

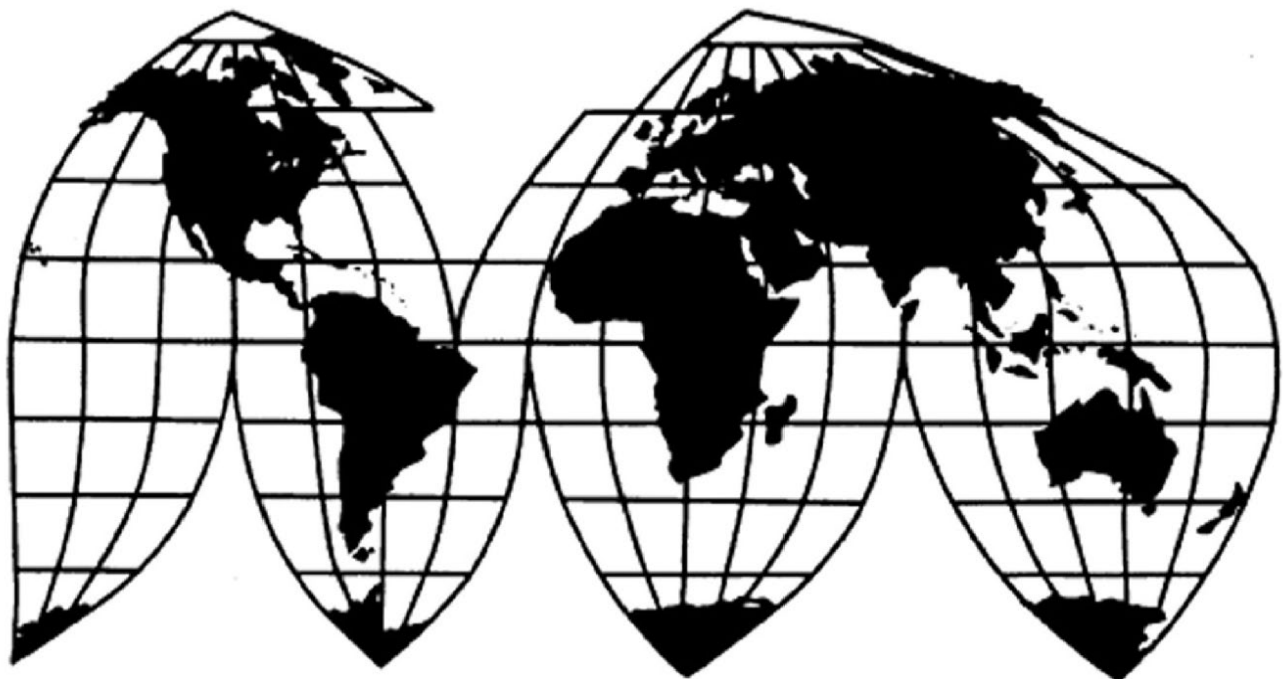
Tin Mill Products from China, Taiwan, and Turkey

Investigation Nos. 701-TA-792 and 731-TA-1786–1788 (Preliminary)

Publication 5745

June 2026

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual firms may not be published.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

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-792 and 731-TA-1786-1788 (Preliminary)

Tin Mill Products from China, Taiwan, and Turkey

DETERMINATIONS

On the basis of the record¹ developed in the subject investigations, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of tin mill products from China, Taiwan, and Turkey, provided for in subheadings 7210.11.00, 7210.12.00, 7210.50.00, 7212.10.00, 7212.50.00, 7225.99.00, and 7226.99.01 of the Harmonized Tariff Schedule of the United States, that are alleged to be sold in the United States at less than fair value (“LTFV”) and imports of the subject merchandise from China that are alleged to be subsidized by the government of China.²

COMMENCEMENT OF FINAL PHASE INVESTIGATIONS

Pursuant to section 207.18 of the Commission’s rules, the Commission also gives notice of the commencement of the final phase of its investigations. The Commission will issue a final phase notice of scheduling, which will be published in the *Federal Register* as provided in § 207.21 of the Commission’s rules, upon notice from the U.S. Department of Commerce (“Commerce”) of affirmative preliminary determinations in the investigations under §§ 703(b) or 733(b) of the Act, or, if the preliminary determinations are negative, upon notice of affirmative final determinations in those investigations under §§ 705(a) or 735(a) of the Act. Parties that filed entries of appearance in the preliminary phase of the investigations need not enter a separate appearance for the final phase of the investigations. Any other party may file an entry of appearance for the final phase of the investigations after publication of the final phase notice of scheduling. Industrial users, and, if the merchandise under investigation is sold at the retail level, representative consumer organizations have the right to appear as parties in Commission antidumping and countervailing duty investigations. The Secretary will prepare a public service list containing the names and addresses of all persons, or their representatives,

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

² 91 FR 24157 and 24170 (May 5, 2026).

who are parties to the investigations. As provided in section 207.20 of the Commission's rules, the Director of the Office of Investigations will circulate draft questionnaires for the final phase of the investigations to parties to the investigations, placing copies on the Commission's Electronic Document Information System (EDIS, <https://edis.usitc.gov>), for comment.

BACKGROUND

On April 9, 2026, United States Steel Corporation (Pittsburgh, Pennsylvania) and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union (Pittsburgh, Pennsylvania) filed petitions with the Commission and Commerce, alleging that an industry in the United States is materially injured or threatened with material injury by reason of subsidized imports of tin mill products from China and LTFV imports of tin mill products from China, Taiwan, and Turkey. Accordingly, effective April 9, 2026, the Commission instituted countervailing duty investigation No. 701-TA-792 and antidumping duty investigation Nos. 731-TA-1786-1788 (Preliminary).

Notice of the institution of the Commission's investigations and of a public conference to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of April 14, 2026 (91 FR 19201). The Commission conducted its conference on April 30, 2026. All persons who requested the opportunity were permitted to participate.

Views of the Commission

Based on the record in the preliminary phase of these investigations, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of certain tin- and chromium steel sheet products (“tin mill” or “tin mill products”) from China, Taiwan, and Turkey that are allegedly sold in the United States at less than fair value (“LTFV”) and subsidized by the government of China.

I. The Legal Standard for Preliminary Determinations

The legal standard for preliminary antidumping and countervailing duty determinations requires the Commission to determine, based upon the information available at the time of the preliminary determinations, whether there is a reasonable indication that a domestic industry is materially injured or threatened with material injury, or that the establishment of an industry is materially retarded, by reason of the allegedly unfairly traded imports.¹ In applying this standard, the Commission weighs the evidence before it and determines whether “(1) the record as a whole contains clear and convincing evidence that there is no material injury or threat of such injury; and (2) no likelihood exists that contrary evidence will arise in a final investigation.”²

II. Background

The petitions in these investigations were filed on April 9, 2026, by United States Steel Corporation (“U.S. Steel”), a domestic producer of tin mill products, and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union (“USW”), a union representing workers at all major facilities in the United States where tin mill products are produced (collectively, “Petitioners”).³ Petitioners appeared at the staff conference with counsel⁴ and submitted a postconference brief.⁵

Several respondent entities participated in these investigations. EP Steel America, Inc.

¹ 19 U.S.C. §§ 1671b(a), 1673b(a) (2000); *see also American Lamb Co. v. United States*, 785 F.2d 994, 1001-04 (Fed. Cir. 1986); *Aristech Chem. Corp. v. United States*, 20 CIT 353, 354-55 (1996). No party argues that the establishment of an industry in the United States is materially retarded by the allegedly unfairly traded imports.

² *American Lamb Co.*, 785 F.2d at 1001; *see also Texas Crushed Stone Co. v. United States*, 35 F.3d 1535, 1543 (Fed. Cir. 1994).

³ Petition, vol. 1, EDIS Doc. 878339 (April 9, 2026) (“Petition”).

⁴ *See* Transcript of Preliminary Conference, EDIS Doc. 881093 (May 4, 2026) (“Conference Tr.”).

⁵ Petitioners’ Postconference Brief, EDIS Doc. 881301 (May 5, 2026) (“Petitioners’ Postconference Br.”).

and Macsteel International USA Corp., U.S. importers of subject merchandise, and Jiangsu Ninesky Optoelectronics Technology Co., Ltd., Shou Gang Casey Steel Co., Ltd., Shougang Jingtang United Iron & Steel Co., Ltd., and Handan Jintai Packing Material Co., Ltd., Chinese producers and exporters of subject merchandise (collectively, “Chinese Respondents”), jointly submitted a postconference brief.⁶

U.S. industry data are based on the questionnaire responses of three firms accounting for all known U.S. production of tin mill products in 2025.⁷ U.S. import data are based on the questionnaire responses from 27 U.S. importers, accounting for *** percent of the U.S. imports from China, *** percent of U.S. imports from Taiwan, and *** percent of imports from Turkey.⁸ Foreign industry data and related information are based on the questionnaire responses of six producers/exporters of tin mill products in China and two producers/exporters from Turkey. No responses to the Commission’s foreign producer/exporter questionnaire were received from producers/exporters of tin mill products in Taiwan. The six responding producers/exporters of tin mill products in China accounted for approximately *** percent of tin mill production in that country in 2025, and the two producers in Turkey accounted for approximately *** percent of production there in 2025.⁹

III. Domestic Like Product

In determining whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of imports of the subject merchandise, the Commission first defines the “domestic like product” and the “industry.”¹⁰ Section 771(4)(A) of the Tariff Act of 1930, as amended (“the Tariff Act”), defines the relevant domestic industry as the “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”¹¹ In turn, the Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in

⁶ Chinese Respondents’ Postconference Brief, EDIS Doc. 881306 (May 5, 2026) (“Chinese Respondents’ Postconference Br.”).

⁷ Confidential Report (“CR”), INV-YY-065 (May 18, 2026) (“CR”) at Table 3.1; *Tin Mill Products from China, Taiwan, and Turkey*, Investigation Nos. 701-TA-792 and 731-TA-1786-1788 (Preliminary), USITC Pub. 5745 (June 2026) (“PR”) at 3.1. Domestic producer Cleveland Cliffs ceased production at its tin mill facility in Weirton, West Virginia in April 2024. *Id.* at Table 3.3; Conference Tr. at 50 (Beline).

⁸ CR/PR at 4.1.

⁹ CR/PR at 7.3 & Table 7.1.

¹⁰ 19 U.S.C. § 1677(4)(A).

¹¹ 19 U.S.C. § 1677(4)(A).

characteristics and uses with, the article subject to an investigation.”¹²

By statute, the Commission’s “domestic like product” analysis begins with the “article subject to an investigation,” *i.e.*, the subject merchandise as determined by the U.S. Department of Commerce (“Commerce”).¹³ Therefore, Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value is “necessarily the starting point of the Commission’s like product analysis.”¹⁴ The Commission then defines the domestic like product in light of the imported articles Commerce has identified.¹⁵ The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of “like” or “most similar in characteristics and uses” on a case-by-case basis.¹⁶ No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.¹⁷ The Commission looks for clear dividing lines among possible like products and disregards minor variations.¹⁸ The Commission may, where

¹² 19 U.S.C. § 1677(10).

¹³ 19 U.S.C. § 1677(10). The Commission must accept Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See, e.g., USEC, Inc. v. United States*, 34 F. App’x 725, 730 (Fed. Cir. 2002) (“The ITC may not modify the class or kind of imported merchandise examined by Commerce.”); *Algoma Steel Corp. v. United States*, 688 F. Supp. 639, 644 (Ct. Int’l Trade 1988), *aff’d*, 865 F.2d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

¹⁴ *Cleo Inc. v. United States*, 501 F.3d 1291, 1298 (Fed. Cir. 2007); *see also Hitachi Metals, Ltd. v. United States*, 949 F.3d 710, 717 (Fed. Cir. 2020) (the statute requires the Commission to start with Commerce’s subject merchandise in reaching its own like product determination).

¹⁵ *Cleo*, 501 F.3d at 1298 n.1 (“Commerce’s {scope} finding does not control the Commission’s {like product} determination.”); *Hosiden Corp. v. Advanced Display Mfrs.*, 85 F.3d 1561, 1568 (Fed. Cir. 1996) (the Commission may find a single like product corresponding to several different classes or kinds defined by Commerce); *Torrington Co. v. United States*, 747 F. Supp. 744, 748–52 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (affirming the Commission’s determination defining six like products in investigations where Commerce found five classes or kinds).

¹⁶ *See, e.g., Cleo*, 501 F.3d at 1299; *NEC Corp. v. Dep’t of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (“every like product determination ‘must be made on the particular record at issue’ and the ‘unique facts of each case’”). The Commission generally considers a number of factors including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. *See Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996).

¹⁷ *See, e.g., S. Rep. No. 96-249 at 90–91* (1979).

¹⁸ *See, e.g., Nippon*, 19 CIT at 455; *Torrington*, 747 F. Supp. at 748–49; *see also S. Rep. No. 96-249 at 90–91* (Congress has indicated that the like product standard should not be interpreted in “such a narrow fashion as to permit minor differences in physical characteristics or uses to lead to the conclusion that the product and article are not ‘like’ each other, nor should the definition of ‘like

appropriate, include domestic articles in the domestic like product in addition to those described in the scope.¹⁹

A. Scope Definition

In its notices of initiation, Commerce defined the imported merchandise within the scope of these investigations as:

The products within the scope of these investigations are tin mill flat-rolled products that are coated or plated with tin, chromium, or chromium oxides. Flat-rolled steel products coated with tin are known as tinplate. Flat-rolled steel products coated with chromium or chromium oxides are known as tin-free steel or electrolytic chromium-coated steel. The scope includes all the noted tin mill products regardless of thickness, width, form (in coils or cut sheets), coating type (electrolytic or otherwise), edge (trimmed, untrimmed or further processed, such as scroll cut), coating thickness, surface finish, temper, coating metal (tin, chromium, chromium oxide), reduction (single- or double-reduced), and whether or not coated with a plastic material.²⁰

The scope of these investigations includes both tin-coated steel sheet, known as tinplate, and chromium-coated steel sheet, known as tin-free steel (“TFS”). Both tinplate and TFS are produced from black plate, an uncoated flat-rolled steel product. To produce tinplate, black plate is coated on both sides with commercially pure tin. To produce TFS, black plate is coated on both sides with chromium metal and chromium oxide.²¹

Tinplate is commonly manufactured to ASTM Standard Specifications A599, A623, A624, and A626.²² It is primarily used to make welded cans for food, aerosol, paint, filtration, and more general applications.²³ TFS is manufactured to ASTM Standard Specification A657. It is

product’ be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.”).

¹⁹ See, e.g., *Pure Magnesium from China and Israel*, Inv. Nos. 701-TA-403 & 731-TA-895–896 (Final), USITC Pub. 3467 (Nov. 2001) at 8 n.34; *Torrington*, 747 F. Supp. at 748–49 (holding that the Commission is not legally required to limit the domestic like product to the product advocated by the petitioner, co-extensive with the scope).

²⁰ *Tin Mill Products from the People’s Republic of China, Taiwan, and the Republic of Turkey: Initiation of Less-Than-Fair-Value Investigations*, 91 Fed. Reg. 24,157, 24,162 (Dep’t of Commerce May 5, 2026) (“AD Initiation Notice”); *Tin Mill Products from the People’s Republic of China: Initiation of Countervailing Duty Investigation*, 91 Fed. Reg. 24,170, 24,173 (Dep’t of Commerce May 5, 2026) (“CVD Initiation Notice”).

²¹ Petition, vol. 1 at 10-11; CR/PR at 1.12-1.13; Conference Tr. at 11 (Kopf).

²² Petition, vol. 1 at 10 & Ex. I-5; CR/PR at 1.12.

²³ CR/PR at 1.13; Petition, vol. 1 at 12 (citing *id.* at Ex. I-5).

primarily used to make certain two-piece drawn cans and ends (tops) for food and beverage cans, as well as caps and closures for glass containers.²⁴

B. Arguments of the Parties

Petitioners argue that the Commission should define a single domestic like product consisting of all tin mill products, coextensive with Commerce's scope.²⁵ They emphasize that in its previous antidumping and countervailing duty investigations regarding tin mill products, which involved essentially the same scope as in the current investigations,²⁶ the Commission defined a single domestic like product based on its application of the traditional like products factors.²⁷

Respondents do not challenge Petitioners' definition of the domestic like product.²⁸

C. Analysis

Based on the record, we define a single domestic like product consisting of all domestically produced tin mill products, coextensive with the scope in these investigations.

Physical Characteristics and Uses. Tinplate and TFS share the same basic physical characteristics, as both are produced from black plate and both are primarily used in metal can production.²⁹ Tinplate and TFS are also available in similar thicknesses, with both single-reduced tinplate and single-reduced TFS commonly available in thicknesses of 0.38 mm and

²⁴ CR/PR at 1.13; Petition, vol. 1 at 12 (citing *id.* at Ex. I-5).

²⁵ Petitioners' Postconference Br. at 3-7.

