In response to petitions filed on September 30, 2013,¹ by AK Steel Corp. (“AK Steel”), a domestic producer of NOES, the Commission determined in November 2014 that the domestic industry was materially injured by reason of less-than-fair-value (“LTFV”) imports of NOES from China, Germany, Japan, South Korea, Sweden, and Taiwan and subsidized imports of NOES from China and Taiwan.² Subsequently, in December 2014, the U.S. Department of Commerce

¹ *Non-Oriented Electrical Steel from China, Germany, Japan, South Korea, Sweden, and Taiwan*, Inv. Nos. 701-TA-506, 508 and 731-TA-1238-1243 (Final), USITC Pub. 4502 (Nov. 2014) (“*Original Determinations*”) at 1.1. One Commissioner determined that an industry in the United States was neither materially injured nor threatened with material injury by reason of subject imports. See *Separate and Dissenting Views of Chairman Meredith M. Broadbent*, EDIS Doc. 546979.

² *Original Determinations* at 3. 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 antidumping duty orders on imports from China, Germany, Japan, and Sweden, and the countervailing duty order on imports from China. *Id.* In October 2014, Commerce made a final negative countervailing duty determination concerning imports of NOES from South Korea. *Non-Oriented Electrical Steel From the Republic of Korea: Final Negative Countervailing Duty Determination and Final Negative Critical Circumstances Determination*, 79 Fed. Red. 61605 (Dep’t Commerce Oct. 14, 2014). The Commission accordingly terminated the countervailing duty investigation concerning NOES from South Korea. *Non-Oriented Electrical Steel From Korea; Termination of Investigation*, 79 Fed. Reg. 64408 (Oct. 29, 2014).

(“Commerce”) issued its antidumping and countervailing duty orders.³ In the subsequent full review, after the Commission determined that revocation of the orders would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time,⁴ Commerce issued continuations of the orders.⁵

Accordingly, the antidumping order on imports from China and Taiwan and the countervailing duty orders on China, Germany, Japan, South Korea, Sweden, and Taiwan remain in effect.⁶

B. The Current Reviews

In December 2025, the Commission instituted these five-year reviews.⁷ Two U.S. producers of NOES, Cleveland-Cliffs Inc. (“Cleveland-Cliffs”) and United States Steel Corporation

³ *Non-Oriented Electrical Steel from the People’s Republic of China, Germany, Japan, the Republic of Korea, Sweden, and Taiwan: Antidumping Duty Orders*, 79 Fed. Reg. 71,741 (Dep’t Commerce Dec. 3, 2014); *Non-Oriented Electrical Steel from the People’s Republic of China, Germany, Japan, the Republic of Korea, Sweden, and Taiwan: Countervailing Duty Orders*, 79 Fed. Reg. 71,749 (Dep’t Commerce Dec. 3, 2014). China Steel Corporation and its cross-owned affiliates Dragon Steel Corporation, HiMag Magnetic Corporation, and China Steel Global Trading Corporation (collectively, “CSC Companies”) received a *de minimis* net subsidy rate in Commerce’s final affirmative countervailing duty determination with respect to imports of NOES from Taiwan, they were excluded from Commerce’s Taiwan CVD Order. *Non-Oriented Electrical Steel From Taiwan: Final Affirmative Countervailing Duty Determination*, 79 Fed. Reg. 61,602 (Dep’t Commerce Oct. 14, 2014).

⁴ *Non-Oriented Electrical Steel from China, Germany, Japan, South Korea, Sweden, and Taiwan*, Inv. Nos. 701-TA-506, 508 and 731-TA-1238-1243 (Review), USITC Pub. 5140 (Dec. 2020) (“*First Reviews*”) at 1.

⁵ *Non-Oriented Electrical Steel From People's Republic of China, Germany, Japan, Republic of Korea, Sweden, and Taiwan: Continuation of Antidumping Duty and Countervailing Duty Orders*, 85 Fed. Reg. 83,890 (Dep’t Commerce Dec. 23, 2020).

⁶ See Confidential Staff Report: *Non-Oriented Electrical Steel from China, Germany, Japan, South Korea, Sweden, and Taiwan*, INV-YY-024, EDIS Doc. 873229 (Feb. 23, 2026) (“CR”); *Non-Oriented Electrical Steel from China, Germany, Japan, South Korea, Sweden, and Taiwan*, Inv. Nos. 701-TA-506, 508 and 731-TA-1238-1243 (Review), USITC Pub. 5736 (May 2026) (“PR”), (collectively, “CR/PR”) at 1.1-1.3.

⁷ *Non-Oriented Electrical Steel From People's Republic of China, Germany, Japan, Republic of Korea, Sweden, and Taiwan*, 90 Fed. Reg. 55,086 (Dec. 1, 2025).

("U.S. Steel"), submitted responses to the notice of institution.⁸ These domestic interested parties accounted for all domestic production of NOES during 2024.⁹ The Commission did not receive responses from any respondent parties in these reviews.¹⁰ On March 6, 2026, the Commission determined that the domestic interested party group response was adequate for all orders and that the respondent interested party group response was inadequate for all orders.¹¹ Finding no other circumstances that would warrant conducting full reviews, the Commission determined that it would conduct expedited reviews pursuant to section 751(c)(3) of the Tariff Act.¹² Cleveland-Cliffs and U.S. Steel filed comments with the Commission pursuant to 19 C.F.R. § 207.61(d) regarding the determinations that the Commission should reach.¹³

U.S. industry data in these reviews are based on information supplied by the domestic interested parties in their response to the notice of institution and information from the original investigations and prior reviews.¹⁴ U.S. import data and related information are based on Commerce's official import statistics, and information from the original investigations and prior

⁸ Cleveland-Cliffs Inc.'s Response to the Notice of Institution, EDIS Doc. 867289 (Dec. 23, 2025) ("Cleveland-Cliffs' NOI Response") at 1; United States Steel Corporation's Response to the Notice of Institution, EDIS Doc. 867676 (Dec. 31, 2026) ("U.S. Steel's NOI Response") at 1.

⁹ CR/PR at Table B.1.

¹⁰ CR/PR at B.3.

¹¹ Explanation of Commission Determination on Adequacy, EDIS Doc. 878546 (Apr. 10, 2026) ("Commission's Adequacy Explanation") at 1.

¹² Commission's Adequacy Explanation at 1. Commissioner Johanson voted to conduct full reviews based on changes in competitive conditions since the prior reviews. *Id.* n.1.

¹³ CR/PR at B.4; U.S. Steel's Adequacy Comments, EDIS Doc. 871815 (Feb. 6, 2026) at 4-5; Cleveland-Cliffs' Adequacy Comments, EDIS Doc. 871841 (Feb. 6, 2026) at 2, 5-6; *see generally* United States Steel Corporation's Final Comments, EDIS Doc. 879119 (Apr. 15, 2026) ("U.S. Steel's Final Comments"); Cleveland-Cliffs Inc.'s Final Comments, EDIS Doc. 879055 (Apr. 15, 2026) ("Cleveland-Cliffs' Final Comments").

¹⁴ CR/PR at 1.16.

reviews.¹⁵ Foreign industry data and related information are based on information from the original investigations and prior reviews, information submitted by the domestic interested parties in these expedited reviews, Global Trade Atlas (“GTA”) data, and publicly available information compiled by the Commission.¹⁶

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.”¹⁷ 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.”¹⁸ The Commission’s practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.¹⁹

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

¹⁵ See CR/PR at Table 1.5. Data was compiled from Commerce statistics for HTS statistical reporting numbers 7225.19.0000, 7226.19.1000, and 7226.19.9000. *Id.*

¹⁶ See CR/PR at 1.27-1.44. Global Trade Atlas (“GTA”) data was compiled using HS subheadings 7225.19 and 7226.19. These data may be overstated as these subheadings may contain products outside the scope of these reviews. See *e.g.* CR/PR at Table 1.8.

¹⁷ 19 U.S.C. § 1677(4)(A).

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

¹⁹ 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).

The merchandise subject to the *Orders* consists of non-oriented electrical steel (NOES), which includes cold-rolled, flat-rolled, alloy steel products, whether or not in coils, regardless of width, having an actual thickness of 0.20 mm or more, in which the core loss is substantially equal in any direction of magnetization in the plane of the material. The term “substantially equal” means that the cross-grain direction of core loss is no more than 1.5 times the straight grain direction (*i.e.*, the rolling direction) of core loss. NOES has a magnetic permeability that does not exceed 1.65 Tesla when tested at a field of 800 A/m (equivalent to 10 Oersteds) along (*i.e.*, parallel to) the rolling direction of the sheet (*i.e.*, B800 value). NOES contains by weight more than 1.00 percent of silicon but less than 3.5 percent of silicon, not more than 0.08 percent of carbon, and not more than 1.5 percent of aluminum. NOES has a surface oxide coating, to which an insulation coating may be applied.

NOES is subject to the *Orders* whether it is fully processed (*i.e.*, fully annealed to develop final magnetic properties) or semi-processed (*i.e.*, finished to final thickness and physical form but not fully annealed to develop final magnetic properties). Fully processed NOES is typically made to the requirements of ASTM specification A 677, Japanese Industrial Standards (JIS) specification C 2552, and/or International Electrotechnical Commission (IEC) specification 60404-8-4. Semiprocessed NOES is typically made to the requirements of ASTM specification A 683. However, the scope of the *Orders* is not limited to merchandise meeting the ASTM, JIS, and IEC specifications noted immediately above.

NOES is sometimes referred to as cold-rolled non-oriented (CRNO), nongrain oriented (NGO), non-oriented (NO), or cold-rolled non-grain oriented (CRNGO) electrical steel. These terms are interchangeable.

Excluded from the scope of the *Orders* are flat-rolled products not in coils that, prior to importation into the United States, have been cut to a shape and undergone all punching, coating, or other operations necessary for classification in Chapter 85 of the Harmonized Tariff Schedule of the United States (HTSUS) as a part

(*i.e.*, lamination) for use in a device such as a motor, generator, or transformer.²⁰

The scope has not changed since the original investigations.²¹

NOES is a flat-rolled, silicon alloy steel mill product developed as a highly energy efficient raw material specifically for manufacturing the individually cut-to-shape laminations (layers) for subsequent stacking together into laminated electro-magnetic cores for alternating current (“AC”) electrical equipment components. NOES is characterized as having magnetic properties that are similar in all directions, *i.e.*, with a non-oriented granular structure, in contrast to grain-oriented electrical steel (“GOES”), which has superior magnetic properties along the lengthwise direction of the elongated granular structure of the sheet, but less favorable properties in other directions. Thus, NOES is used primarily to produce laminations for which the direction of the magnetic flux in the electrical device is constantly changing, for example in rotating machinery such as motors and generators, whereas GOES is used primarily in static equipment, such as transformers, for which the laminations can take advantage of the favorable directionality of the steel. NOES is also used in small static devices, such as small, low-voltage transformers and fluorescent lighting ballasts (current regulators), when the higher cost of GOES cannot be justified by potential savings from improved energy efficiency.²²

We have considered our analyses of the domestic like product in the original

²⁰ CR/PR at 1.6-1.7; *Non-Oriented Electrical Steel From People's Republic of China, Germany, Japan, Republic of Korea, Sweden, and Taiwan: Continuation of Antidumping Duty and Countervailing Duty Orders*, 85 Fed. Reg. 83,890 (Dep’t Commerce Dec. 23, 2020).

²¹ *Non-Oriented Electrical Steel from the People's Republic of China, Germany, Japan, the Republic of Korea, Sweden, and Taiwan: Antidumping Duty Orders*, 79 Fed. Reg. 71741 (Dec. 3, 2014); *Non-Oriented Electrical Steel From the People's Republic of China and Taiwan: Countervailing Duty Orders*, 79 Fed. Reg. 71749 (Dec. 3, 2014); *Non-Oriented Electrical Steel From People's Republic of China, Germany, Japan, Republic of Korea, Sweden, and Taiwan: Continuation of Antidumping Duty and Countervailing Duty Orders*, 85 Fed. Reg. 83,890 (Dep’t Commerce Dec. 23, 2020).

²² CR/PR at 1.10-1.11.

investigations and first reviews.²³ In particular, we note that in the original determinations the Commission did not expand the definition of the domestic like product to include “cold rolled motor lamination steel” and defined a single domestic like product that is coextensive with the scope.²⁴ The Commission again defined a single domestic like product consisting of NOES, coextensive with Commerce’s scope in its first reviews.²⁵

In these current expedited reviews, the domestic interested parties argue that the Commission should continue to define the domestic like product as it did in the prior proceedings.²⁶ The record does not contain any new information suggesting that the pertinent product characteristics and uses of NOES have changed since the prior proceedings. Accordingly, we again define a single domestic like product consisting of NOES, coextensive with Commerce’s scope.

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.”²⁷ 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-

²³ CR/PR at 1.20; *Original Determinations*, USITC Pub. 4502 at 5-10; *First Reviews*, USITC Pub. 5140 at 8.

²⁴ CR/PR at 1.20. In the original investigations, the Commission investigated whether to define the domestic like product to include, in addition to NOES, cold rolled motor lamination steel (“CRML”), which certain respondents claimed was an alternative to NOES in a broad range of applications. Although the Commission noted that there appeared to be at least some degree of interchangeability between the two products, it found differences between NOES and CRML in physical characteristics, production processes, and prices, and observed that the petitioner and a majority of importers reported that no products could serve as substitutes for NOES. *Original Determinations*, USITC Pub. 4502 at 5-10.

²⁵ *First Reviews*, USITC Pub. 5140 at 8.

²⁶ Cleveland-Cliffs’ NOI Response at 47; U.S. Steel’s NOI Response at 35.

produced, captively consumed, or sold in the domestic merchant market. Moreover, pursuant to the related parties provision, “{i}f a producer of a domestic like product and an exporter or importer of the subject merchandise are related parties, or if a producer of the domestic like product is also an importer of the subject merchandise, the producer may, in appropriate circumstances, be excluded from the industry.”²⁸

We have considered our analyses of the domestic industry in the original investigations and subsequent reviews.²⁹ In the original determinations on NOES from China, Germany, Japan, South Korea, Sweden, and Taiwan, the Commission defined the domestic industry to include AK Steel, the only known U.S. producer of NOES at the time of the original investigations. No related party issues were raised.³⁰ In the first reviews, the Commission again defined the domestic industry to include AK Steel, which continued to be the only known domestic producer of NOES at the time of the first reviews. No related party issues were raised.³¹

²⁷ 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.

²⁸ 19 U.S.C. § 1677(4)(B)(i) (section 1677(4)(B)(i)). Section 771(4)(B)(ii) further provides that: “(ii) For purposes of clause (i), a producer and an exporter or importer shall be considered to be related parties, if-

- (I) the producer directly or indirectly controls the exporter or importer,
- (II) the exporter or importer directly or indirectly controls the producer,
- (III) a third party directly or indirectly controls the producer and the exporter or importer, or
- (IV) the producer and the exporter or importer directly or indirectly control a third party and there is reason to believe that the relationship causes the producer to act differently than a nonrelated producer.

For purposes of this subparagraph, a party shall be considered to directly or indirectly control another party if the party is legally or operationally in a position to exercise restraint or direction over the other party.” 19 U.S.C. § 1677(4)(B)(ii).

²⁹ *Original Investigations*, USITC Pub. 4502 at 10; *First Reviews*, USITC Pub. 5140 at 8-9.

³⁰ *Original Investigations*, USITC Pub. 4502 at 10.

³¹ *First Reviews*, USITC Pub. 5140 at 8-9.

In these current expedited reviews, the record indicates that the current known U.S. producers are U.S. Steel and Cleveland-Cliffs.³² The domestic interested parties contend that the Commission should define the domestic industry as including all U.S. producers of NOES and do not argue for the exclusion of any producers from the domestic industry under the related parties provision.³³ The record in these reviews does not indicate that any of the domestic producers potentially qualify for exclusion as related parties or that there are other domestic industry issues. Accordingly, consistent with our definition of the domestic like product, we define the domestic industry as all domestic producers of NOES.

III. Cumulation

A. Legal Standard

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

the Commission may cumulatively assess the volume and effect of imports of the subject merchandise from all countries with respect to which reviews under section 1675(b) or (c) of this title were initiated on the same day, if such imports would be likely to compete with each other and with domestic like products in the United States market. The Commission shall not cumulatively assess the volume and effects of imports of the subject merchandise in a case in which it determines that such imports are likely to have no discernible adverse impact on the domestic industry.³⁴

Cumulation therefore is discretionary in five-year reviews, unlike original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.³⁵ The Commission may exercise its

³² CR/PR at 1.16; Cleveland-Cliffs' NOI Response at 45; U.S. Steel's NOI Response at 31-32. Cleveland-Cliffs acquired AK Steel in March 2020. Cleveland-Cliffs' NOI Response at 1. U.S. Steel's NOES production came online in late 2023. U.S. Steel's NOI Response at 1.

³³ Cleveland-Cliffs' NOI Response at 47; U.S. Steel's NOI Response at 15, 18, Exh. 1.

³⁴ 19 U.S.C. § 1675a(a)(7).

³⁵ 19 U.S.C. § 1677(7)(G)(i); *see also, e.g., Nucor Corp. v. United States*, 601 F.3d 1291, 1293 (Fed. Cir. 2010) (Commission may reasonably consider likely differing conditions of competition in deciding whether to cumulate subject imports in five-year reviews); *Allegheny Ludlum Corp. v. United States*, 475 F. Supp. 2d 1370, 1378 (Ct. Int'l Trade 2006) (recognizing the wide latitude the Commission has in

discretion to cumulate, however, only if the reviews are initiated on the same day, the Commission determines that the subject imports are likely to compete with each other and the domestic like product in the U.S. market, and imports from each such subject country are not likely to have no discernible adverse impact on the domestic industry in the event of revocation. Our focus in five-year reviews is not only on present conditions of competition, but also on likely conditions of competition in the reasonably foreseeable future.

We have considered our analyses regarding cumulation in the original investigations and first reviews.³⁶ In particular, in the original investigations and first reviews, the Commission found that there would likely be a reasonable overlap of competition among subject imports from each subject country and the domestic like product, as well as between subject imports from each country.³⁷ In the first full reviews, the Commission did not find that imports from any of the subject countries would likely have no discernible adverse impact on the domestic industry in the event of the revocation³⁸ and that there were no significant differences in the likely conditions of competition between imports from all subject sources.³⁹

B. Arguments of the Parties

The domestic interested parties argue that there is no indication that subject imports from each country are likely to have no discernible adverse impact on the domestic industry if the orders were revoked because subject industries have the ability and incentive to ship low-

selecting the types of factors it considers relevant in deciding whether to exercise discretion to cumulate subject imports in five-year reviews); *Nucor Corp. v. United States*, 569 F. Supp. 2d 1328, 1337-38 (Ct. Int'l Trade 2008).

³⁶ *Original Determinations*, USITC Pub. 4502 at 11-15; *First Reviews*, USITC Pub. 5140 at 8-9.

³⁷ *Original Determinations*, USITC Pub. 4502 at 11-15, *First Reviews*, USITC Pub. 5140 at 22-24.

³⁸ *First Reviews*, USITC Pub. 5140 at 12-21.

³⁹ *First Reviews*, USITC Pub. 5140 at 24-25.

priced subject merchandise to the United States and there is a high degree of substitutability between the domestic like product and subject imports.⁴⁰ They assert that as the Commission found in its prior reviews: 1) there is a reasonable level of fungibility between the domestic like product and the subject merchandise, 2) the subject imports and the domestic like product will be sold in similar channels of distribution if the orders are revoked, 3) the subject imports and the domestic like product will be sold in the same geographic regions if the orders are revoked, and 4) the subject imports and the domestic merchandise will be simultaneously present in the market after revocation.⁴¹

C. Analysis

The statutory threshold for cumulation is satisfied in these five-year reviews because each review was initiated on the same day: December 1, 2025.⁴²

i. Likelihood of No Discernible Adverse Impact

The statute precludes cumulation if the Commission finds that subject imports from a country are likely to have no discernible adverse impact on the domestic industry.⁴³ Neither the statute nor the Uruguay Round Agreements Act (“URAA”) Statement of Administrative Action (“SAA”) provides specific guidance on what factors the Commission is to consider in determining that imports “are likely to have no discernible adverse impact” on the domestic industry.⁴⁴ With respect to this provision, the Commission generally considers the likely volume of subject imports and the likely impact of those imports on the domestic industry within a reasonably

⁴⁰ U.S. Steel’s NOI Response at 5-9; Cleveland-Cliffs’ NOI Response at 15-18.

⁴¹ Cleveland-Cliffs’ NOI Response at 18-19; U.S. Steel’s NOI Response at 8-9.

⁴² CR/PR at Table 1.1; *Initiation of Five-Year (Sunset) Reviews*, 90 Fed. Reg. 55,086 (Dec. 1, 2025).

⁴³ 19 U.S.C. § 1675a(a)(7).

⁴⁴ SAA, H.R. Rep. No. 103-316, vol. I at 887 (1994).

foreseeable time if the orders are revoked. Our analysis for each of the subject countries takes into account, among other things, the nature of the product and the behavior of subject imports in the original investigations. Our analysis of the volume of subject imports during the review period is based on official U.S. import statistics for the relevant HTS reporting numbers (7225.19.0000, 7226.19.1000, and 7226.19.9000), which provide the best information available in these expedited reviews regarding subject import volume.

Based on the record in these five-year reviews, we do not find that imports from each of the subject countries, considered individually, would likely have no discernible adverse impact on the domestic industry in the event of revocation of the relevant antidumping and countervailing duty orders.

China. We have considered our analyses regarding the adverse impact of subject imports from China in the original investigations and first full reviews.⁴⁵ In the original investigations, the volume of subject imports from China decreased over the period of investigation (“POI”), but their market share fluctuated over the same period.⁴⁶ During the first full review period, the volume of subject imports from China decreased after the imposition of the order in 2014 and remained low.⁴⁷ Meanwhile, GTA data, which may include out-of-scope

⁴⁵ *Original Determinations*, USITC Pub. 4502 at 29-35; *First Reviews*, USITC Pub. 5140 at 13-14.

⁴⁶ *Non-Oriented Electrical Steel from China, Germany, Japan, Korea, Sweden, and Taiwan* (Final), Confidential Report, INV-MM-109, Oct. 23, 2014, EDIS Doc. 547246 (Dec. 3, 2014) (“Original Determinations Confidential Report”) at Table IV-3. Subject imports from China decreased from 16,401 short tons in 2011 to 14,042 short tons in 2012 and to 12,725 short tons in 2014; they were 1,747 short tons in interim 2014 compared to 8,217 short tons in interim 2013. *Id.* at Tables IV-3, C-1. Their market share decreased from *** percent in 2011 to *** percent in 2012 before increasing to *** percent in 2013; it was *** percent in interim 2014 compared to *** percent in interim 2013. *Id.* at Tables IV-7, C-1.

⁴⁷ The volume of subject imports from China decreased from 2,188 short tons in 2014 to 12 short tons in 2015; it was 4 short tons in 2016, 17 short tons in 2017, 78 short tons in 2018, and 25 short tons in 2019 (the last year of the first reviews). CR/PR at Table C-1; *First Reviews*, USITC Pub. 5140 at Table IV-1.

products, indicated that China was the third largest global exporter of flat-rolled, silicon-electrical steel, other than grain oriented, in 2019.⁴⁸

The volume of subject imports from China remained very low, but fluctuated somewhat over the current review period. They were higher in 2024 than in 2019, at the end of the first reviews.⁴⁹

The record in these expedited reviews contains limited information concerning the NOES industry in China because no producer in China responded to the notice of institution.⁵⁰ Domestic interested parties provided a list of 32 possible active producers of NOES in China,⁵¹ and further assert that subject producers in China maintain the capacity to significantly increase their exports to the United States after revocation.⁵² Cleveland-Cliffs claims that China's capacity has been expanding rapidly in recent years and that China dominates global capacity for both grain-oriented and non-oriented electrical steel.⁵³ U.S. Steel asserts that according to UN Comtrade data, Chinese NOES exports globally rose by 200 percent in the past five years.⁵⁴ Cleveland-Cliffs also asserts that just four large Chinese producers' total capacity amounts to over five million short tons.⁵⁵

⁴⁸ *First Reviews*, USITC Pub. 5140 at 16.

⁴⁹ CR/PR at Table 1.5. The volume of subject imports from China decreased from 48 short tons in 2020 to 0 short tons in 2021, then increased to 1 short ton in 2022, 152 short tons in 2023 and 108 short tons in 2024. *Id.* It was 25 short tons in 2019. CR/PR at Table C-1; *First Reviews*, USITC Pub. 5140 at Table IV-1. The volume of subject imports from China increased by 332 percent between the last year of the previous reviews and the last year of these current reviews. *Calculated from* CR/PR at Tables C-1, 1.5.

⁵⁰ CR/PR at 1.27.

⁵¹ CR/PR at 1.27.

⁵² Cleveland-Cliffs' NOI Response at 24-26; U.S. Steel's NOI Response 15-18.

⁵³ Cleveland-Cliffs' NOI Response at 25-26.