²⁶ Petitioners state that the scope of these investigations is virtually identical to the scope of the existing antidumping duty order on tin- and chromium-coated steel sheet from Japan, except that the current scope does not include the list of scope exclusions that were specific to that proceeding. Petition, vol. 1 at 9 & n.29; Petitioners' Postconference Br. at 4 & n.9 (citing *Tin- and Chromium-Coated Steel Sheet from Japan*, Inv. No. 731-TA-860 (Preliminary), USITC Pub. 3264 (Dec. 1999) ("*Japan Preliminary Determination*"); *Tin- and Chromium-Coated Steel Sheet from Japan*, Inv. No. 731-TA-860 (Final), USITC Pub. 3337 (Aug. 2000) at 5 ("*Japan Final Determination*")); Conference Tr. at 26-27 (Beline); see also *Tin- and Chromium-Coated Steel Sheet from Japan*, Inv. No. 731-TA-860 (Fourth Review), USITC Pub. 5507 (May 2024) at 11. Thus, we collectively refer to the investigation and order regarding Japan as also covering "tin mill products." Petitioners also state that the current scope language is virtually identical to the scope language in *Tin Mill Products from Canada, China, Germany, and South Korea*, Inv. Nos. 701-TA-685, 731-TA-1599-1601 and 1603 (Final), USITC Pub. 5492 (Feb. 2024) ("*Tin Mill Products Final*"), in which the Commission found no present material injury or threat of material injury to an industry in the United States, except that the scope in those investigations also included a similar list of highly technical exclusions. Petitioners' Postconference Br. at 4 & n.9; Conference Tr. at 26-27 (Beline).

²⁷ Petitioners' Postconference Br. at 3-5.

²⁸ See generally Chinese Respondents' Postconference Br.

²⁹ CR/PR at 1.13.

lighter, and both double-reduced tinplate and double-reduced TFS commonly available in thicknesses of 0.28 mm and lighter.³⁰ The principal difference between tinplate and TFS is that the former is coated in tin and the latter is coated in chromium.³¹ Due to the greater corrosion resistance of tinplate, tinplate tends to be used to produce can bodies, and TFS tends to be used to produce the ends of cans, although TFS is also used to produce certain two-piece drawn cans.³²

Manufacturing Facilities, Production Processes, and Employees. Although tinplate and TFS are ultimately coated in different materials, the processes used in their production are otherwise the same.³³ Petitioners have indicated that producers making both tinplate and TFS do so in the same mills, but on different production lines.³⁴ In addition, in its prior investigations of tin mill products, the Commission found that most companies produced tinplate and TFS using the same manufacturing facilities and employees.³⁵

Channels of Distribution. Domestically produced tin mill products are primarily sold through a common channel of distribution, to can manufacturers.³⁶

Interchangeability. Petitioners state that “{t}in mill products are generally interchangeable.”³⁷ In its prior investigations of tin mill products, the Commission found that, although tinplate and TFS are rarely used interchangeably in particular applications, they are theoretically interchangeable, and Petitioners maintain that this prior analysis remains valid.³⁸

Producer and Customer Perceptions. Petitioners indicate that customers and producers view all tin mill products “as existing on a continuum.”³⁹ In its prior investigations of tin mill products, the Commission found that producers and customers grouped tinplate and TFS into a

³⁰ CR/PR at 1.12-1.13.

³¹ CR/PR at 1.12-1.13.

³² CR/PR at 1.13.

³³ CR/PR at 1.14-1.16.

³⁴ Petition, vol. 1, at 14.

³⁵ Tin Mill Products from Canada, China, Germany, Netherlands, South Korea, Taiwan, Turkey, and United Kingdom, Inv. Nos. 701-TA-685 and 731-TA-1599-1606 (Preliminary), USITC Pub. 5413 (Mar. 2023) (“*Tin Mill Products Prelim.*”) at 13, unchanged in *Tin Mill Products Final*, USITC Pub. 5492 at 14-15; *Japan Preliminary Determination*, USITC Pub. 3264 at 5, unchanged in *Japan Final Determination*, USITC Pub. 3337 at 5.

³⁶ CR/PR at 2.2 & Table 2.2; Petitioners’ Postconference Br. at 6. The remainder are sold to distributors and other end users. *Id.*

³⁷ Petitioners’ Postconference Br. at 6.

³⁸ *Tin Mill Products Prelim.*, USITC Pub. 5413 at 13, unchanged in *Tin Mill Products Final*, USITC Pub. 5492 at 14-15; *Japan Preliminary Determination*, USITC Pub. 3264 at 5, unchanged in *Japan Final Determination*, USITC Pub. 3337 at 5; Petitioners’ Postconference Br. at 6.

³⁹ Petitioners’ Postconference Br. at 6.

single class of products.⁴⁰

Price. The pricing data indicate that quarterly prices among the various pricing products for domestically produced in-scope tin mill products overlapped within similar ranges during the 2023 to 2025 period of investigation (“POI”).⁴¹

Conclusion. The record of these investigations thus indicates overlap between tinplate and TFS regarding each of the domestic like product factors. Also, the Commission has in past investigations, which had similar scopes, defined a single domestic like product coextensive with these scopes, and no party argues that there have been changes to tin mill products in regard to the domestic like product factors since those investigations.

Based on the record of the preliminary phase of these investigations, we define a single domestic like product consisting of all domestically produced tin mill products, coextensive with the scope.

IV. Domestic Industry

The domestic industry is defined as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”⁴² In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

These investigations raise the issue of whether appropriate circumstances exist to exclude *** from the domestic industry pursuant to the related parties provision. This provision of the statute allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise, or which are themselves importers.⁴³

Petitioners argue that the Commission should define a single domestic industry consisting of all domestic tin mill producers during the POI.⁴⁴ While acknowledging that *** is a related party subject to possible exclusion based upon its affiliation with ***, through its parent company ***, Petitioners argue that appropriate circumstances do not exist for this firm’s

⁴⁰ *Tin Mill Products Prelim.*, USITC Pub. 5413 at 13, unchanged in *Tin Mill Products Final*, USITC Pub. 5492 at 14-15; *Japan Preliminary Determination*, USITC Pub. 3264 at 5, unchanged in *Japan Final Determination*, USITC Pub. 3337 at 5.

⁴¹ CR/PR at Tables 5.5 through 5.8; Petitioners’ Postconference Br. at 7.

⁴² 19 U.S.C. § 1677(4)(A).

⁴³ 19 U.S.C. § 1677(4)(B).

⁴⁴ Petitioners’ Postconference Br. at 7.

exclusion because it supports the petitions and has not been shielded from the adverse effects of subject imports.⁴⁵

Respondents do not contest Petitioners' definition of the domestic industry.⁴⁶

*** is subject to possible exclusion under the related parties provision because its parent company, ***, jointly owns *** and ***, a firm that imported *** of tin mill products from Taiwan and Turkey in 2025.⁴⁷

*** was the *** U.S. producer of tin mill products in 2025, accounting for *** percent of U.S. production of tin mill products in that year.⁴⁸ Its affiliated U.S. importer, *** imported subject merchandise from Taiwan and Turkey in 2025.⁴⁹ *** imported *** short tons from Taiwan and Turkey in 2025, amounting to *** percent of *** domestic tin mill production in that year.⁵⁰ Neither *** nor *** explained why *** imported subject merchandise.⁵¹ *** reported capital expenditures of \$*** in 2023, \$*** in 2024, and \$*** in 2025.⁵² *** financial performance was *** than the financial performance reported by other responding domestic producers during the POI.⁵³

*** is a *** and the domestic industry's ***. Its affiliate accounted for a *** volume of subject imports, and the ratio of the affiliate's subject imports to ***'s domestic production was also ***. There is no information on the record indicating that *** domestic production operations either benefitted from its affiliate's imports of subject merchandise or that it was otherwise shielded from subject import competition such that its inclusion in the domestic industry would skew industry data or mask injury. For these reasons, we do not find that appropriate circumstances to exclude *** from the domestic industry as a related party.

⁴⁵ Petitioners' Postconference Br. at 7 n.24.

⁴⁶ See generally Chinese Respondents' Postconference Br.

⁴⁷ 19 U.S.C. § 1677(4)(B)(ii)(III); CR/PR at 3.12 & Table 3.11. Additionally, *** is affiliated with ***, a producer of tin mill products in China. Petitioners' Postconference Br. at 7-8 & n.24. ***, and there is no additional information about the company in the record. CR/PR at 3.2; Petition, vol. I at Ex. I-6; *** U.S. Producer Questionnaire Response at I-7. It is thus unclear based on the record of these preliminary determinations whether this affiliation provides a basis for possible exclusion under the related parties provision.

⁴⁸ CR/PR at Table 3.1. Its production totaled *** short tons in this year. *Id.* at Table 3.7.

⁴⁹ CR/PR at Table 3.11.

⁵⁰ CR/PR at 3.12 & Table 3.11.

⁵¹ See generally *** U.S. Producer Questionnaire Response; *** U.S. Importer Questionnaire Response.

⁵² CR/PR at Table 6.6.

⁵³ CR/PR at Table 6.3. The ratio of net income to net sales reported by responding domestic producers as a whole was *** percent in 2023, *** percent in 2024 and *** percent in 2025. *Id.* By comparison, *** ratio of net income to net sales was *** percent in 2023, *** percent in 2024 and *** percent in 2025. *Id.*

Accordingly, based on our definition of the domestic like product, we define the domestic industry to include all domestic producers of tin mill products.

V. Negligible Imports

Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall be deemed negligible.⁵⁴ The statute further provides that subject imports from a single country which comprise less than 3 percent of total such imports of the product may not be considered negligible if there are several countries subject to investigation with negligible imports and the sum of such imports from all those countries collectively accounts for more than 7 percent of the volume of all such merchandise imported into the United States.⁵⁵ In the case of countervailing duty investigations involving developing countries (as designated by the United States Trade Representative (“USTR”)), the statute indicates that the negligibility limits are 4 percent and 9 percent, rather than 3 percent and 7 percent.⁵⁶

Based on Petitioners’ calculations using official import statistics, they argue that subject imports from China, Taiwan, and Turkey are clearly above negligible levels.⁵⁷

Based on the Commission’s questionnaire data, during the 12-month period preceding filing of the petition (April 2025 to March 2026), subject imports from China in the antidumping and countervailing duty investigations accounted for *** percent of total imports of tin mill products, subject imports from Taiwan in the antidumping duty investigation accounted for *** percent of such imports, and subject imports from Turkey in the antidumping duty investigation accounted for *** percent of such imports.⁵⁸ As subject imports from each subject country exceed the three percent negligibility threshold, we find that imports of tin mill products from China, Taiwan, and Turkey are not negligible.

⁵⁴ 19 U.S.C. §§ 1671b(a), 1673b(a), 1677(24)(A)(i), 1677(24)(B); *see also* 15 C.F.R. § 2013.1 (developing countries for purposes of 19 U.S.C. § 1677(36)).

⁵⁵ 19 U.S.C. § 1677(24)(A)(ii).

⁵⁶ 19 U.S.C. § 1677(24)(B). The USTR has deemed none of the subject countries in these investigations a developing country. *See Designations of Developing and Least Developed Countries Under the Countervailing Duty Law*, 85 Fed. Reg. 7613 (Feb. 10, 2020).

⁵⁷ Petitioners’ Postconference Br. at 8. Chinese respondents do not address negligibility. *See generally* Chinese Respondents’ Postconference Br.

⁵⁸ CR/PR at Table 4.4.

VI. Cumulation

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

- (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality related questions;
- (2) the presence of sales or offers to sell in the same geographic markets of subject imports from different countries and the domestic like product;
- (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and
- (4) whether the subject imports are simultaneously present in the market.⁵⁹

While no single factor is necessarily determinative, and the list of factors is not exclusive, these factors are intended to provide the Commission with a framework for determining whether the subject imports compete with each other and with the domestic like product.⁶⁰ Only a “reasonable overlap” of competition is required.⁶¹

⁵⁹ See *Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-80 (Final), USITC Pub. 1845 (May 1986), *aff'd*, *Fundicao Tupy, S.A. v. United States*, 678 F. Supp. 898 (Ct. Int'l Trade), *aff'd*, 859 F.2d 915 (Fed. Cir. 1988).

⁶⁰ See, e.g., *Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int'l Trade 1989).

⁶¹ The Statement of Administrative Action (SAA) to the Uruguay Round Agreements Act (URAA), expressly states that “the new section will not affect current Commission practice under which the statutory requirement is satisfied if there is a reasonable overlap of competition.” H.R. Rep. No. 103-316, Vol. I at 848 (1994) (*citing Fundicao Tupy*, 678 F. Supp. at 902); see *Goss Graphic Sys., Inc. v. United States*, 33 F. Supp. 2d 1082, 1087 (Ct. Int'l Trade 1998) (“cumulation does not require two products to be highly fungible”); *Wieland Werke, AG*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”).

A. Arguments of the Parties

Petitioners argue that the Commission should cumulatively assess imports from all subject countries. They note that the petitions for each of the subject countries were filed on the same day and contend that a reasonable overlap in competition exists among tin mill products produced in the subject countries and between tin mill products from all subject countries and the domestic like product.⁶² According to Petitioners, subject imports from China, Taiwan, and Turkey should be cumulated for purposes of present material injury since they are fungible with the domestic like product and each other, are sold in the same geographic markets, share common channels of distribution, and were present in the U.S. market in every month during the POI.⁶³

Respondents' Arguments. Chinese Respondents do not directly address cumulation; however, Chinese Respondents argue that Commerce's Bureau of Industry and Security's ("BIS") 15 determinations granting exclusion requests for various Chinese tin mill products from duties imposed pursuant to Section 232 of the Trade Expansion Act of 1962 ("Section 232"), which required it to evaluate whether domestic manufacturers were able to produce the products in a sufficient amount and of a satisfactory quality, demonstrate that Chinese tin mill products do not overlap with those produced by the domestic industry.⁶⁴ They emphasize that the exclusion requests regarding drawn and walled ironed ("D&I") tin mill products, which are often sold in wider coils than tinplate used in other applications,⁶⁵ were uncontested by the domestic industry.⁶⁶ Further, they state that five of the other exclusion requests were granted over the domestic industry's objections.⁶⁷

B. Analysis and Conclusion

We consider subject imports from China, Taiwan, and Turkey on a cumulated basis as we find that the statutory criteria for cumulation are satisfied. As an initial matter, Petitioners filed the current antidumping and countervailing duty petitions with respect to all subject countries on the same day, April 9, 2026.⁶⁸

⁶² Petitioners' Postconference Br. at 9.

⁶³ Petitioners' Postconference Br. at 10-12.

⁶⁴ Chinese Respondents' Postconference Br. at 6-9 & Exs. 2.A through 2.C.

⁶⁵ Chinese Respondents' Postconference Br. at 7 & n.14 (citing *Tin Mill Products Final*, USITC Pub. 5492 at 14).

⁶⁶ Chinese Respondents' Postconference Br. at 6-7 & Exs. 2A through 2.B.

⁶⁷ Chinese Respondents' Postconference Br. at 8-9 & Exs. 2.A through 2.C.

⁶⁸ CR/PR at 1.1. None of the statutory exceptions to cumulation applies.

Fungibility. All tin mill products are commonly manufactured to ASTM Standard Specifications, namely A623, A624, and A626, for tinplate, and A657 for TFS.⁶⁹ U.S. producers reported that subject imports from each subject country are always or frequently interchangeable with each other as well as with domestically produced tin mill products.⁷⁰ At least half of U.S. importers reported that subject imports from each subject country are always or frequently interchangeable with domestically produced tin mill products, and majorities of U.S. importers reported that subject imports from each country are always or frequently interchangeable with each other.⁷¹

Domestic producers reported sales of domestically produced products 1 through 4, and U.S. importers reported sales of products 1 and 2 imported from each subject country during the POI, sales of product 3 from China and Taiwan, and sales of product 4 from China and

⁶⁹ CR/PR at 1.12-1.13.

⁷⁰ CR/PR at Table 2.7. For domestically produced tin mill products and subject imports from each of the three subject countries, two U.S. producers rated the products as always interchangeable and one producer rated the products as frequently interchangeable. *Id.* For each comparison of subject imports with each other, one U.S. producer each rated such products as always interchangeable and one U.S. producer each rated such products as frequently interchangeable. *Id.*

⁷¹ CR/PR at Table 2.8. For domestically produced tin mill products and subject imports from China, two importers rated the products as always interchangeable, seven importers rated the products as frequently interchangeable, six importers rated the products as sometimes interchangeable, and three importers rated the products as never interchangeable. *Id.*

For domestically produced tin mill products and subject imports from Taiwan, two importers rated the products as always interchangeable, five importers rated the products as frequently interchangeable, three importers rated the products as sometimes interchangeable, and four importers rated the products as never interchangeable. *Id.*

For domestically produced tin mill products and subject imports from Turkey, seven importers rated the products as frequently interchangeable, three importers rated the products as sometimes interchangeable, and three importers rated the products as never interchangeable. *Id.*

For subject imports of tin mill products from China and subject imports of tin mill products from Taiwan, five importers rated the products as always interchangeable, three importers rated the products as frequently interchangeable, and one importer rated the products as sometimes interchangeable. *Id.*

For subject imports of tin mill products from China and subject imports of tin mill products from Turkey, one importer rated the products as always interchangeable, three importers rated the products as frequently interchangeable, and three importers rated the products as sometimes interchangeable. *Id.*

For subject imports of tin mill products from Taiwan and subject imports of tin mill products from Turkey, one importer rated the products as always interchangeable, four importers rated the products as frequently interchangeable, and four importers rated the products as sometimes interchangeable. *Id.*

Turkey.⁷² Additionally, eight of 12 purchasers responding to the Commission’s Lost Sales/Lost Revenue survey reported buying subject imports from China, Taiwan, or Turkey instead of the domestic like product, which further supports a finding of fungibility between the domestic like product and subject imports from each of these sources.⁷³

In 2025, domestically produced tin mill products and imports from each subject source overlapped by product attributes. Specifically, with respect to coating type, most U.S. shipments of domestic product sold in 2025 were other tinplate, as were most shipments of subject imports from each source that year.⁷⁴ The record also indicates that domestic tin mill products and subject imports from each source overlap with respect to both width and easy open (“EZO”) product application type. In 2025, the *** of domestic tin mill products and most or all of subject imports from each source had a width of less than 39 inches.⁷⁵ Similarly, domestic and subject imported tin mill products from each source overlapped in terms of EZO product application type, with most domestic tin mill products and most or all subject imports from each subject source having other than EZO applications.⁷⁶

Channels of Distribution. Throughout the POI, the majority of domestically produced tin mill products were sold to can manufacturers, as were most subject imported tin mill products from each source.⁷⁷

Geographic Overlap. Domestic producers reported shipping the domestic like product to all regions in the contiguous United States during the POI.⁷⁸ U.S. importers reported shipping subject imports from China and Taiwan to all regions of the United States except the Mountain region, and they reported shipping subject imports from Turkey to all regions except the Central Southwest and Mountain regions.⁷⁹

Simultaneous Presence in Market. According to the quarterly pricing data of the preliminary phase of these investigations, domestically produced tin mill products were present

⁷² CR/PR at Tables 5.5-5.8. For product 3, imports from China were reported ***. *Id.* at Table 5.7. For product 4, imports from China were reported ***, and imports from Turkey were reported in the ***. *Id.* at Table 5.8.