⁵⁴ U.S. Steel's NOI Response at 18.

⁵⁵ Cleveland-Cliffs' NOI Response at 25-26.

During the current review period, there were several new production line openings and expansions in China.⁵⁶

GTA data indicate that exports from China of flat-rolled silicon electrical steel, other than grain oriented, a category that includes NOES and may include out-of-scope products, increased irregularly during the review period, with a low of 295,773 short tons in 2020 and a high of 926,954 in 2022.⁵⁷ Likely because of the restraining effect of the order, with the exception of 2023, the United States was not one of the top five export destinations for NOES produced in China, although exports to the United States did fluctuate upward over the review period.⁵⁸

In the original investigations subject imports from China undersold the domestic like product in 42 of 43 (or 97.7 percent of) quarterly comparisons over the investigation period, by an average margin of 23.7 percent.⁵⁹ In the first full reviews, the Commission found that imports from China undersold the domestic like product in *** of *** (*** percent of) quarterly comparisons over the POR, by an average margin on *** percent.⁶⁰ No product-specific pricing data concerning NOES from China were obtained in these current expedited reviews.

Subject imports from China are currently subject to an additional 50 percent *ad valorem* duty under Section 232 of the Trade Expansion Act of 1962, as amended.⁶¹ They are also

⁵⁶ CR/PR at Table 1.7 (developments in the industry in China).

⁵⁷ CR/PR at Table 1.8.

⁵⁸ See CR/PR at Table 1.9 (Flat-rolled silicon electrical steel, other than grain oriented: Quantity of exports from China, by destination and period). Exports from China to the U.S. were 5,850 short tons in 2020, 28,760 short tons in 2021, 54,209 short tons in 2022, 105,826 short tons in 2023 before decreasing to 59,988 short tons in 2024. *Id.*

⁵⁹ Original Determinations Confidential Report at V-51, Table V-16.

⁶⁰ *Non-Oriented Electrical Steel from China, Germany, Japan, Korea, Sweden, and Taiwan* (First Review), Confidential Report, INV-SS-128, Nov. 4, 2020, EDIS Doc. 724061 (Nov. 4, 2020) (“First Reviews Confidential Report”) at Table V-10a.

⁶¹ CR/PR at 1.7. Articles subject to section 232 tariffs, including NOES, originating in China were not subject to tariffs initiated in February 2026 under section 122 of the Trade Act of 1974. See *Imposing*

currently subject to a 25 percent *ad valorem* duty under Section 301 of the Trade Act of 1974.⁶² Thus, subject imports from China are currently subject to a total of an additional 75 percent *ad valorem* duties.⁶³

In light of these considerations, including the significant volume of subject imports from China in the original investigations, the substantial decline in that volume following imposition of the order reflecting the disciplining effect of the order, the continued presence of subject imports in the U.S. market, the large size and exports of the subject industry in China, and the underselling by subject imports from China during the original investigations, we find that subject imports from China would not likely have no discernible adverse impact on the domestic industry if the antidumping duty order covering these imports were revoked.

Germany. We have considered our analyses regarding the adverse impact of subject imports from Germany in the original investigations and first full reviews.⁶⁴ In the original investigations, the volume of subject imports from Germany and their market share decreased

a Temporary Import Surcharge To Address Fundamental International Payments Problems, 91 Fed. Reg. 9,339 (Feb. 25, 2026).

⁶² CR/PR at 1.8. Effective September 1, 2019, NOES originating in China was 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 NOES was reduced to 7.5 percent. Effective September 27, 2024, the additional section 301 duty for NOES originating in China increased to 25 percent. *Id.* Beginning on February 4, 2025, NOES originating in China was subject to additional duties under the International Emergency Economic Powers Act (“IEEPA”) at varying levels.

⁶³ Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated. See CR/PR at 1.9, n.33; *Learning Resources Inc. v. Trump*, No. 24-1287, 2026 WL 477534, 607___U.S. (2026); *Ending Certain Tariff Actions*, 91 Fed. Reg. 9,437 (Feb. 25, 2026). There is no information on the current record of the impact of additional duties effective during this review period, particularly the additional 25 percent duty under Section 232 effective June 4, 2025, and the increase in Section 301 duty effective September 27, 2024. See CR/PR at 1.7-1.8, n.31.

⁶⁴ *Original Determinations*, USITC Pub. 4502 at 29-35; *First Reviews*, USITC Pub. 5140 at 14-17.

over the POI.⁶⁵ During the first full review period, the volume and market share of subject imports from Germany decreased after the imposition of the order in 2014 and were present in only very small amounts by the end of the period.⁶⁶ The volume of subject imports from Germany remained very low over the current review period. They were lower in 2024 than in 2019, at the end of the first reviews.⁶⁷

The record of these five-year reviews contains limited information concerning the NOES industry in Germany because no producer in Germany responded to the notice of institution.⁶⁸ Domestic interested parties provided a list of three possible active producers of NOES in Germany,⁶⁹ and further assert that subject producers in Germany maintain the capacity to significantly increase their exports to the United States after revocation.⁷⁰ Specifically, Cleveland-Cliffs claims that Germany makes significant amounts of NOES, with investments increasing its capacity in recent years.⁷¹ U.S. Steel provides UN Comtrade data showing German

⁶⁵ Original Determinations Confidential Report at Table IV-3. Subject imports from Germany decreased from 14,385 short tons in 2011 to 9,568 short tons in 2012 and to 7,493 short tons in 2013; they were 2,282 short tons in interim 2014 compared to 3,795 short tons in interim 2013. *Id.* at Tables IV-3, C-1. Their market share decreased from *** percent in 2011 to *** percent in 2012 and to *** percent in 2013; it was *** percent in interim 2014 compared to *** percent in interim 2013. *Id.* at Tables IV-7, C-1.

⁶⁶ *First Reviews*, USITC Pub. 5140 at 16-17; CR/PR at Table C-1. The volume of subject imports from Germany decreased from 2,304 short tons in 2014, to 181 short tons in 2015; it was 179 short tons in 2016, 12 short tons in 2017, 14 short tons in 2018, and 12 short tons in 2019 (the last year of the first reviews). CR/PR at Table C-1; *First Reviews*, USITC Pub. 5140 at Table IV-1.

⁶⁷ CR/PR at Table 1.5. The volume of subject imports from Germany was 9 short tons in 2020, 7 short tons in 2021, 6 short ton in 2022, 7 short tons in 2023, and 2 short tons in 2024. *Id.* It was 12 short tons in 2019. CR/PR at Table C-1; *First Reviews*, USITC Pub. 5140 at Table IV-1. The volume of subject imports from Germany decreased by 83.3 percent between the last year covered by the previous reviews and the last year of these current reviews. *Calculated from* CR/PR at Tables C-1, 1.5.

⁶⁸ CR/PR at 1.30.

⁶⁹ CR/PR at 1.30.

⁷⁰ Cleveland-Cliffs' NOI Response at 27.

⁷¹ Cleveland-Cliffs' NOI Response at 27-28.

NOES exports rose 62 percent in the past five years.⁷²

During the review period, German producer ThyssenKrupp made major investments to expand its NOES production and ArcelorMittal S.A. reportedly received 1.3 billion Euro (\$1.4 billion) from the German government to construct and operate new steel plants.⁷³

GTA data indicate that exports from Germany of flat-rolled silicon electrical steel, other than grain oriented, a category that may include subject merchandise and out-of-scope products, fluctuated upward during the review period, with a low of 209,831 short tons in 2020 and a high of 438,783 in 2022.⁷⁴ Likely because of the restraining effect of the order, the United States was not one of the top ten export destinations for NOES produced in Germany during the review period.⁷⁵

In the original investigations subject imports from Germany undersold the domestic like product 46 out of 61 (75.4 percent of) quarterly comparisons over the investigation period, by an average margin of 16.8 percent.⁷⁶ In the first full reviews, the Commission found that imports from Germany undersold the domestic like product in *** of *** (or *** percent of) quarterly comparisons over the POR, by an average margin on *** percent.⁷⁷ No product-specific pricing data concerning NOES from Germany were obtained these current expedited reviews.

Subject imports from Germany are currently subject to additional 50 percent *ad valorem*

⁷² U.S. Steel's NOI Response at 19, Exh. GENERAL-4.

⁷³ CR/PR at Table 1.9 (developments in the industry in Germany).

⁷⁴ CR/PR at Table 1.10. According to GTA data, total German exports amounted to 209,831 short tons in 2020, 311,680 short tons in 2021, 438,783 short tons in 2022, 375,881 short tons in 2023, and 429,485 short tons in 2024. *Id.*

⁷⁵ See CR/PR at Table 1.10.

⁷⁶ Original Determinations Confidential Report at V-51, Table V-16.

⁷⁷ First Reviews Confidential Report at Table V-10a.

duty under Section 232 of the Trade Expansion Act of 1962, as amended.^{78 79}

In light of these considerations, including the significant volume of subject imports from Germany in the original investigations, the substantial decline in that volume following imposition of the order reflecting the disciplining effect of the order, the large size and exports of the subject industry in Germany, and the underselling by subject imports from Germany during the original investigations, we find that subject imports from Germany would not likely have no discernible adverse impact on the domestic industry if the antidumping duty order covering these imports were revoked.

Japan. We have considered our analyses regarding the adverse impact of subject imports from Japan in the original investigations and first full reviews.⁸⁰ In the original investigations, the volume of subject imports from Japan and their market share decreased irregularly over the POI.⁸¹ During the first full review period, the volume and market share of subject imports from Japan decreased after the imposition of the order in 2014, and these

⁷⁸ CR/PR at 1.7. Articles subject to section 232 tariffs, including NOES, originating in Germany were not subject to tariffs initiated in February 2026 under section 122 of the Trade Act of 1974. *See Imposing a Temporary Import Surcharge To Address Fundamental International Payments Problems*, 91 Fed. Reg. 9,339 (Feb. 25, 2026).

⁷⁹ NOES and other steel articles originating in Germany were not subject to tariffs initiated under IEEPA. CR/PR at 1.7. There is no information on the current record of the impact of additional duties effective during this review period, particularly the additional 25 percent duty under Section 232 effective June 4, 2025. *See* CR/PR at 1.7, n.31.

⁸⁰ *Original Determinations*, USITC Pub. 4502 at 29-35; *First Reviews*, USITC Pub. 5140 at 17-18.

⁸¹ *Original Determinations Confidential Report* at Table IV-3. Subject imports from Japan decreased from 22,747 short tons in 2011 to 18,540 short tons in 2012 and to 15,916 short tons in 2013; they were 4,969 short tons in interim 2014 compared to 6,887 short tons in interim 2013. *Id.* at Tables IV-3, C-1. Their market share decreased from *** percent in 2011 to *** percent in 2012 before increasing to *** percent in 2013; they were *** percent in interim 2014 compared to *** percent in interim 2013. *Id.* at Tables IV-7, C-1.

imports were present in only very small amounts by the end of the period.⁸² The volume of subject imports from Japan remained low over the first three years of the current review period, but increased in the 2023 and 2024. They were 563.8 percent higher in 2024 than in 2019, at the end of the first reviews.⁸³

The record of these five-year reviews contains limited information concerning the NOES industry in Japan because no producer in Japan responded to the notice of institution.⁸⁴ Domestic interested parties provided a list of eight possible active producers of NOES in Japan,⁸⁵ and further assert that subject producers in Japan maintain the capacity to significantly increase their exports to the United States after revocation.⁸⁶ Specifically, the domestic interested parties claim that Japanese producers made significant investments to expand their NOES production during the period of review, asserting JFE Steel's and Nippon Steel's expansions will, respectively, triple its production and more than quadruple its production.⁸⁷ U.S. Steel provides UN Comtrade data showing Japanese NOES exports rose 2,365 percent in the past five years.⁸⁸

⁸² *First Reviews*, USITC Pub. 5140 at 17; CR/PR at Table C-1. The volume of subject imports from Japan decreased from 8,571 short tons in 2014 to 5,166 short tons in 2015; it was 800 short tons in 2016, 398 short tons in 2017, 50 short tons in 2018, and 105 short tons in 2019 (the last year of the first reviews). CR/PR at Table C-1; *First Reviews*, USITC Pub. 5140 at Table IV-1.

⁸³ CR/PR at Table 1.5. The volume of subject imports from Japan was 34 short tons in 2020, 39 short tons in 2021, 24 short ton in 2022, 617 short tons in 2023, and 697 short tons in 2024. *Id.* It was 105 short tons in 2019. CR/PR at Table C-1; *First Reviews*, USITC Pub. 5140 at Table IV-1. The volume of subject imports from Japan increased by 563.8 percent between the last year covered by the previous reviews and the last year of these current reviews. *Calculated from* CR/PR at Tables C-1, 1.5.

⁸⁴ CR/PR at 1.32.

⁸⁵ CR/PR at 1.32.

⁸⁶ Cleveland-Cliffs' NOI Response at 28.

⁸⁷ Cleveland-Cliffs' NOI Response at 28-29; U.S. Steel's NOI Response at 20-21.

⁸⁸ U.S. Steel's NOI Response at 21, Exh. GENERAL-4.

The record confirms these large expansions during the POR.⁸⁹

GTA data indicate that exports from Japan of flat-rolled silicon electrical steel, other than grain oriented, a category including NOES that that may also include out-of-scope products, fluctuated during the review period, with a low of 212,217 short tons in 2020 and a high of 319,112 in 2021.⁹⁰ Likely, in part, because of the restraining effect of the order, the United States was not one of the top five export destinations for NOES produced in Japan during the review period.⁹¹

In the original investigations subject imports from Japan undersold the domestic like product 42 out of 64 (or 65.6 percent of) quarterly comparisons over the investigation period, by an average margin of 7.6 percent.⁹² In the first full reviews, the Commission found that imports from Japan undersold the domestic like product in *** of *** (or *** percent of) quarterly comparisons over the POR, by an average margin of *** percent.⁹³ No product-specific pricing data concerning NOES from Japan were obtained these current expedited reviews.

Subject imports from Japan are currently subject to additional 50 percent *ad valorem* duty under Section 232 of the Trade Expansion Act of 1962, as amended.^{94 95}

⁸⁹ CR/PR at Table 1.11 (developments in the industry in Japan). We note that Nippon Steel completed its acquisition of U.S. Steel in June 2025, which will operate as a subsidiary of Nippon Steel North America, Inc. *Id.*

⁹⁰ CR/PR at Table 1.10. According to GTA data, total Japanese exports amounted to 212,217 short tons in 2020, 319,112 short tons in 2021, 283,711 short tons in 2022, 236,160 short tons in 2023, and 212,544 short tons in 2024. *Id.*

⁹¹ See CR/PR at Table 1.10.

⁹² Original Determinations Confidential Report at V-51, Table V-16.

⁹³ First Reviews Confidential Report at Table V-10a.

⁹⁴ CR/PR at 1.7. Articles subject to section 232 tariffs, including NOES, originating in Japan were not subject to tariffs initiated in February 2026 under section 122 of the Trade Act of 1974. See *Imposing*

In light of these considerations, including the significant volume of subject imports from Japan in the original investigations, the substantial decline in that volume following imposition of the order reflecting the disciplining effect of the order, the continuing presence of subject imports in the U.S. market, the large size and exports of the subject industry in Japan, and the underselling by subject imports from Japan during the original investigations, we find that subject imports from Japan would not likely have no discernible adverse impact on the domestic industry if the antidumping duty order covering these imports were revoked.

South Korea. We have considered our analyses regarding the adverse impact of subject imports from South Korea in the original investigations and first full reviews.⁹⁶ In the original investigations, the volume of subject imports from South Korea and their market share fluctuated downward over the POI.⁹⁷ During the first full review period, the volume and market share of subject imports from South Korea first increased in 2015 and then decreased to only very small amounts by the end of the period.⁹⁸ The volume of subject imports from South Korea fluctuated, but remained relatively low over the current review period. They were 71.8

a Temporary Import Surcharge To Address Fundamental International Payments Problems, 91 Fed. Reg. 9,339 (Feb. 25, 2026).

⁹⁵ NOES and other steel articles originating in Japan are not subject to tariffs initiated under IEEPA. CR/PR at 1.7.

⁹⁶ *Original Determinations*, USITC Pub. 4502 at 29-35; *First Reviews*, USITC Pub. 5140 at 18-19.

⁹⁷ *Original Determinations Confidential Report* at Table IV-3. Subject imports from South Korea increased from 6,880 short tons in 2011 to 7,331 short tons in 2012 before decreasing to 4,622 short tons in 2013; they were 1,823 short tons in interim 2014 compared to 1,357 short tons in interim 2013. *Id.* at Tables IV-3, C-1. Their market share increased from *** percent in 2011 to *** percent in 2012 before decreasing to *** percent in 2013; it was *** percent in interim 2014 compared to *** percent in interim 2013. *Id.* at Tables IV-7, C-1.

⁹⁸ *First Reviews*, USITC Pub. 5140 at 18-19; CR/PR at Table C-1. The volume of subject imports from South Korea was 1,841 short tons in 2014, 3,162 short tons in 2015, 883 short tons in 2016, 263 short tons in 2017, 0 short tons in 2018, and 177 short tons in 2019 (the last year of the first reviews). CR/PR at Table C-1; *First Reviews*, USITC Pub. 5140 at Table IV-1.

percent lower in 2024 than in 2019, at the end of the first reviews.⁹⁹

The record of these five-year reviews contains limited information concerning the NOES industry in South Korea because no producer in South Korea responded to the notice of institution.¹⁰⁰ Domestic interested parties provided a list of four possible active producers of NOES in South Korea,¹⁰¹ and further assert that subject producers in South Korea maintain substantial capacity to increase their exports to the United States after revocation.¹⁰² Specifically, the domestic interested parties claim that POSCO, the primary South Korean producer of NOES, built a new production facility for non-oriented electrical steel resulting in a 300,000 metric ton expansion of their production capacity.¹⁰³ U.S. Steel asserts that this production capacity exceeds domestic demand in South Korea for NOES.¹⁰⁴ U.S. Steel provides U.N. Comtrade data showing that South Korean exports of NOES globally increased by 37 percent over the POR and increased by 3,640 percent to the United States.¹⁰⁵ The record confirms POSCO's large expansions during the POR.¹⁰⁶

GTA data indicate that exports from South Korea of flat-rolled silicon electrical steel, other than grain oriented, a category that may also include out-of-scope products, fluctuated

⁹⁹ CR/PR at Table 1.5. The volume of subject imports from South Korea was 40 short tons in 2020, 4 short tons in 2021, 24 short ton in 2022, 8 short tons in 2023, and 50 short tons in 2024. *Id.* It was 177 short tons in 2019. CR/PR at Table C-1; *First Reviews*, USITC Pub. 5140 at Table IV-1. The volume of subject imports from South Korea decreased by 71.8 percent between the last year covered by the previous reviews and the last year of these current reviews. *Calculated from* CR/PR at Tables C-1, 1.5.

¹⁰⁰ CR/PR at 1.35.

¹⁰¹ CR/PR at 1.32.

¹⁰² Cleveland-Cliffs' NOI Response at 30; U.S. Steel's NOI Response at 21-22.

¹⁰³ Cleveland-Cliffs' NOI Response at 30; U.S. Steel's NOI Response at 20-21.

¹⁰⁴ U.S. Steel's NOI Response at 21.

¹⁰⁵ U.S. Steel's NOI Response at 22, Exh. GENERAL-4.

¹⁰⁶ CR/PR at Table 1.13 (developments in the industry in Korea). The record also indicates that Hyundai obtained nine new NOES materials-related patents in 2025, indicating it may start producing NOES. *Id.*

upward during the review period, with a low of 415,182 short tons in 2020 and a high of 568,654 in 2024.¹⁰⁷ Likely, in part, because of the restraining effect of the order, the United States was not one of the top ten export destinations for NOES produced in South Korea during the review period.¹⁰⁸

In the original investigations subject imports from South Korea undersold the domestic like product 20 out of 22 (90.9 percent of) quarterly comparisons over the investigation period, by an average margin of 24.9 percent.¹⁰⁹ In the first full reviews, the Commission found that imports from South Korea undersold the domestic like product in *** of *** (or *** percent of) quarterly comparisons over the POR, by an average margin on *** percent.¹¹⁰ No product-specific pricing data concerning NOES from South Korea were obtained these current expedited reviews.

Subject imports from South Korea are currently subject to additional 50 percent *ad valorem* duty under Section 232 of the Trade Expansion Act of 1962, as amended.^{111 112}

In light of these considerations, including the significant volume of subject imports from South Korea in the original investigations, the substantial decline in that volume following

¹⁰⁷ CR/PR at Table 1.14. According to GTA data, total South Korea exports amounted to 415,182 short tons in 2020, 552,249 short tons in 2021, 458,102 short tons in 2022, 420,913 short tons in 2023, and 568,654 short tons in 2024. *Id.*

¹⁰⁸ See CR/PR at Table 1.14.

¹⁰⁹ *Original Investigation*, Confidential Report at V-51, Table V-16.

¹¹⁰ First Reviews Confidential Report at Table V-10a.

¹¹¹ CR/PR at 1.7. Articles subject to section 232 tariffs, including NOES, originating in South Korea were not subject to tariffs initiated in February 2026 under section 122 of the Trade Act of 1974. See *Imposing a Temporary Import Surcharge To Address Fundamental International Payments Problems*, 91 Fed. Reg. 9,339 (Feb. 25, 2026).

¹¹² NOES and other steel articles originating in South Korea were not subject to tariffs initiated under IEEPA. CR/PR at 1.7. There is no information on the current record of the impact of additional duties effective during this review period, particularly the additional 25 percent duty under Section 232 effective June 4, 2025. See CR/PR at 1.7, n.31.

imposition of the order reflecting the disciplining effect of the order, the continuing (albeit small) presence of subject imports in the U.S. market, the large size and exports of the subject industry in South Korea, and the underselling by subject imports from South Korea during the original investigations, we find that subject imports from South Korea would not likely have no discernible adverse impact on the domestic industry if the antidumping duty order covering these imports were revoked.

Sweden. We have considered our analyses regarding the adverse impact of subject imports from Sweden in the original investigations and first full reviews.¹¹³ In the original investigations, the volume of subject imports from Sweden fluctuated downward while their market share fluctuated upward over the POI.¹¹⁴ During the first full review period, the volume and market share of subject imports from Sweden decreased after the imposition of the order in 2014, and these imports were present in only very small amounts by the end of the period.¹¹⁵ The volume of subject imports from Sweden fluctuated over the current review period. They were 67.4 percent higher in 2024 than in 2019, at the end of the first reviews.¹¹⁶

¹¹³ *Original Determinations*, USITC Pub. 4502 at 29-35; *First Reviews*, USITC Pub. 5140 at 19-20.

¹¹⁴ Original Determinations Confidential Report at Table IV-3. Subject imports from Sweden increased from 8,599 short tons in 2011 to 9,359 short tons in 2012 before decreasing to 7,068 short tons in 2013; they were 3,162 short tons in interim 2014 compared to 3,559 short tons in interim 2013. *Id.* at Tables IV-3, C-1. Their market share increased from *** percent in 2011 to *** percent in 2012 before decreasing to *** percent in 2013; they were *** percent in interim 2014 compared to *** percent in interim 2013.

¹¹⁵ *First Reviews*, USITC Pub. 5140 at 19-20; CR/PR at Table C-1. The volume of subject imports from Sweden decreased from 12,724 short tons in 2013 (the last year of the original investigations) to 2,188 short tons in 2014, to 12 short tons in 2015. It was 4 short tons in 2016, 17 short tons in 2017, 78 short tons in 2018, and 25 short tons in 2019 (the last year of the first reviews). CR/PR at Table C-1; *First Reviews*, USITC Pub. 5140 at Table IV-1.

¹¹⁶ CR/PR at Table 1.5. The volume of subject imports from Sweden was 137 short tons in 2020, 769 short tons in 2021, 504 short tons in 2022, 97 short tons in 2023, and 308 short tons in 2024. *Id.* It was 184 short tons in 2019. CR/PR at Table C-1; *First Reviews*, USITC Pub. 5140 at Table IV-1. The

The record of these five-year reviews contains limited information concerning the NOES industry in Sweden because no producer in Sweden responded to the notice of institution.¹¹⁷ Domestic interested parties provided a list of two possible active producers of NOES in Sweden,¹¹⁸ and further assert that subject producers in Sweden maintain significant capacity to increase their exports to the United States after revocation.¹¹⁹ Specifically, Cleveland-Cliffs claims that Surahammars Bruk AB, which is part of the TATA steel group, has the ability to product 176,369 short tons of electrical steel, including NOES.¹²⁰ U.S. Steel claims that the United States remains one of Sweden's primary export markets, even with the orders in place.¹²¹ There were no major developments in the Swedish industry during the POR.¹²²

GTA data indicate that exports from Sweden of flat-rolled silicon electrical steel, other than grain oriented, a category that includes NOES and may also include out-of-scope products, fluctuated during the review period, with a low of 0 short tons in 2023 and a high of 247 short tons in 2022.¹²³

In the original investigations subject imports from Sweden undersold the domestic like product in 35 out of 62 (or 56.5 percent of) quarterly comparisons over the investigation period,

volume of subject imports from Sweden increased by 67.4 percent between the last year covered by the previous reviews and the last year of these current reviews. *Calculated from* CR/PR at Tables C-1, 1.5.

¹¹⁷ CR/PR at 1.38.

¹¹⁸ CR/PR at 1.38.

¹¹⁹ Cleveland-Cliffs' NOI Response at 30-31. *See also* U.S. Steel's NOI Response at 23.

¹²⁰ Cleveland-Cliffs' NOI Response at 30; U.S. Steel's NOI Response at 20-21.

¹²¹ U.S. Steel's NOI Response at 23.

¹²² CR/PR at 1.38.

¹²³ CR/PR at Table 1.15. According to GTA data, total Sweden exports amounted to 180 short tons in 2020, 48 short tons in 2021, 247 short tons in 2022, 0 short tons in 2023, and 6 short tons in 2024. *Id.* We note that as indicated above, U.S. import statistics indicate greater volumes of imports of NOES during the review period. *See* CR/PR at Table 1.5. As the Customs data relate specifically to entries into the U.S. market, we place greater weight on those data.

by an average margin of 15.7 percent.¹²⁴ In the first full reviews, the Commission found that imports from Sweden undersold the domestic like product in *** of *** quarterly comparisons over the POR.¹²⁵ No product-specific pricing data concerning NOES from Sweden were obtained in these current expedited reviews.

Subject imports from Sweden are currently subject to additional 50 percent *ad valorem* duty under Section 232 of the Trade Expansion Act of 1962, as amended.^{126 127}

In light of these considerations, including the significant volume of subject imports from Sweden in the original investigations, the substantial decline in that volume following imposition of the order reflecting the disciplining effect of the order, the continuing presence of subject imports in the U.S. market, the large size and exports of the subject industry in Sweden, and the underselling by subject imports from Sweden during the original investigations, we find that subject imports from Sweden would not likely have no discernible adverse impact on the domestic industry if the antidumping duty order covering these imports were revoked.

Taiwan. We have considered our analyses regarding the adverse impact of subject imports from Taiwan in the original investigations and first full reviews.¹²⁸ In the original investigations, the volume of subject imports from Taiwan and their market share increased

¹²⁴ Original Determinations Confidential Report at V-51, Table V-16.

¹²⁵ First Reviews Confidential Report at Table V-10a.

¹²⁶ CR/PR at 1.7. Articles subject to section 232 tariffs, including NOES, originating in Sweden were not subject to tariffs initiated in February 2026 under section 122 of the Trade Act of 1974. *See Imposing a Temporary Import Surcharge To Address Fundamental International Payments Problems*, 91 Fed. Reg. 9,339 (Feb. 25, 2026).

¹²⁷ NOES and other steel articles originating in Sweden were not subject to tariffs initiated under IEEPA. CR/PR at 1.7. There is no information on the current record of the impact of additional duties effective during this review period, particularly the additional 25 percent duty under Section 232 effective June 4, 2025. *See* CR/PR at 1.7, n.31.

¹²⁸ *Original Determinations*, USITC Pub. 4502 at 29-35; *First Reviews*, USITC Pub. 5140 at 20-21.

irregularly over the POI with a significant spike in 2012.¹²⁹ During the first full review period, the volume and market share of subject imports from Taiwan decreased after the imposition of the order in 2014, and these imports were present in only very small amounts by the end of the period.¹³⁰ The volume of subject imports from Taiwan decreased irregularly during the current review period. They were 84.6 percent lower in 2024 than in 2019, at the end of the first reviews.¹³¹

The record of these five-year reviews contains limited information concerning the NOES industry in Taiwan because no producer in Taiwan responded to the notice of institution.¹³² Domestic interested parties provided a list of four possible active producers of NOES in Taiwan,¹³³ and further assert that subject producers in Taiwan maintain significant capacity to increase their exports to the United States after revocation.¹³⁴ Specifically, the domestic interested parties claim that public reports indicate that China Steel Corporation, Taiwan's

¹²⁹ Original Determinations Confidential Report at Table IV-3. Subject imports from Taiwan increased from 5,203 short tons in 2011 to 17,136 short tons in 2012 before decreasing to 9,768 short tons in 2013; they were 8,691 short tons in interim 2014 compared to 2,637 short tons in interim 2013. *Id.* at Tables IV-3, C-1. Their market share increased from *** percent in 2011 to *** percent in 2012 before decreasing to *** percent in 2013; they were *** percent in interim 2014 compared to *** percent in interim 2013. *Id.* at Tables IV-7, C.1.

¹³⁰ *First Reviews*, USITC Pub. 5140 at 21; CR/PR at Table C-1. The volume of subject imports from Taiwan was 9,477 short tons in 2014, 2,118 short tons in 2015, 3,160 short tons in 2016, 2,760 short tons in 2017, 572 short tons in 2018, and 1,228 short tons in 2019. CR/PR at Table C-1; *First Reviews*, USITC Pub. 5140 at Table IV-1.

¹³¹ CR/PR at Table 1.5. The volume of subject imports from Taiwan was 386 short tons in 2020, 131 short tons in 2021, 6 short tons in 2022, 0 short tons in 2023, and 189 short tons in 2024. *Id.* It was 9 1,228 short tons in 2019. CR/PR at Table C-1; *First Reviews*, USITC Pub. 5140 at Table IV-1. The volume of subject imports from Taiwan decreased by 84.6 percent between the last year covered by the previous reviews and the last year of these current reviews. *Calculated from* CR/PR at Tables C-1, 1.5.

¹³² CR/PR at 1.40.

¹³³ CR/PR at 1.38.

¹³⁴ Cleveland-Cliffs' NOI Response at 31-32. *See also* U.S. Steel's NOI Response at 23.

largest steel producer, intends to increase its electrical steel output and characterizes itself as an export-oriented producer.¹³⁵

The record indicates that China Steel Corporation contracted with Primetals Technologies to expand its annual production capacity at its electrical steel facility during the POR.¹³⁶

GTA data indicate that exports from Taiwan of flat-rolled silicon electrical steel, other than grain oriented, a category that includes NOES and may also include out-of-scope products, fluctuated during the review period, with a low of 414,771 short tons in 2024 and a high of 747,944 short tons in 2022.¹³⁷

In the original investigations, subject imports from Taiwan undersold the domestic like product in 25 out of 30 (or 83.3 percent of) quarterly comparisons over the investigation period, by an average margin of 13.9 percent.¹³⁸ In the first full reviews, the Commission found that imports from Taiwan undersold the domestic like product in *** of *** (*** percent of) quarterly comparisons over the POR, by an average margin of *** percent.¹³⁹ No product-specific pricing data concerning NOES from Taiwan were obtained in these current expedited reviews.

¹³⁵ Cleveland-Cliffs' NOI Response at 31-32; U.S. Steel's NOI Response at 24.

¹³⁶ CR/PR at Table 1.16.

¹³⁷ CR/PR at Table 1.17. According to GTA data, total Taiwan exports amounted to 549,938 short tons in 2020, 747,944 short tons in 2021, 616,178 short tons in 2022, 538,697 short tons in 2023, and 414,771 short tons in 2024. *Id.*

¹³⁸ Original Determinations Confidential Report at V-51, Table V-16.

¹³⁹ First Reviews Confidential Report at Table V-10a.

Subject imports from Taiwan are currently subject to additional 50 percent *ad valorem* duty under Section 232 of the Trade Expansion Act of 1962, as amended.^{140 141}

In light of these considerations, including the significant volume of subject imports from Taiwan in the original investigations, the decline in that volume following imposition of the order reflecting the disciplining effect of the order, the continuing presence of Taiwanese subject imports in the U.S. market, the expanding industry in Taiwan, and the underselling by subject imports from Taiwan during the original investigations and first full reviews, we find that subject imports from Taiwan would not likely have no discernible adverse impact on the domestic industry if the antidumping duty order covering these imports were revoked.

ii. Likelihood of a Reasonable Overlap of Competition

The Commission generally has considered four factors intended to provide a framework for determining whether subject imports compete with each other and with the domestic like product.¹⁴² Only a “reasonable overlap” of competition is required.¹⁴³ In five-year reviews, the

¹⁴⁰ CR/PR at 1.7. Articles subject to section 232 tariffs, including NOES, originating in Taiwan were not subject to tariffs initiated in February 2026 under section 122 of the Trade Act of 1974. *See Imposing a Temporary Import Surcharge To Address Fundamental International Payments Problems*, 91 Fed. Reg. 9,339 (Feb. 25, 2026).

¹⁴¹ NOES and other steel articles originating in Taiwan were not subject to tariffs initiated under IEEPA. CR/PR at 1.7.

¹⁴² The four factors generally considered by the Commission in assessing whether imports compete with each other and with the domestic like product are as follows: (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality-related questions; (2) the presence of sales or offers to sell in the same geographical markets of imports from different countries and the domestic like product; (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and (4) whether subject imports are simultaneously present in the market with one another and the domestic like product. *See, e.g., Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

¹⁴³ *See Mukand Ltd. v. United States*, 937 F. Supp. 910, 916 (Ct. Int’l Trade 1996); *Wieland Werke*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”); *United States Steel Group v. United States*, 873 F. Supp. 673, 685 (Ct. Int’l Trade 1994), *aff’d*, 96 F.3d 1352 (Fed. Cir. 1996). We note,

relevant inquiry is whether there likely would be competition even if none currently exists because the subject imports are absent from the U.S. market.¹⁴⁴

We have considered our analyses regarding the overlap of competition between and among subject imports from each subject country and the domestic like products in the original investigations and subsequent reviews.¹⁴⁵ In the original investigations, the Commission found that all four factors indicated a reasonable overlap of competition existed.¹⁴⁶ Similarly, in the first full reviews, the Commission concluded that there likely would be a reasonable overlap of competition between the subject imports and the domestic like product, and among the subject imports themselves, if the orders were revoked.¹⁴⁷

Fungibility. In the prior proceedings, the Commission found that subject imports and the domestic like product were sufficiently fungible for purposes of cumulation because foreign-produced subject NOES generally was interchangeable with U.S.-produced NOES and competed on the basis of the same or similar qualities.¹⁴⁸

There is no new information in the record that suggests that the degree of fungibility between and among subject imports from each subject country and the domestic like product has changed since the prior proceedings. Domestic interested parties argue that conditions

however, that there have been investigations where the Commission has found an insufficient overlap in competition and has declined to cumulate subject imports. *See, e.g., Live Cattle from Canada and Mexico*, Inv. Nos. 701-TA-386 and 731-TA-812-13 (Preliminary), USITC Pub. 3155 at 15 (Feb. 1999), *aff'd sub nom, Ranchers-Cattlemen Action Legal Foundation v. United States*, 74 F. Supp. 2d 1353 (Ct. Int'l Trade 1999); *Static Random Access Memory Semiconductors from the Republic of Korea and Taiwan*, Inv. Nos. 731-TA-761-62 (Final), USITC Pub. 3098 at 13-15 (Apr. 1998).

¹⁴⁴ *See generally, Cheflene Corp. v. United States*, 219 F. Supp. 2d 1313, 1314 (Ct. Int'l Trade 2002).

¹⁴⁵ *Original Determinations*, USITC Pub. 4502 at 12-14; *First Reviews*, USITC Pub. 5140 at 21-24.

¹⁴⁶ *Original Determinations*, USITC Pub. 4502 at 14.

¹⁴⁷ *First Reviews*, USITC Pub. 5140 at 24.

¹⁴⁸ *Original Determinations*, USITC Pub. 4502 at 12-13; *First Reviews*, USITC Pub. 5140 at 22-23.

have not changed since the prior proceedings, and that there continues to be a high degree of interchangeability among the domestic like product and the subject imports, resulting in a reasonable degree of fungibility.¹⁴⁹

Channels of Distribution. In the prior proceedings, the Commission found that there was some overlap in channels of distribution between the subject imports and the domestic like product.¹⁵⁰ In the original investigations, the Commission found that although the majority of subject imports from Sweden are sold to end users, the domestic industry and all subject sources, except from Taiwan, sell regularly to that channel, and subject imports from Taiwan have had a sufficient presence in that channel to constitute a reasonable overlap.¹⁵¹ In the first full reviews, the Commission found that there were again common channels of distribution, particularly with respect to sales to ***.¹⁵² In the current reviews, there is no new information on the record to indicate that the channels of distribution used by the domestic industry and imports from each subject country have changed since the prior proceedings or would likely not have a reasonable overlap if the orders were revoked.

Geographic Overlap. In the prior proceedings, the Commission found that the domestic like product and imports from subject sources were sold in overlapping geographic areas, particularly in the ***.¹⁵³ During the current reviews, U.S. imports from subject countries

¹⁴⁹ Cleveland-Cliffs' NOI Response at 18-19. See also U.S. Steel's NOI Response at 8-9.

¹⁵⁰ *Original Investigations*, USITC Pub. 4502 at 14; *First Reviews*, USITC Pub. 5140 at 22-23.

¹⁵¹ *Original Determinations*, USITC Pub. 4502 at 15.

¹⁵² *Non-Oriented Electrical Steel from China, Germany, Japan, Korea, Sweden, and Taiwan* (First Review), Confidential Commission Views, EDIS Doc. 728001 (Dec. 15, 2020) ("*First Reviews*, Confidential Views") at 30.

¹⁵³ *Non-Oriented Electrical Steel from China, Germany, Japan, Korea, Sweden, and Taiwan* (Final), Confidential Commission Views, EDIS Doc. 547246 (Dec. 3, 2014) ("*Original Determinations*, Confidential Views") at 14; *First Reviews*, Confidential Views at 29-30.

entered through all various borders of entry over the review period.¹⁵⁴ There is no indication that, if the orders were revoked, there would not be geographic overlap among domestic product and subject imports.

Simultaneous Presence. In the prior proceedings, the Commission found that the domestic like product and subject imports from all subject countries were present in the United States market throughout the period examined.¹⁵⁵ In these current reviews, imports of NOES from China were reported in 15 of the 60 months, imports from Germany were reported in 9 of the 60 months, imports from Japan were reported in 28 of the 60 months, imports from South Korea were reported in 14 of the 60 months, imports from Sweden were reported in all months, and imports from Taiwan were reported in 13 of the 60 months from 2020 to 2024.¹⁵⁶

Conclusion. The record in these expedited reviews indicates that there has not been any meaningful change in the considerations that led the Commission in the original investigations and first full reviews to conclude that there was a reasonable overlap or likely reasonable

¹⁵⁴ CR/PR at 1.24. Imports from China entered primarily through the southern borders of entry in 2020, 2023, and 2024, while all imports from China entered the western borders of entry in 2022. There were no imports from China in 2021. Imports from Germany entered primarily through the eastern borders of entry in 2020, 2021, and 2023, the northern borders of entry in 2022, and the southern borders of entry in 2024. Imports of NOES from Germany did not enter through the western borders of entry during the period for which data were collected. Imports of NOES from Japan entered primarily through the southern borders of entry in 2020 and 2021 and the eastern borders of entry in 2023 and 2024. Imports from Japan entered the various borders of entries in relatively even quantities in 2022. Imports of NOES from South Korea entered primarily through the southern borders of entry from 2020 through 2023 and primarily through the northern borders of entry in 2024. Imports of NOES from South Korea did not enter through the eastern borders of entry from 2020 through 2024. Imports of NOES from Sweden entered primarily through the eastern and northern borders of entry in all years. Imports of NOES from Sweden did not enter through the western borders of entry during the period for which data were collected. Imports of NOES from Taiwan entered primarily through the eastern ports of entry in 2020, the northern and southern borders of entry in 2021, and through the southern borders of entry in 2022 and 2024. There were no imports of NOES from Taiwan in 2023. *Id.*

¹⁵⁵ *Original Determinations*, USITC Pub. 4502 at 14; First Reviews, USITC Pub. 5140 at 23-24.

¹⁵⁶ CR/PR at 1.24.

overlap, respectively, of competition among subject imports and between subject imports and the domestic like product. In particular, there is no new information in the record that suggests that the degree of fungibility among subject imports from each subject country and the domestic like product has changed since the prior proceedings. There is also no indication in the record indicating that overlaps in channels of distribution, geographic presence in the United States, and simultaneous presence in the market that were present during the original investigations would not recur upon revocation.

For these reasons, and absent any contrary argument, we find that there will be a likely reasonable overlap of competition between the domestic like product and subject imports, and among imports from the different subject countries, should the orders be revoked.

iii. Likely Conditions of Competition

In determining whether to exercise our discretion to cumulate the subject imports, we consider whether subject imports from each subject country would likely compete under similar or different conditions in the U.S. market after revocation of the orders. The record in these five-year reviews contains limited current information about the NOES industries in each subject country and the U.S. market for NOES. Based on the information available, and in the absence of any argument to the contrary, we do not find any likely significant differences in conditions of competition that would warrant not cumulating subject imports from each subject country.

iv. Conclusion

We determine that subject imports from each subject country, considered individually, are not likely to have no discernible adverse impact on the domestic industry if the corresponding orders were revoked. We also find that there would likely be a reasonable

overlap of competition between and among subject imports from each subject country and the domestic like product if the orders were revoked. Finally, we do not find any likely significant differences in conditions of competition that would warrant not cumulating subject imports from each subject country. We therefore exercise our discretion to cumulate subject imports from all subject countries for purposes of our analysis in these five-year reviews.

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

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”¹⁵⁷ 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.”¹⁵⁸ Thus, the likelihood

¹⁵⁷ 19 U.S.C. § 1675a(a).

¹⁵⁸ SAA at 883-84. The SAA states that “{t}he likelihood of injury standard applies regardless of the nature of the Commission’s original determination (material injury, threat of material injury, or material retardation of an industry). Likewise, the standard applies to suspended investigations that were never completed.” *Id.* at 883.

standard is prospective in nature.¹⁵⁹ 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.¹⁶⁰

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.”¹⁶¹ 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.”¹⁶²

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

¹⁵⁹ 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.

¹⁶⁰ 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’”).

¹⁶¹ 19 U.S.C. § 1675a(a)(5).

¹⁶² 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.*

investigation is terminated.”¹⁶³ 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).¹⁶⁴ 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.¹⁶⁵

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.¹⁶⁶ 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

¹⁶³ 19 U.S.C. § 1675a(a)(1).

¹⁶⁴ 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings. See Issues and Decision Memorandum for the Final Results of the Expedited Second Sunset Reviews of the Antidumping Duty Orders on Non-Oriented Electrical Steel from Sweden, Germany, the People’s Republic of China, the Republic of Korea, Taiwan, and Japan, Case Nos. A-401-809, A-428-843, A-570-996, A-580-872, A-583-851, A-588-872 (Sunset Reviews) (Apr. 14, 2026), EDIS Doc. 879223 (Apr. 16, 2026).

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

¹⁶⁶ 19 U.S.C. § 1675a(a)(2).

produce other products.¹⁶⁷

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.¹⁶⁸

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.¹⁶⁹ 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 orders under

¹⁶⁷ 19 U.S.C. § 1675a(a)(2)(A-D).

¹⁶⁸ 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.

¹⁶⁹ 19 U.S.C. § 1675a(a)(4).

review and whether the industry is vulnerable to material injury upon revocation.¹⁷⁰

The record in these expedited reviews contains limited new information with respect to the NOES industry in each subject country. There also is limited information on the NOES market in the United States during the POR. Accordingly, for our determination, we rely as appropriate on the facts available from the original investigations and prior reviews, 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 affected industry.”¹⁷¹ We have considered our analyses regarding the conditions of competition in the original investigations and subsequent reviews.¹⁷² The following conditions of competition inform our determinations in these reviews.

i. Demand

The information available indicates that demand for NOES continues to be derived from the demand for the downstream products such as electric motors, transformers, and generators.¹⁷³ U.S. Steel contends that although U.S. demand for NOES may be increasing in parallel with increasing demand for electric vehicles, this demand is also fueling increasing

¹⁷⁰ 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.

¹⁷¹ 19 U.S.C. § 1675a(a)(4).

¹⁷² *Original Determinations*, USITC Pub. 4502 at 19-22; *First Reviews*, USITC Pub. 5140 at 28-32.

¹⁷³ Cleveland-Cliffs’ NOI Response at 11-12; U.S. Steel’s NOI Response at 33-34. *See also First Reviews*, USITC Pub. 5140 at 29.

capacity and production in subject countries. It further contends that any increase in demand has not been enough to fill the U.S. industry's production capacity.¹⁷⁴

Apparent U.S. consumption of NOES declined during the original investigations and the first review period.¹⁷⁵ In the current review period, apparent U.S. consumption of NOES has declined from *** short tons in 2019 to *** short tons in 2024, or by *** percent.¹⁷⁶

ii. Supply

Domestically produced NOES was the largest source of NOES in the U.S. market in 2024, accounting for *** percent of apparent U.S. consumption in that year.¹⁷⁷ The domestic industry experienced several acquisitions and new facility expansions during the POR.¹⁷⁸

Subject imports were the smallest source of NOES in the U.S. market during the POR, accounting for *** percent of apparent U.S. consumption by quantity in 2024.¹⁷⁹

Nonsubject imports were the second largest source of NOES in the U.S. market during the POR, accounting for *** percent of apparent U.S. consumption by quantity in 2024.¹⁸⁰

¹⁷⁴ U.S. Steel's NOI Response at 34-35.

¹⁷⁵ *Original Determinations*, USITC Pub. 4502 at 19-22; *First Reviews*, USITC Pub. 5140 at 28-29.

¹⁷⁶ CR/PR at Table 1.6.

¹⁷⁷ CR/PR at Table 1.6.

¹⁷⁸ CR/PR at Table 1.3. Cleveland-Cliffs became a domestic producer of NOES after acquiring AK Steel in March 2020. Later that year it also acquired the flat-rolled steel facilities of ArcelorMittal USA LLC that produce NOES motor laminations. *Id.* U.S. Steel acquired Big River Steel LLC in January 2021 and then launched its NOES product in March 2023. It also initiated a new NOES production line, with an annual production capacity of 200,000 short tons in 2023 and production reportedly commenced in late 2024. *Id.* In February 2025, ArcelorMittal USA LLC announced a \$1.2 billion investment to construct a new NOES facility in Alabama with an annual production capacity of 150,000 metric tons (165,347 short tons), with production anticipated to commence in 2027. *Id.* Nippon Steel Corp. acquired U.S. Steel in June 2025 and announced that it will provide \$11 billion in new investments in U.S. Steel by 2028. In late 2025, U.S. Steel broke ground on its electric-arc furnace steelmaking and flat-rolling and finishing facility, which will result in an annual steelmaking capacity of 3 million short tons per year and includes a NOES line. *Id.*

¹⁷⁹ CR/PR at Table 1.6.

¹⁸⁰ CR/PR at Table 1.6.

iii. Substitutability and Other Conditions

In the original investigations and the first full reviews, the Commission found a moderate-to-high degree of substitutability between domestically produced NOES and subject imports, and that price is an important factor in purchasing decisions for NOES.¹⁸¹ The record of these reviews contains no new information indicating that the degree of substitutability between the domestic like product and cumulated subject imports or the importance of price has changed since the prior proceedings. Domestic interested parties contend that there continues to be a strong level of interchangeability given that the subject imports and domestic like product have the same physical and performance characteristics and are manufactured to the same performance and technical specifications.¹⁸² They also contend that price continues to be a “very important” purchasing factor.¹⁸³ Specifically, Cleveland-Cliffs contends that purchasers routinely require that Cleveland-Cliffs meet subject import prices.¹⁸⁴ Accordingly, we find that there continues to be a moderate-to-high degree of substitutability between domestically produced NOES and subject imports, and that price is an important factor in purchasing decisions for NOES.

Subject imports from China, Germany, Japan, South Korea, Sweden, and Taiwan are currently subject to additional tariffs as indicated in Section III.C.

¹⁸¹ *Original Determinations*, USITC Pub. 4502 at 20, 24; *First Reviews*, USITC Pub. 5140 at 30-31.

¹⁸² Cleveland-Cliffs’ NOI Response at 14-15; U.S. Steel’s NOI Response at 9.

¹⁸³ Cleveland-Cliffs’ NOI Response at 14-15; U.S. Steel’s NOI Response at 9.

¹⁸⁴ Cleveland-Cliffs’ NOI Response at 15.

C. Likely Volume of Cumulated Subject Imports

We have considered our findings regarding the volume of subject imports in the original investigations, and likely volume of subject imports in the first full reviews.¹⁸⁵ The record indicates that the discipline of the orders has limited, and continues to limit, cumulated subject import volumes.¹⁸⁶ Although the volume of cumulated subject imports fluctuated upward, it remained relatively low over the POR, particularly when compared to the original investigation period: cumulated subject imports increased from 653 short tons in 2020 to 949 short tons in 2021, then decreased to 564 short tons in 2022, then increased again to 882 short tons in 2023 and 1,355 short tons in 2024, equivalent to *** percent of U.S. apparent consumption in 2024.¹⁸⁷

The record in these five-year reviews contains limited information on the subject foreign industries. As discussed in detail in section III.C.1. the domestic interested parties have identified 33 possible producers of NOES in China, six possible producers in Germany, eight possible producers in Japan, four possible producers in South Korea, two possible producers in Sweden, and four possible producers in the Taiwan.¹⁸⁸ The record indicates that the subject industries are large producers and exporters of subject merchandise and most have numerous large subject producers and exporters, some of which have expanded capacity and/or production.¹⁸⁹ GTA data for HS subheadings 7225.19 and 7226.19, which may include out-of-scope merchandise, indicate that NOES producers in most of the subject countries are large

¹⁸⁵ *Original Determinations*, USITC Pub. 4502 at 23-24; *First Reviews*, USITC Pub. 5140 at 32-33.