⁷³ CR/PR at 5.18 & Tables 5.15-5.16.

⁷⁴ CR/PR at 4.8 & Tables 4.5 & D.1 through D.5; *id.* at Figures D.1 through D.2.

⁷⁵ CR/PR at Tables 4.6 & D.1 through D.5; *id.* at Figures D.1 through D.2.

⁷⁶ CR/PR at Table 4.7.

⁷⁷ CR/PR at Table 2.2.

⁷⁸ CR/PR at Table 2.3.

⁷⁹ CR/PR at Table 2.3. Subject imports from all three subject countries entered the United States from all borders in 2025. *Id.* at Table 4.9. Subject imports from China primarily entered through the northern and southern borders, subject imports from Taiwan primarily entered through the southern and western borders, and subject imports from Turkey primarily entered through the eastern and northern borders. *Id.*

in the U.S. market for every quarter covering the 2023 to 2025 POI.⁸⁰ During this 36-month POI, subject imports from China were present in the U.S. market in all months, and subject imports from Taiwan were present in the U.S. market in all months except for July and August 2023.⁸¹ Subject imports from Turkey were intermittently present in the U.S. market in 2023, with shipments in January, May, and July of that year.⁸² Although subject imports from Turkey were not present in the first quarter of 2024, these imports were present beginning in the second quarter of that year through the remainder of the POI, except for November 2024 and April 2025.⁸³

Conclusion. The record indicates that subject imports from China, Taiwan, and Turkey are generally fungible with the domestic like product and each other, that subject imports from each subject country and the domestic like product are sold in similar channels of distribution and in similar geographic markets, and have been simultaneously present in the U.S. market for a substantial number of months of the POI.

We are unpersuaded by Chinese Respondents' argument that there is limited overlap between subject imports from China and the domestic like product because Chinese producers manufacture tin mill products that are otherwise unavailable from domestic sources.⁸⁴ Although Chinese Respondents emphasize that eight of the Section 232 exclusions for tin mill products that were granted between July 2022 and November 2024 were for D&I tin mill products, the data indicate that *** of imports of Chinese tin mill products have an *** coating type, indicating they are not D&I tin mill products.⁸⁵ Similarly, most domestically produced tin mill products have an *** coating type.⁸⁶ While the record indicates no shipments of domestically produced D&I tinplate in 2025, D&I tinplate products constitute *** percent of total subject imports from China in 2025.⁸⁷ In addition, the record indicates that all U.S. producers and half of U.S. importers reported that the domestic like product and subject imports from China are always or frequently interchangeable.⁸⁸ Finally, both domestic producers and subject producers from China reported sales of all four pricing products.⁸⁹ Thus,

⁸⁰ CR/PR at Tables 5.5-5.8.

⁸¹ CR/PR at Table 4.10.

⁸² CR/PR at Table 4.10.

⁸³ CR/PR at Table 4.10.

⁸⁴ Chinese Respondents' Postconference Br. at 6-9.

⁸⁵ CR/PR at Table 4.5.

⁸⁶ CR/PR at Table 4.5.

⁸⁷ CR/PR at Table 4.5.

⁸⁸ CR/PR at Tables 2.7 & 2.8.

⁸⁹ CR/PR at Table 5.9.

the record reflects that there is sufficient competition between subject imports from China and the domestic like product for purposes of our cumulation analysis.

Because the record indicates that there is a reasonable overlap of competition between and among imports from each subject country and the domestic like product, we consider subject imports from China, Taiwan, and Turkey on a cumulated basis for our analysis of whether there is a reasonable indication of material injury by reason of subject imports.

VII. Reasonable Indication of Material Injury by Reason of Subject Imports

A. Legal Standard

In the preliminary phase of antidumping and countervailing duty investigations, the Commission determines whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.⁹⁰ In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.⁹¹ The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”⁹² In assessing whether there is a reasonable indication that the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.⁹³ No single factor is dispositive, and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”⁹⁴

Although the statute requires the Commission to determine whether there is a reasonable indication that the domestic industry is “materially injured or threatened with material injury by reason of” unfairly traded imports,⁹⁵ it does not define the phrase “by reason of,” indicating that this aspect of the injury analysis is left to the Commission’s reasonable exercise of its discretion.⁹⁶ In identifying a causal link, if any, between subject imports and

⁹⁰ 19 U.S.C. §§ 1671b(a), 1673b(a).

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

⁹² 19 U.S.C. § 1677(7)(A).

⁹³ 19 U.S.C. § 1677(7)(C)(iii).

⁹⁴ 19 U.S.C. § 1677(7)(C)(iii).

⁹⁵ 19 U.S.C. §§ 1671b(a), 1673b(a).

⁹⁶ *Angus Chemical Co. v. United States*, 140 F.3d 1478, 1484-85 (Fed. Cir. 1998) (“{T}he statute does not ‘compel the commissioners’ to employ {a particular methodology}.”), *aff’d*, 944 F. Supp. 943, 951 (Ct. Int’l Trade 1996).

material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the “by reason of” standard must ensure that subject imports are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.⁹⁷

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.⁹⁸ In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.⁹⁹ Nor does

⁹⁷ The Federal Circuit, in addressing the causation standard of the statute, observed that “{a}s long as its effects are not merely incidental, tangential, or trivial, the foreign product sold at less than fair value meets the causation requirement.” *Nippon Steel Corp. v. USITC*, 345 F.3d 1379, 1381 (Fed. Cir. 2003). This was further ratified in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), where the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that “this court requires evidence in the record ‘to show that the harm occurred ‘by reason of’ the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.’” See also *Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass’n v. USITC*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

⁹⁸ Uruguay Round Agreements Act Statement of Administrative Action (“SAA”), H.R. Rep. 103-316, vol. I. at 851-52 (“{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.”); S. Rep. 96-249 at 75 (1979) (the Commission “will consider information which indicates that harm is caused by factors other than less-than-fair-value imports.”); H.R. Rep. 96-317 at 47 (1979) (“in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the petitioner to the subsidized or dumped imports is attributable to such other factors;” those factors include “the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry”); accord *Mittal Steel*, 542 F.3d at 877.

⁹⁹ SAA at 851-52 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports.”); *Taiwan Semiconductor Industry Ass’n*, 266 F.3d at 1345 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports ... Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.” (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int’l Trade 2002) (“{t}he Commission is not

the “by reason of” standard require that unfairly traded imports be the “principal” cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.¹⁰⁰ It is clear that the existence of injury caused by other factors does not compel a negative determination.¹⁰¹

Assessment of whether material injury to the domestic industry is “by reason of” subject imports “does not require the Commission to address the causation issue in any particular way” as long as “the injury to the domestic industry can reasonably be attributed to the subject imports.”¹⁰² The Commission ensures that it has “evidence in the record” to “show that the harm occurred ‘by reason of’ the LTFV imports,” and that it is “not attributing injury from other sources to the subject imports.”¹⁰³ The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”¹⁰⁴

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

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

¹⁰⁰ S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

¹⁰¹ *See Nippon Steel Corp.*, 345 F.3d at 1381 (“an affirmative material-injury determination under the statute requires no more than a substantial-factor showing. That is, the ‘dumping’ need not be the sole or principal cause of injury.”).

¹⁰² *Mittal Steel*, 542 F.3d at 876 & 78; *see also id.* at 873 (“While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured ‘by reason of’ subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.”), *citing United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swift-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission’s causation analysis as comporting with the Court’s guidance in *Mittal*.

¹⁰³ *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 877-79. We note that one relevant “other factor” may involve the presence of significant volumes of price-competitive nonsubject imports in the U.S. market, particularly when a commodity product is at issue. In appropriate cases, the Commission collects information regarding nonsubject imports and producers in nonsubject countries in order to conduct its analysis.

¹⁰⁴ *Nucor Corp. v. United States*, 414 F.3d 1331, 1336, 1341 (Fed. Cir. 2005); *see also Mittal Steel*, 542 F.3d at 879 (“*Bratsk* did not read into the antidumping statute a Procrustean formula for determining whether a domestic injury was ‘by reason’ of subject imports.”).

evidence standard.¹⁰⁵ Congress has delegated this factual finding to the Commission because of the agency’s institutional expertise in resolving injury issues.¹⁰⁶

B. Conditions of Competition and the Business Cycle

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

i. Demand Conditions

Demand for tin mill products derives from the demand for the products in which they are used, including food, aerosol spray, and paint cans.¹⁰⁷

All responding U.S. producers reported no change in demand for tin mill products during the POI.¹⁰⁸ Responses from U.S. importers, however, were mixed, with 11 importers reporting that demand for tin mill products had either steadily increased or fluctuated upwards, six importers reporting no change, and 11 reporting that demand had fluctuated downwards or steadily decreased.¹⁰⁹ At the staff conference, Petitioners argued that there was a high level of demand for tin mill products throughout the POI.¹¹⁰ Witnesses for Petitioners indicated that they did not expect any “material changes” in market demand in the near future.¹¹¹

Apparent U.S. consumption of tin mill products increased by *** percent overall between 2023 and 2025, initially declining slightly, by *** percent, from 2023 to 2024 before increasing by *** percent from 2024 to 2025.¹¹²

¹⁰⁵ We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

¹⁰⁶ *Mittal Steel*, 542 F.3d at 873; *Nippon Steel Corp.*, 458 F.3d at 1350, citing *U.S. Steel Group*, 96 F.3d at 1357; S. Rep. 96-249 at 75 (“The determination of the ITC with respect to causation is ... complex and difficult, and is a matter for the judgment of the ITC.”).

¹⁰⁷ CR/PR at 2.1.

¹⁰⁸ CR/PR at 2.6 & Table 2.5.

¹⁰⁹ CR/PR at Table 2.5.

¹¹⁰ Conference Tr. at 18 (Kopf) (stating that there was “overall increasing demand” during the POI); *id.* at 38 (Kopf) (“I mean, the overall demand trend has been higher over the course of the POI”). Petitioners contend that the growth in demand for tin mill products has been driven by several factors including growth in the ready-to-eat and convenience food sector and advances in coating and technology that have improved product longevity and safety, more stringent environmental regulations that required the adoption of advanced filtration products, and growth in demand for aerosol spray cans in the personal care and cosmetics sector due to rising disposable incomes and interest in easy-to-use, portable packaging. Petitioners’ Postconference Br. at 13 (citing Petition, vol. 1 at 24).

¹¹¹ Conference Tr. at 50 (Kopf).

¹¹² CR/PR at Tables 4.11 & C.1. Apparent U.S. consumption was *** short tons in 2023, *** short tons in 2024, and *** short tons in 2025. *Id.*

ii. Supply Conditions

The domestic industry, comprising Cleveland Cliffs, Ohio Coatings, and U.S. Steel, was the second-largest supplier of tin mill products to the U.S. market during the POI.¹¹³ The domestic industry's share of apparent U.S. consumption declined by *** percentage points over the POI, falling from *** percent in 2023 to *** percent in 2024, and then falling further to *** percent in 2025.¹¹⁴

A number of domestic production facilities have been idled both during and immediately prior to the POI. Cleveland Cliffs idled its production of tin mill products at its only domestic production facility in Weirton, West Virginia in April 2024.¹¹⁵ U.S. Steel idled its production of tin mill products at two facilities in 2022, permanently idling production in East Chicago, Indiana in March 2022, and idling production at its Gary Works facility in Gary, Indiana in December 2022.¹¹⁶ In December 2023, U.S. Steel indefinitely idled production at its UPI plant in Pittsburg, California.¹¹⁷ In 2025, the remaining domestic producers were U.S. Steel, which accounted for *** percent of domestic production of tin mill products, and Ohio Coatings, which accounted for *** percent.¹¹⁸ In April 2026, U.S. Steel announced plans to restart production at its Gary Works facility.¹¹⁹ The restart is expected to occur in early 2027 at an estimated cost of between \$15.0 million and \$20.0 million.¹²⁰

During the POI, U.S. producers' practical tin mill production capacity declined by more than its production. The industry's practical capacity decreased by *** percent during the POI, while tin mill production decreased by *** percent over this period, resulting in an increase in practical tin mill product capacity utilization of *** percentage points, rising from *** percent in 2023 to *** percent in 2024 and *** percent in 2025.¹²¹ Petitioners assert that the domestic

¹¹³ CR/PR at Table 4.11.

¹¹⁴ CR/PR at Tables 4.11 & C.1.

¹¹⁵ CR/PR at Table 3.3; Conference Tr. at 50 (Beline).

¹¹⁶ *Tin Mill Products Final*, USITC Pub. 5492 at 30.

¹¹⁷ CR/PR at Table 3.3.

¹¹⁸ CR/PR at Table 3.1. During the POI, Cleveland Cliffs' share of U.S. production fell from *** percent in 2023 to *** percent in 2024 and *** production in 2025. *Id.* at Table 3.7. *** share of domestic production increased by *** percentage points during the POI, rising from *** percent in 2023 to *** percent in 2024 and *** percent in 2025. *Calculated from id.* *** share of domestic production increased irregularly by *** percentage points over the POI, falling from *** percent in 2023 to *** percent in 2024, before rising to *** percent in 2025. *Id.*

¹¹⁹ Conference Tr. at 13 (Kopf).

¹²⁰ CR/PR at Table 3.3; Conference Tr. at 13 (Kopf) (stating that U.S. Steel "hope{s} to get Gary restarted by 2027 if market conditions allow"); *id.* at 18-19 (Kopf) (estimating the cost of the restart).

¹²¹ CR/PR at Tables 3.5 & C.1. U.S. producers' practical capacity declined from *** short tons in 2023 to *** short tons in 2024 and *** short tons in 2025; U.S. producers' production also declined over

industry has sufficient capacity to supply the entire U.S. market – and that it will have additional capacity if U.S. Steel is able to restart production at its Gary Works facility – but has been unable to do so due to subject imports.^{122 123}

Although U.S. shipments of cumulated subject imports were the third-largest source of supply to the U.S. market during the POI, their share of apparent U.S. consumption increased by *** percentage points, rising from *** percent in 2023 to *** percent in 2024 and *** percent in 2025.¹²⁴

U.S. shipments of imports from nonsubject countries were the largest source of tin mill products throughout the POI. Their share of apparent U.S. consumption increased by *** percentage points, rising from *** percent in 2023 to *** percent in 2024 and *** percent in 2025.¹²⁵ The largest sources of nonsubject imports are Germany, Canada, and the Netherlands.¹²⁶

All three U.S. producers and 15 of 27 importers reported that they had not experienced supply constraints after January 1, 2023.¹²⁷ Of the U.S. importers that reported that they had experienced supply constraints, 11 reported that the constraints had occurred in 2023, nine reported that they occurred during 2024, seven during 2025, and five since January 1, 2026. Importers identified several reasons for these constraints, including limited availability of

the POI, falling from *** short tons in 2023 to *** short tons in 2024 and *** short tons in 2025. *Id.* These declines result from U.S. Steel’s idling of its UPI facility in December 2023 and Cleveland Cliffs’ closure of its Weirton facility in April 2024. *Id.* at Table 3.3. Cleveland Cliffs’ practical capacity declined during the POI, falling from *** short tons in 2023 to *** short tons in 2024 and *** short tons in 2025. *Id.* at Table 3.7. ***’s practical capacity also declined during the POI, falling from *** short tons in 2023, to *** short tons in 2024 and 2025. *Id.* *** practical capacity was *** short tons throughout the POI. *Id.* Cleveland Cliffs’ production fell from *** short tons in 2023 to *** short tons in 2024 and *** production in 2025. *Id.* ***’s production declined irregularly over the POI, falling from *** short tons in 2023 to *** short tons in 2024, before rising slightly to *** short tons in 2025. *Id.* *** production increased irregularly, rising from *** short tons in 2023 to *** short tons in 2024, before declining slightly to *** short tons in 2025. *Id.*

¹²² CR/PR at Table 3.8; Petitioners’ Postconference Br. at 14-15; Conference Tr. at 18 (Kopf) (“U.S. Steel can supply any of the products offered by subject imports and we have the capacity to do it.”); *id.* at 55 (Kopf) (explaining that restarting tin mill operations at the Gary Works facility would allow U.S. Steel to “optimize our product offerings, and expand the product offerings by being able to run two tin mill lines instead of just one”). *See also* CR/PR at 3.4 (describing the capabilities at the Gary Works facility and how long it would take for each line to restart production).