¹⁸⁶ See CR/PR at Tables 1.5, C-1.

¹⁸⁷ CR/PR at Tables 1.5. 1.6; *Compare* Table 1.5 with Table C-1.

¹⁸⁸ CR/PR at 1.27, 1.30, 1.32, 1.35, 1.38, 1.40.

¹⁸⁹ See Cleveland-Cliffs' NOI Response at 24-32; U.S. Steel's NOI Response at 15-25; Cleveland-Cliffs' Final Comments at 7; U.S. Steel's Final Comments at 3.

exporters: all together, subject countries exported more than 2.5 million short tons of NOES in 2024, which was more than *** apparent U.S. consumption that year.¹⁹⁰ We note that GTA data indicate that due to the disciplinary effect of the orders, at least in part, the United States was not in the top ten destinations for exports from Germany, South Korea, and Taiwan, and not in the top five destinations for exports from China or Japan.¹⁹¹

Available information also indicates that the U.S. market remains attractive to subject producers.¹⁹² The domestic interested parties contend that the United States has significant markets for the downstream products in which NOES is used, such as electrical vehicles, electric motors, transformers, and generators.¹⁹³ They also contend that prices in the U.S. market are generally higher than in other markets, creating incentives for subject industries to sell into the United States if the orders were revoked.¹⁹⁴ Cleveland-Cliffs also argues that entry into the U.S. market is relatively easy given that the market has a sophisticated network of steel distributors, importers, and end-users.¹⁹⁵ U.S. Steel contends that other tariff measures, including those under Section 232, would not disincentivize subject producers from shipping large volumes of NOES to the United States upon revocation, in line with the Commission's findings in the first reviews.¹⁹⁶

¹⁹⁰ *Calculated from* CR/PR at Tables 1.8, 1.10, 1.12, 1.14, 1.15, 1.17. According to GTA data in 2024, China exported 887,507 short tons, Germany exported 429,485 short tons, Japan exported 212,544 short tons, South Korea exported 568,654 short tons, Sweden exported 6 short tons, and Taiwan exported 414,771 short tons. CR/PR at Tables 1.8, 1.10, 1.12, 1.14, 1.15, 1.17.

¹⁹¹ *Calculated from* CR/PR at Tables 1.8, 1.10, 1.12, 1.14, 1.15, 1.17 and Table 1.6.

¹⁹² Cleveland-Cliffs' NOI Response at 22-23; U.S. Steel's NOI Response at

¹⁹³ Cleveland-Cliffs' NOI Response at 22-23.

¹⁹⁴ Cleveland-Cliffs' NOI Response at 23; U.S. Steel's NOI Response at 14.

¹⁹⁵ Cleveland-Cliffs' NOI Response at 23.

¹⁹⁶ U.S. Steel's NOI Response at 14-15. As noted above, there is no information on the current record of the impact of additional duties imposed under Section 232 during this review period.

Subject imports from each country remained in the U.S. market and therefore likely have distribution networks and customers in the United States.¹⁹⁷ Other countries have also imposed duties on NOES from subject countries, making the U.S. market more attractive if the orders are revoked.¹⁹⁸

Thus, on a cumulated basis, subject producers have the means and the incentive to export subject merchandise to the U.S. market in significant volumes within a reasonably foreseeable time if the orders were revoked. In light of these considerations, including the significant volume of cumulated subject imports during the original investigations, the continued presence and increase in cumulated subject imports in the U.S. market during the POR, the subject industries' substantial capacity, and the attractiveness of the U.S. market to subject producers, we find that the volume of cumulated subject imports would likely be significant, both in absolute terms and relative to consumption in the United States, if the orders were revoked.

D. Likely Price Effects of Cumulated Subject Imports

We have considered our findings regarding the price effects of subject imports in the original investigations, and likely price effects of subject imports in the first reviews.¹⁹⁹ In the original investigations, the Commission found that there was a moderate-to-high degree of substitutability between the domestic like product and cumulated subject imports and that

¹⁹⁷ CR/PR at Table 1.6.

¹⁹⁸ CR/PR at 1.42-1.43. Brazil continued its antidumping orders on non-oriented silicon steels originating in China, Germany, South Korea, and Taiwan in July 2019; the EU currently imposes safeguard measures on steel imports over the allowed quota amounts from China, Japan, South Korea, Sweden, and Taiwan; India has current antidumping orders on cold-rolled non-oriented electrical steel originating in China; and Taiwan imposed preliminary antidumping duty orders on cold-rolled NOES plates originating in China and South Korea in December 2025. *Id.*

¹⁹⁹ *Original Determinations*, USITC Pub. 4502 at 24-29; *First Reviews*, USITC Pub. 5140 at 34-36.

price was a significant factor in purchasing decisions.²⁰⁰ Cumulated subject imports undersold domestically produced NOES in 210 of 282 quarterly sales comparisons (74.4 percent), with underselling margins remaining substantial throughout the POI and ranging between 0.3 and 65.3 percent.²⁰¹ The Commission found the underselling to be significant.²⁰² It also found that because of pervasive underselling by subject imports, subject imports depressed prices for the domestic like product to a significant degree.²⁰³ The Commission concluded that, in light of the significant volume of subject imports, the substitutability of subject imports and domestic product, the significant underselling by subject imports, and the price depression caused by subject imports, subject imports had significant price effects.²⁰⁴

In the first full reviews, the Commission again found that there was a moderate-to-high degree of substitutability between the domestic like product and subject imports and that price played an important role in purchasing decisions.²⁰⁵ Pricing data collected by the Commission indicated cumulated subject imports undersold the domestic like product in 17 of 38 quarterly comparisons, or 44.7 percent of the time, with an average underselling margin of 13.4 percent.²⁰⁶ The Commission found that, in light of the underselling observed during the original POI and during the first POR with the orders in place, the significance of price in purchasing decisions, and the moderate-to-high degree of substitutability between the domestic like product and subject imports, significant underselling by cumulated subject imports was likely in

²⁰⁰ *Original Determinations*, USITC Pub. 4502 at 20, 24.

²⁰¹ *Original Determinations*, USITC Pub. 4502 at 24; *Original Determinations Confidential Report* at Table V-16

²⁰² *Original Determinations*, USITC Pub. 4502 at 25.

²⁰³ *Original Determinations*, USITC Pub. 4502 at 25-28.

²⁰⁴ *Original Determinations*, USITC Pub. 4502 at 29.

²⁰⁵ *First Reviews*, USITC Pub. 5140 at 34-35.

²⁰⁶ *First Reviews*, USITC Pub. 5140 at 35, Table V-10a.

the event of revocation.²⁰⁷ It also found that the likely significant quantities of low-priced subject imports that would likely enter the United States in the event of revocation would likely force the domestic industry to lower prices, forego price increases, or risk losing market share.

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

The record in these expedited five-year reviews does not contain recent product-specific pricing information. Based on the moderate-to-high degree of substitutability between subject imports and the domestic like product and the importance of price 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 and first reviews. The likely significant volumes of low-priced subject imports would force the domestic industry to lower prices or forego needed price increases, or else lose sales and market share to subject imports. Consequently, we find that if the orders were to be revoked, subject imports would likely have significant depressing and/or suppressing price effects within a reasonably foreseeable time.

E. Likely Impact of Cumulated Subject Imports

We have considered our findings regarding the impact of subject imports in the original investigations, and the likely impact of subject imports in subsequent reviews.²⁰⁹ The record in these five-year reviews contains limited information concerning the domestic industry's performance since the period examined in the last reviews.

²⁰⁷ *First Reviews*, USITC Pub. 5140 at 35.

²⁰⁸ *First Reviews*, USITC Pub. 5140 at 35.

²⁰⁹ *Original Determinations*, USITC Pub. 4502 at 29-36; *First Reviews*, USITC Pub. 5140 at 36-40.

The information available indicates that the domestic industry's performance in 2024 varied as compared to the prior proceedings, but its overall financial performance was generally ***.²¹⁰ Although the industry's capacity and production, at *** short tons and *** short tons, respectively, were higher in 2024 than at the end of the original period of investigation (2013) and the first review period (2019), its capacity utilization, at *** percent was lower than in 2013 and 2019.²¹¹ In 2024, the domestic industry's U.S. shipments by quantity, at *** short tons, were also lower than in 2013 and 2019.²¹² The average unit value ("AUV") of the domestic industry's U.S shipments in 2024, \$*** per short ton, was higher than in 2013 and 2019.²¹³ In 2024, the industry's net sales were the highest of any proceeding, at \$***. Its ratio of cost of goods sold ("COGS") to net sales in 2024, at *** percent, was lower than in 2013, but higher than in 2019 and its COGS in 2024, at \$***, was lower than in 2013 but higher than in 2019.²¹⁴ The domestic industry's operating income margin in 2024, at *** percent, was better than in 2013 and 2019.²¹⁵ The limited information on the record of these expedited reviews is insufficient for us to make a finding on whether the domestic industry is vulnerable to the

²¹⁰ CR/PR at Table 1.4.

²¹¹ CR/PR at Table 1.4. The industry's production capacity was *** short tons in 2013 and 2019. Its production was *** short tons in 2013 and *** short tons in 2019. *Id.* We note that the trade and financial data for 2013 and 2019 are representative of the only U.S. producer at that time, AK Steel (which is now owned by Cleveland-Cliffs). The data for 2024 are representative of U.S. producers Cleveland-Cliffs and U.S. Steel. *See* CR/PR at 1.19, n.53.

²¹² CR/PR at Table 1.4. The domestic industry's U.S. shipments by quantity were *** short tons in 2013 and *** short tons in 2019. *Id.* We note that domestic industry's U.S. shipments by value, at \$***, was also lower than in 2013, at \$***, and 2019, at \$***. *Id.*

²¹³ CR/PR at Table 1.5. The domestic industry's U.S. shipments AUV in 2013 was \$*** and in 2019 was \$***. *Id.*

²¹⁴ CR/PR at Table 1.4. The domestic industry's gross profit or loss was \$*** in 2013 and \$*** in 2019. The domestic industry's COGS to net sales was *** percent in 2013 and was *** percent in 2019. Its COGS value was \$*** in 2013 and \$*** in 2019. *Id.*

²¹⁵ CR/PR at Table 1.4. The domestic industry's operating income or loss to net sales ratio was *** percent in 2013 and *** percent in 2019. *Id.*

continuation or recurrence of material injury in the event of revocation of the orders.²¹⁶

Based on the information available on the record, we find that revocation of the orders would likely result in a significant volume of subject imports that would likely undersell the domestic like product to a significant degree. Given the moderate-to-high degree of substitutability between subject imports and the domestic like product and the importance of price to purchasers, significant volumes of low-priced subject imports would likely capture sales and market share from the domestic industry and/or force domestic producers to lower their prices or forgo needed price increases in order to maintain their sales, thereby depressing or suppressing prices for the domestic like product to a significant degree. The likely significant volume of subject imports and their likely price effects would negatively affect the domestic industry's capacity, production, capacity utilization, shipments, and market share, which would in turn negatively impact the industry's profitability and employment. Consequently, we conclude that if the orders were revoked, cumulated subject imports 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 the presence of nonsubject imports. Although nonsubject imports' share of the NOES market was substantial, their presence in the U.S. market would not preclude subject imports from taking market share from the domestic industry, the largest supplier of NOES to the U.S. market, or

²¹⁶ Commissioner Kearns continues to find the industry vulnerable as the Commission did in the first review. Despite the entry of U.S. Steel in 2023 and somewhat higher prices prevailing in 2024 as compared to prior periods, the domestic industry's capacity utilization was *** percent in 2024. CR/PR at Table 1.4. This was not due to the added capacity from U.S. Steel; domestic production of *** short tons in 2024 divided by the capacity of *** short tons in 2019 before entry of U.S. Steel still did not reach 60 percent. See CR/PR at Table 1.4. The domestic industry's COGS/net sales ratio was *** percent and the industry *** in 2024. CR/PR at Table 1.4.

forcing the domestic industry to lower its prices to compete if the orders were revoked. Consequently, as we have in prior proceedings, 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 also note that apparent U.S. consumption of NOES was lower, by *** percent, in 2024 than in 2019.²¹⁷ Given that subject imports and the domestic like product are highly substitutable, and that price is important in purchasing decisions, declining U.S. demand for NOES would not prevent low-priced subject imports from being significant after revocation of the orders but rather a declining market would exacerbate the likely adverse impact of subject imports on the domestic industry.

In sum, we conclude that if the orders were revoked, cumulated subject imports of NOES from China, Germany, Japan, South Korea, Sweden, and Taiwan would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

V. Conclusion

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

²¹⁷ *Calculated from CR/PR at Table 1.6.*

Information obtained in these reviews

Background

On December 1, 2025, the U.S. International Trade Commission (“Commission”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),¹ that it had instituted reviews to determine whether revocation of countervailing duty orders on non-oriented electrical steel (“NOES”) from China and Taiwan and revocation of the antidumping duty orders on NOES from China, Germany, Japan, South Korea, Sweden, and Taiwan would likely 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 NOES: Information relating to the background and schedule of this proceeding

Effective date	Action
November 3, 2025	Notice of initiation by Commerce (90 FR 55086, December 1, 2025)
November 3, 2025	Notice of institution by Commission (90 FR 55159, December 1, 2025)
March 6, 2026	Commission’s vote on adequacy
April 14, 2026	Commerce’s results of its expedited reviews
May 8, 2026	Commission’s determinations and views

¹ 19 U.S.C. 1675(c).

² 90 FR 55159, December 1, 2025. In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. 90 FR 55086, December 1, 2025. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission’s website (www.usitc.gov).

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

⁴ Interested parties were also requested to provide a list of three to five leading purchasers in the U.S. market for the domestic like NOES 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 September 30, 2013 with Commerce and the Commission by AK Steel Corp. (“AK Steel”), West Chester, Ohio.⁵ On October 14, 2014, Commerce determined that imports of NOES from China, Germany, Japan, South Korea, Sweden, and Taiwan were being sold at less than fair value (“LTFV”) and subsidized by the governments of China and Taiwan.⁶ On October 14, 2014, Commerce made a final negative countervailing duty determination concerning imports of NOES from South Korea.⁷ The Commission accordingly terminated the countervailing duty investigation concerning NOES from South Korea, effective October 14, 2014.⁸ The Commission determined on November 25, 2014 that the domestic industry was materially injured by reason of LTFV imports of NOES from China, Germany, Japan, South Korea, Sweden, and Taiwan and subsidized imports of NOES from China and Taiwan.⁹ On December 3, 2014, Commerce issued its antidumping duty orders with final weighted-average dumping margins of 407.52 percent for China, 6.88 percent for South Korea, and ranging from 86.29 to 98.84 percent for Germany, 135.59 to 204.79 percent for Japan, 98.46 to 126.72 percent for Sweden, and 27.54 to 52.23 percent for Taiwan, and its countervailing duty orders with net subsidy rates of 158.88 percent for China and ranging from 8.80 to 17.12 percent for Taiwan.¹⁰

⁵ Non-Oriented Electrical Steel from China, Germany, Japan, South Korea, Sweden, and Taiwan, Inv. Nos. 701-TA-506 and 508 and 731-TA-1238-1243 (Final), USITC Publication 4502, November 2014 (“Original publication”), p. 1.1.

⁶ 79 FR 61602, 79 FR 61607, 79 FR 61609, 79 FR 61612, and 79 FR 61614, October 14, 2014.

⁷ 79 FR 61605, October 14, 2014.

⁸ 79 FR 64408, October 29, 2014.

⁹ 79 FR 71446, December 2, 2014. 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 antidumping duty orders on imports from China, Germany, Japan, and Sweden, and the countervailing duty order on imports from China.

¹⁰ 79 FR 71741 and 79 FR 71749, December 3, 2014. Because China Steel Corporation and its cross-owned affiliates Dragon Steel Corporation, HiMag Magnetic Corporation, and China Steel Global Trading Corporation (collectively, CSC Companies) received a de minimis net subsidy rate in Commerce’s final affirmative countervailing duty determination with respect to imports of NOES from Taiwan, they were excluded from Commerce’s Taiwan CVD order. 79 FR 61602, October 14, 2014.

The first five-year reviews

On February 4, 2020, the Commission determined that it would conduct full reviews of the antidumping orders on NOES from China, Germany, Japan, South Korea, Sweden, and Taiwan and the countervailing duty orders on NOES from China and Taiwan.¹¹ On February 27, 2020, Commerce determined that revocation of the antidumping duty orders on NOES from China, Germany, Japan, South Korea, Sweden, and Taiwan and the countervailing duty order on NOES from China would be likely to lead to continuation or recurrence of dumping and subsidization.¹² On March 6, 2020, Commerce determined that revocation of the countervailing duty order on NOES from Taiwan would be likely to lead to continuation or recurrence of subsidization.¹³ On December 10, 2020, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.¹⁴ Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective December 23, 2020, Commerce issued a continuation of the antidumping duty orders on imports of NOES from China, Germany, Japan, South Korea, Sweden, and Taiwan and the countervailing duty orders on imports of NOES from China and Taiwan.¹⁵

Previous and related investigations

NOES has not been the subject of any prior related antidumping or countervailing duty investigations in the United States. However, the Commission has conducted investigations regarding grain-oriented electrical steel (GOES).

In 1993, GOES was the subject of antidumping and countervailing duty investigations with respect to imports from Italy and Japan. Following affirmative determinations by Commerce¹⁶ and the Commission,¹⁷ a countervailing duty order covering U.S. imports of GOES from Italy was published on June 7, 1994, an antidumping duty order was published on U.S. imports of GOES from Japan on June 10, 1994, and an antidumping duty order was published on imports of GOES from Italy on August 12, 1994.¹⁸

¹¹ 85 FR 8325, February 13, 2020.

¹² 85 FR 11337 and 85 FR 11339, February 27, 2020.

¹³ 85 FR 13135, March 6, 2020.

¹⁴ 85 FR 81486, December 16, 2020.

¹⁵ 85 FR 83890, December 23, 2020.

¹⁶ 59 FR 74, April 18, 1994; 59 FR 79, April 25, 1994; and 59 FR 126, July 1, 1994.

¹⁷ 59 FR 158, August 17, 1994.

¹⁸ 59 FR 108, June 7, 1994; 59 FR 111, June 10, 1994; and 59 FR 155, August 12, 1994.

On December 1, 1999, Commerce initiated and the Commission instituted the first five year reviews of the antidumping and countervailing duty orders on GOES from Italy and Japan. The Commission determined that revocation of the countervailing duty order on imports of GOES from Italy and revocation of the antidumping duty orders on imports of GOES from Italy and Japan would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.¹⁹ On March 14, 2001, Commerce published a notice of the continuation of the antidumping and countervailing duty orders.²⁰

On February 1, 2006, Commerce initiated and the Commission instituted the second five-year reviews of the antidumping and countervailing duty orders.²¹ Due to the domestic industry's decision not to participate in the reviews,²² the antidumping and countervailing duty orders on GOES from Italy and Japan were revoked effective March 14, 2006.²³

In 2013, GOES was the subject of antidumping and countervailing duty investigations with respect to imports from China, Czech Republic, Germany, Japan, South Korea, Poland, and Russia. On August 27, 2014, the Commission found an industry in the United States was not materially injured or threatened with material injury, and the establishment of an industry in the United States was not materially retarded, by reason of imports from Germany, Japan, and Poland of GOES, found by Commerce²⁴ to be sold in the United States at LTFV.²⁵ On October 23, 2014, the Commission found that an industry in the United States was not materially injured or threatened with material injury, and the establishment of an industry in the United States was not materially retarded, by reason of imports from China, Czech Republic, South Korea, and Russia of GOES, found by Commerce²⁶ to be sold in the United States at LTFV and subsidized by the government of China.²⁷

¹⁹ 66 FR 12958, March 1, 2001.

²⁰ 50 FR 14889, March 14, 2001.

²¹ 70 FR 5243, February 1, 2006; and 70 FR 5376, February 1, 2006.

²² Grain-Oriented Electrical Steel from Germany, Japan, and Poland, Inv. Nos. 731-TA-1233, 1234, and 1236 (Final), USITC Publication 4491, September 2014, p. 1.9.

²³ 59 FR 15376, March 28, 2006.

²⁴ 79 FR 42501, July 22, 2014.

²⁵ 79 FR 54744, September 12, 2014.

²⁶ 79 FR 58324, September 29, 2014; 79 FR 59226, October 1, 2014; 79 FR 59224, October 1, 2014; 79 FR 59223, October 1, 2014; and 79 FR 59221, October 1, 2014.

²⁷ 79 FR 66739, November 10, 2014.

Commerce's five-year reviews

Commerce announced that it would conduct expedited reviews with respect to the orders on imports of NOES from China, Germany, Japan, South Korea, Sweden, and Taiwan with the intent of issuing the final results of these reviews based on the facts available not later than April 14, 2026.²⁸ 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/or countervailing duty orders on imports of NOES from China, Germany, Japan, South Korea, Sweden, and Taiwan are noted in the sections titled "The original investigations" and "U.S. imports," if applicable.

²⁸ Letter from Alex Villanueva, Senior Director, Office I, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, February 18, 2026, updating previous letter sent January 23, 2026

Product

Commerce's scope

Commerce has defined the scope as follows:

The merchandise subject to the *Orders* consists of non-oriented electrical steel (NOES), which includes cold-rolled, flat-rolled, alloy steel products, whether or not in coils, regardless of width, having an actual thickness of 0.20 mm or more, in which the core loss is substantially equal in any direction of magnetization in the plane of the material. The term “substantially equal” means that the cross-grain direction of core loss is no more than 1.5 times the straight grain direction (*i.e.*, the rolling direction) of core loss. NOES has a magnetic permeability that does not exceed 1.65 Tesla when tested at a field of 800 A/m (equivalent to 10 Oersteds) along (*i.e.*, parallel to) the rolling direction of the sheet (*i.e.*, B800 value). NOES contains by weight more than 1.00 percent of silicon but less than 3.5 percent of silicon, not more than 0.08 percent of carbon, and not more than 1.5 percent of aluminum. NOES has a surface oxide coating, to which an insulation coating may be applied.

NOES is subject to the *Orders* whether it is fully processed (*i.e.*, fully annealed to develop final magnetic properties) or semi-processed (*i.e.*, finished to final thickness and physical form but not fully annealed to develop final magnetic properties). Fully processed NOES is typically made to the requirements of ASTM specification A 677, Japanese Industrial Standards (JIS) specification C 2552, and/or International Electrotechnical Commission (IEC) specification 60404-8-4. Semi-processed NOES is typically made to the requirements of ASTM specification A 683. However, the scope of the *Orders* is not limited to merchandise meeting the ASTM, JIS, and IEC specifications noted immediately above.

NOES is sometimes referred to as cold-rolled non-oriented (CRNO), non-grain oriented (NGO), non-oriented (NO), or cold-rolled non-grain oriented (CRNGO) electrical steel. These terms are interchangeable.

Excluded from the scope of the *Orders* are flat-rolled products not in coils that, prior to importation into the United States, have been cut to a shape and undergone all punching, coating, or other operations necessary for classification in Chapter 85 of the Harmonized Tariff Schedule of the United States (HTSUS) as a part (*i.e.*, lamination) for use in a device such as a motor, generator, or transformer.²⁹

Tariff treatment

NOES is provided for in Harmonized Tariff Schedule of the United States (“HTS”) subheadings 7225.19.00, 7226.19.10, and 7226.19.90. The general rate of duty is “Free” for these HTS subheadings.³⁰ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Below is a summary of additional tariffs applied to the product during the period of review. See table 1.2 for a summary of additional tariffs in place as of January 16, 2026.

Section 232 tariffs

NOES originating in China, Germany, Japan, South Korea, Sweden, and Taiwan is subject to an additional 50 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended.³¹

²⁹ 85 FR 83890, December 23, 2020.

³⁰ The subject merchandise in this proceeding may also be imported under HTS statistical reporting numbers 7225.50.8080, 7225.99.0090, 7226.92.5000, 7226.92.7050, 7226.92.8050, or 7226.99.0180. USITC, HTS (2026) Revision 3, Publication 5705, February 2026, pp. 72.39 to 72.41.

³¹ Effective March 23, 2018, steel articles originating in China and Taiwan became subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended. Effective June 4, 2025, this section 232 rate of duty increased to 50 percent. The duty is applied to the declared value of the steel content of the product if the product is classified in chapter 73 of the HTS; if the product is not classified in chapter 73, the duty is applied to the full value of the product.

Effective June 1, 2018, steel articles originating in Germany, Sweden, and other European Union (“EU”) member countries were subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended. Effective January 1, 2022, steel articles originating in EU

(continued...)

Section 301 tariffs

Effective September 1, 2019, NOES originating in China was 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 NOES was reduced to 7.5 percent. Effective September 27, 2024, the additional section 301 duty for NOES originating in China increased to 25 percent.³²

(...continued)

member countries became subject to tariff-rate quotas (“TRQs”), and imports that exceeded the TRQ limits became subject to the section 232 duties. Effective March 12, 2025, the TRQs for EU member countries were terminated and steel articles originating in EU member countries were subject to an additional 25 percent ad valorem duty under section 232. Effective June 4, 2025, this section 232 rate of duty increased to 50 percent. The duty is applied to the declared value of the steel content of the product if the product is classified in chapter 73 of the HTS; if the product is not classified in chapter 73, the duty is applied to the full value of the product.

Effective March 23, 2018, steel articles originating in Japan were subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended. Effective April 1, 2022, steel articles originating in Japan became subject to tariff-rate quotas (“TRQs”), and imports that exceeded the TRQ limits became subject to the section 232 duties. Effective March 12, 2025, the TRQs for Japan were terminated and steel articles originating in Japan were subject to an additional 25 percent ad valorem duty under section 232. Effective June 4, 2025, this section 232 rate of duty increased to 50 percent. The duty is applied to the declared value of the steel content of the product if the product is classified in chapter 73 of the HTS; if the product is not classified in chapter 73, the duty is applied to the full value of the product.

Effective June 1, 2018, steel articles originating in South Korea were subject to annual absolute import quotas under section 232 of the Trade Expansion Act of 1962, as amended. Following the termination of the absolute import quotas, effective March 12, 2025, steel articles originating in South Korea were subject to an additional 25 percent ad valorem duty under section 232. Effective June 4, 2025, this section 232 rate of duty increased to 50 percent. The duty is applied to the declared value of the steel content of the product if the product is classified in chapter 73 of the HTS; if the product is not classified in chapter 73, the duty is applied to the full value of the product.

83 FR 11625, March 15, 2018; 83 FR 13361, March 28, 2018; 87 FR 19351, April 1, 2022; 83 FR 20683, May 7, 2018; 87 FR 11, January 3, 2022; 89 FR 227, January 3, 2024; 90 FR 9817, February 18, 2025; and 90 FR 24199, June 9, 2025. See also HTS heading 9903.81.87 and U.S. note 16(j) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 3, Publication 5705, February 2026, pp. 99.3.59 and 99.3.440.

³² 84 FR 45821, August 30, 2019; 85 FR 3741, January 22, 2020; and 89 FR 76581, September 18, 2024. See also HTS heading 9903.91.01 and U.S. notes 31(a) and 31(b) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 3, Publication 5705, February 2026, pp. 99.3.332 to 99.3.335, and 99.3.467.

Tariffs initiated under the International Emergency Economic Powers Act (“IEEPA”)³³

Country specific IEEPA tariffs

Effective February 4, 2025, NOES originating in China was 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. However, effective November 10, 2025, that additional duty was reduced back to 10 percent.³⁴

Tariffs initiated in April 2025 under IEEPA

NOES and other steel articles originating in China, Germany, Japan, South Korea, Sweden, and Taiwan are not subject to tariffs initiated in April 2025 under IEEPA.³⁵

³³ Multiple tariffs have been enacted under the authority of the International Emergency Economic Powers Act (“IEEPA”), including tariffs that apply to countries that may not be subject in this proceeding. Tariffs specific to Canada, China, and Mexico were initiated in February 2025. Tariffs initiated in April 2025 under IEEPA were applied globally. Tariffs specific to Brazil were initiated in July 2025. Tariffs specific to India were initiated in August 2025. Tariffs under IEEPA have been amended over time. On February 20, 2026, the Supreme Court held that IEEPA does not authorize the President to impose tariffs. See *Learning Resources Inc. v. Trump*, No. 24-1287, 2026 WL 477534, 607 ___ U.S. (2026).

³⁴ 90 FR 9121, February 7, 2025; 90 FR 11426, March 6, 2025; 90 FR 11463, March 7, 2025; and 90 FR 50725, November 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 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 3, Publication 5705, February 2026, pp. 99.3.4 to 99.3.5, and 99.3.366 to 99.3.367.

³⁵ Articles subject to section 232 tariffs, including PC strand, are not subject to the tariffs initiated in April 2025 under IEEPA. 90 FR 15041, April 7, 2025. See also HTS headings 9903.01.25 and 9903.01.33 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 3, Publication 5705, February 2026, pp. 99.3.13, 99.3.367, and 99.3.369.

Table 1.2 NOES: Additional tariffs on imports from China, Germany, Japan, South Korea, Sweden, and Taiwan as of January 16, 2026

Duty rates in percent, ad valorem; NA is not applicable.

Additional tariff	China	Germany	Japan	South Korea	Sweden	Taiwan
Section 232	50	50	50	50	50	50
Section 301	25	NA	NA	NA	NA	NA
IEEPA – Country specific	10	NA	NA	NA	NA	NA
IEEPA - initiated April 2025	NA	NA	NA	NA	NA	NA
Total additional ad valorem rate	85	50	50	50	50	50

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

Note: For the purposes of this table, “not applicable” is shown as “NA.” This applies when the subject product from that subject trade partner is not subject to the tariff for any reason.

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 uses³⁶

NOES is a flat-rolled, silicon alloy steel mill product developed as a highly energy efficient raw material specifically for manufacturing the individually cut-to-shape laminations (layers) for subsequent stacking together into laminated electro-magnetic cores for alternating current (“AC”) electrical equipment components.³⁷ NOES is characterized as having magnetic properties that are similar in all directions, i.e., with a non-oriented granular structure, in contrast to grain-oriented electrical steel (“GOES”), with superior magnetic properties along the lengthwise direction of the elongated granular structure of the sheet, but less favorable

³⁶ Unless otherwise noted, this information is based on the original publication, pp. 1.10 to 1.11; and Non-oriented Electrical Steel (NOES) from China, Germany, Japan, South Korea, Sweden, and Taiwan (First Review), USITC Publication 5140, December 2020 (“First review publication”), pp. 1.20 to 1.23.

³⁷ Electromagnetic cores can become more energy efficient (with less energy lost as heat) by restricting eddy currents, minimizing hysteresis, and enhancing permeability of the steel. Eddy (stray electrical) currents in the magnetic field generated by the electrical current flow can be restricted by constructing the magnetic core from stacked laminations and by alloying the steel with silicon, aluminum, and manganese to increase its electrical resistance. Hysteresis (misalignment of the magnetization/demagnetization cycle phases of the core material subject to AC current flow) can be minimized by utilizing steels with large grain size; having very low carbon contents; and that are relatively free of oxide, nitride, and sulfide contaminants. High-permeability (magnetization efficiency) steels that provide greater flux density (magnetic force) to magnetic field strength require less electrical current (and generate lesser heat losses) to provide a given magnetic force. For more information, see: U.S. Steel Corp., “Cold-Rolled Coil, Motor Lamination Sheet,” ©2025, <https://www.ussteel.com/customers/products/cold-rolled-coil>, retrieved January 26, 2026.

properties in other directions. Thus, NOES is used primarily to produce laminations for which the direction of the magnetic flux in the electrical device is constantly changing, for example in rotating machinery such as motors and generators, whereas GOES is used primarily in static equipment, such as transformers, for which the laminations can take advantage of the favorable directionality of the steel. NOES is also used in small static devices, such as small, low-voltage transformers and fluorescent lighting ballasts (current regulators), when the higher cost of GOES cannot be justified by potential savings from improved energy efficiency. Figures 1.1 to 1.3 present images for the description and use of NOES in electric motors.

Figure 1.1 NOES: End-use applications overview

NOES PRODUCTS

- Non-grain-oriented Electrical Steel (NOES)
 - Used in rotating applications, such as motors and generators
 - Magnetic properties are virtually the same in all directions
 - Smaller grains (better strength than GOES)

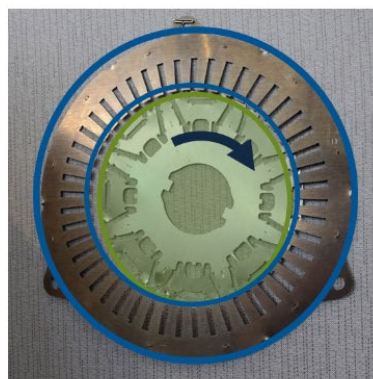


Source: Christopher Jones, “NOES for EV Applications,” American Iron & Steel Institute (“AISI”), Great Designs in Steel Symposium (“GDIS”)™ 2023, Novi, Michigan, June 2023, p. 8, <https://www.steel.org/wp-content/uploads/2023/06/Track-2-Session-10-Jones-Cleveland-Cliffs-Inc.pdf>.

Figure 1.2 NOES: Use of NOES in electric motor components

ELECTRIC MOTOR BASICS

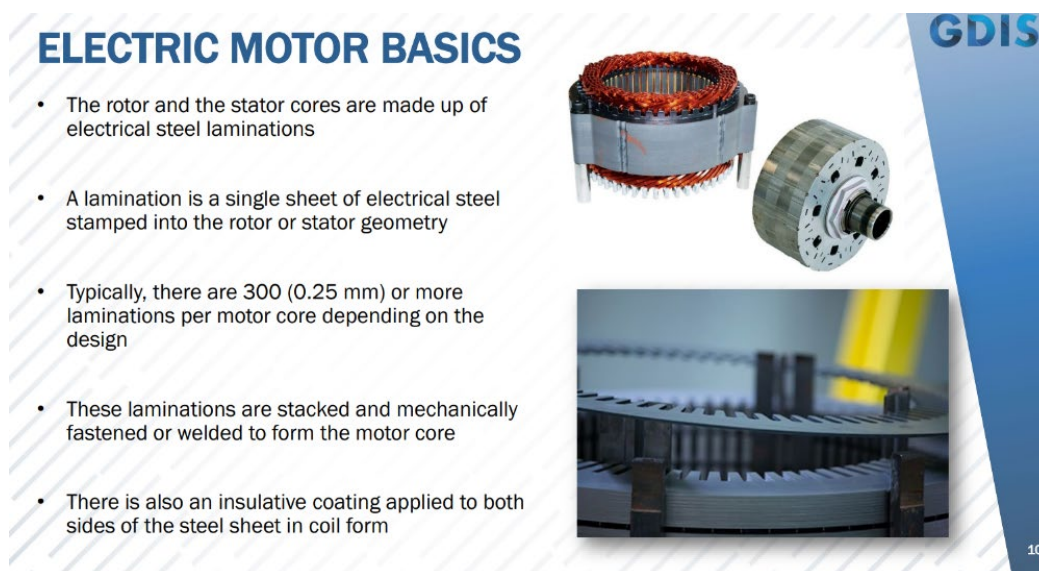
- Rotor
 - Rotating part of the motor
 - Magnets are placed or cast into the rotor core (PM motor)
- Stator
 - Stationary part of the motor
 - A copper winding is wound through the slots
 - When current is applied to the winding this induces a magnetic field resulting in the rotor rotating



9

Source: Christopher Jones, “NOES for EV Applications,” AISI, Great Designs in Steel Symposium (“GDIS”)™ 2023, Novi, Michigan, June 2023, p. 9, <https://www.steel.org/wp-content/uploads/2023/06/Track-2-Session-10-Jones-Cleveland-Cliffs-Inc.pdf>.

Figure 1.3 NOES: Use of NOES in electric motors



Source: Christopher Jones, “NOES for EV Applications,” AISI, Great Designs in Steel Symposium (“GDIS”)™ 2023, Novi, Michigan, June 2023, p. 10, <https://www.steel.org/wp-content/uploads/2023/06/Track-2-Session-10-Jones-Cleveland-Cliffs-Inc.pdf>.

NOES is available from steel mills either as coils or in straight lengths. Two types of NOES are distinguishable by their degree of annealing: fully processed NOES, which is final-annealed by the producer; and semi-processed NOES, which, although annealed by the producer, must be re-annealed by the consumer after being formed into laminations³⁸ to achieve its potential magnetic properties.³⁹ According to domestic interested party Cleveland-Cliffs, both domestic and subject NOES have the same physical and performance characteristics and are produced to the same technical and performance standards,⁴⁰ including ASTM International,⁴¹ proprietary, and international specifications.⁴²

³⁸ Laminations are produced from NOES by stamping or sometimes by laser cutting.

³⁹ Flattening, stamping, or shearing NOES into individual laminations introduces strains within the steel that impede its magnetic properties. Annealing the laminations removes these accumulated strains and restores the potential magnetic properties.

⁴⁰ Domestic interested party Cleveland-Cliffs’ response to the notice of institution, p. 14.

⁴¹ Specification ASTM A677 covers fully processed types and ASTM A683 covers semi-processed types of NOES. Both specify properties for NOES of the commonly produced thicknesses of 0.0185 inch and 0.025 inch. ASTM A677 also specifies the properties for 0.014-inch thick material. ASTM International, “ASTM A677-16 – Standard Specification for Nonoriented Electrical Steel, Fully Processed Types,” December 27, 2023, <https://store.astm.org/a0677-16.html>; “ASTM A683-16 – Standard Specification for Nonoriented Electrical Steel, Semiprocessed Types,” December 27, 2023, <https://store.astm.org/a0683-16.html>.

⁴² International standards are similar to ASTM standards.

As defined by the scope, NOES contains by weight more than 1.00 percent but less than 3.5 percent of silicon, with aluminum usually added in lesser amounts. Both silicon and aluminum increase the electrical resistivity of steel, resulting in lower loss of energy in finished motors or other electrical devices produced using NOES.⁴³

Manufacturing process⁴⁴

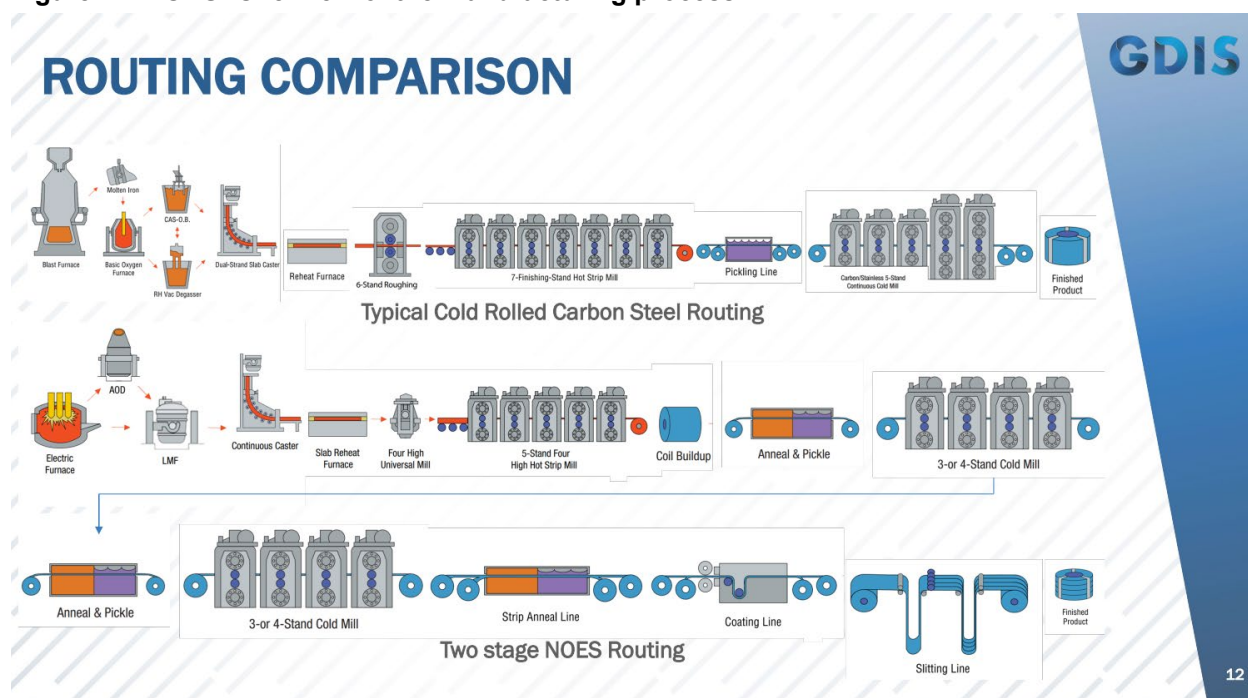
The manufacturing process for NOES is shown in figure 1.4. Both the domestic and the subject foreign producers generally used similar manufacturing processes to produce NOES. Moreover, some domestic producers also use the same melting, casting, and hot-rolling equipment to produce NOES for other types of steel as well, including GOES, stainless steels, and carbon steels. Manufacturing begins with melting of steel in either an electric-arc furnace (“EAF”) or a basic oxygen furnace (“BOF”). The molten steel is transferred to a refining ladle where it undergoes additional processing such as argon-oxygen refining, ladle metallurgy treatment, and vacuum degassing. These steps refine the chemistry of the molten steel by reducing undesirable contaminants. Silicon, aluminum, and other alloying metals are imparted as ferroalloys. The refined molten steel is then continuously cast and cut into slabs. Individual slabs are reheated in a furnace prior to being passed through a roughing stand and then through the successive hot-rolling stands of a continuous hot-strip mill to produce hot-rolled coils. An alternative to this batch process is an “endless casting and rolling line” that integrates casting and hot rolling into a continuous process. It is also more energy efficient by eliminating the need to reheat cut slabs.⁴⁵

⁴³ For more information, see: U.S. Steel Corp., “Cold-Rolled Coil, Motor Lamination Sheet,” ©2025, <https://www.ussteel.com/customers/products/cold-rolled-coil>, retrieved January 26, 2026.

⁴⁴ Unless otherwise noted, this information is based on the original publication, pp. 1.11 to 1.13; and the first review publication, pp. 1.23 to 1.25.

⁴⁵ U.S. Steel’s new technologically advanced, EAF steelmaking and flat-rolling and finishing “BRS-2” facility being constructed at its existing Big River Steel (“BRS”) facility site located in Osceola, Arkansas, includes such an endless casting and rolling line. U.S. Steel, “Next Generation Steel Mill,” ©2025, <https://www.ussteel.com/media/next-generation-steel-mill>, accessed January 27, 2026; Daniel Brown, “The Next Generation of American Steelmaking is BIG and Well Underway,” U.S. Steel, December 15, 2025, <https://www.ussteel.com/w/the-next-generation-of-american-steelmaking-is-big-and-well-underway>; Juergen Scholler, Carlo Piemonte, and Christoph Fellner, “Revolutionizing Rolled Materials: Endless Hot Rolled Coil (eHRC) from Arvedi ESP,” Primemetals Technologies, January 15, 2026, <https://www.primemetals.com/en/metals-magazine/revolutionizing-rolled-materials-endless-hot-rolled-coil>.

Figure 1.4 NOES: Overview of the manufacturing process



Source: Christopher Jones, "NOES for EV Applications," AISI, Great Designs in Steel Symposium ("GDIS")™ 2023, Novi, Michigan, June 2023, p. 12, <https://www.steel.org/wp-content/uploads/2023/06/Track-2-Session-10-Jones-Cleveland-Cliffs-Inc.pdf>.

All subsequent coil processing steps are performed on continuous processing lines for which the coils are uncoiled, passed through the processing lines, and recoiled after processing. The first step of coil processing is annealing and cleaning. Next, the coils are rolled to ordered thickness on a cold-rolling mill.⁴⁶ Then, the coils are annealed for the final time on a continuous annealing line using a controlled, decarburizing atmosphere that results in a tightly adherent surface oxide to prevent the laminations from sticking to one another and to increase the electrical resistance between laminations. Fully processed NOES is usually provided with an applied coating (called "coreplate") to increase further the electrical resistance between adjacent laminations.⁴⁷ Finally, the coils may be slit to ordered width.

⁴⁶ In some cases, to produce very thin product, coils may be initially cold-rolled to an intermediate thickness, annealed, and then cold-rolled again to the desired thickness.

⁴⁷ Several types of coatings are applied to NOES in a continuous process and are cured by heating. An organic varnish/enamel coating is most common for fully processed NOES. However, such a coating will not withstand later stress-relief annealing temperatures. If fully processed NOES is to be stress-relief annealed by the customer after stamping, the applied coating may be inorganic or mostly inorganic with certain ceramic fillers or film-forming inorganic components added to increase the surface insulating ability. Semi-processed NOES usually includes a thin inorganic coating, often referred to as "anti-stick." ASTM International, "ASTM A976-18 – Standard Classification of Insulating Coatings for Electrical Steels

(continued...)

Because NOES is produced in a wider width than that needed by the end user, virtually all NOES is slit— i.e., cut into one or more coils of narrower width— before it is consumed. Slitting may be performed either by the steel producer or by the purchaser.⁴⁸ Purchasers that complete this step include firms that specialize in laminating and stamping, while certain purchasers in the automotive industry (e.g., original equipment manufacturers of vehicle motors) may complete this stage themselves. If a producer of NOES is certified as an approved supplier by an automotive OEM, the producer could supply NOES directly to stampers/laminators that have been selected by the OEM as part of the approved supply chain.

(...continued)

by Composition, Relative Insulating Ability and Application,” October 30, 2018, <https://store.astm.org/a0976-18.html>; Cynthia A. Gosselin, “Coatings Xperience: Coatings for the Electrification Revolution,” American Coatings Association (“ACA”), ©2026, <https://www.paint.org/coatingstech-magazine/articles/coatings-xperience-coatings-for-the-electrification-revolution>, retrieved January 26, 2026.

⁴⁸ NOES may also be flattened and sheared into rectangular sheets for further processing. Such rectangular or other straight-length forms that have not been cut into the shape of laminations are included within the scope.

The industry in the United States

U.S. producers

During the final phase of the original investigations, the Commission received a U.S. producer questionnaire from AK Steel, the sole domestic producer of NOES in the United States in 2013.⁴⁹ During the first five-year reviews, the Commission received a U.S. producer questionnaire from AK Steel, which is believed to have accounted for all U.S. production of NOES in 2019.⁵⁰

In response to the Commission's notice of institution in these current reviews, domestic interested parties provided a list of two known and currently operating U.S. producers of NOES. Two firms providing U.S. industry data in response to the Commission's notice of institution are believed to account for all known production of NOES in the United States during 2024.⁵¹

Recent developments

Table 1.3 presents events in the U.S. industry since the Commission's last five-year reviews.⁵²

Table 1.3 NOES: Developments in the U.S. industry

Item	Firm	Event
Acquisition	Cleveland-Cliffs, AK Steel	March 2020— Cleveland-Cliffs became a domestic producer of NOES after completing its \$1.1-billion acquisition of AK Steel, including its facilities located in Butler, Pennsylvania, Ohio, and Zanesville, Ohio, that respectively produced and finished NOES.
Acquisition	Cleveland-Cliffs, AMUSA	December 2020— Cleveland-Cliffs completed its \$1.4-billion acquisition of the flat-rolled steel facilities of ArcelorMittal USA LLC ("AMUSA"), including the Indiana Harbor facility located in East Chicago, Indiana, that produces NOES motor laminations.
Acquisition	U.S. Steel, BRS	January 2021— U.S. Steel completed its \$774-million acquisition of Big River Steel ("BRS") LLC, with its technologically advanced flat-rolling facilities for carbon and alloy steels (but not yet NOES), located in Osceola, Alabama.
New product	U.S. Steel	March 2023— U.S. Steel launched its new wide-width, ultra-thin, and light-weight InduX™ brand NOES designed specifically for the U.S.

⁴⁹ Original publication, p. 3.1.

⁵⁰ First review publication, p. 1.26.

⁵¹ Domestic interested party Cleveland-Cliffs' response to the notice of institution, December 23, 2025, p. 45; and domestic interested party U.S. Steel's response to the notice of institution, December 31, 2025, p. 31.

⁵² For recent developments, if any, in tariff treatment, please see "U.S. tariff treatment" section.

Item	Firm	Event
		electric vehicle market and GOES for the U.S. generator and transformer market.
New production line	U.S. Steel	October 2023— U.S. Steel initiated a new \$450 million NOES production line, with an annual production capacity of 200,000 short tons at BRS. NOES production reportedly commenced in the fourth quarter of 2024.
New facility	AMUSA	February 2025— AMUSA announced a \$1.2 billion investment to construct a new NOES facility in Calvert, Alabama, with annual production capacity of 150,000 metric tons (165,347 short tons). Construction is reportedly on schedule, commencing in the second half of 2025, with production anticipated to commence in 2027. This new facility is located near AMUSA's existing ArcelorMittal Calvert flat-rolling facility for carbon and alloy steels (but not NOES), in which ArcelorMittal acquired full ownership from its former joint-venture partner, Nippon Steel Corp. ("NSC"), in June 2025.
Acquisition	U.S. Steel, NSC	June 2025— NSC completed its acquisition of U.S. Steel, which will operate as a subsidiary of Nippon Steel North America ("NSNA") Inc. According to the national security agreement with the U.S. government required for granting regulatory approval, U.S. Steel will retain its corporate name as a U.S.-incorporated entity, have U.S. citizens as senior corporate managers and a majority of the corporate board of directors, and maintain its production capacity to supply steel from its U.S. facilities to meet domestic market demand. NSC will provide \$11 billion in new investments in U.S. Steel by 2028 and not interfere with U.S. Steel's ability to pursue trade action under U.S. law.
New facility	U.S. Steel	Late 2025— U.S. Steel broke ground to construct a technologically advanced, electric-arc furnace ("EAF") steelmaking and flat-rolling and finishing "BRS-2" facility at its existing BRS facility site. This \$3-billion investment project will feature an annual steelmaking capacity of 3 million short tons per year, an endless casting and rolling line, advanced finishing capabilities, and a NOES line.