¹²³ Domestic producer Ohio Coatings reported that ***. CR/PR at Table 3.8. It stated that either producing ***. *Id.*

¹²⁴ CR/PR at Tables 4.11 & C.1.

¹²⁵ CR/PR at Tables 4.11 & C.1.

¹²⁶ CR/PR at 2.5.

¹²⁷ CR/PR at 2.5.

domestically produced tin mill products, production reliability issues, and tariffs or quotas limiting availability of imports from certain countries, including South Korea.¹²⁸ One importer reported that Cleveland Cliffs' idling of its Weirton facility in 2024 impacted its ability to meet contractual obligations to customers.¹²⁹

iii. Substitutability and Other Conditions

Based on the record in the preliminary phase of these investigations, we find that there is a moderate to high degree of substitutability between cumulated subject imports and domestically produced tin mill products.¹³⁰ As discussed in Section VI.B above, all U.S. producers reported that subject imports from each subject country are always or frequently interchangeable with the domestic like product,¹³¹ and at least half of U.S. importers reported that subject imports from each subject country are always or frequently interchangeable with domestically produced tin mill products.¹³²

We also find that price is an important factor in tin mill product purchasing decisions, among other factors. Purchasers responding to the Commission's Lost Sales/Lost Revenue survey generally ranked price, availability, quality, and qualified/ability to meet specifications as being among the top factors influencing their purchasing decisions.¹³³ Price was most frequently cited as a top-three purchasing factor, while qualified/ability to meet specifications was most frequently cited as the first-most important factor.¹³⁴ All U.S. producers reported that differences other than price were sometimes or never significant between the domestic like product and subject imports from each source.¹³⁵ By contrast, U.S. importers were more mixed in their responses, with a majority of U.S. importers reporting that factors other than price were always significant when comparing domestically produced tin mill products with

¹²⁸ CR/PR at 2.5.

¹²⁹ CR/PR at 2.5.

¹³⁰ CR/PR at 2.7.

¹³¹ CR/PR at Table 2.7.

¹³² CR/PR at Table 2.8.

¹³³ CR/PR at 2.8.

¹³⁴ CR/PR at Table 2.6. Nine purchasers cited price as a top-three purchasing factor, while availability factors and quality factors were cited by seven purchasers each as top-three purchasing factors, and qualified/ability to meet specifications factor was cited by four purchasers. *Id.* Four purchasers rated qualified/ability to meet specifications as the most important factor, and two purchasers rated price as the most important factor, while one purchaser each rated availability and quality as the most important factor. *Id.* The most commonly ranked second-most important factors were availability (five purchasers), quality (four purchasers), and price (one purchaser). *Id.* Price was the most commonly cited third-most important factor (six purchasers), followed by quality (two purchasers), and availability (one purchaser). *Id.*

¹³⁵ CR/PR at Table 2.9.

subject imports from China, and half of the importers reporting that there are only sometimes significant differences other than price when comparing the domestic product and subject imports from Taiwan and Turkey.¹³⁶

As explained above, domestically produced tin mill products and subject imports were sold mainly to can manufacturers.¹³⁷

Tin mill products are primarily produced to order. U.S. producers reported that *** percent of their commercial shipments were produced to order, with lead times averaging *** days.¹³⁸ The remaining *** percent of their commercial shipments were sold from inventories, with lead times averaging *** days.¹³⁹ U.S. importers reported that *** percent of their commercial shipments were produced to order, with lead times averaging *** days.¹⁴⁰ They reported that the remaining *** percent of their commercial shipments were sold from U.S. inventories and *** percent of commercial shipments were sold from foreign inventories, with lead times averaging *** days, regardless of source.¹⁴¹

U.S. producers reported selling most of their tin mill products under annual contracts, with lesser but substantial quantities sold under long-term contracts, and smaller quantities sold on the spot market.¹⁴² Petitioners state that, although the domestic industry makes most of its sales through annual contracts, purchasers are not penalized if they elect not to purchase the quantities of tin mill products required under those contracts and can also procure tin mill products on the spot market.¹⁴³ Importers sold the vast majority of their tin mill products on the spot market, followed by ***, and a smaller quantity sold under ***.¹⁴⁴ U.S. producers and importers reported setting prices primarily using transaction-by-transaction negotiations and

¹³⁶ CR/PR at Table 2.10. In comparing domestically produced tin mill products and subject imports from China, nine importers reported that differences other than price are always significant, one reported that they are frequently significant, and five reported that they are sometimes significant. *Id.* For domestically produced tin mill products and subject imports from Taiwan, four importers reported that differences other than price are always significant, two reported that they are frequently significant, and six reported that they are sometimes significant. *Id.* For domestically produced tin mill products and subject imports from Turkey, two importers reported that differences other than price are always significant, three reported that they are frequently significant, and five reported that they are sometimes significant. *Id.*

¹³⁷ CR/PR at 2.2 & Table 2.2.

¹³⁸ CR/PR at 2.8.

¹³⁹ CR/PR at 2.8.

¹⁴⁰ CR/PR at 2.8.

¹⁴¹ CR/PR at 2.8.

¹⁴² CR/PR at 5.3 & Table 5.4.

¹⁴³ Petitioners' Postconference Br. at 16-17; CR/PR at 5.4 (citing Conference Tr. at 17 (Kopf)).

¹⁴⁴ CR/PR at 5.3 & Table 5.4.

contracts, although a smaller number of importers reported using a set price list.¹⁴⁵

Raw materials for tin mill products include black plate, hot welded steel, and coating materials.¹⁴⁶ The prices of hot- and cold-rolled coil fluctuated during the POI, with larger peaks in April 2023 and January 2024, smaller peaks in March and April of 2025 and in early 2026, and ending at a price that was *** percent higher for hot-rolled coil and *** percent higher for cold-rolled coil.¹⁴⁷ Raw materials as a share of U.S. producers' cost of goods sold ("COGS") increased by *** percentage points from 2023 to 2025, rising from *** percent in 2023 to *** percent in 2024 and *** percent in 2025.¹⁴⁸

In January 2023, following the filing of petitions by Cleveland Cliffs and the USW, the Commission and Commerce initiated antidumping investigations of tin mill products from Canada, China, Germany, the Netherlands, South Korea, Taiwan, Turkey, and the United Kingdom, and a countervailing duty investigation of tin mill products from China.¹⁴⁹ Cash deposit requirements were imposed after June 26, 2023 on imports of tin mill products from China following Commerce's affirmative preliminary countervailing duty determination, and after August 22, 2023 on imports of tin mill products from China, Canada, and Germany following Commerce's affirmative preliminary antidumping duty determinations.¹⁵⁰ Commerce published negative final antidumping determinations regarding the Netherlands, Taiwan, Turkey, and the United Kingdom, and the Commission consequently terminated its investigations for these countries in January 2024.¹⁵¹ In February 2024, the Commission issued its final determination for the remaining countries. Commerce had found a *de minimis* rate for one exporter from South Korea, and the Commission found that the remaining subject imports from South Korea were negligible and so terminated its investigation for this country. For the remaining subject imports from Canada, China, and Germany, the Commission found that the domestic industry was not materially injured or threatened with material injury by reason of these imports, and consequently the cash deposit requirements for imports from these

¹⁴⁵ CR/PR at 5.3 & Table 5.3. Petitioners reported that annual contract negotiations typically begin in the third quarter for the next year. *Id.* at 5.3 (citing Conference Tr. at 16 (Kopf)).

¹⁴⁶ CR/PR at 5.1.

¹⁴⁷ CR/PR at 5.1, Figure 5.1 & Table 5.1.

¹⁴⁸ CR/PR at Table 6.1.

¹⁴⁹ Chinese Respondents' Postconference Br. at 2-6 (citing *Tin Mill Products Prelim.*, USITC Pub. 5413 & *Tin Mill Products Final*, USITC Pub. 5492); CR/PR at Table 1.2.

¹⁵⁰ *See, e.g.*, 88 Fed. Reg. 41373 (June 26, 2023) (China preliminary CVD determination); 88 Fed. Reg. 57801 (August 22, 2023) (Canada preliminary AD determination). Commerce made preliminary negative determinations in the antidumping duty investigations into imports of tin mill products from the Netherlands, South Korea, Taiwan, Turkey, and the United Kingdom. *Tin Mill Products Final*, USITC Pub. 5492 at Table I-1.

¹⁵¹ CR/PR at Table 1.2; *Tin Mill Products Final*, USITC Pub. 5492 at I-2.

countries were lifted.¹⁵²

Tin mill products imported from China, Taiwan, and Turkey were subject to an additional Section 232 duty of 25 percent *ad valorem*, effective March 23, 2018.¹⁵³ Effective June 4, 2025, the Section 232 rate of duty for subject imports from all subject countries was increased to 50 percent *ad valorem*.¹⁵⁴

As discussed in section VI above, prior to February 2025, market participants could request that Commerce's BIS grant exclusions from the Section 232 tariffs.¹⁵⁵ Exclusions could be granted for any steel article that BIS concluded was not produced in the United States "in a sufficient and reasonably available amount or of a satisfactory quality."¹⁵⁶ Chinese Respondents have submitted 15 decisions granting Section 232 exclusion requests for tin mill products that were issued between July 2022 and November 2024.¹⁵⁷ U.S. Steel did not object to ten of the exclusion requests, eight of which were for D&I products, and five of the requests were granted over U.S. Steel's objection.¹⁵⁸ All of the requests were granted based upon the BIS' conclusion that the production was not produced in the United States in a sufficient and reasonably available amount or of a satisfactory quality.¹⁵⁹ The ability for market participants to obtain new exclusion requests was discontinued in February 2025.¹⁶⁰

Tin mill products from China became subject to an additional 15 percent *ad valorem* duty pursuant to Section 301 of the Trade Act of 1974, as amended ("Section 301"), effective September 1, 2019. Effective February 14, 2020, the Section 301 duty rate was reduced to 7.5 percent *ad valorem*; however, effective September 27, 2024, the Section 301 duty rate increased to 25 percent *ad valorem*.¹⁶¹

Effective February 4, 2025, tin mill products originating in China were subject to an additional 10 percent *ad valorem* duty under the International Emergency Economic Powers Act ("IEEPA").¹⁶² Effective March 4, 2025, that additional duty was increased to 20 percent *ad valorem*, but it was reduced back to 10 percent effective November 10, 2025. Effective

¹⁵² CR/PR at Table 1.2; *Tin Mill Products Final*, USITC Pub. 5492 at 1.

¹⁵³ CR/PR at 1.9 & n.9. Effective August 13, 2018, the Section 232 duty for Turkey was raised to 50 percent *ad valorem* but was reduced to 25 percent *ad valorem* effective May 21, 2019. *Id.*

¹⁵⁴ CR/PR at 1.9 & n.9.

¹⁵⁵ Chinese Respondents' Postconference Br. at 6-9 & Ex. 2.

¹⁵⁶ *E.g.*, Chinese Respondents' Postconference Br. at Ex. 2.B.

¹⁵⁷ Chinese Respondents' Postconference Br. at Ex. 2.

¹⁵⁸ Chinese Respondents' Postconference Br. at 6-9 & Ex. 2.

¹⁵⁹ Chinese Respondents' Postconference Br. at Ex. 2.B-2.C.

¹⁶⁰ Chinese Respondents' Postconference Br. at 5; 90 Fed. Reg. 9817 (Feb. 18, 2025).

¹⁶¹ CR/PR at 1.10

¹⁶² 50 U.S.C. § 1701, *et seq.*

February 20, 2026, all tariffs initiated under IEEPA were terminated.¹⁶³

U.S. producers were evenly split as to the impact of the Section 301 tariffs and IEEPA tariffs, with one producer reporting that such tariffs had had an impact, one that they did not have an impact, and one that they did not know.¹⁶⁴ Importer responses were similarly mixed concerning the impact of Section 301 tariffs, with 12 U.S. importers reporting that such tariffs had had an impact, four importers that they did not have an impact, and 11 importers that they did not know.¹⁶⁵ For the IEEPA tariffs, a majority of 22 U.S. importers reported that such tariffs had had an impact, while two reported that they did not have an impact, and three reported they did not know.¹⁶⁶ With respect to the Section 232 tariffs, two U.S. producers reported such tariffs had had an impact, and one producer reported that they had not had an impact, while the vast majority of U.S. importers (22 of 27) reported that such tariffs had had an impact.¹⁶⁷

C. Volume of Cumulated Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the “Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant.”¹⁶⁸

The volume of cumulated subject imports increased by 115.1 percent over the POI, from 160,249 short tons in 2023 to 217,558 short tons in 2024 and 344,770 short tons in 2025.^{169 170}

¹⁶³ CR/PR at 1.10-1.11. Tin mill products originating in China, Taiwan, and Turkey are not subject to tariffs initiated in February 2026 under section 122 of the Trade Act of 1974. CR/PR at 1.10.

¹⁶⁴ CR/PR at Table 2.1.

¹⁶⁵ CR/PR at Table 2.1.

¹⁶⁶ CR/PR at Table 2.1.

¹⁶⁷ CR/PR at Table 2.1. Of the remaining importers, three reported that the Section 232 tariffs had not had an impact, and two importers reported that they did not know. *Id.* In addition, some U.S. producers reported that, while the Section 232 and 301 tariffs and the IEEPA tariffs were sometimes initially effective in reducing imports from subject countries, they had not had a significant effect. *Id.* at 2.1. Many U.S. importers, however, reported that the tariffs had increased costs and reduced their competitiveness. *Id.*

¹⁶⁸ 19 U.S.C. § 1677(7)(C)(i).

¹⁶⁹ CR/PR at Tables 4.2 & 4.3.

¹⁷⁰ Petitioners contend that official U.S. import statistics represent the most complete set of data available to the Commission for measuring import volumes. Petitioners’ Postconference Br. at 2-3. However, given the large share of imports accounted for by responding importers, we have used data from importer questionnaire responses to measure import volumes and apparent U.S. consumption. See CR/PR at 4.1 (responding importers account for 96.3 percent of imports from subject sources under the official U.S. import statistics). Moreover, given the substantial increase in importers’ ending inventories during the POI, measuring apparent U.S. consumption using official import statistics, rather than importers’ U.S. shipments of imports, would overstate the increase in apparent U.S. consumption during the POI. Importers’ ending inventories of imports from all sources increased by *** short tons (***) percent) from 2023 to 2025. *Id.* at Table C.1.

¹⁷¹ Cumulated subject imports as a share of apparent U.S. consumption increased by *** percentage points, from *** percent in 2023 to *** percent in 2024 and *** percent in 2025.¹⁷²

Chinese Respondents assert that 2023 is an improper benchmark for measuring the increase in subject imports. They contend that the antidumping and countervailing duties that were preliminarily imposed on subject imports from China in 2023 as a result of Commerce’s and the Commission’s antidumping and countervailing duty investigations abruptly halted subject imports from China until the Commission issued its final negative determination. They assert that if 2021 was the starting point, Chinese imports have increased only by 12 percent and that subject imports from all three countries as well as nonsubject imports followed the same general trend.¹⁷³ They also maintain that both subject and nonsubject imports increased in 2024 to meet pent up demand after the Commission issued its final negative determination and that inventories of both subject and nonsubject imports increased in 2025 because of uncertainty surrounding the Section 232 tariffs.¹⁷⁴

As an initial matter, we disagree with Chinese Respondents that the imposition of preliminary duties in the prior investigations, overlapping with the POI of the present investigation, requires the Commission to deviate from its usual practice with respect to the assessment of volume in its investigations. The Commission is not required to consider the reasons for increased subject import volumes in assessing whether the volume or increase in volume is significant.¹⁷⁵

Although Chinese Respondents contend that imports were depressed in 2023, record evidence indicates that most of the increase in cumulated subject imports occurred between

¹⁷¹ The volume of U.S. importers’ U.S. shipments of cumulated subject imports increased by 53.5 percent, from 193,955 short tons in 2023 to 198,327 short tons in 2024 and to 297,742 short tons in 2025. CR/PR at Tables 4.11 & C.1.

¹⁷² CR/PR at Tables 4.11 & C.1. As a ratio to U.S. production, subject imports followed a similar pattern, increasing by *** percentage points, rising from *** percent in 2023 to *** percent in 2024 and *** percent in 2025. *Id.* at Tables 4.2 & 4.3.