Source: Cleveland-Cliffs, "Cleveland-Cliffs to Acquire AK Steel," News Release, December 3, 2019, <https://www.clevelandcliffs.com/news/news-releases/detail/50/cleveland-cliffs-to-acquire-ak-steel>;
Cleveland-Cliffs, "Cleveland-Cliffs Completes Acquisition of AK Steel," News Release, March 13, 2020, <https://www.clevelandcliffs.com/news/news-releases/detail/35/cleveland-cliffs-completes-acquisition-of-ak-steel>;
Cleveland-Cliffs, "Fact Sheet: Butler Works," ©2026, https://d1io3yog0oux5.cloudfront.net/_da354bb91f25dc5119665a753b2b34ad/clevelandcliffs/db/1170/10179/fact_sheet/CC_FactSheet_ButlerWorks_092025.pdf, retrieved January 28, 2026;
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Cleveland-Cliffs, "Cleveland-Cliffs Inc. Completes Acquisition of ArcelorMittal USA," News Release, December 9, 2020, <https://www.clevelandcliffs.com/news/news-releases/detail/8/cleveland-cliffs-inc-completes-acquisition-of>;

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U.S. Steel, "U.S. Steel Completes Acquisition of Big River Steel," Press Release, January 15, 2021, <https://www.ussteel.com/media/newsroom/-/blogs/united-states-steel-corporation-completes-big-river-steel-acquisition>;

U.S. Steel, "U.S. Steel Introduces InduX™ Electrical Steel at Ceres Global," Press Release, March 23, 2023, <https://www.ussteel.com/prereleases/-/blogs/u-s-steel-introduces-indux-electrical-steel-at-ceres-global>;

U.S. Steel, "U.S. Steel Celebrates Launch of New Electrical Steel Line with Ribbon Cutting in Osceola, Arkansas," Press Release, October 12, 2023, <https://www.ussteel.com/media/newsroom/-/blogs/u-s-steel-celebrates-launch-of-new-electrical-steel-line-with-ribbon-cutting-in-osceola-arkansas>;

Fitch Ratings online, "Fitch Affirms U.S. Steel at 'BB' and Removes Ratings Watch – Positive Outlook States," January 7, 2025, <https://www.fitchratings.com/research/corporate-finance/fitch-affirms-u-s-steel-at-bb-removes-rating-watch-positive-outlook-stable-07-01-2025>;

ArcelorMittal, "ArcelorMittal to Move Forward with Construction of a New, World-class Electrical Steel Facility in Alabama," News Article, February 6, 2025, <https://corporate.arcelormittal.com/media/news-articles/arcelormittal-to-move-forward-with-construction-of-a-new-world-class-electrical-steel-manufacturing-facility>;

ArcelorMittal, "ArcelorMittal Completes the Acquisition of Nippon Steel Corporation's Interest in AM/NS Calvert," Press Release, June 18, 2025, <https://corporate.arcelormittal.com/media/press-releases/arcelormittal-completes-the-acquisition-of-nippon-steel-corporation-s-interest-in-am-ns-calvert>;

U.S. Steel, "Nippon Steel Corporation and U.S. Steel Finalize Historic Partnership," Press Release, June 18, 2025, <https://www.ussteel.com/media/newsroom/-/blogs/nippon-steel-corporation-and-u-s-steel-finalize-historic-partnership>;

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Domestic interested party Cleveland-Cliffs' response to the notice of institution, December 23, 2025, pp. 1, 7, Exhibits 2 and 3; and domestic interested party U.S. Steel's response to the notice of institution, December 31, 2025, pp. 33 to 34, Exhibits GENERAL-5 to GENERAL-7.

U.S. producers' trade and financial data

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year reviews. Table 1.4 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigations and subsequent five-year reviews.⁵³

Table 1.4 NOES: Trade and financial data submitted by U.S. producers, by period

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

Item	Measure	2013	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 2013 and 2019, data are compiled using data submitted in the Commission's original investigations and first five-year reviews. For the year 2024, data are compiled using data submitted by domestic interested parties. Domestic interested party U.S. Steel's response to the notice of institution, Exhibit GENERAL-1 and domestic interested party Cleveland-Cliffs' response to the notice of institution, Exhibit 1.

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

⁵³ The trade and financial data for the years 2013 and 2019 are representative of the only U.S. producer at the time, AK Steel (predecessor-in-interest of domestic interested party Cleveland-Cliffs). The data for the year 2024 are representative of U.S. producers Cleveland-Cliffs and U.S. Steel, the latter of which began production of NOES at its Big River, Arkansas facility in 2024. Domestic interested party Cleveland-Cliffs' response to the notice of institution, December 23, 2025, p. 7.

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.⁵⁴

In its original determinations and its full first five-year review determinations, the Commission defined a single domestic like product consisting of NOES, coextensive with Commerce’s scope. In its original determinations and its full first five-year review determinations, the Commission defined the domestic industry as AK Steel, the only known U.S. producer of NOES.⁵⁵

⁵⁴ Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

⁵⁵ 90 FR 55159, December 1, 2025.

U.S. importers

During the final phase of the original investigations, the Commission received U.S. importer questionnaires from 24 firms, which accounted for approximately 89.7 percent of total U.S. imports of NOES from China, Germany, Japan, South Korea, Sweden, and Taiwan from 2011 to 2013.⁵⁶ Import data presented in the original investigations are based on official Commerce statistics.

During the first five-year reviews, the Commission received U.S. importer questionnaires from 13 firms, which accounted for approximately 70 percent of total U.S. imports of NOES from China, Germany, Japan, South Korea, Sweden, and Taiwan during 2019.⁵⁷ Import data presented in the first reviews are based on questionnaire responses and official Commerce statistics.

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, domestic interested party Cleveland-Cliffs provided a list of 23 potential U.S. importers of NOES and domestic interested party U.S. Steel provided a list of 47 potential U.S. importers of NOES.

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⁵⁶ Original publication, p. 4.1.

⁵⁷ First review publication, p. 1.27.

⁵⁸ Domestic interested party Cleveland-Cliffs' response to the notice of institution, December 23, 2025, Exhibit 1; and domestic interested party U.S. Steel's response to the notice of institution, December 31, 2025, Exhibit GENERAL-1.

⁵⁹ The list of possible U.S. importers submitted by domestic interested party U.S. Steel likely overstates the actual number of U.S. importers of NOES because it includes a number of duplicate entities. Domestic interested party U.S. Steel's response to the notice of institution, December 31, 2025, Exhibit GENERAL-1.

U.S. imports

Table 1.5 presents the quantity, value, and unit value of U.S. imports from China, Germany, Japan, South Korea, Sweden, and Taiwan as well as the other top sources of U.S. imports (shown in descending order of 2024 imports by quantity).

Table 1.5 NOES: U.S. imports, by source and period

Quantity in short tons; value in 1,000 dollars

U.S. imports from	Measure	2020	2021	2022	2023	2024
China	Quantity	48	—	1	152	108
Germany	Quantity	9	7	6	7	2
Japan	Quantity	34	39	24	617	697
South Korea	Quantity	40	4	24	8	50
Sweden	Quantity	137	769	504	97	308
Taiwan	Quantity	386	131	6	—	189
Subject sources	Quantity	653	949	564	882	1,355
Austria	Quantity	2,400	1,303	4,675	2,088	1,476
France	Quantity	2,661	4,652	5,320	616	1,011
Slovakia	Quantity	765	559	1,140	704	459
Romania	Quantity	5,028	1,604	1,728	3,079	354
All other sources	Quantity	2,933	544	1,003	591	269
Nonsubject sources	Quantity	13,787	8,662	13,865	7,078	3,569
All import sources	Quantity	14,441	9,611	14,429	7,959	4,924
China	Value	33	—	3	322	286
Germany	Value	63	13	29	19	9
Japan	Value	64	63	67	1,626	1,784
South Korea	Value	48	4	39	21	145
Sweden	Value	1,046	2,009	1,673	908	1,218
Taiwan	Value	364	333	17	—	224
Subject sources	Value	1,617	2,422	1,829	2,896	3,667
Austria	Value	3,450	2,204	6,856	3,093	3,155
France	Value	3,588	7,747	6,190	1,062	1,826
Slovakia	Value	919	1,075	2,204	1,209	599
Romania	Value	6,644	2,416	3,806	6,328	781
All other sources	Value	3,435	1,617	2,320	1,237	398
Nonsubject sources	Value	18,036	15,059	21,376	12,928	6,758
All import sources	Value	19,653	17,480	23,204	15,824	10,425

Table continued.

Table 1.5 (Continued) NOES: U.S. imports, by source and period

Quantity in short tons; value in 1,000 dollars

U.S. imports from	Measure	2020	2021	2022	2023	2024
China	Unit value	693	—	2,926	2,122	2,646
Germany	Unit value	6,742	1,859	5,142	2,514	3,842
Japan	Unit value	1,868	1,619	2,806	2,633	2,559
South Korea	Unit value	1,204	939	1,662	2,664	2,898
Sweden	Unit value	7,652	2,614	3,321	9,343	3,948
Taiwan	Unit value	943	2,548	2,799	—	1,189
Subject sources	Unit value	2,475	2,552	3,241	3,284	2,706
Austria	Unit value	1,437	1,692	1,467	1,481	2,138
France	Unit value	1,348	1,665	1,164	1,724	1,806
Slovakia	Unit value	1,201	1,923	1,933	1,717	1,303
Romania	Unit value	1,321	1,506	2,203	2,055	2,206
All other sources	Unit value	1,171	2,973	2,313	2,091	1,481
Nonsubject sources	Unit value	1,308	1,739	1,542	1,827	1,894
All import sources	Unit value	1,361	1,819	1,608	1,988	2,117

Source: Compiled from official Commerce statistics for HTS statistical reporting numbers 7225.19.0000, 7226.19.1000, and 7226.19.9000, accessed January 5, 2025.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

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

Cumulation considerations⁶⁰

In assessing whether imports should be cumulated in five-year reviews, the Commission considers, among other things, whether there is a likelihood of a reasonable overlap of competition among subject imports and the domestic like product. Additional information concerning geographical markets and simultaneous presence in the market is presented below.⁶¹

Imports of NOES from China were reported in 15 of the 60 months, imports from Germany were reported in 9 of the 60 months, imports from Japan were reported in 28 of the 60 months, imports from South Korea were reported in 14 of the 60 months, imports from Sweden were reported in all months, and imports from Taiwan were reported in 13 of the 60 months from 2020 to 2024.

Imports from China entered primarily through the southern borders of entry in 2020, 2023, and 2024, while all imports from China entered the western borders of entry in 2022. There were no imports from China in 2021. Imports from Germany entered primarily through the eastern borders of entry in 2020, 2021, and 2023, the northern borders of entry in 2022, and the southern borders of entry in 2024. Imports of NOES from Germany did not enter through the western borders of entry during the period for which data were collected. Imports of NOES from Japan entered primarily through the southern borders of entry in 2020 and 2021 and the eastern borders of entry in 2023 and 2024. Imports from Japan entered the various borders of entries in relatively even quantities in 2022.

Imports of NOES from South Korea entered primarily through the southern borders of entry from 2020 through 2023 and primarily through the northern borders of entry in 2024. Imports of NOES from South Korea did not enter through the eastern borders of entry from 2020 through 2024. Imports of NOES from Sweden entered primarily through the eastern and northern borders of entry in all years. Imports of NOES from Sweden did not enter through the western borders of entry during the period for which data were collected. Imports of NOES from Taiwan entered primarily through the eastern ports of entry in 2020, the northern and southern borders of entry in 2021, and through the southern borders of entry in 2022 and 2024. There were no imports of NOES from Taiwan in 2023.

⁶⁰ Unless otherwise noted, this information is based on official U.S. import statistics for HTS statistical reporting numbers 7225.19.0000, 7226.19.1000, and 7226.19.9000.

⁶¹ In addition, available information concerning subject producers and the global market is presented in the next section of this report.

Apparent U.S. consumption and market shares

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

Table 1.6 NOES: Apparent U.S. consumption and market shares, by source and period

Quantity in short tons; value in 1,000 dollars

Source	Measure	2013	2019	2024
U.S. producers	Quantity	***	***	***
China	Quantity	12,724	25	108
Germany	Quantity	7,493	12	2
Japan	Quantity	15,916	105	697
South Korea	Quantity	4,622	177	50
Sweden	Quantity	7,068	184	308
Taiwan	Quantity	9,768	1,228	189
Subject sources	Quantity	57,591	1,731	1,355
Nonsubject sources	Quantity	3,879	22,923	3,569
All import sources	Quantity	61,470	24,655	4,924
Apparent U.S. consumption	Quantity	***	***	***
U.S. producers	Value	***	***	***
China	Value	12,231	26	286
Germany	Value	8,342	30	9
Japan	Value	20,035	197	1,784
South Korea	Value	4,207	196	145
Sweden	Value	10,556	1,532	1,218
Taiwan	Value	8,745	1,189	224
Subject sources	Value	64,116	3,169	3,667
Nonsubject sources	Value	4,956	30,826	6,758
All import sources	Value	69,072	33,996	10,425
Apparent U.S. consumption	Value	***	***	***

Table continued.

Table 1.6 (Continued) NOES: Apparent U.S. consumption and market shares, by source and period

Shares in percent

Source	Measure	2013	2019	2024
U.S. producers	Share of quantity	***	***	***
China	Share of quantity	***	***	***
Germany	Share of quantity	***	***	***
Japan	Share of quantity	***	***	***
South Korea	Share of quantity	***	***	***
Sweden	Share of quantity	***	***	***
Taiwan	Share of quantity	***	***	***
Subject sources	Share of quantity	***	***	***
Nonsubject sources	Share of quantity	***	***	***
All import sources	Share of quantity	***	***	***
U.S. producers	Share of value	***	***	***
China	Share of value	***	***	***
Germany	Share of value	***	***	***
Japan	Share of value	***	***	***
South Korea	Share of value	***	***	***
Sweden	Share of value	***	***	***
Taiwan	Share of value	***	***	***
Subject sources	Share of value	***	***	***
Nonsubject sources	Share of value	***	***	***
All import sources	Share of value	***	***	***

Source: For the years 2013 and 2019, data are compiled using data submitted in the Commission's original investigations and first five-year reviews. For the year 2024, U.S. producers' U.S. shipments are compiled from the domestic interested parties' responses to the Commission's notice of institution and U.S. imports are compiled from official Commerce statistics for HTS statistical reporting numbers 7225.19.0000, 7226.19.1000, and 7226.19.9000, accessed January 5, 2025.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

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

The industry in China

Producers in China

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from two firms, which accounted for the majority of production of NOES in China during the period of investigation, and approximately *** percent of NOES exports from China to the United States during 2011 to 2013.⁶²

Although the Commission did not receive responses from any respondent interested parties in its first five-year reviews, the domestic interested party provided a list of 25 possible producers of NOES in China in that proceeding.⁶³

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, domestic interested party Cleveland-Cliffs provided a list of eight possible producers of NOES in China and domestic interested party U.S. Steel provided a list of 25 possible producers of NOES in China.⁶⁴

Recent developments

Table 1.7 presents events in the industry in China since the Commission's last five-year reviews.

Table 1.7 NOES: Developments in the industry in China

Item	Firm	Event
New production line	Baosteel	December 2020— Baoshan Iron & Steel Co. Ltd. ("Baosteel") commenced production of NOES for electric vehicles. The facility has an estimated initial annual production capacity of 500,000 metric tons (551,155 short tons).
Expansion	Baosteel	March 2023— Baosteel commenced operating its new production line that increased its annual NOES production capacity by another 500,000 metric tons (551,155 short tons) to increase its total annual NOES production capacity to 1 million metric tons (1.1 million short tons).
Expansion	Ansteel	April 2023— The Ansteel Group, announced plans to increase its annual production capacity for electrical steels (both NOES and GOES

⁶² Non-Oriented Electrical Steel from China, Germany, Japan, South Korea, Sweden, and Taiwan (Final), Confidential Report, INV-MM-109, October 23, 2014, ("Original confidential report"), p. 7.3.

⁶³ First review publication, pp. 4.25.

⁶⁴ Domestic interested party Cleveland-Cliffs' response to the notice of institution, December 23, 2025, Exhibit 1; and domestic interested party U.S. Steel's response to the notice of institution, December 31, 2025, Exhibit GENERAL-1.

Item	Firm	Event
		combined) by 100,000 metric tons (110,231 short tons) for a total capacity of 1.2 million metric tons (1.3 million short tons).
Expansion	Hongwang	November 2023— Hongwang Electrical Steel (“Hongwang”) began producing NOES on several new production lines, which increased its capacity to 1.42 million metric tons (1.56 million short tons). It announced further plans to expand its annual NOES production capacity to 2.03 million metric tons (2.24 million short tons).
Expansion	Shougang	April 2024— The Shougang Group, with annual NOES production capacity of 550,000 metric tons (616,192 short tons), reportedly anticipates its total electrical steel (including both NOES and GOES) will reach 2.2 million to 2.3 million metric tons (2.42 million to 2.54 million short tons) by 2025.
New production line	Anshan	November 2024— Anshan Iron and Steel Co. Ltd. (“Anshan”) produced the first NOES coils on a new continuous processing line, designed to rapidly meet consumption demand, particularly for electric vehicles.
Acquisition	Baosteel	April 2025— Baosteel acquired a 49-percent ownership share of MaSteel Ltd., a subsidiary of Maanshan Iron and Steel Co. Ltd.
Expansion	Shagang	May 2025— The Shagan Group ordered a second DMS 20Hi EcoMill cold-rolling mill to expand its production of NOES at its facility located in Jiangsu Province. This new rolling mill, scheduled for commissioning in 2026, is designed with an annual production capacity of 80,000 metric tons (88,185 short tons) of high-grade NOES. It will also be capable of rolling NOES strip down to a thickness of 0.1 mm (0.004 inch) across the width of 1,350 mm (53 inches) and providing the superior surface quality and flatness required by high-performance electric motors.
New plant	WISCO	July 2025— Wuhan Iron and Steel Co. Ltd. (“WISCO”), as subsidiary of the China Baowu Steel Group, officially commenced production and shipped the first NOES coils from its New Energy NOES sub-facility located in Wuhan, Hubei Province.

Source: Shanghai Metals Market (“SMM”), “Baosteel Non-oriented Silicon Steel Production Line Starts: 2.72 Billion of the Total Investment is Entirely for New Energy Vehicles,” December 11, 2020, <https://news.metal.com/newscontent/101343384/baosteel-non-oriented-silicon-steel-production-line-starts-272-billion-of-the-total-investment-is-entirely-for-new-energy>;

Yieh Corp., “Baosteel’s High-grade Non-oriented Silicon Steel for New Energy Vehicles Officially Put into Production,” Steel News, dated March 27, 2023, <https://www.yieh.com/en/News/baosteels-high-grade-non-oriented-silicon-steel-for-new-energy-vehicles-officially-put-into-production/140202>;

SteelRadar Online, “China’s Ansteel to Increase Production of Electrical Steel,” April 13, 2023, <https://www.steelradar.com/en/haber/chinas-ansteel-to-increase-production-of-electrical-steel>;

Hongwang, “Non-oriented Electrical Steel Project Statistics,” Press Release, November 22, 2023, ; Jessica Long and Jihuan Pan, “Electrical Steel Now China’s Star Product Amid Global Decarbonization Drive,” Fastmarkets, April 23, 2024, <https://www.fastmarkets.com/insights/electrical-steel-now-chinas-star-product-amid-global-decarbonization-drive>;

Tenova, “Ansteel Group Celebrates the First Coil of NGO Electrical Steel Produced on the New ACL,” Press Release, November 27, 2024, <https://loi.tenova.com/newsroom/lates-tenova/ansteel-group-celebrates-first-coil-ngo-electrical-steel-produced-new-aclr>;

SMM, “Baosteel Invests in Subsidiary of Maanshan Steel, Accelerating Asset Integration of Baowu Group,” April 17, 2025, <https://www.metal.com/en/newscontent/103284775>;

MESSteel News, “Shagang to Boost Electrical Steel Output,” May 7, 2025, <https://news.mesteel.com/shagang-to-boost-electrical-steel-output>;

SteelRadar Online, “Shagang Group Ordered Second Cold Rolling Mill for Its Plant in Jiangsu,” May 31, 2025, <https://www.steelradar.com/en/shagang-group-ordered-second-cold-rolling-mill-for-its-plant-in-jiangsu>;

SMM, “The New Energy Non-oriented Electrical Steel Sub-factory of the Electrical Steel Department of Baosteel Wuhan Iron and Steel Co., Ltd. Has Officially Commenced Production,” July 21, 2025, <https://news.metal.com/newscontent/103438067/the-new-energy-non-oriented-electrical-steel-sub-factory-of-the-electrical-steel-department-of-baosteel-wuhan-iron-and-s>;

Domestic interested party Cleveland-Cliffs’ response to the notice of institution, December 23, 2025, pp. 25 to 26, Exhibit 5; and domestic interested party U.S. Steel’s response to the notice of institution, December 31, 2025, pp. 15 to 18, Exhibits CHINA-3, CHINA-5, CHINA-6.

Exports

Table 1.8 presents export data for flat-rolled silicon electrical steel, other than grain oriented, a category that includes NOES and out-of-scope products, from China (by export destination in descending order of quantity for 2024).

Table 1.8 Flat-rolled silicon electrical steel, other than grain oriented: Quantity of exports from China, by destination and period

Quantity in short tons

Destination market	2020	2021	2022	2023	2024
India	22,021	52,305	70,030	138,704	162,649
Mexico	35,240	118,358	90,175	90,569	98,779
Vietnam	22,197	48,146	63,301	68,906	97,470
Italy	39,066	110,537	208,512	76,779	75,390
South Korea	50,363	50,696	79,563	58,552	66,622
United States	5,850	28,760	54,209	105,826	59,988
Brazil	8,045	45,504	57,010	37,871	56,681
Türkiye	7,168	42,535	55,078	60,199	49,750
Thailand	27,280	45,488	37,023	26,418	37,284
Belgium	9	10,796	87,543	28,365	25,211
All other markets	78,534	122,249	124,510	123,450	157,683
All markets	295,773	675,374	926,954	815,639	887,507

Source: S&P Global, Global Trade Information Services Inc., Global Trade Atlas, HS subheadings 7225.19 and 7226.19. These data may be overstated as HS subheadings 7225.19 and 7226.19 may contain products outside the scope of these reviews.

The industry in Germany

Producers in Germany

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from three firms, which are estimated to account for all production of NOES in Germany during the period of investigation, and *** percent of NOES exports from Germany to the United States during 2011 to 2013.⁶⁵

During the first five-year reviews, the Commission received a foreign producer/exporter questionnaire from Thyssenkrupp, which accounted for approximately *** percent of production of NOES in Germany during 2019. Thyssenkrupp ***.⁶⁶

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, domestic interested party Cleveland-Cliffs and domestic interested party U.S. Steel each provided a list of three possible producers of NOES in Germany.⁶⁷

Recent developments

Table 1.9 presents events in the industry in Germany since the Commission's last five-year reviews.

Table 1.9 NOES: Developments in the industry in Germany

Item	Firm	Event
Government funding	ArcelorMittal	June 2024— ArcelorMittal S.A. reportedly received €1.3 billion (\$1.4 billion) from the German government to construct and operate new steel plants in Germany, with the stated objective of producing “green” steel.
Expansion	ThyssenKrupp	January 2025— ThyssenKrupp recently invested €300 million (\$310 million) to expand its NOES production facilities located in Germany. These expansions, anticipated to become operational in 2026, will increase the firm's annual production capacity for NOES to 218,000 metric tons (240,304 short tons).

⁶⁵ Original confidential report, p. 7.6.

⁶⁶ Non-Oriented Electrical Steel from China, Germany, Japan, South Korea, Sweden, and Taiwan (Review), Confidential Report, INV-SS-128, November 4, 2020, (“First review confidential report”), p. 4.31 and 4.33.

⁶⁷ Domestic interested party Cleveland-Cliffs' response to the notice of institution, December 23, 2025, Exhibit 1; and domestic interested party U.S. Steel's response to the notice of institution, December 31, 2025, Exhibit GENERAL-1.

Item	Firm	Event
Investment	ThyssenKrupp	March 2025— ThyssenKrupp invested €300 million (\$324 million) to modernize its NOES facility. Upgrades to the rolling mill upstream from the annealing and isolating line have already been completed. A new electrical steel inspection line and a finishing line are scheduled to commence operations in 2026.