¹⁷³ Chinese Respondents’ Postconference Br. at 2-6 (citing Tin Mill Products from the People’s Republic of China: Preliminary Affirmative Determination of Sales at Less than Fair Value and Preliminary Affirmative Determination of Critical Circumstances, 88 Fed. Reg. 57,009, 57,009 (Dep’t Commerce Aug. 22, 2023); Tin Mill Products from the People’s Republic of China: Preliminary Affirmative Determination of Countervailing Duty Determination and Alignment of Final Determination with Final Antidumping Duty Determination, 88 Fed. Reg. 41,373, 41,374 (Dep’t of Commerce June 26, 2023)). Further, Chinese Respondents note that, prior to February 2024, when the Commission issued its negative determination, U.S. imports of tin mill products from China were subject to antidumping rates of 122.52 percent and countervailing duty rates of up to 542.55 percent. *Id.*

¹⁷⁴ Chinese Respondents’ Postconference Br. at 5.

¹⁷⁵ *OCTAL, Inc. v. United States*, 539 F. Supp. 3d 1291, 1299-1300 (Ct. Int’l Trade 2021) (citing 19 U.S.C. § 1677(7)(C)(i)).

2024 and 2025 which would have been largely unaffected by cash deposit requirements for subject imports from China, which ended in February 2024.¹⁷⁶ Specifically, between 2024 and 2025, cumulated subject imports increased by 58.5 percent, cumulated U.S. shipments from subject sources increased by 50.1 percent, and subject imports gained *** percentage points of U.S. market share.¹⁷⁷ Conversely, between 2023 and 2024, cumulated subject imports increased by 35.8 percent, cumulated U.S. shipments from subject sources increased by 2.3 percent, and subject sources gained *** percentage points of market share.¹⁷⁸ Further, we note that official import statistics indicate that cumulated subject import volumes were lower in 2021 than in 2024 and 2025; thus, even using Chinese Respondents' preferred starting point, cumulated subject import volumes still increased significantly.¹⁷⁹

Based on the record of this preliminary phase of the investigations, we conclude that the volume of cumulated subject imports and the increase in that volume are significant, both in absolute terms and relative to consumption in the United States.

D. Price Effects of Cumulated Subject Imports

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

- (I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and
- (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.¹⁸⁰

As addressed in section VII.B.iii above, we have found a moderate to high degree of substitutability between the domestic like product and subject imports and that price is an important factor in purchasing decisions, among other factors.

The Commission collected quarterly quantity and f.o.b. pricing data on sales of four products shipped by U.S. producers and importers to unrelated U.S. customers during the POI.¹⁸¹ Two U.S. producers and 14 importers provided usable pricing data for sales of the

¹⁷⁶ CR/PR at Tables 4.2, 4.11 & C.1

¹⁷⁷ CR/PR at Tables 4.3, 4.11 & C.1.

¹⁷⁸ CR/PR at Tables 4.3, 4.11 & C.1.

¹⁷⁹ Specifically, based on official import statistics, the volume of cumulated subject imports was 20.1 percent higher in 2024 than in 2021 and 127.1 percent higher in 2025 than in 2021. *Derived from* CR/PR at Table E.1.

¹⁸⁰ 19 U.S.C. § 1677(7)(C)(ii).

¹⁸¹ CR/PR at 5.5. These four pricing products were defined as follows:

requested products, although not all firms reported pricing for all products for all quarters.¹⁸² Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. shipments of tin mill products, *** percent of reported U.S. commercial shipments of subject imports from China, *** percent of reported U.S. commercial shipments of subject imports from Taiwan, and *** percent of reported U.S. commercial shipments of subject imports from Turkey from January 2023 to December 2025.¹⁸³

These pricing data indicate that cumulated subject imports undersold domestically produced tin mill in all four pricing products in 44 of 60 quarterly comparisons (73.3 percent of instances), involving *** short tons of reported subject import sales (corresponding to *** percent of the volume of subject imports in the pricing data), at margins ranging from *** to *** percent and averaging *** percent.¹⁸⁴ In the remaining *** quarterly comparisons, *** short tons of subject imports oversold domestically produced tin mill products for pricing products 1, 2, and 3, with overselling margins ranging from *** to *** percent and averaging *** percent.¹⁸⁵ By volume, the majority of subject imports in the pricing data undersold the domestic like product in every year of the POI.¹⁸⁶

We have also considered purchasers' responses to the Lost Sales/Lost Revenue survey. Purchases reported by the 12 responding purchasers are nearly comprehensive of apparent U.S. consumption during the POI.¹⁸⁷ Of the 12 responding purchasers, eight reported that they

Product 1: Single reduced, electrolytic tinplate with base box weights of 75 lbs.–95 lbs. inclusive, in coils.

Product 2: Double reduced, electrolytic tinplate with base box weights of 55 lbs.–65 lbs. inclusive, in coils.

Product 3: Single reduced, electrolytic chromium-coated steel with base box weights of 65 lbs.–80 lbs. inclusive, in coils.

Product 4: Double reduced, electrolytic chromium-coated steel with base box weights of 55 lbs.–65 lbs. inclusive, in coils.

Id.

¹⁸² CR/PR at 5.5.

¹⁸³ CR/PR at 5.5.

¹⁸⁴ CR/PR at 5.15 & Table 5.10.

¹⁸⁵ CR/PR at 5.15 & Table 5.10.

¹⁸⁶ CR/PR at Table 5.12. In 2023, *** short tons of subject imports undersold the domestic like product (*** percent of subject imports in the pricing data); in 2024, *** short tons of subject imports undersold the domestic like product (*** percent); and in 2025, *** short tons of subject imports undersold the domestic like product (*** percent). *Id.*

¹⁸⁷ Purchases reported by responding purchasers account for *** percent of U.S. importers' U.S. shipments of cumulated subject imports, *** percent of U.S. producers' U.S. shipments, and *** percent of U.S. producers' and importers' shipments from all sources during the POI. *Derived from* CR/PR at Tables 4.11, 5.13, C.1. Petitioners state that while most of the "major players" are represented

had purchased subject imports instead of U.S.-produced tin mill products during the POI.¹⁸⁸ Of these purchasers, six reported that subject import prices were lower than those of U.S.-produced tin mill products, and three of these purchasers reported that price was a primary reason for the decision to purchase subject imports rather than U.S.-produced tin mill products.¹⁸⁹ These three firms estimated that they, in total, purchased *** short tons of subject imports instead of U.S.-produced tin mill products primarily because of the lower price of the subject imports.¹⁹⁰ This volume of sales lost to subject imports due to price is equivalent to approximately *** percent of responding purchasers' purchases/imports of subject imports, approximately *** percent of importers' U.S. shipments of cumulated subject imports over the POI, and approximately *** percent of the domestic industry's shipments during the POI.¹⁹¹ Other purchasers identified availability, size ranges, product quality, rates of rejection, on-time delivery, and lead times as non-price reasons for purchasing imported rather than U.S.-produced tin mill products.¹⁹²

Based on the foregoing, including the moderate to high degree of substitutability between domestically produced tin mill products and cumulated subject imports, the importance of price in purchasing decisions for tin mill products among other factors, and the available pricing data, we find, for purposes of these preliminary determinations, that underselling by cumulated subject imports from China, Taiwan, and Turkey was significant. In addition, we cannot determine for purposes of these preliminary determinations that underselling did not result in subject imports gaining market share at the expense of the domestic industry. Cumulated subject imports gained *** percentage points of market share at the expense of the domestic industry during the POI. However, most purchasers gave non-price reasons for purchasing subject imports or reported that they did not buy subject imports instead of the domestic product, and confirmed lost sales were limited. Further, there is an apparent lack of production of certain products by the domestic industry (as discussed below in section VII.E). We intend to further examine these issues in any final phase of these investigations.

in our data, certain of U.S. Steel's top customers did not submit questionnaire responses. Petitioners' Postconference Br. at 2.

¹⁸⁸ CR/PR at 5.18.

¹⁸⁹ CR/PR at 5.18.

¹⁹⁰ CR/PR at 5.18 & Table 5.15.

¹⁹¹ *Derived from* CR/PR at Tables 4.11 & 5.15. The volume of sales lost to subject imports due to price additionally is equivalent to approximately *** percent of total apparent U.S. consumption during the POI. *Derived from id.*

¹⁹² CR/PR at 5.18. One large purchaser, ***, indicated that ***. *Id.* at Table 5.15. It also noted that ***. *Id.* at Table 5.17. In addition, *** stated that it ***, and *** stated that ***. *Id.* at Table 5.15.

We have also considered whether subject imports depressed domestic prices or prevented price increases for domestically produced tin mill products which otherwise would have occurred to a significant degree. Prices for all four of the domestically produced pricing products declined irregularly over the POI, with decreases occurring between the first quarter of 2023 and the first quarter of 2024 and fluctuations upwards within a relatively narrow band for the remainder of the POI.¹⁹³ From the beginning to end of the POI, prices of domestically produced tin mill products decreased by *** percent for pricing product 1, by *** percent for pricing product 2, by *** percent for pricing product 3, and by *** percent for pricing product 4.¹⁹⁴ Prices for subject imports for pricing products 1 and 3 from Taiwan decreased during the POI; however, prices for subject imports for pricing product 1 from China increased.¹⁹⁵

Two of 12 responding purchasers reported that U.S. producers had reduced prices in order to compete with lower-priced subject imports, while five reported that they did not know if this had occurred and five reported that U.S. producers had not lowered their prices.¹⁹⁶ The reported estimated price reductions for domestic product were *** percent to compete with subject imports from China, *** percent to compete with subject imports from Taiwan, and *** percent to compete with subject imports from Turkey.¹⁹⁷

During the POI, the domestic industry's net sales average unit value ("AUV") decreased irregularly by less than the decrease in its per-unit cost of goods sold ("COGS").¹⁹⁸ Specifically, from 2023 to 2024, as apparent U.S. consumption declined by *** percent, the domestic industry's net sales unit value fell by \$*** per short ton (*** percent) and unit total COGS declined by more, \$*** per short ton (*** percent).¹⁹⁹ From 2024 to 2025, as apparent U.S. consumption increased by *** percent, the domestic industry's net sales unit value increased

¹⁹³ CR/PR at Tables 5.5 through 5.8 & Figures 5.5 through 5.8.

¹⁹⁴ CR/PR at Table 5.9. As noted above, the domestic industry's prices for pricing product 4 decreased by *** than prices for other pricing products. *Id.* In addition, the volume of pricing product 4 was *** from each subject country than for other pricing products. *Id.*

¹⁹⁵ CR/PR at 5.14 & Table 5.9. Prices of subject imports from Taiwan decreased by *** percent for pricing product 1 and by *** percent for pricing product 3. *Id.* Prices for pricing product 1 from China increased by *** percent. *Id.* at Table 5.9. There was insufficient data reported to determine trends for pricing products from Turkey, for pricing products 1 and 4 from Taiwan, and for pricing products 2 through 4 from China. *Id.* at 5.14.

¹⁹⁶ CR/PR at 5.18 & Table 5.17.

¹⁹⁷ CR/PR at 5.18 & Table 5.17.

¹⁹⁸ CR/PR at Table 6.2.

¹⁹⁹ CR/PR at Table 6.2. The decline in unit total COGS was driven by direct labor and other factory costs, which decreased by \$*** per short ton (*** percent) and \$*** per short ton (*** percent), respectively, from 2023 to 2024 as raw material costs fell by \$*** per short ton (*** percent). *Id.*

by \$*** per short ton (**% percent) and unit total COGS increased by less, \$*** per short ton (**% percent).²⁰⁰ Thus, overall during the POI the industry's per-unit total COGS decreased by \$*** per short ton (**% percent), more than the decline in its net sales unit value of \$*** per short ton (**% percent) from 2023 to 2025.²⁰¹ As a result, the industry's COGS-to-net-sales ratio decreased by ** percentage points over the POI, from ** percent in 2023 to ** percent in 2024 and ** percent in 2025.²⁰²

However, on a per short ton basis, the decline in total COGS was driven by declines in direct labor and other factory costs, as raw material costs increased irregularly over the POI. In particular, the industry's direct labor costs and other factory costs declined by \$*** per short ton (**% percent) and \$*** per short ton (**% percent), respectively, from 2023 to 2025, while the domestic industry's per-unit raw material costs increased irregularly by \$*** per short ton (**% percent) during that period.²⁰³ Petitioners attribute the declines in the industry's per-unit direct labor and other factory costs to capacity rationalization.²⁰⁴ In any final phase of the investigations, we intend to investigate further these reductions and the extent to which they may have contributed to domestic price decreases during the POI.

Thus, over the POI while subject imports significantly undersold the domestic like product and demand increased irregularly, domestic producer prices declined, two purchasers confirmed that U.S. producers had reduced prices in order to compete with lower-priced subject imports, and the domestic industry's net sales unit value declined from 2023 to 2025 while per-unit raw material costs increased. At the same time, the domestic industry's COGS-to-net sales ratio declined over the POI as the domestic industry's unit COGS declined (due to declining labor and other factory costs) to a greater degree than its net sales AUV. As a result, the domestic industry's operating margins improved significantly over the POI.²⁰⁵ Therefore,

²⁰⁰ CR/PR at Table 6.2. The increase in unit total COGS was driven by increasing raw material costs, which grew by \$*** per short ton (**% percent) from 2024 to 2025. *Id.*

²⁰¹ CR/PR at Table 6.2.

²⁰² CR/PR at Tables 6.1 & C.1.

²⁰³ CR/PR at Table 6.2.

²⁰⁴ Petitioners' Postconference Br. at 27. Ohio Coatings reported that its per-unit direct labor costs ***. CR/PR at 6.14 n.13.

²⁰⁵ The improvement in the domestic industry's COGS to net sales ratio is not solely driven by the closure of Cleveland Cliffs. For the remaining U.S. producers (U.S. Steel and Ohio Coatings) combined, their net sales unit value declined by \$*** per ton (**% percent) from 2023 to 2025 while unit raw material costs declined by \$*** per ton (**% percent), unit direct labor costs declined by \$*** per ton (**% percent), unit other factory costs declined by \$*** per ton (**% percent), and unit total COGS declined by \$*** per ton (**% percent). *Derived from* CR/PR at Table 6.3. As a result of their net sales unit value declining by less than unit COGS, their combined COGS to net sales ratio improved from ** percent in 2023 to ** percent in 2025. *Id.*

based on the record of these preliminary investigations, we cannot determine that subject imports did not depress prices to a significant degree.²⁰⁶

In sum, for purposes of these preliminary investigations, we find that cumulated subject imports significantly undersold the domestic like product. We cannot determine that underselling did not result in imports gaining market share at the expense of the domestic industry. In addition, we cannot determine that subject imports did not depress prices to a significant degree. Consequently, we cannot find that subject imports did not have significant price effects.

E. Impact of Cumulated Subject Imports²⁰⁷

Section 771(7)(C)(iii) of the Tariff Act provides that the Commission, in examining the impact of the subject imports on the domestic industry, “shall evaluate all relevant economic factors which have a bearing on the state of the industry.” These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debt, research and development (“R&D”), and factors affecting domestic prices. No single factor is dispositive and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”²⁰⁸

Almost all of the domestic industry’s trade and employment indicators worsened during the POI, while its financial performance improved. The domestic industry’s practical tin mill capacity decreased by *** percent, from *** short tons in 2023 to *** short tons in 2024 and *** short tons in 2025.²⁰⁹ The industry’s tin mill production decreased by *** percent, from *** short tons in 2023 to *** short tons in 2024 and *** short tons in 2025.²¹⁰ The industry’s practical capacity utilization, however, increased by *** percentage points, from *** percent in

²⁰⁶ From 2023 to 2024, the COGS-to-net-sales ratio *** for all three companies. From 2024 to 2025, with unit raw materials costs ***, partially because ***, U.S. Steel and Ohio Coatings were both ***. CR/PR at Tables 3.7, 6.2 & 6.3. Improving operating margins for *** and ***, as described below in Section VII.E, are also indicative of the lack of price suppression/depression. *Id.* at Table 6.3.

²⁰⁷ Commerce initiated antidumping duty investigations for subject imports from China based on estimated dumping margins ranging from 85.87 to 136.52 percent, for subject imports from Taiwan ranging from 60.68 to 137.24 percent, and for subject imports from Turkey based on estimated dumping margins ranging from 41.11 to 198.04 percent. *AD Initiation Notice*, 91 Fed. Reg. at 24,160.

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

²⁰⁹ CR/PR at Tables 3.7 & C.1.

²¹⁰ CR/PR at Tables 3.7 & C.1.

2023 to *** percent in 2024 and *** percent in 2025.²¹¹

The domestic industry's U.S. shipments decreased by *** percent, falling from *** short tons in 2023 to *** short tons in 2024 and *** short tons in 2025.²¹² The industry's share of apparent U.S. consumption declined by *** percentage points, falling from *** percent in 2023 to *** percent in 2024 and *** percent in 2025.²¹³

The domestic industry's end-of-period inventories increased irregularly by *** percent, falling from *** short tons in 2023 to *** short tons in 2024, before rising to *** short tons in 2025.²¹⁴ As a share of total shipments, the domestic industry's end-of-period inventories increased by *** percentage points, from *** percent in 2023 to *** percent in 2024 and *** percent in 2025.²¹⁵

The domestic industry's employment-related indicators also worsened over the POI. The number of production and related workers ("PRWs") decreased by *** percent, from *** PRWs in 2023 to *** PRWs in 2024 and *** PRWs in 2025.²¹⁶ The industry's total hours worked decreased by *** percent, from *** hours in 2023 to *** hours in 2024 and *** hours in 2025.²¹⁷ Wages paid decreased by *** percent, from \$*** in 2023 to \$*** in 2024 and \$*** in 2025.²¹⁸ Productivity increased by *** percent, from *** short tons per 1,000 hours in 2023 to *** short tons per 1,000 hours in 2024 and *** short tons per 1,000 hours in 2025.²¹⁹

The domestic industry's financial performance was mixed over the POI. The industry's net sales revenues decreased by *** percent, from \$*** in 2023 to \$*** in 2024 and \$*** in 2025.²²⁰ Its gross profit increased by *** percent, from \$*** in 2023 to \$*** in 2024 and \$*** in 2025.²²¹ The industry's operating income increased by *** percent, from \$*** in 2023 to \$*** in 2024 and \$*** in 2025.²²² The industry's net income increased irregularly by *** percent, falling from \$*** in 2023 to \$*** in 2024, before rising to \$*** in 2025.²²³ The industry's operating income as a ratio to net sales increased by *** percentage points, from

²¹¹ CR/PR at Tables 3.7 & C.1.

²¹² CR/PR at Table C.1.

²¹³ CR/PR at Tables 4.11 & C.1.

²¹⁴ CR/PR at Tables 3.10 & C.1.

²¹⁵ CR/PR at Tables 3.10 & C.1.

²¹⁶ CR/PR at Tables 3.12 & C.1.

²¹⁷ CR/PR at Tables 3.12 & C.1.

²¹⁸ CR/PR at Tables 3.12 & C.1.

²¹⁹ CR/PR at Tables 3.12 & C.1.

²²⁰ CR/PR at Tables 6.1 & C.1.

²²¹ CR/PR at Tables 6.1 & C.1.

²²² CR/PR at Tables 6.1 & C.1.

²²³ CR/PR at Tables 6.1 & C.1.

*** percent in 2023 to *** percent in 2024 and *** percent in 2025.²²⁴ The industry's net income as a ratio to net sales increased irregularly by *** percentage points, falling from *** percent in 2023 to *** percent in 2024, before rising to *** percent in 2025.²²⁵

The domestic industry's capital expenditures decreased by *** percent, falling from \$*** in 2023 to \$*** in 2024 and \$*** in 2025.²²⁶ U.S. producers' research and development declined irregularly by *** percent, falling from \$*** in 2023 to \$*** in 2024, before rising slightly to \$*** in 2025.²²⁷ The domestic industry's return on assets increased by *** percentage points, from *** percent in 2023 to *** percent in 2024 and *** percent in 2025.²²⁸

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In addition, responding U.S. producers reported that subject imports had actual and/or anticipated negative effects on investment, growth and development over the POI.²³⁰

Chinese Respondents contend that the domestic industry does not produce certain tin mill products, which results in reduced competition between subject imports and the domestic industry.²³¹ U.S. producers did not report any shipments of either D&I tinplate or laminated

²²⁴ CR/PR at Tables 6.1 & C.1.

²²⁵ CR/PR at Tables 6.1 & C.1.

²²⁶ CR/PR at Tables 6.6 & C.1.

²²⁷ CR/PR at 6.8 & C.1.

²²⁸ CR/PR at Table 6.11.

²²⁹ While the closure of Cleveland Cliffs' tin mill facility drove much of the changes in the industry's performance during the POI, resulting in substantial declines in the domestic industry's output and employment indicators but an improvement in the domestic industry's financial performance given Cleveland Cliffs' significantly worse financial performance leading up to its closure, the trends described above remain the same when examining the two remaining domestic producers, U.S. Steel and Ohio Coatings. The combined U.S. market share held by U.S. Steel and Ohio Coatings declined by *** percentage points from 2023 to 2025. *Calculated from* CR/PR at Table 4.11. The practical capacity of these two firms combined declined by *** short tons (***) percent) from 2023 to 2025 due to *** idling capacity. *Calculated from* CR/PR at Table 3.7. Their combined production also declined by *** short tons (***) percent). *Calculated from id.* The capacity utilization rates for both remaining producers increased from 2023 to 2025. *Id.* While Cleveland Cliffs' closure resulted in the loss of *** PRWs between 2023 and 2025, *** also laid off workers, resulting in a loss of *** PRWs for the two remaining producers. *Id.* at 3.13 & *calculated from* U.S. Producers' Questionnaire Responses at II-13. Both remaining domestic producers improved their financial performance during the POI. *Id.* at Table 6.3. *** ratio of operating income to net sales increased from *** percent in 2023 to *** percent in 2025, while *** increased from *** percent to *** percent. *Id.* Both producers' return on assets increased from 2023 to 2025. *Id.* at Table 6.11. Both remaining producers' capital expenditures fell over the POI. *Id.* at Table 6.6.

²³⁰ CR/PR at Table 6.14. For example, U.S. Steel reported that because of subject imports ***. *Id.* Similarly, Ohio Coatings reported that ***. *Id.*

²³¹ Chinese Respondents' Postconference Br. at 6-9 & Exs. 2.A through 2.C.

TFS products in 2025.²³² These products account for a substantial portion of the U.S. market: combined, they accounted for *** percent of apparent consumption in 2025 and *** percent of U.S. shipments of cumulated subject imports in 2025.²³³ Nonetheless, as discussed in section IV.B above, the record shows there is considerable overlap between the domestic industry and subject sources regarding other types of tin mill products, such as other tinplate, which accounted for *** percent of the domestic industry's U.S. shipments and *** percent of U.S. shipments from cumulated subject sources in 2025.²³⁴ In any final phase investigations, we will further investigate the degree to which product availability impacts competition between the domestic product and subject imports.

As discussed above, we have found that subject import volumes and their increase were significant absolutely and relative to consumption, and that subject imports significantly undersold the domestic industry. We also cannot find that subject imports did not depress prices to a significant degree, or that underselling did not cause subject imports to gain market share at the expense of the domestic industry.²³⁵ As a result, we cannot determine that underselling did not result in the industry's trade, employment, and financial indicators being worse than they otherwise would have been. Consequently, for purposes of the preliminary phase of these investigations, we cannot find that cumulated subject imports did not have a significant adverse impact on the domestic industry.

²³² CR/PR at 4.8 & Tables 4.5 & D.1.

²³³ *Calculated from* CR/PR at Tables 4.5 & C.1. In addition, Chinese Respondents have submitted evidence indicating that BIS granted 15 Section 232 exclusions for tin mill products between July 2022 and November 2024, ten of which were uncontested by the domestic industry, and eight of these were for D&I products. Of the remaining exclusions, all five were granted over the industry's objections. Chinese Respondents' Postconference Br. at 6-9 & Exs. 2.A through 2.C.

²³⁴ CR/PR at Table 4.5 & D.1 through D.4.

²³⁵ While cumulated subject imports gained market share over the POI and purchasers confirmed some lost sales, there was a relatively low volume of confirmed lost sales. Specifically, as noted, purchases reported by purchasers are nearly comprehensive of apparent U.S. consumption and purchasers' reported quantities of lost sales were equivalent to just *** percent of importers' U.S. shipments of cumulated subject imports, *** percent of the domestic industry's U.S. shipments, and *** percent of apparent U.S. consumption during the POI. *Derived from* CR/PR at Tables 4.11, 5.15 & C.1. Several purchasers reported that they purchased subject imports instead of the domestic product due to non-price reasons, including availability, product quality, and rates of rejection. *Id.* at 5.18 & Tables 5.15 & 5.17. We also note that the record shows that the domestic industry did not produce certain types of tin mill products in 2025, such as D&I tinplate and laminated TFS, which accounted for *** percent of apparent U.S. consumption and *** percent of U.S. shipments of subject imports in 2025. *Calculated from id.* at Table 4.5 & C.1. We intend to further investigate these issues in any final phase of the investigation.

We have also considered whether there are other factors that may have had an impact on the domestic industry to ensure that we are not attributing injury from such other factors to subject imports. Petitioners assert that, although nonsubject imports made up the majority of U.S. imports of tin mill products, “{t}he pricing of those imports is relatively close to domestic pricing.”²³⁶ Nonsubject imports were the largest source of supply to the U.S. market during the POI and their share of apparent consumption rose steadily over the POI, gaining *** percentage points of market share from 2023 to 2025.²³⁷ During the POI, the AUVs of U.S. importers’ U.S. shipments of nonsubject imports were higher than those of cumulated subject imports but lower than the AUVs of U.S. producers’ U.S. shipments.²³⁸ In any final phase of these investigations, we intend to further explore the role of nonsubject imports in the U.S. market.

We have also considered trends in apparent consumption. Apparent U.S. consumption for tin mill products increased irregularly during the POI.²³⁹ Petitioners contend that they were unable to take advantage of otherwise favorable demand conditions because of dumped and subsidized subject imports.²⁴⁰ In any final phase of these investigations we intend to further consider the role of demand in the U.S. market.

VIII. Conclusion

For the reasons stated above, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of tin mill products from China, Taiwan, and Turkey that are allegedly sold in the United States at LTFV and subsidized by the government of China.

²³⁶ Petitioners’ Postconference Br. at 33 (quoting Conference Tr. at 14-15 (Kopf)).

²³⁷ CR/PR at Tables 4.11 & C.1. As noted in section VII.B.ii above, nonsubject imports’ market share increased from *** percent in 2023 to *** percent in 2024 and *** percent in 2025. *Id.*

²³⁸ CR/PR at Table C.1. Nonsubject imports’ U.S. shipment AUVs declined irregularly during the POI, falling from \$*** in 2023 to \$*** in 2024, before rising to \$*** in 2025. *Id.*

²³⁹ As noted in Section VII.B.i above, apparent U.S. consumption declined by *** percent from 2023 to 2024 before increasing by *** percent from 2024 to 2025, for an overall increase of *** percent. CR/PR at Tables 4.11 & C.1.

²⁴⁰ Petitioners’ Postconference Br. at 34.

Part 1: Introduction

Background

These investigations result from petitions filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by United States Steel Corporation (Pittsburgh, Pennsylvania) (“U.S. Steel”) and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union (Pittsburgh, Pennsylvania), on April 9, 2026, alleging that an industry in the United States is materially injured and threatened with material injury by reason of imports of tin mill products from China, Taiwan, and Turkey that are alleged to be sold in the United States at less than fair value (“LTFV”) and that are alleged to be subsidized by the Government of China. Table 1.1 presents information relating to the background of these investigations.^{1 2}

Table 1.1 Tin mill products: Information relating to the background and schedule of this proceeding

Effective date	Action
April 9, 2026	Petitions filed with Commerce and the Commission; institution of the Commission investigations (91 FR 19201, April 14, 2026)
April 30, 2026	Commission’s conference
May 5, 2026	Commerce’s notices of initiation (91 FR 24157 and 24170, May 5, 2026)
May 22, 2026	Commission’s vote
May 26, 2026	Commission’s determinations
June 2, 2026	Commission’s views

¹ Pertinent Federal Register notices are referenced in appendix A and may be found at the Commission’s website (www.usitc.gov).

² A list of witnesses appearing at the conference is presented in appendix B of this report.

Statutory criteria

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

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

Section 771(7)(C) of the Act (19 U.S.C. § 1677(7)(C)) further provides that—³

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

³ Amended by PL 114—27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

or more advanced version of the domestic like product, and (V) in {an antidumping investigation}, the magnitude of the margin of dumping.

In addition, Section 771(7)(J) of the Act (19 U.S.C. § 1677(7)(J)) provides that—⁴

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

Organization of report

Part 1 of this report presents information on the subject merchandise, alleged subsidy rates and dumping margins, and domestic like product. Part 2 of this report presents information on conditions of competition and other relevant economic factors. Part 3 presents information on the condition of the U.S. industry, including data on capacity, production, shipments, inventories, and employment. Parts 4 and 5 present the volume of subject imports and pricing of domestic and imported products, respectively. Part 6 presents information on the financial experience of U.S. producers. Part 7 presents the statutory requirements and information obtained for use in the Commission’s consideration of the question of threat of material injury as well as information regarding nonsubject countries.

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

Market summary

Tin mill products are primarily used to manufacture welded cans for food, aerosol, paint, and filtration. The U.S. producers of tin mill products are U.S. Steel and Ohio Coatings Company (“Ohio Coatings”), while leading producers of tin mill products in subject countries include Shougang Group of China, Ton Yi Industrial Corporation of Taiwan, and Tosyalı Toyo Steel of Turkey. Leading importers of tin mill products from subject countries include *** (China); *** (Taiwan); and *** (Turkey). Leading importers of tin mill products from nonsubject countries include ***. U.S. purchasers of tin mill are end users, such as can manufacturers, and distributors. The largest responding purchasers are ***.

Apparent U.S. consumption of tin mill products totaled approximately *** short tons (\$***) in 2025. Currently, two firms are known to produce tin mill products in the United States. U.S. producers’ U.S. shipments of tin mill products totaled *** short tons (\$***) in 2025 and accounted for *** percent of apparent U.S. consumption by quantity (**% percent by value). U.S. shipments of imports from subject sources totaled 297,742 short tons (\$512.1 million) in 2025 and accounted for *** percent of apparent U.S. consumption by quantity (**% percent by value). U.S. shipments of imports from nonsubject sources totaled 1.4 million short tons (\$2.4 billion) in 2025 and accounted for *** percent of apparent U.S. consumption by quantity (**% percent by value).

Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, table C.1. The Commission’s questionnaires collected data for the years 2023 to 2025. Except as noted, U.S. industry data are based on questionnaire responses of three firms that accounted for all known U.S. production of tin mill products during 2025. U.S. imports are based on U.S. importer questionnaire responses.

Previous and related investigations

Tin mill products and similar merchandise have been the subject of prior antidumping and countervailing duty investigations in the United States as presented in table 1.2.

Table 1.2 Tin mill products: Previous and related Commission proceedings

Date	Number	Product	Country	ITC Original Determination	Current Status of Order
1999	731-TA-860	Tin- and chromium-coated Steel Sheet	Japan	Affirmative	Order continued after fourth review, 07/17/2024
2023	701-TA-685	Tin Mill Products	China	Negative	N/A
2023	731-TA-1599	Tin Mill Products	Canada	Negative	N/A
2023	731-TA-1600	Tin Mill Products	China	Negative	N/A
2023	731-TA-1601	Tin Mill Products	Germany	Negative	N/A
2023	731-TA-1602	Tin Mill Products	Netherlands	N/A (Commerce negative)	N/A
2023	731-TA-1603	Tin Mill Products	South Korea	Terminated (Negligible/Partial Commerce negative)	N/A
2023	731-TA-1604	Tin Mill Products	Taiwan	N/A (Commerce negative)	N/A
2023	731-TA-1605	Tin Mill Products	Turkey	N/A (Commerce negative)	N/A
2023	731-TA-1606	Tin Mill Products	United Kingdom	N/A (Commerce negative)	N/A

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

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

Additionally, there have been countervailing and antidumping duty investigations on hot-rolled and cold-rolled steel, including substrates used in the production of tin mill products. Table 1.3 presents information on proceedings with AD/CVD orders in place on these related upstream products since 2015.

Table 1.3 Commission proceedings on related upstream products since 2015

Date	Number	Product	Country	ITC Original Determination	Current Status of Order
2015	701-TA-540	Cold-rolled steel flat products	Brazil	Affirmative	Order revoked after first review, 08/25/2022
2015	701-TA-541	Cold-rolled steel flat products	China	Affirmative	Order continued after first review, 08/19/2022
2015	701-TA-542	Cold-rolled steel flat products	India	Affirmative	Order continued after first review, 08/25/2022
2015	701-TA-543	Cold-rolled steel flat products	South Korea	Affirmative	Order continued after first review, 08/19/2022
2015	701-TA-544	Cold-rolled steel flat products	Russia	Negative	N/A
2015	731-TA-1283	Cold-rolled steel flat products	Brazil	Affirmative	Order revoked after first review, 08/25/2022
2015	731-TA-1284	Cold-rolled steel flat products	China	Affirmative	Order continued after first review, 08/25/2022
2015	731-TA-1285	Cold-rolled steel flat products	India	Affirmative	Order continued after first review, 08/25/2022
2015	731-TA-1286	Cold-rolled steel flat products	Japan	Affirmative	Order continued after first review, 08/25/2022
2015	731-TA-1287	Cold-rolled steel flat products	South Korea	Affirmative	Order continued after first review, 08/25/2022
2015	731-TA-1288	Cold-rolled steel flat products	Netherlands	Negative	N/A
2015	731-TA-1289	Cold-rolled steel flat products	Russia	Negative	N/A

Table continued.

Table 1.3 (Continued) Commission proceedings on related upstream products since 2015

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

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

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

Note: Additionally, an antidumping duty order on hot-rolled steel flat products from Russia (Inv. No. 731-TA-808) remains in place, originating from a petition filed in 1998.

Nature and extent of alleged subsidies and sales at LTFV

Alleged subsidies

On May 5, 2026, Commerce published a notice in the Federal Register of the initiation of its countervailing duty investigation on tin mill products from China.⁵

Alleged sales at LTFV

On May 5, 2026, Commerce published a notice in the Federal Register of the initiation of its antidumping duty investigations on tin mill products from China, Taiwan, and Turkey.⁶ Commerce has initiated antidumping duty investigations based on estimated dumping margins ranging from 85.87 to 136.52 percent for China, 60.68 to 137.24 percent for Taiwan, and 41.11 to 198.04 percent for Turkey.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:⁷

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

⁵ For further information on the alleged subsidy programs see Commerce's notice of initiation and related CVD Initiation Checklist. 91 FR 24170, May 5, 2026.