Source: GMK Center, “Germany Approves Financing of ArcelorMittal’s Green Transition,” June 3, 2024, <https://gmk.center/en/news/germany-approves-financing-of-arcelormittals-green-transition>; Eurometal.net, “ThyssenKrupp Starts New Electrical Steel Processing Line,” January 29, 2025, <https://eurometal.net/thyssenkrupp-starts-new-electrical-steel-processing-line>; Magnetism Magazine, “ThyssenKrupp Modernizes Plant for Thin-Sheet Electrical Steel,” March 7, 2025, <https://magnetismmag.com/thyssenkrupp-modernizes-plant-for-thin-sheet-electrical-steel>; Domestic interested party Cleveland-Cliffs’ response to the notice of institution, December 23, 2025, pp. 27 to 28, Exhibit 6; and domestic interested party U.S. Steel’s response to the notice of institution, December 31, 2025, pp. 18 to 19, Exhibits GERMANY-1, GERMANY-2.

Exports

Table 1.10 presents export data for flat-rolled silicon electrical steel, other than grain oriented, a category that includes NOES and out-of-scope products, from Germany (by export destination in descending order of quantity for 2024).

Table 1.10 Flat-rolled silicon electrical steel, other than grain oriented: Quantity of exports from Germany, by destination and period

Quantity in short tons

Destination market	2020	2021	2022	2023	2024
European Union	—	—	138,092	138,633	207,902
Italy	101,969	133,532	133,253	95,371	62,019
Poland	6,042	65,762	60,051	44,370	46,062
France	24,048	23,767	25,903	30,958	24,645
Switzerland	20,596	26,864	26,109	25,929	21,907
Slovenia	5,831	5,923	7,041	11,660	17,195
Hungary	9,098	7,225	7,497	5,432	13,619
Czech Republic	4,309	10,841	14,753	9,654	13,502
Belgium	3,334	6,309	1,282	771	9,454
Spain	7,231	11,366	11,676	7,509	6,094
All other markets	27,373	20,091	13,126	5,594	7,086
All markets	209,831	311,680	438,783	375,881	429,485

Source: S&P Global, Global Trade Information Services Inc., Global Trade Atlas, HS subheadings 7225.19 and 7226.19. These data may be overstated as HS subheadings 7225.19 and 7226.19 may contain products outside the scope of these reviews.

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

The industry in Japan

Producers in Japan

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from three firms, which are estimated to account for all production of NOES in Japan during 2013, and approximately *** percent of NOES exports from Japan to the United States during 2011 to 2013.⁶⁸

During the first five-year reviews, the Commission received foreign producer/exporter questionnaires from two firms, which accounted for approximately *** percent of production of NOES in Japan during 2019. ***.⁶⁹

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, domestic interested party Cleveland-Cliffs provided a list of three possible producers of NOES in Japan and domestic interested party U.S. Steel provided a list of five possible producers of NOES in Japan.⁷⁰

Recent developments

Table 1.11 presents events in the industry in Japan since the Commission's last five-year reviews.

Table 1.11 NOES: Developments in the industry in Japan

Item	Firm	Event
Expansion	JFE	April 2021— JFE Steel announced a ¥49 billion (\$449 million) investment for the initial phase of a capacity expansion program to double production of NOES at its Kurashiki facility.
Expansion	JFE	February 2023— JFE announced a second phase of the expansion program, with an additional ¥50 billion (\$325 million) investment at the Kurashiki facility. According to JFE, this second phase will triple its annual production capacity for NOES, which is anticipated to become operational in April 2026.
Expansion	NSC	May 2023— Nippon Steel Corp. ("NSC") announced capacity-expansion investments totaling ¥213 billion (\$1.6 billion) to expand NOES production by its Setouchi and Kyushu facilities. NSC anticipates that these expansions will quintuple its capabilities to meet growing global demand for electric vehicles.

⁶⁸ Original confidential report, p. 7.11.

⁶⁹ First review confidential report, p. 4.37 and 4.39.

⁷⁰ Domestic interested party Cleveland-Cliffs' response to the notice of institution, December 23, 2025, Exhibit 1; and domestic interested party U.S. Steel's response to the notice of institution, December 31, 2025, Exhibit GENERAL-1.

Item	Firm	Event
Expansion	JFE	September 2024— JFE completed a phase of the expansion program at its Kurashiki facility, doubling the high-grade NOES production capacity.
Acquisition	NSC	June 2025— NSC completed its acquisition of U.S. Steel, which will operate as a subsidiary of Nippon Steel North America (“NSNA”) Inc.

Source: JFE, “JFE Steel to Expand Electrical Steel Sheet Production Capacity at Kurashiki Facility,” News Release, April 1, 2021, <https://www.jfe-steel.co.jp/en/release/2021/210401.html>;

JFE, “JFE Steel to Further Expand Electrical Steel Sheet Production Capacity in Kurashiki Facility,” News Release, February 6, 2023, <https://www.jfe-steel.co.jp/en/release/2023/230206.html>;

Steel Orbis.com, “Nippon Steel to Increase Non-oriented Electrical Steel Sheet Output Capacity,” May 18, 2023, <https://www.steelorbis.com/steel-news/latest-news/nippon-steel-to-increase-non-oriented-electrical-steel-sheet-output-capacity-1290580.htm>;

JFE, “JFE Steel’s Kurashiki Facility Resumes Production of Electrical Steel Sheet After Completing First Phase of Capacity Expansion,” News Release, September 26, 2024, <https://www.jfe-steel.co.jp/en/release/2024/09/240926.html>;

Steel Orbis, “JFE Steel Resumes Electrical Steel Sheet Production at Kurashiki,” September 30, 2024, <https://www.steelorbis.com/steel-news/latest-news/jfe-steel-resumes-electrical-steel-sheet-production-at-kurashiki-1359454.htm>;

NSC, “Nippon Steel Corporation and U.S. Steel Finalize Historic Partnership,” News Release, June 18, 2025, https://www.nipponsteel.com/en/newsroom/news/2025/pdf/20250614_100.pdf;

Domestic interested party Cleveland-Cliffs’ response to the notice of institution, December 23, 2025, pp. 28 to 29, Exhibit 7; and domestic interested party U.S. Steel’s response to the notice of institution, December 31, 2025, pp. 20 to 21, Exhibits JAPAN-1, JAPAN-3.

Exports

Table 1.12 presents export data for flat-rolled silicon electrical steel, other than grain oriented, a category that includes NOES and out-of-scope products, from Japan (by export destination in descending order of quantity for 2024).

Table 1.12 Flat-rolled silicon electrical steel, other than grain oriented: Quantity of exports from Japan, by destination and period

Quantity in short tons

Destination market	2020	2021	2022	2023	2024
China	86,289	115,024	99,937	67,042	69,278
Thailand	61,301	94,193	79,298	58,588	47,402
Mexico	14,099	26,492	35,772	52,320	39,158
India	4,060	6,604	7,710	10,399	11,875
Vietnam	7,306	10,713	9,854	8,043	10,228
United States	337	1,879	4,432	4,441	8,316
Taiwan	8,234	10,418	7,821	5,546	6,210
Philippines	5,516	7,326	6,674	3,881	4,372
Indonesia	3,023	6,246	5,103	5,057	4,276
Italy	0	0	1	332	4,057
All other markets	22,052	40,217	27,109	20,511	7,372
All markets	212,217	319,112	283,711	236,160	212,544

Source: S&P Global, Global Trade Information Services Inc., Global Trade Atlas, HS subheadings 7225.19 and 7226.19. These data may be overstated as HS subheadings 7225.19 and 7226.19 may contain products outside the scope of these reviews.

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

Note: Quantities shown as "0" represent values greater than zero short tons, but less than 0.5 short tons.

The industry in South Korea

Producers in South Korea

During the final phase of the original investigations, the Commission received a foreign producer/exporter questionnaire from POSCO, the sole producer of NOES in South Korea at that time. POSCO accounted for approximately *** percent of NOES exports from South Korea to the United States during 2011 to 2013.⁷¹

Although the Commission did not receive responses from any respondent interested parties in its first five-year reviews, the domestic interested party provided a list of three possible producers of NOES in South Korea in that proceeding.⁷²

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, domestic interested party Cleveland-Cliffs provided one possible producer of NOES in South Korea and domestic interested party U.S. Steel provided a list of three possible producers of NOES in South Korea.⁷³

Recent developments

Table 1.13 presents events in the industry in South Korea since the Commission's last five-year reviews.

Table 1.13 NOES: Developments in the industry in South Korea

Item	Firm	Event
Expansion	POSCO	April 2022— POSCO commenced constructing new 1 trillion-won (\$800 million) NOES production facilities at its current steel facility located in Gwangyang, South Jeolla Province. These new facilities are designed to quadruple POSCO's annual NOES production capacity to approximately 400,000 metric tons (440,924 short tons). The facility reached the final stages of phase 1 construction in July 2022, prior to anticipated starting of partial operations in October 2023.
Expansion	POSCO	December 2023— POSCO completed phase-1 construction of its "Hyper NO" NOES production facility at Gwangyang, which expanded the firm's annual production capacity for NOES from 100,000 metric tons (110,231 short tons) to 400,000 metric tons (440,924 short tons) by the second half of 2024. The Hyper NO facility reportedly will be

⁷¹ Original confidential report, p. 7.15.

⁷² First review publication, p. 4.45.

⁷³ Domestic interested party Cleveland-Cliffs' response to the notice of institution, December 23, 2025, Exhibit 1; and domestic interested party U.S. Steel's response to the notice of institution, December 31, 2025, Exhibit GENERAL-1.

Item	Firm	Event
		capable of producing enough NOES to supply electric drive motors for up to five million electric vehicles annually.
New facility	POSCO	January 2024— POSCO completed phase-1 construction of its “Hyper NO” NOES production facility at Gwangyang.
New products	Hyundai	October 2025— Hyundai Steel Corp., a subsidiary of the Hyundai Motor Group (“Hyundai”), registered nine new NOES materials-related patents this month, a move interpreted by some industry observers as revealing “Hyundai’s intention to start producing its own NOES.”

Source: Kan Hyeong-woo, “Posco to Produce More EV Materials,” The Korea Herald, July 6, 2023, <https://www.koreaherald.com/article/3163136>;

Seneca ESG, “POSCO to Launch USD800m Facility to Quadruple Non-Oriented Electrical Steel Sheet Production,” April 26, 2022, <https://senecaesg.com/insights/posco-to-launch-usd800m-facility-to-quadruple-non-oriented-electrical-steel-sheet-production>;

Sungsu Bae, “POSCO Gears Up for Big Stride as Green Materials Firm, with Hyper NO,” The Korea Economic Daily, July 8, 2023, <https://www.kedglobal.com/steel/newsView/ked202307060023>;

Lee Min-hyung, “POSCO Completes Construction of Electrical Steel Sheet Factory,” The Korea Times, December 21, 2023, <https://www.koreatimes.co.kr/business/companies/20231221/posco-completes-construction-of-electrical-steel-sheet-factory>;

Peter Schmidt, “POSCO Completes Construction of Electrical Steel Sheet Plant in Gwangyang,” ChemAnalyst, January 4, 2024, <https://www.chemanalyst.com/NewsAndDeals/NewsDetails/posco-completes-construction-of-electrical-steel-sheet-plant-in-gwangyang-24307>;

Lim Jae-seop, “Hyundai Motor Group Acquires 9 Patents for Key Electric Vehicle Motor Materials,” MSN, November 2025, <https://www.msn.com/ko-kr/news/other>;

Domestic interested party Cleveland-Cliffs’ response to the notice of institution, December 23, 2025, p. 30, Exhibit 8; and domestic interested party U.S. Steel’s response to the notice of institution, December 31, 2025, pp. 21 to 22, Exhibits KOREA-1 to KOREA-4.

Exports

Table 1.14 presents export data for flat-rolled silicon electrical steel, other than grain oriented, a category that includes NOES and out-of-scope products, from South Korea (by export destination in descending order of quantity for 2024).

Table 1.14 Flat-rolled silicon electrical steel, other than grain oriented: Quantity of exports from South Korea, by destination and period

Quantity in short tons

Destination market	2020	2021	2022	2023	2024
India	113,790	229,783	203,389	229,070	220,768
Mexico	47,636	38,657	25,347	29,320	75,316
Japan	15,660	34,555	40,101	37,821	52,814
Italy	33,987	56,157	48,115	28,546	46,569
Türkiye	44,319	17,383	15,421	3,774	41,403
Taiwan	5,124	3,094	5,347	3,215	25,713
Slovenia	12,386	23,227	27,379	16,813	23,039
Vietnam	28,810	31,093	21,689	15,931	21,018
Canada	6,210	13,649	14,576	16,456	15,441
China	66,245	62,368	29,244	20,747	10,985
All other markets	41,015	42,283	27,494	19,220	35,588
All markets	415,182	552,249	458,102	420,913	568,654

Source: S&P Global, Global Trade Information Services Inc., Global Trade Atlas, HS subheadings 7225.19 and 7226.19. These data may be overstated as HS subheadings 7225.19 and 7226.19 may contain products outside the scope of these reviews.

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

The industry in Sweden

Producers in Sweden

During the final phase of the original investigations, the Commission received a foreign producer questionnaire from Surahammars Bruks AB (“Surahammars”), the sole producer of NOES in Sweden at that time. Surahammars accounted for approximately *** percent of NOES exports from Sweden to the United States during 2011 to 2013.⁷⁴

During the first five-year reviews, the Commission received a foreign producer questionnaire from Surahammars, which accounted for approximately *** production of NOES in Sweden during 2019. Surahammars exported *** short tons to the United States in 2019.⁷⁵

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, domestic interested parties Cleveland-Cliffs and U.S. Steel each provided one possible producer of NOES in Sweden.⁷⁶

Recent developments

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

Exports

Table 1.15 presents export data for flat-rolled silicon electrical steel, other than grain oriented, a category that includes NOES and out-of-scope products, from Sweden (by export destination in descending order of quantity for 2024).

⁷⁴ Original confidential report, p. 7.17.

⁷⁵ First review confidential report, p. 4.48.

⁷⁶ Domestic interested party Cleveland-Cliffs’ response to the notice of institution, December 23, 2025, Exhibit 1; and domestic interested party U.S. Steel’s response to the notice of institution, December 31, 2025, Exhibit GENERAL-1.

Table 1.15 Flat-rolled silicon electrical steel, other than grain oriented: Quantity of exports from Sweden, by destination and period

Quantity in short tons

Destination market	2020	2021	2022	2023	2024
United States	—	—	—	0	6
Brazil	—	—	—	0	—
Israel	—	—	—	0	—
South Africa	—	—	—	0	—
Türkiye	24	—	181	—	—
United Arab Emirates	—	—	47	—	—
Singapore	—	48	19	—	—
Bangladesh	155	—	—	—	—
Norway	1	—	—	—	—
All other markets	0	0	0	0	0
All markets	180	48	247	0	6

Source: S&P Global, Global Trade Information Services Inc., Global Trade Atlas, HS subheadings 7225.19 and 7226.19. These data may be overstated as HS subheadings 7225.19 and 7226.19 may contain products outside the scope of these reviews.

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Quantities shown as “0” represent values greater than zero short tons, but less than 0.5 short tons.

The industry in Taiwan

Producers in Taiwan

During the final phase of the original investigations, the Commission received a foreign producer/exporter questionnaire from China Steel, the sole producer of NOES in Taiwan at that time. China Steel accounted for approximately *** percent of NOES exports from Taiwan to the United States during 2011 to 2013.⁷⁷

Although the Commission did not receive responses from any respondent interested parties in its first five-year reviews, the domestic interested party provided a list of two possible producers of NOES in Taiwan in that proceeding.⁷⁸

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, domestic interested parties Cleveland-Cliffs and U.S. Steel each provided a list of two possible producers of NOES in Taiwan.⁷⁹

Recent developments

Table 1.16 presents events in the industry in Taiwan since the Commission's last five-year reviews.

Table 1.16 NOES: Developments in the industry in Taiwan

Item	Firm	Event
Expansion, upgrade	CSC	August 2023— China Steel Corp. ("CSC") contracted with Primetals Technologies to expand the annual production capacity and product quality by upgrading the pickling lines and cold-rolling mills at its electrical-steel facility located in Kaohsiung. CSC anticipates commencing operations at this upgraded and expanded facility in September 2025.

Source: Primetals Technologies, "China Steel Corporation (CSC) Places Large Order to Ramp Up Electrical Steel Production," August 22, 2023, <https://www.primetals.com/en/news/china-steel-corporation-csc-places-large-order-to-ramp-up-electrical-steel-production>; Steel Orbis, "Taiwan's CSC to Increase Electrical Steel Capacity with Upgrade," August 23, 2023, <https://www.steelorbis.com/steel-news/latest-news/taiwans-csc-to-increase-electrical-steel-capacity-with-upgrade-1303144.htm>; Domestic interested party Cleveland-Cliffs' response to the notice of institution, December 23, 2025, pp. 31 to 32, Exhibit 10; and domestic interested party U.S. Steel's response to the notice of institution, December 31, 2025, pp. 24 to 25, Exhibit TAIWAN-1.

⁷⁷ Original confidential report, p. 7.22.

⁷⁸ First review publication, p. 4.55.

⁷⁹ Domestic interested party Cleveland-Cliffs' response to the notice of institution, December 23, 2025, Exhibit 1; and domestic interested party U.S. Steel's response to the notice of institution, December 31, 2025, Exhibit GENERAL-1.

Exports

Table 1.17 presents export data for flat-rolled silicon electrical steel, other than grain oriented, a category that includes NOES and out-of-scope products, from Taiwan (by export destination in descending order of quantity for 2024).

Table 1.17 Flat-rolled silicon electrical steel, other than grain oriented: Quantity of exports from Taiwan, by destination and period

Quantity in short tons

Destination market	2020	2021	2022	2023	2024
India	134,167	205,336	149,502	159,599	136,243
Mexico	60,886	118,295	110,968	124,661	83,645
Italy	33,029	64,503	74,104	71,641	76,066
Thailand	36,957	47,124	51,654	38,657	34,124
Japan	27,967	38,744	47,684	42,052	29,533
China	194,647	223,201	113,564	55,085	21,260
Indonesia	13,755	15,108	12,318	13,159	13,098
Vietnam	20,020	13,353	18,264	13,526	12,341
Malaysia	3,982	4,417	13,336	9,742	3,705
Singapore	6,859	9,456	11,280	3,587	2,700
All other markets	17,669	8,407	13,504	6,988	2,056
All markets	549,938	747,944	616,178	538,697	414,771

Source: S&P Global, Global Trade Information Services Inc., Global Trade Atlas, HS subheadings 7225.19 and 7226.19. These data may be overstated as HS subheadings 7225.19 and 7226.19 may contain products outside the scope of these reviews.

Third-country trade actions

Brazil— Antidumping orders were continued in July 2019 on non-oriented silicon steels originating in China, Germany, South Korea, and Taiwan. The current antidumping duty rates are:

China: \$90.00 to \$166.32 per metric ton (\$81.65 to \$150.88 per short ton),
Germany: \$166.32 per metric ton (\$150.88 per short ton),
South Korea: \$90.00 to \$166.32 per metric ton (\$81.65 to \$150.88 per short ton),
Taiwan: \$132.50 to \$166.32 per metric ton (\$120.20 to \$150.88 per short ton).⁸⁰

European Union (“EU”)— Steel import safeguard measures, consisting of tariff rate quotas, with an over-quota rate of 25 percent ad valorem, remain in force on electrical steel, other than GOES, originating in China, Japan, South Korea, Sweden, and Taiwan.^{81 82}

India— In December 2025, the Directorate General of Trade Remedies (“DGTR”) imposed antidumping duties on cold-rolled non-oriented electrical steel (“CRNO”) originating in China. The preliminary order imposed duties of \$223.82 per metric ton (\$203.05 per short ton) on certain Chinese producers and \$414.92 per metric ton (\$376.41 per short ton) on all others

⁸⁰ Domestic interested party Cleveland-Cliffs response to the notice of institution, December 23, 2025, p. 35; World Trade Organization (“WTO”), “Trade Remedies Data Portal,” ©2026, accessed January 25, 2026, <https://trade-remedies.wto.org/en>.

⁸¹ Domestic interested party Cleveland-Cliffs response to the notice of institution, December 23, 2025, p. 35; World Trade Organization (“WTO”), “Trade Remedies Data Portal,” ©2026, accessed January 25, 2026, <https://trade-remedies.wto.org/en>; European Commission (“EC”), “Commission Implementing Regulation (EU) 2019/159 of 31 January 2019 Imposing Definitive Safeguard Measures Against Imports of Certain Steel Products,” February 1, 2019, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0159>; EC, “Commission Imposes Definitive Safeguard Measures on Imports of Steel Products,” Press Release, January 31, 2019, https://ec.europa.eu/commission/presscorner/detail/en/ip_19_821.

⁸² The European Commission (“EC”) proposed a plan to replace the current steel safeguard measures, which are set to expire by June 2026. The EC’s proposed plan will tightening these measures by reducing the duty-free in-quota quantity by 47 percent from 33 million metric tons (36.4 million short tons) to 18.3 million metric tons (20.2 million short tons), doubling the out-of-quota tariff from 25 percent to 50 percent ad valorem, and including a “melt and pour” requirement for traceability, among other measures to address negative trade-related impacts of global overcapacity upon the EU steel market. EC, “Proposal for a Regulation of the European Parliament and of the Council Addressing the Negative Trade-related Effects of Global Overcapacity on the Union Steel Market,” Memorandum 2025/0726 (COD), October 7, 2025, <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52025PC0726>; EU Steel Industry from Unfair Impacts of Global Overcapacity,” Press Release, October 6, 2025, https://ec.europa.eu/commission/presscorner/detail/en/ip_25_2293.

for a period of five years. Cold-rolled fully hardened silicon steel (“CRFH”), to produce CRNO, was excluded from the investigation.⁸³

Taiwan— In December 2025, the Ministry of Finance imposed preliminarily antidumping duties of 17.62 percent ad valorem on cold-rolled NOES plates originating in China (from the major parastatal and non-parastatal firms) and 35.85 percent ad valorem on cold-rolled NOES plates originating in South Korea (from POSCO).⁸⁴

The global market

Table 1.18 presents global export data for flat-rolled silicon electrical steel, other than grain oriented, a category that includes NOES and out-of-scope products (by source in descending order of quantity for 2024).

Table 1.18 Flat-rolled silicon electrical steel, other than grain oriented: Quantity of global exports by country and period

Quantity in short tons

Exporting country	2020	2021	2022	2023	2024
China	295,773	675,374	926,954	815,639	887,507
South Korea	415,182	552,249	458,102	420,913	568,654
Germany	209,831	311,680	438,783	375,881	429,485
Taiwan	549,938	747,944	616,178	538,697	414,771
Japan	212,217	319,112	283,711	236,160	212,544
Austria	167,519	203,665	211,864	169,923	139,216
Slovakia	65,776	93,594	94,420	78,219	67,100
France	75,344	88,583	82,786	83,958	63,415
Slovenia	59,404	68,024	79,052	49,124	59,109
Türkiye	77,963	115,429	120,658	53,444	56,667
All other exporters	472,483	595,035	461,143	325,570	238,015
All exporters	2,601,430	3,770,689	3,773,651	3,147,526	3,136,483

⁸³ Domestic interested party U.S. Steel ‘sresponse to the notice of institution, December 31, 2025, Exhibit CHINA-7; The Economic Times, “DGTR Recommends Anti-dumping Duty on Chinese Electrical Steel for 5 Yrs,” September 22, 2025, <https://economictimes.indiatimes.com/news/economy/foreign-trade/dgtr-recommends-anti-dumping-duty-on-chinese-electrical-steel-for-5-yrs/articleshow/124053637.cms?from=mdr>; and GMK Center, “India Has Imposed Antidumping Duties on Imports of Chinese Electrical Steel,” December 19, 2025, <https://gmk.center/en/news/india-has-imposed-anti-dumping-duties-on-imports-of-chinese-electrical-steel>.

⁸⁴ Domestic interested party U.S. Steel’s response to the notice of institution, December 31, 2025, Exhibit CHINA-8; Taiwan Ministry of Finance, “Dumping Rate 35.85%... Taiwan Initiates Anti-dumping Investigation into POSCO’s Nonoriented Electrical Steel Sheets,” December 18, 2025, <https://www.eyard.net/news/view?id=562678>.

Source: S&P Global, Global Trade Information Services Inc., Global Trade Atlas, HS subheadings 7225.19 and 7226.19. These data may be overstated as HS subheadings 7225.19 and 7226.19 may contain products outside the scope of these reviews.

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

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 55159, Dec. 1, 2025	Non-Oriented Electrical Steel From China, Germany, Japan, South Korea, Sweden, and Taiwan; Institution of Five-Year Reviews	https://www.govinfo.gov/content/pkg/FR-2025-12-01/pdf/2025-21687.pdf
90 FR 55086, Dec. 1, 2025	Initiation of Five-Year (Sunset) Reviews	https://www.govinfo.gov/content/pkg/FR-2025-12-01/pdf/2025-21693.pdf

APPENDIX B

RESPONSES TO THE NOTICE OF INSTITUTION

Responses to the Commission's notice of institution

Individual responses

The Commission received two submissions in response to its notice of institution in the subject reviews. They were filed on behalf of the following entities:

1. Cleveland-Cliffs Inc. ("Cleveland-Cliffs")
2. United States Steel Corporation ("U.S. Steel"), domestic producers of non-oriented electrical steel (collectively referred to herein as "domestic interested parties").

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

Contains Business Proprietary Information

Table B.1 NOES: Summary of responses to the Commission's notice of institution

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

Note: The U.S. producer coverage figure presented is based on domestic interested parties' responses to the notice of institution, in which they state that Cleveland-Cliffs and U.S. Steel are the only U.S. producers of NOES.

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 Cleveland-Cliffs and U.S. Steel. Cleveland-Cliffs requests that the Commission conduct expedited reviews of the antidumping and countervailing duty orders on NOES. U.S. Steel requests that the Commission conduct expedited reviews of the antidumping and countervailing duty orders on NOES. ¹

Company-specific information

Table B.2 NOES: 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	Cleveland-Cliffs	U.S. Steel
Nature of operation	Yes	Yes
Statement of intent to participate	Yes	Yes
Statement of likely effects of revoking the order	Yes	Yes
U.S. producer list	Yes	Yes
U.S. importer/foreign producer list	Yes	Yes
List of 3-5 leading purchasers	Yes	Yes
List of sources for national/regional prices	Yes	Yes
Trade/financial data	Yes	Yes
Changes in supply/demand	Yes	Yes
Complete response	Yes	Yes

¹ Domestic interested party Cleveland-Cliffs' comments on adequacy, February 6, 2026, p. 2; and domestic interested party U.S. Steel's comments on adequacy, February 6, 2026, p. 2.

APPENDIX C

SUMMARY DATA COMPILED IN PREVIOUS PROCEEDINGS

Table C-1

NOES: Summary data concerning the U.S. market, 2014-19, January to June 2019, and January to June 2020

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

	Reported data							
	Calendar year						January to June	
	2014	2015	2016	2017	2018	2019	2019	2020
U.S. consumption quantity:								
Amount.....	***	***	***	***	***	***	***	***
Producers' share (fn1).....	***	***	***	***	***	***	***	***
Importers' share (fn1):								
China	***	***	***	***	***	***	***	***
Germany.....	***	***	***	***	***	***	***	***
Japan.....	***	***	***	***	***	***	***	***
Korea.....	***	***	***	***	***	***	***	***
Sweden.....	***	***	***	***	***	***	***	***
Taiwan.....	***	***	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***
U.S. consumption value:								
Amount.....	***	***	***	***	***	***	***	***
Producers' share (fn1).....	***	***	***	***	***	***	***	***
Importers' share (fn1):								
China	***	***	***	***	***	***	***	***
Germany.....	***	***	***	***	***	***	***	***
Japan.....	***	***	***	***	***	***	***	***
Korea.....	***	***	***	***	***	***	***	***
Sweden.....	***	***	***	***	***	***	***	***
Taiwan.....	***	***	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***
U.S. imports from:								
China:								
Quantity.....	2,188	12	4	17	78	25	---	48
Value.....	1,840	21	8	21	115	26	---	33
Unit value.....	\$841	\$1,816	\$1,757	\$1,243	\$1,483	\$1,036	---	\$693
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Germany:								
Quantity.....	2,304	181	179	12	14	12	11	4
Value.....	2,538	170	233	32	41	30	27	19
Unit value.....	\$1,102	\$941	\$1,296	\$2,691	\$3,025	\$2,507	\$2,466	\$4,981
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Japan:								
Quantity.....	8,571	5,166	800	398	50	105	87	30
Value.....	11,400	6,302	1,007	625	88	197	169	52
Unit value.....	\$1,330	\$1,220	\$1,259	\$1,572	\$1,770	\$1,879	\$1,938	\$1,706
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Korea:								
Quantity.....	1,841	3,162	883	263	---	177	177	41
Value.....	1,776	2,930	1,028	333	---	196	196	50
Unit value.....	\$965	\$927	\$1,165	\$1,268	---	\$1,104	\$1,104	\$1,235
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Sweden:								
Quantity.....	4,700	228	760	323	502	184	91	68
Value.....	7,563	1,650	2,159	1,660	1,795	1,532	1,114	603
Unit value.....	\$1,609	\$7,247	\$2,839	\$5,133	\$3,574	\$8,333	\$12,189	\$8,931
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Taiwan:								
Quantity.....	9,477	2,118	3,160	2,760	572	1,228	578	382
Value.....	7,664	1,581	2,052	1,990	547	1,189	580	356
Unit value.....	\$809	\$746	\$649	\$721	\$957	\$968	\$1,003	\$934
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Subject sources:								
Quantity.....	29,082	10,867	5,787	3,772	1,215	1,731	945	572
Value.....	32,782	12,654	6,487	4,661	2,587	3,169	2,085	1,114
Unit value.....	\$1,127	\$1,164	\$1,121	\$1,235	\$2,129	\$1,831	\$2,207	\$1,947
Ending inventory quantity.....	***	***	***	***	***	***	***	***

Table continued.

Table C-1--Continued

NOES: Summary data concerning the U.S. market, 2014-19, January to June 2019, and January to June 2020

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

	Period changes						January to June
	2014-19	2014-15	Comparison years		2017-18	2018-19	2019-20
			2015-16	2016-17			
U.S. consumption quantity:							
Amount.....	▼***	▼***	▼***	▲***	▼***	▼***	▼***
Producers' share (fn1).....	▲***	▼***	▲***	▼***	▲***	▼***	▲***
Importers' share (fn1):							
China	▼***	▼***	▼***	▲***	▲***	▼***	▲***
Germany.....	▼***	▼***	▲***	▼***	▲***	▼***	▼***
Japan.....	▼***	▼***	▼***	▼***	▼***	▲***	▼***
Korea.....	▼***	▲***	▼***	▼***	▼***	▲***	▼***
Sweden.....	▼***	▼***	▲***	▼***	▲***	▼***	▲***
Taiwan.....	▼***	▼***	▲***	▼***	▼***	▲***	▼***
Subject sources.....	▼***	▼***	▼***	▼***	▼***	▲***	▼***
Nonsubject sources.....	▲***	▲***	▼***	▲***	▼***	▼***	▼***
All import sources.....	▼***	▲***	▼***	▲***	▼***	▲***	▼***
U.S. consumption value:							
Amount.....	▼***	▼***	▼***	▲***	▲***	▼***	▼***
Producers' share (fn1).....	▲***	▼***	▲***	▼***	▼***	▲***	▼***
Importers' share (fn1):							
China	▼***	▼***	▼***	▲***	▲***	▼***	▲***
Germany.....	▼***	▼***	▲***	▼***	▲***	▼***	▲***
Japan.....	▼***	▼***	▼***	▼***	▼***	▲***	▼***
Korea.....	▼***	▲***	▼***	▼***	▼***	▲***	▼***
Sweden.....	▼***	▼***	▲***	▼***	▲***	▼***	▼***
Taiwan.....	▼***	▼***	▲***	▼***	▼***	▲***	▼***
Subject sources.....	▼***	▼***	▼***	▼***	▼***	▲***	▼***
Nonsubject sources.....	▲***	▲***	▼***	▲***	▲***	▼***	▲***
All import sources.....	▼***	▲***	▼***	▲***	▲***	▼***	▲***
U.S. imports from:							
China:							
Quantity.....	▼(98.9)	▼(99.5)	▼(61.8)	▲277.3	▲367.6	▼(67.7)	▲---
Value.....	▼(98.6)	▼(98.9)	▼(63.1)	▲166.9	▲458.0	▼(77.5)	▲---
Unit value.....	▲23.2	▲115.9	▼(3.2)	▼(29.2)	▲19.3	▼(30.2)	▲---
Ending inventory quantity.....	▼***	***	▼***	▲***	***	▼***	***
Germany:							
Quantity.....	▼(99.5)	▼(92.2)	▼(0.7)	▼(93.4)	▲14.6	▼(13.2)	▼(65.2)
Value.....	▼(98.8)	▼(93.3)	▲36.7	▼(86.2)	▲28.8	▼(28.1)	▼(29.7)
Unit value.....	▲127.6	▼(14.5)	▲37.7	▲107.6	▲12.4	▼(17.1)	▲102.0
Ending inventory quantity.....	▼***	▼***	▼***	▼***	***	***	***
Japan:							
Quantity.....	▼(98.8)	▼(39.7)	▼(84.5)	▼(50.3)	▼(87.5)	▲109.8	▼(65.1)
Value.....	▼(98.3)	▼(44.7)	▼(84.0)	▼(38.0)	▼(85.9)	▲122.6	▼(69.3)
Unit value.....	▲41.2	▼(8.3)	▲3.2	▲24.8	▲12.6	▲6.1	▼(12.0)
Ending inventory quantity.....	▼***	▲***	▼***	▼***	▼***	***	***
Korea:							
Quantity.....	▼(90.4)	▲71.8	▼(72.1)	▼(70.3)	▼(100.0)	▲***	▼(77.0)
Value.....	▼(89.0)	▲65.0	▼(64.9)	▼(67.6)	▼(100.0)	▲***	▼(74.2)
Unit value.....	▲14.4	▼(4.0)	▲25.7	▲8.9	▼(100.0)	▲***	▲11.9
Ending inventory quantity.....	▼***	▲***	▼***	▼***	▼***	▼***	***
Sweden:							
Quantity.....	▼(96.1)	▼(95.2)	▲234.0	▼(57.5)	▲55.3	▼(63.4)	▼(26.1)
Value.....	▼(79.7)	▼(78.2)	▲30.8	▼(23.1)	▲8.1	▼(14.6)	▼(45.8)
Unit value.....	▲417.9	▲350.4	▼(60.8)	▲80.8	▼(30.4)	▲133.2	▼(26.7)
Ending inventory quantity.....	***	***	***	***	***	***	***
Taiwan:							
Quantity.....	▼(87.0)	▼(77.7)	▲49.2	▼(12.7)	▼(79.3)	▲114.9	▼(34.0)
Value.....	▼(84.5)	▼(79.4)	▲29.8	▼(3.0)	▼(72.5)	▲117.4	▼(38.6)
Unit value.....	▲19.7	▼(7.7)	▼(13.0)	▲11.0	▲32.8	▲1.1	▼(6.9)
Ending inventory quantity.....	▼***	▼***	▼***	▼***	***	***	***
Subject sources:							
Quantity.....	▼(94.0)	▼(62.6)	▼(46.7)	▼(34.8)	▼(67.8)	▲42.5	▼(39.5)
Value.....	▼(90.3)	▼(61.4)	▼(48.7)	▼(28.2)	▼(44.5)	▲22.5	▼(46.6)
Unit value.....	▲62.4	▲3.3	▼(3.7)	▲10.2	▲72.3	▼(14.0)	▼(11.8)
Ending inventory quantity.....	▼***	▲***	▼***	▼***	▼***	▼***	***

Table continued.

Table C-1--Continued

NOES: Summary data concerning the U.S. market, 2014-19, January to June 2019, and January to June 2020

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

	Reported data							
	Calendar year							January to June
	2014	2015	2016	2017	2018	2019	2019	2020
U.S. imports from:								
Nonsubject sources:								
Quantity.....	24,656	35,095	22,766	28,882	25,078	22,923	12,272	8,438
Value.....	27,876	37,481	22,854	31,264	34,054	30,826	16,815	11,276
Unit value.....	\$1,131	\$1,068	\$1,004	\$1,082	\$1,358	\$1,345	\$1,370	\$1,336
Ending inventory quantity.....	***	***	***	***	***	***	***	***
All import sources:								
Quantity.....	53,738	45,962	28,554	32,655	26,293	24,655	13,217	9,010
Value.....	60,658	50,134	29,341	35,925	36,641	33,996	18,901	12,390
Unit value.....	\$1,129	\$1,091	\$1,028	\$1,100	\$1,394	\$1,379	\$1,430	\$1,375
Ending inventory quantity.....	***	***	***	***	***	***	***	***
U.S. producers':								
Average capacity quantity.....	***	***	***	***	***	***	***	***
Production quantity.....	***	***	***	***	***	***	***	***
Capacity utilization (fn1).....	***	***	***	***	***	***	***	***
U.S. shipments:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Export shipments:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Inventories/total shipments (fn1).....	***	***	***	***	***	***	***	***
Production workers.....	***	***	***	***	***	***	***	***
Hours worked (1,000s).....	***	***	***	***	***	***	***	***
Wages paid (\$1,000).....	***	***	***	***	***	***	***	***
Hourly wages.....	***	***	***	***	***	***	***	***
Productivity (short tons per 1,000 hours).....	***	***	***	***	***	***	***	***
Unit labor costs.....	***	***	***	***	***	***	***	***
Net sales:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Cost of goods sold (COGS).....	***	***	***	***	***	***	***	***
Gross profit of (loss).....	***	***	***	***	***	***	***	***
SG&A expenses.....	***	***	***	***	***	***	***	***
Operating income or (loss).....	***	***	***	***	***	***	***	***
Net income or (loss).....	***	***	***	***	***	***	***	***
Capital expenditures.....	***	***	***	***	***	***	***	***
Research and development expenses.....	***	***	***	***	***	***	***	***
Net assets.....	***	***	***	***	***	***	***	***
Unit COGS.....	***	***	***	***	***	***	***	***
Unit SG&A expenses.....	***	***	***	***	***	***	***	***
Unit operating income or (loss).....	***	***	***	***	***	***	***	***
Unit net income or (loss).....	***	***	***	***	***	***	***	***
COGS/sales (fn1).....	***	***	***	***	***	***	***	***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***

Table continued.

Table C-1--Continued

NOES: Summary data concerning the U.S. market, 2014-19, January to June 2019, and January to June 2020

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

	Period changes						January to June
	2014-19	2014-15	Comparison years		2017-18	2018-19	
			2015-16	2016-17			2019-20
U.S. imports from:							
Nonsubject sources:							
Quantity.....	▼(7.0)	▲42.3	▼(35.1)	▲26.9	▼(13.2)	▼(8.6)	▼(31.2)
Value.....	▲10.6	▲34.5	▼(39.0)	▲36.8	▲8.9	▼(9.5)	▼(32.9)
Unit value.....	▲18.9	▼(5.5)	▼(6.0)	▲7.8	▲25.4	▼(1.0)	▼(2.5)
Ending inventory quantity.....	▼***	▲***	▲***	▲***	▼***	▲***	▲***
All import sources:							
Quantity.....	▼(54.1)	▼(14.5)	▼(37.9)	▲14.4	▼(19.5)	▼(6.2)	▼(31.8)
Value.....	▼(44.0)	▼(17.3)	▼(41.5)	▲22.4	▲2.0	▼(7.2)	▼(34.4)
Unit value.....	▲22.2	▼(3.4)	▼(5.8)	▲7.1	▲26.7	▼(1.1)	▼(3.8)
Ending inventory quantity.....	▼***	▲***	▼***	▼***	▼***	▲***	▲***
U.S. producers':							
Average capacity quantity.....	***	***	***	***	***	***	***
Production quantity.....	▼***	▼***	▼***	▲***	▲***	▼***	▼***
Capacity utilization (fn1).....	▼***	▼***	▼***	▲***	▲***	▼***	▼***
U.S. shipments:							
Quantity.....	▼***	▼***	▼***	▲***	▼***	▼***	▼***
Value.....	▼***	▼***	▼***	▲***	▲***	▼***	▼***
Unit value.....	▲***	▼***	▼***	▲***	▲***	▲***	▼***
Export shipments:							
Quantity.....	▼***	▼***	▼***	▲***	▼***	▼***	▼***
Value.....	▼***	▼***	▼***	▲***	▼***	▼***	▼***
Unit value.....	▲***	▼***	▼***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	▼***	▼***	▼***	▲***	▲***	▼***	▼***
Inventories/total shipments (fn1).....	▼***	▲***	▼***	▼***	▲***	▼***	▲***
Production workers.....	▼***	▼***	▼***	▲***	▼***	▲***	▼***
Hours worked (1,000s).....	▼***	▼***	▼***	▲***	▼***	▲***	▼***
Wages paid (\$1,000).....	▼***	▼***	▼***	▲***	▼***	▲***	▼***
Hourly wages.....	▼***	▲***	▼***	▲***	▼***	▲***	▼***
Productivity (short tons per 1,000 hours).....	▼***	▼***	▼***	▲***	▲***	▼***	▼***
Unit labor costs.....	▲***	▲***	▲***	▼***	▼***	▲***	▲***
Net sales:							
Quantity.....	▼***	▼***	▼***	▲***	▼***	▼***	▼***
Value.....	▼***	▼***	▼***	▲***	▼***	▼***	▼***
Unit value.....	▲***	▼***	▼***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	▼***	▼***	▼***	▲***	▼***	▼***	▼***
Gross profit of (loss) (fn 2).....	▼***	▼***	▲***	▼***	▲***	▼***	▼***
SG&A expenses.....	▼***	▼***	▼***	▼***	▼***	▼***	▼***
Operating income or (loss) (fn 2).....	▼***	▼***	▼***	▼***	▼***	▼***	▲***
Net income or (loss) (fn 2).....	▼***	▼***	▼***	▼***	▼***	▼***	▼***
Capital expenditures.....	▼***	▲***	▼***	▼***	▲***	▼***	▼***
Research and development expenses.....	▼***	▲***	▼***	▼***	▲***	▼***	▼***
Net assets.....	▼***	▼***	▼***	▲***	▼***	▲***	***
Unit COGS.....	▲***	▼***	▲***	▲***	▲***	▼***	▲***
Unit SG&A expenses.....	▲***	▲***	▲***	▼***	▼***	▲***	▼***
Unit operating income or (loss) (fn 2).....	▼***	▲***	▲***	▼***	▼***	▼***	▲***
Unit net income or (loss) (fn 2).....	▲***	▲***	▲***	▼***	▼***	▼***	▲***
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 "--". Shares preceded by a "▲" represent an increase, while shares preceded by a "▼" represent a decrease.

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

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

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 7225.19.0000, 7226.19.1000, and 7226.19.9000, accessed August 9, 2020.

Table C-1

NOES: Summary data concerning the U.S. market, 2011-13, January to June 2013, and January to June 2014

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

	Reported data					Period changes			
	Calendar year		January to June			Calendar year			Jan-Jun
	2011	2012	2013	2013	2014	2011-13	2011-12	2012-13	2013-14
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (1).....	***	***	***	***	***	***	***	***	***
Importers' share (1):									
China.....	***	***	***	***	***	***	***	***	***
Germany.....	***	***	***	***	***	***	***	***	***
Japan.....	***	***	***	***	***	***	***	***	***
Korea.....	***	***	***	***	***	***	***	***	***
Sweden.....	***	***	***	***	***	***	***	***	***
Taiwan.....	***	***	***	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
Total imports.....	***	***	***	***	***	***	***	***	***
U.S. consumption value:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (1).....	***	***	***	***	***	***	***	***	***
Importers' share (1):									
China.....	***	***	***	***	***	***	***	***	***
Germany.....	***	***	***	***	***	***	***	***	***
Japan.....	***	***	***	***	***	***	***	***	***
Korea.....	***	***	***	***	***	***	***	***	***
Sweden.....	***	***	***	***	***	***	***	***	***
Taiwan.....	***	***	***	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
Total imports.....	***	***	***	***	***	***	***	***	***
U.S. imports from:									
China:									
Quantity.....	16,401	14,042	12,724	8,217	1,747	(22.4)	(14.4)	(9.4)	(78.7)
Value.....	19,702	15,305	12,231	7,912	1,498	(37.9)	(22.3)	(20.1)	(81.1)
Unit value.....	\$1,201	\$1,090	\$961	\$963	\$858	(20.0)	(9.3)	(11.8)	(10.9)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Germany:									
Quantity.....	14,385	9,568	7,493	3,795	2,282	(47.9)	(33.5)	(21.7)	(39.9)
Value.....	19,492	11,224	8,342	4,163	2,512	(57.2)	(42.4)	(25.7)	(39.7)
Unit value.....	\$1,355	\$1,173	\$1,113	\$1,097	\$1,101	(17.8)	(13.4)	(5.1)	0.4
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Japan:									
Quantity.....	22,747	18,540	15,916	6,887	4,969	(30.0)	(18.5)	(14.2)	(27.9)
Value.....	29,889	23,625	20,035	8,500	7,037	(33.0)	(21.0)	(15.2)	(17.2)
Unit value.....	\$1,314	\$1,274	\$1,259	\$1,234	\$1,416	(4.2)	(3.0)	(1.2)	14.7
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Korea:									
Quantity.....	6,880	7,331	4,622	1,357	1,823	(32.8)	6.6	(36.9)	34.3
Value.....	7,605	6,830	4,207	1,311	1,752	(44.7)	(10.2)	(38.4)	33.7
Unit value.....	\$1,105	\$932	\$910	\$966	\$961	(17.7)	(15.7)	(2.3)	(0.5)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Sweden:									
Quantity.....	8,599	9,359	7,068	3,559	3,162	(17.8)	8.8	(24.5)	(11.2)
Value.....	14,467	15,394	10,556	5,283	4,684	(27.0)	6.4	(31.4)	(11.3)
Unit value.....	\$1,682	\$1,645	\$1,494	\$1,484	\$1,482	(11.2)	(2.2)	(9.2)	(0.2)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Taiwan:									
Quantity.....	5,203	17,136	9,768	2,637	8,691	87.7	229.4	(43.0)	229.6
Value.....	6,459	18,231	8,745	2,485	7,009	35.4	182.2	(52.0)	182.1
Unit value.....	\$1,242	\$1,064	\$895	\$942	\$806	(27.9)	(14.3)	(15.8)	(14.4)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Subject sources:									
Quantity.....	74,215	75,977	57,591	26,453	22,674	(22.4)	2.4	(24.2)	(14.3)
Value.....	97,615	90,608	64,116	29,654	24,494	(34.3)	(7.2)	(29.2)	(17.4)
Unit value.....	\$1,315	\$1,193	\$1,113	\$1,121	\$1,080	(15.4)	(9.3)	(6.6)	(3.6)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Nonsubject sources:									
Quantity.....	6,790	6,242	3,879	1,168	8,001	(42.9)	(8.1)	(37.9)	585.1
Value.....	11,087	8,066	4,956	1,621	9,441	(55.3)	(27.2)	(38.6)	482.4
Unit value.....	\$1,633	\$1,292	\$1,278	\$1,388	\$1,180	(21.8)	(20.9)	(1.1)	(15.0)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Total imports:									
Quantity.....	81,005	82,219	61,470	27,620	30,675	(24.1)	1.5	(25.2)	11.1
Value.....	108,702	98,674	69,072	31,275	33,936	(36.5)	(9.2)	(30.0)	8.5
Unit value.....	\$1,342	\$1,200	\$1,124	\$1,132	\$1,106	(16.3)	(10.6)	(6.4)	(2.3)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***

Table continued next page.

Table C-1--Continued

NOES: Summary data concerning the U.S. market, 2011-13, January to June 2013, and January to June 2014

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

	Reported data					Period changes			
	Calendar year		January to June			Calendar year		Jan-Jun	
	2011	2012	2013	2013	2014	2011-13	2011-12	2012-13	2013-14
U.S. producers:									
Average capacity quantity.....	***	***	***	***	***	***	***	***	***
Production quantity.....	***	***	***	***	***	***	***	***	***
Capacity utilization (1).....	***	***	***	***	***	***	***	***	***
U.S. shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Export shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Inventories/total shipments (1).....	***	***	***	***	***	***	***	***	***
Production workers.....	***	***	***	***	***	***	***	***	***
Hours worked (1,000s).....	***	***	***	***	***	***	***	***	***
Wages paid (\$1,000).....	***	***	***	***	***	***	***	***	***
Hourly wages (dollars per hour).....	***	***	***	***	***	***	***	***	***
Productivity (short tons per 1,000 hours).....	***	***	***	***	***	***	***	***	***
Unit labor costs.....	***	***	***	***	***	***	***	***	***
Net Sales:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS).....	***	***	***	***	***	***	***	***	***
Gross profit of (loss).....	***	***	***	***	***	***	***	***	***
SG&A expenses.....	***	***	***	***	***	***	***	***	***
Operating income or (loss).....	***	***	***	***	***	***	***	***	***
Capital expenditures.....	***	***	***	***	***	***	***	***	***
Unit COGS.....	***	***	***	***	***	***	***	***	***
Unit SG&A expenses.....	***	***	***	***	***	***	***	***	***
Unit operating income or (loss).....	***	***	***	***	***	***	***	***	***
COGS/sales (1).....	***	***	***	***	***	***	***	***	***
Operating income or (loss)/sales (1).....	***	***	***	***	***	***	***	***	***

Notes:

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

(2)--Undefined.

Source: Official statistics of the U.S. Department of Commerce and 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 nine firms as top purchasers of NOES ***. Purchaser questionnaires were sent to these nine firms and none of the firms responded.