⁶ 91 FR 24157, May 5, 2026.

⁷ 91 FR 24157 and 24170, May 5, 2026.

Tariff treatment

Tin mill products are currently imported under the following provisions of the Harmonized Tariff Schedule of the United States (“HTS”): 7210.11.0000, 7210.12.0000, 7210.50.0020, 7210.50.0090, 7212.10.0000, 7212.50.0000, 7225.99.0090, and 7226.99.0180. The 2026 general rate of duty is free for HTS subheadings 7210.11.00, 7210.12.00, 7210.50.00, 7212.10.00, 7212.50.00, 7225.99.00, and 7226.99.01.⁸ 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 tin mill products from subject countries. Table 1.3 provides a summary of additional tariffs in place as of May 18, 2026. Historical information is summarized beneath the table.

Table 1.3 Tin Mill Products: Additional tariffs on imports originating in China, Taiwan, and Turkey as of May 18, 2026

Duty rates in percent ad valorem

Additional tariff	China	Taiwan	Turkey
Section 232	50	50	50
Section 301	25	NA	NA
Section 122	NA	NA	NA
Total additional ad valorem rate	75	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 country 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 below for historical changes to the additional tariffs.

Section 232 tariffs

Tin mill products originating in China, Taiwan, and Turkey are subject to an additional 50 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended.⁹

⁸ USITC, HTS (2026) Revision 7, Publication 5735, April 2026, pp. 72.17, 72.19, 72.40, and 72.41.

⁹ Effective March 23, 2018, steel articles originating in China, Taiwan, and Turkey became subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended. Effective August 13, 2018, the section 232 duty on steel articles originating in Turkey was increased to 50 percent ad valorem but was later reduced back to 25 percent ad valorem effective May 21, 2019. Effective June 4, 2025, the section 232 rate of duty on steel articles originating in China, Taiwan, and Turkey increased to 50 percent. 83 FR 11625, March 15, 2018; 83 FR 40429, August 15, (continued...)

Section 301 tariffs

Effective September 1, 2019, tin mill products originating in China were subject to an additional 15 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective February 14, 2020, the section 301 duty for tin mill products was reduced to 7.5 percent. Effective September 27, 2024, the additional section 301 duty for tin mill products originating in China increased to 25 percent.¹⁰

Section 122 tariffs

Tin mill products originating in China, Taiwan, and Turkey are not subject to tariffs initiated in February 2026 under section 122 of the Trade Act of 1974.¹¹

Tariffs initiated under the International Emergency Economic Powers Act (“IEEPA”)¹²

Effective February 20, 2026, all tariffs initiated under IEEPA were terminated. Below is a history of the IEEPA tariffs relevant to tin mill products originating in China, Taiwan, and Turkey that were in effect until February 20, 2026.¹³

2018; 84 FR 23421, May 21, 2019; 90 FR 9817, February 18, 2025; 90 FR 24199, June 9, 2025; 91 FR 18201, April 9, 2026. See also HTS heading 9903.82.02 and U.S. note 16(c)(iii) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 7, USITC Publication 5735, April, pp. 99.3.64 and 99.3.420

¹⁰ 84 FR 45821, August 30, 2019; 85 FR 3741, January 22, 2020; 89 FR 76581, September 18, 2024. See also HTS heading 9903.91.01 and U.S. note 31 to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 7, Publication 5735, April 2026, pp. 99.3.336 to 99.3.340, and 99.3.436.

¹¹ Section 122 authorizes the President to impose a temporary import surcharge for a period not exceeding 150 days unless such period is extended by an Act of the Congress. Articles subject to section 232 tariffs, including tin mill products, are not subject to the tariffs initiated under section 122. 91 FR 9339, February 25, 2026. See also HTS heading 9903.03.06 and U.S. note 2(aa)(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 7, Publication 5735, April 2026, pp. 99.3.49 to 99.3.59, and 99.3.403.

¹² Multiple tariffs were enacted under the authority of the International Emergency Economic Powers Act (“IEEPA”), including tariffs that applied 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 and terminated effective February 7, 2026. Tariffs under IEEPA were amended over time. All tariffs initiated under IEEPA were terminated effective February 20, 2026. 91 FR 9437, February 25, 2026.

¹³ 91 FR 9437, February 25, 2026.

Country specific IEEPA tariffs

Effective February 4, 2025, tin mill products originating in China were subject to an additional 10 percent ad valorem duty under 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.¹⁴ Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.¹⁵

Tariffs initiated in April 2025 under IEEPA

Tin mill products originating in China, Taiwan, and Turkey were not subject to tariffs initiated in April 2025 under IEEPA.¹⁶ Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.¹⁷

¹⁴ 90 FR 9121, February 7, 2025; 90 FR 11426, March 6, 2025; 90 FR 11463, March 7, 2025; 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 7, Publication 5735, April 2026, pp. 99.3.3 to 99.3.4, 99.3.366, and 99.3.367.

¹⁵ 91 FR 9437, February 25, 2026.

¹⁶ Articles subject to section 232 tariffs, including tin mill products, were 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.XX and U.S. note 2(v)(iii)(a) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 7, Publication 5735, April 2026, pp. 99.3.4 to 99.3.11, and 99.3.367.

¹⁷ 91 FR 9437, February 25, 2026.

The product

Description and applications

Tin mill products are flat-rolled steel products that are coated or plated with tin, chromium, or chromium oxides. Flat-rolled steel products coated with tin are known as tinplate. Flat-rolled steel products coated with chromium or chromium oxides are known as tin-free steel or electrolytic chromium-coated steel sheet. The below sections provide detailed descriptions of each of these products.

Tinplate

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

A common commercial weight for tin is 20 pounds per base box.¹⁸ Tinplate is also available with different coating weights on the two sides of the sheet. Single-reduced electrolytic tinplate is commonly produced by cold rolling in thicknesses of 0.49 mm and lighter while double-reduced electrolytic tinplate is normally produced by cold rolling and annealing, followed by further cold reduction in thicknesses of 0.29 mm and lighter.¹⁹ Tinplate is commonly manufactured to several ASTM standard specifications, including A599, A623, A624, and A626.

Single-reduced tinplate is produced with different surface finishes. The five following basic surface finishes are available:²⁰

- Bright finish – Consists of a surface provided by a flow-brightened tin coating on a smooth finish steel base. Bright finishes are normally for general use.
- Light stone finish – Consists of a surface provided by a flow-brightened tin coating on a steel base finish characterized by a light directional pattern.

¹⁸ A base box is a unit of sale that refers to an area equivalent to 31,360 square inches (217.78 square feet or 20.23 square meters) consisting of 112 tinplate sheets, each measuring 14 inches (356 mm) by 20 inches (508 mm). The corresponding surface area (on both sides) of a base box is 62,720 square inches (435.56 square feet or 40.46 square meters). The weight of the tinplate coating is expressed in terms of pounds per base box (“lbs/bb”). ITRI Ltd., “Guide to Tinplate,” 2000, pp. 27, 30, <https://italabs.co.uk/guide-to-tinplate/>, retrieved April 15, 2026.

¹⁹ ITRI Ltd., “Guide to Tinplate,” 2000, p. 27, <https://italabs.co.uk/guide-to-tinplate/>, retrieved April 15, 2026.

²⁰ For general can-making operations, a bright or stone finish is most common.

- Stone finish – Consists of a surface provided by a flow-brightened tin coating on a steel base finish characterized by a directional pattern. This type of finish makes the scratches of printing and can making less conspicuous.
- Matte finish – Consists of a surface provided by an un-melted coating normally on a shot blast finish steel base. This is a dull type of finish and mainly used for making bottle crowns.
- Silver finish – Consists of a matte finish product which has been flow melted. This type of finish is also called “satin finish.” This is a rough, dull finish mainly for artistic cans.

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

Chromium-coated steel sheet

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

Primary applications

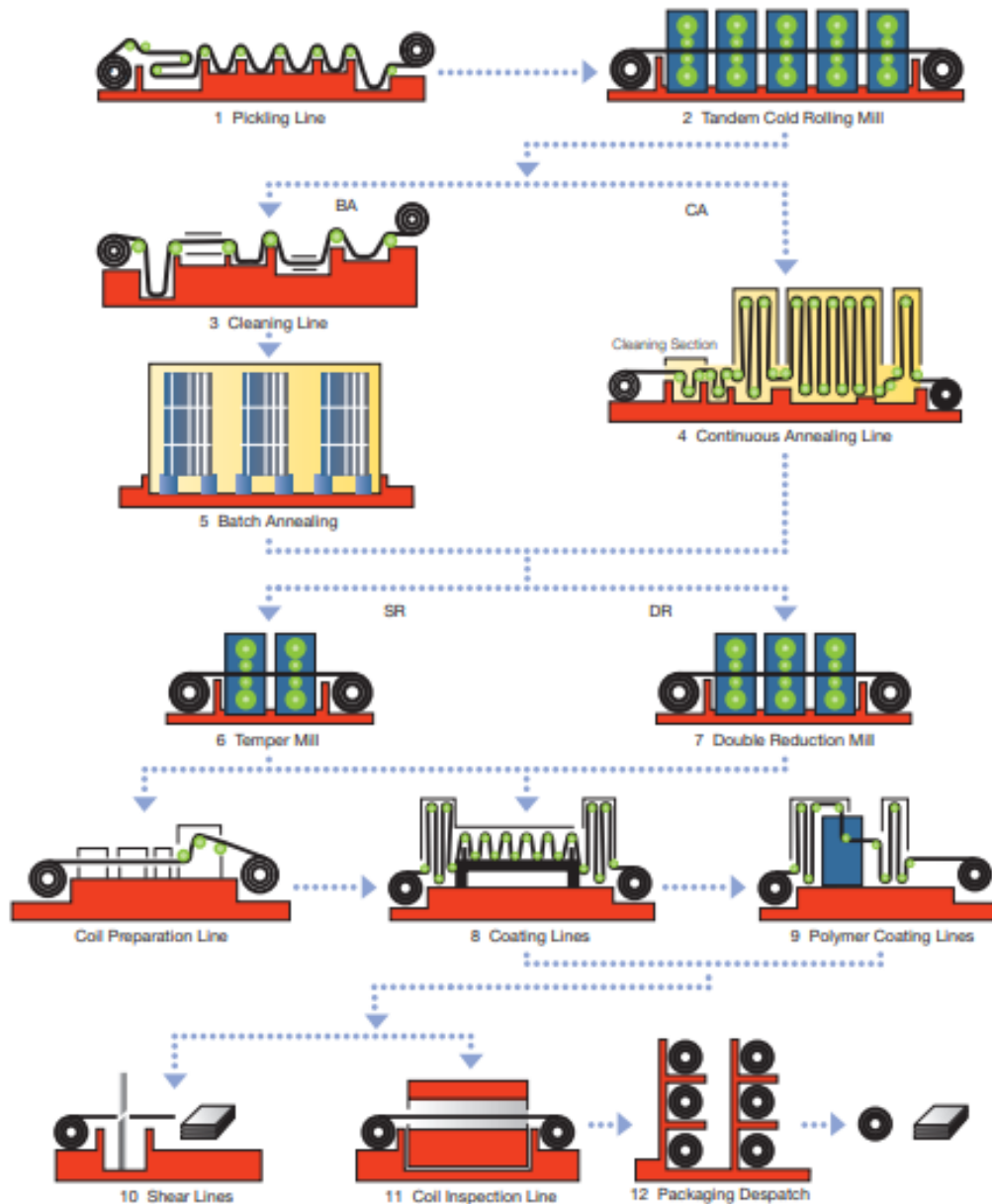
Tinplate is used primarily to manufacture welded cans for food, aerosol, paint, filtration, and more general applications. Tinplate is used for can bodies because of its shinier surface and corrosion resistance.

Chromium-coated steel sheet is used primarily for certain two-piece drawn cans and ends (tops) for food and beverage cans, as well as caps and closures for glass containers. Chromium-coated steel sheet, which has a duller surface finish and less corrosion resistance, is considered adequate for can ends because the tops have less contact with the contents of the can.

Manufacturing processes

Both tinplate and chromium-coated steel sheet are manufactured in five major production steps. Producers need not engage in all five steps, as steel inputs can be obtained from outside a tin mill production facility. The production process steps are displayed in figure (1.1) and described below.

Figure 1.1: Tin mill products: Manufacturing process flow diagram



Source: Steel Mills of the World, "The Manufacturing Route for Tinplate Products," https://www.steelmillsoftheworld.com/products/cs/tinplatecoils/Tinplate_manufacturing_route.pdf, retrieved April 21, 2026.

1. Hot rolling and cold reduction

Both tinplate and chromium-coated steel sheet are produced from molten steel that is either cast into slabs or poured as ingots that are rolled into slabs in a separate mill. While hot, the slabs are reduced in thickness and greatly elongated by further rolling through a series of roughing and finishing stands in a hot strip mill. The hot strip passes between rolls in successive roll stands being reduced to a predetermined thickness, typically between 1.6 and 2.5 mm. Upon leaving the last finishing stand, the strip is coiled. After cooling, the hot-rolled strip is uncoiled and pickled²¹ by passing it through a series of tanks or sprays of diluted acid to remove the oxide scale formed during the hot rolling process. The pickled strip is then typically dried, oiled, and recoiled.²² The hot-rolled and pickled strip is cold reduced by passing it through a series of rolls, in much the same manner as in the hot-rolling operation, except that a lubricant is applied between the stands as an aid in reduction and to prevent undue heating of the rolls and strip. Because the cold-reduction process hardens the strip, the strip must be annealed.

2. Annealing

Annealing is a heat treatment process that changes the physical (and sometimes the chemical) properties of a material to increase ductility and reduce the hardness to make the material more workable. There are two basic types of annealing operations for cold-rolled strip: batch annealing and continuous annealing. In batch annealing (“BA” in figure 1.1), the coiled strips are placed in a sealed container and slowly heated to, and cooled from, a subcritical temperature to soften the steel and to relieve stresses produced during rolling. To reduce oxidation, an inert or slightly reducing gas is introduced into the container during the operation. Batch annealing produces a steel product with a relatively bright surface finish and relatively greater flexibility than continuous annealing.

Continuous annealing (“CA” in figure 1.1) is accomplished by passing the cold-reduced strip through a series of vertical passes within a furnace consisting of heating, soaking, and cooling zones. The strip is heated rapidly to the desired temperature and subsequently cooled before leaving the furnace. This process results in a product with less flexibility compared to batch-annealed steel.

After the strip is annealed, it undergoes further processing. Single-reduced strip (“SR” in figure 1.1) is temper rolled, while double-reduced strip (“DR” in figure 1.1) is subjected to a second cold reduction process. Each of these processes is described below.

²¹ Pickling is an acid bath process to remove the unusable iron oxide scale that forms on hot worked steels as well as other impurities. Metal Supermarkets, “What is Steel Pickling?” November 23, 2021, <https://metalsupermarkets.com/what-is-steel-pickling/>.

²² The oil serves as protection against rusting prior to and as a lubricant during cold reduction.

3. Temper rolling

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

4. Additional cold reduction

Double-reduced strip is typically not temper rolled; instead, it is subjected to a second cold-reduction process after annealing to impart mechanical and surface properties to the steel. This reduction is accomplished by passing the strip through either a single roller, or a series of rollers, using a suitable lubricant. This second cold reduction supplies the final thickness and finish and the desired stiffness, strength, and flatness. It also produces a stronger, lighter weight product. After final reduction, the coils are ready to be trimmed and sheared, which occurs in a series of operations. This product, known as “black plate,” is highly susceptible to rusting in storage and transportation. Therefore, it is typically oiled— or chemically treated and then oiled— after cold reduction. The oil is later removed prior to coating.

5. Coating

In the electroplating process, the temper-rolled or double-reduced coiled strip travels through a lower and upper plating unit where individual plating cells are arranged in tandem. The plating cells contain the plating solution—either a stannous tin-containing sulphonic acid for tinfoil, or a chromate solution for chromium-coated steel sheet. A conductor roll at the end of each cell rides along the top surface of the strip and serves as the cathode, while the tin- or chromium coating material is deposited in the bottom of each cell and serves as the anode. The coating material dissolves into the plating solution and is electrochemically deposited on the steel substrate. The electroplating process is followed by rinsing, drying, quenching, and applying a lubricating film. Tinfoil and chromium-coated steel sheet are produced in varying coating weights and can be differentially coated, where the heavier coated surface is employed as the more protected inside of containers. Most producers that manufacture both tinfoil and chromium-coated steel sheet do so in the same mill, but on different coating lines. While the coating process is similar for both products, it is financially impractical for a producer to shift product to another production line because of the expense that would be involved in retrofitting the production line.

Domestic like product issues

No issues with respect to domestic like product have been raised in these investigations. The petitioner argues the Commission should find that there is a single domestic like product in these investigations, covering all tin mill products included in the scope.²³ No respondents have made any arguments with respect to the Commission's domestic like product definition.

²³ Petition, p. 20 and Petitioner's postconference brief, pp. 3 through 7.

Part 2: Conditions of competition in the U.S. market

U.S. market characteristics

Tin mill products are used primarily to manufacture welded cans for food, aerosol, paint, automotive applications, including oil filters, gaskets, tubing, and trunk hardware filtration, and general line applications.¹ Tin mill products face competition from substitute materials as well as pressure from can manufacturers to reduce the weight of tin mill products used per container.² Tin mill products are commonly manufactured to standard specifications issued by the American Society for Testing and Materials (ASTM).³

Two of 3 U.S. producers and 17 of 26 importers indicated that the market was subject to distinctive conditions of competition. Specifically, producer *** reported that tin mill products are sold by annual contracts to a small number of sophisticated customers and importers reported cheaper packaging alternatives such as plastic or aluminum, lack of U.S. capacity, annual supply arrangements that do not align with agricultural harvest seasons, the inability of U.S. producers to produce certain products, and concentrated purchasers that are often supplied by contracts.

Apparent U.S. consumption of tin mill products increased by *** percent during January 2023 to December 2025.

Impact of section 301 tariffs, section 232 tariffs, and new/modified tariffs

U.S. producers and importers were asked to report the impact of section 301 tariffs and section 232 tariffs on overall demand, supply, prices, or raw material costs, as well as the impact of new/modified tariffs since January 1, 2025 (table 2.1). U.S. producers stated that section 301 tariffs, section 232 measures, and new/modified tariffs, while sometimes initially effective in reducing imports from subject countries, have not had a significant effect. On the other hand, many importers reported that the tariffs increased costs and reduced their competitiveness.

¹ Petition, p. 12; Conference transcript, p. 12 (Kopf).

² Tin Mill Products from Canada, China, Germany, and South Korea, Inv. Nos. 701-TA-685 and 731-TA-1599-1601 and 1603 (Final), USITC Publication 5492, February 2024.

³ Petition, p. 10.

Table 2.1 Tin mill products: Count of firms' responses regarding the impact of the section 232 steel and aluminum measures, 301 tariffs on Chinese origin products or new/modified tariffs since January 1, 2025

Tariff type	Firm type	No	Yes	Don't know
Section 301 tariff	U.S. producers	1	1	1
Section 301 tariff	Importers	4	12	11
Section 232 measures	U.S. producers	1	2	0
Section 232 measures	Importers	3	22	2
New / modified tariff	U.S. producers	1	1	1
New / modified tariff	Importers	2	22	3

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

Channels of distribution

U.S. producers and subject importers sold mainly to can manufacturers as shown in table 2.2.

Table 2.2 Tin mill products: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent

Source	Channel	2023	2024	2025
United States	Distributors	***	***	***
United States	Can manufacturers	***	***	***
United States	Other end users	***	***	***
China	Distributors	***	***	***
China	Can manufacturers	***	***	***
China	Other end users	***	***	***
Taiwan	Distributors	***	***	***
Taiwan	Can manufacturers	***	***	***
Taiwan	Other end users	***	***	***
Turkey	Distributors	***	***	***
Turkey	Can manufacturers	***	***	***
Turkey	Other end users	***	***	***
Subject sources	Distributors	***	***	***
Subject sources	Can manufacturers	***	***	***
Subject sources	Other end users	***	***	***
Nonsubject sources	Distributors	***	***	***
Nonsubject sources	Can manufacturers	***	***	***
Nonsubject sources	Other end users	***	***	***
All imports sources	Distributors	***	***	***
All imports sources	Can manufacturers	***	***	***
All imports sources	Other end users	***	***	***

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

Geographic distribution

U.S. producers reported selling tin mill products to all regions in the contiguous United States (table 2.3). Importers reported selling to all regions in the contiguous United States, except the Mountains. For U.S. producers, *** percent of sales were within 100 miles of their production facility, *** percent were between 101 and 1,000 miles, and *** percent were over 1,000 miles. Importers sold *** percent within 100 miles of their U.S. point of shipment, *** percent between 101 and 1,000 miles, and *** percent over 1,000 miles.

Table 2.3 Tin mill products: Count of U.S. producers' and U.S. importers' geographic markets

Region	U.S. producers	China	Taiwan	Turkey	Subject sources
Northeast	3	2	5	5	7
Midwest	3	6	6	4	12
Southeast	3	3	7	4	10
Central Southwest	2	1	2	0	3
Mountains	1	0	0	0	0
Pacific Coast	3	4	3	1	7
Other	0	0	0	0	0
All regions (except Other)	1	0	0	0	0
Reporting firms	3	10	10	8	18

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

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

Supply and demand considerations

U.S. supply

Table 2.4 provides a summary of the supply factors regarding tin mill products from U.S. producers and from subject countries.

Table 2.4 Tin mill products: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in short tons; ratios and shares in percent; count in number of firms reporting

Factor	Measure	United States	China	Turkey
Capacity 2023	Quantity	***	***	***
Capacity 2025	Quantity	***	***	***
Capacity utilization 2023	Ratio	***	***	***
Capacity utilization 2025	Ratio	***	***	***
Inventories to total shipments 2023	Ratio	***	***	***
Inventories to total shipments 2025	Ratio	***	***	***
Home market shipments 2025	Share	***	***	***
Non-US export market shipments 2025	Share	***	***	***
Ability to shift production	Count	***	***	***

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

Note: U.S. producers accounted for all known U.S. production of tin mill products in 2025. Responding foreign producer/exporter firms accounted for a large majority of U.S. imports of tin mill products from China and Turkey during 2025. (No subject producers/exporters in Taiwan provided data). For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Parts 3 and 7.

Domestic production

Based on available information, U.S. producers of tin mill products have the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced tin mill products to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity⁴ and the availability of inventories. Factors mitigating responsiveness of supply include a limited ability to shift shipments from alternate markets and an inability to shift production to or from alternate products.

Subject imports

Based on available information, producers of tin mill products from subject countries have the ability to respond to changes in demand with moderate changes in the quantity of shipments of tin mill products to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the moderately low availability of unused capacity, low inventories, and the inability to shift production to or from alternate products for most foreign

⁴ Nonetheless, this capacity has declined by approximately *** percent since 2023.

producers.⁵ Chinese producers had high capacity utilization, low inventories, and a relatively large share of exports to non-U.S. markets. Turkish producers had somewhat lower capacity utilization, somewhat higher inventories, and a lower share of exports to non-U.S. markets. No responses were received from producers in Taiwan.

Imports from nonsubject sources

Imports from nonsubject sources accounted for *** percent of total U.S. imports in 2025. The largest sources of imports from nonsubject countries during January 2023 to December 2025 were Germany, Canada, and the Netherlands.

Supply constraints

All three U.S. producers and 15 of 27 importers reported that they had not experienced supply constraints since January 1, 2023. Of the importers that reported they had experienced supply constraints, 11 reported the constraints occurred during 2023, 9 reported they occurred during 2024, 7 during 2025, and 5 since January 1, 2026. General constraints reported by importers since 2023 included limited availability of U.S.-produced tin mill products, production reliability issues, tariffs, and section 232 tariffs or quotas limiting availability of imports from certain countries, including South Korea.

Importer *** reported that the closure of Cleveland Cliff's Weirton mill in 2024 impacted its own ability to meet its contractual obligations to its customers, and importer *** reported that a fire at a mill in Turkey limited supply for about four months in 2025.

U.S. demand

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

⁵ One foreign producer, ***.

End uses and cost share

U.S. demand for tin mill products depends on the demand for cans used for food packaging, filtration products, aerosol spray, and paint cans.⁶ Tin mill products account for a moderate-to-large share of the cost of the end-use products in which they are used. Reported cost shares for some end uses were as follows:

- Window spacers (***) percent)
- Aerosol cans (70 to 85 percent)
- Filters (60 to 80 percent)
- Tin caps and home canning lids (60 to 78 percent)
- Paint and chemical cans (60 percent)
- Food cans (40 to 95 percent)
- Armor tape for fiber optic cable (15 to 74 percent)

Business cycles

Two of three U.S. producers and 20 of 27 importers indicated that the market was subject to seasonality and business cycles. Specifically, the food canning industry demand varies depending on the season, with slightly lower demand in winter months when a lower volume of agricultural products are packaged. Petitioner stated that there is a pack season in the second and third quarter of the year.⁷ U.S. producer *** reported that spikes in the automotive sector for electric vehicles have further reduced demand for filtration products. Two importers also reported that demand for aerosol disinfectants increased since the COVID-19 pandemic.

Demand trends

Both responding U.S. producers reported no change in demand (table 2.5). Importers were split in their responses regarding demand with 11 importers reporting increasing (steadily or fluctuating) demand, 6 reporting no change, and 11 reporting decreasing (steadily or fluctuating) demand. Petitioner states that demand for tin mill products is growing due to more stringent environmental regulations that require the adoption of advanced filtration products and that aerosol spray cans are driving demand for tin mill products in personal care and cosmetic applications due to rising disposable incomes and interest in easy-to-use, portable packaging.⁸

⁶ Petition, p. 24.

⁷ Conference transcript, p. 38 (Kopf).

⁸ Petition, p. 24.

Table 2.5 Tin mill products: Count of firms' responses regarding overall domestic and foreign demand, by firm type

Count in number of firms reporting

Market	Firm type	Steadily Increase	Fluctuate Up	No change	Fluctuate Down	Steadily Decrease
Domestic demand	U.S. producers	0	0	2	0	0
Domestic demand	Importers	8	3	6	7	4
Foreign demand	U.S. producers	0	0	2	0	0
Foreign demand	Importers	7	1	7	3	1

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

Substitute products

One U.S. producer and 13 importers described substitutes for tin mill products, including aluminum, glass, hot-rolled/cold-rolled/galvanized steel, laminate, plastic, and TetraPak. Seven importers reported that the pricing of these substitutes can affect the pricing of tin mill products. However, 2 of 3 U.S. producers and 11 of 24 importers reported that there are no substitutes.

Substitutability issues

This section assesses the degree to which U.S.-produced tin mill products and imports of tin mill products from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of tin mill products from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderate to high degree of substitutability between domestically produced tin mill products and those imported from subject sources.⁹ Most U.S. producers indicated that U.S. and subject product were always interchangeable with factors other than price never significant, while importers were more likely to describe some limitations on interchangeability, including due to quality and particular specifications.

⁹ The degree of substitution between domestic and imported tin mill products depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced tin mill products to the tin mill products imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as relative prices (discounts/rebates), quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

Factors affecting purchasing decisions

Most important purchase factors

Purchasers responding to lost sales lost revenue allegations¹⁰ were asked to identify the main purchasing factors their firm considered in their purchasing decisions for tin mill products.

The most often cited top four factors firms consider in their purchasing decisions for tin mill products were price (9 firms), availability and quality (7 firms each), and qualified/ability to meet specifications (4 firms) as shown in table 2.6. Qualified/ability to meet specifications was the most frequently cited first-most important factor (cited by 4 firms), followed by price (2 firms); availability was the most frequently reported second-most important factor (5 firms); and price was the most frequently reported third-most important factor (6 firms).

Table 2.6 Tin mill products: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Count in number of firms reporting

Factor	First	Second	Third	Total
Price	2	1	6	9
Availability	1	5	1	7
Quality	1	4	2	7
Qualified/ability to meet specifications	4	0	0	4
All other factors	4	2	3	NA

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

Note: Other factors include on-time delivery and (5 purchasers each), product range and lead times (2 each), capability, relationship, and payment terms (1 each). Two purchasers reported price in addition to their top three factors.

Lead times

Tin mill products are primarily produced-to-order. U.S. producers reported that *** percent of their commercial shipments were produced-to-order, with lead times averaging *** days. The remaining *** percent of their commercial shipments came from inventories, with lead times averaging *** days. Importers reported that *** percent of their commercial shipments were produced-to-order, with lead times averaging *** days. The remaining share, *** percent from U.S. inventories and *** percent from foreign inventories, averaged *** and days, regardless of source.

¹⁰ This information is compiled from responses by purchasers identified by Petitioners to the lost sales lost revenue allegations. See Part 5 for additional information.

Comparison of U.S.-produced and imported tin mill products

In order to determine whether U.S.-produced tin mill products can generally be used in the same applications as imports from China, Taiwan, and Turkey, U.S. producers and importers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables 2.7 to 2.8, two of three U.S. producers reported that U.S.-produced tin mill products can always be used interchangeably with tin mill products produced in subject countries, and one reported that the products can frequently be used interchangeably. Importers reported a variety of experiences. Few importers reported that U.S.-produced tin mill products and tin mill products produced in subject countries could always be used interchangeably, but a plurality of firms reported that these products could frequently be used interchangeably. In most cases, half (or approximately half) of responding importers reported that the products from different sources could only sometimes or never be used interchangeably. However, most importers indicated that product from China and Taiwan are always or frequently interchangeable, and half of responding importers indicated that products from the United States and nonsubject countries are sometimes interchangeable.

Importers stated that specifications and availability of certain sizes or products limit interchangeability. Importer *** reported that tin mill products that are available in the United States are not a match for the specification required for wire and cable armor applications. Importer *** reported that wide-DWI tinplate or laminated tin-free steel is not produced in the United States.

Table 2.7 Tin mill products: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	2	1	0	0
United States vs. Taiwan	2	1	0	0
United States vs. Turkey	2	1	0	0
China vs. Taiwan	1	1	0	0
China vs. Turkey	1	1	0	0
Taiwan vs. Turkey	1	1	0	0
United States vs. Other	1	1	0	0
China vs. Other	1	1	0	0
Taiwan vs. Other	1	1	0	0
Turkey vs. Other	1	1	0	0

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

Table 2.8 Tin mill products: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	2	7	6	3
United States vs. Taiwan	2	5	3	4
United States vs. Turkey	0	7	3	3
China vs. Taiwan	5	3	1	0
China vs. Turkey	1	3	3	0
Taiwan vs. Turkey	1	4	4	0
United States vs. Other	0	3	8	5
China vs. Other	2	3	5	0
Taiwan vs. Other	2	3	5	0
Turkey vs. Other	1	3	4	1

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

In addition, U.S. producers and importers were asked to assess how often differences other than price were significant in sales of tin mill products from the United States, subject, or nonsubject countries. As seen in tables 2.9 to 2.10, two of three U.S. producers reported that factors other than price were sometimes significant, and one U.S. producer reported that they were never significant. Most importers reported that factors other than price were always significant when comparing U.S.-produced tin mill products with tin mill products from China. While a plurality of importers reported that differences other price were sometimes significant when comparing U.S.-produced products with products produced in Taiwan and Turkey.

Table 2.9 Tin mill products: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	0	0	2	1
United States vs. Taiwan	0	0	2	1
United States vs. Turkey	0	0	2	1
China vs. Taiwan	0	0	1	1
China vs. Turkey	0	0	1	1
Taiwan vs. Turkey	0	0	1	1
United States vs. Other	0	0	1	1
China vs. Other	0	0	1	1
Taiwan vs. Other	0	0	1	1
Turkey vs. Other	0	0	1	1

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

Table 2.10 Tin mill products: Count of importers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	9	1	5	0
United States vs. Taiwan	4	2	6	0
United States vs. Turkey	2	3	5	0
China vs. Taiwan	2	2	3	2
China vs. Turkey	2	2	4	0
Taiwan vs. Turkey	3	2	3	1
United States vs. Other	5	4	4	1
China vs. Other	2	3	5	0
Taiwan vs. Other	2	3	4	1
Turkey vs. Other	2	3	3	1

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

Importers reported many factors other than price that they considered including global trade risk, quality, reliability, availability, transportation, product range, and lead times. Importer *** reported that Chinese mills are working to improve their quality and *** reported that Chinese produced tin mill products always have high quality, fewer claims, higher yield, faster lead times, better technical support better customer service, and better transportation partners. Importer *** reported that no U.S. producer would quote for the products it purchased from China because they cannot satisfy the specifications at the small quantities it would have requested. Importer *** reported that the quality of tin mill products from Taiwan is significantly better than U.S. producers and that Turkish producer Tosyali Toyo offers “state-of-the-art rolling and plating combined with Japanese technology.”

Part 3: U.S. producers’ production, shipments, and employment

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the alleged subsidies and dumping margins was presented in Part 1 of this report, and information on the volume and pricing of imports of the subject merchandise is presented in Part 4 and Part 5. Information on the other factors specified is presented in this section and/or Part 6 and (except as noted) is based on the questionnaire responses of three firms that accounted for all known U.S. production of tin mill products during 2025.

U.S. producers

The Commission issued a U.S. producer questionnaire to three firms based on information contained in the petition, and all three firms provided U.S. producer questionnaire responses. Table 3.1 lists U.S. producers of tin mill products, their production locations, positions on the petition, and shares of total production.

Table 3.1 Tin mill products: U.S. producers, their positions on the petition, production locations, and shares of reported production, 2025

Firm	Position on petition	Production location(s)	Share of production
Cleveland-Cliffs	***	Weirton, WV	***
Ohio Coatings	***	Yorkville, OH	***
U.S. Steel	Petitioner	Gary, IN Portage, IN Pittsburg, CA	***
All firms	Various	Various	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Cleveland-Cliffs shut down its tin mill production facility in April 2024.

Table 3.2 presents information on U.S. producers' ownership, related, and/or affiliated firms. Ohio Coatings is jointly owned by Esmark, Inc. and TCC Steel, ***, and is therefore related to its co-parent TCC Steel in South Korea.¹ U.S. Steel is wholly owned by Nippon Steel Corporation through its U.S. subsidiary and is related both to its parent in Japan and to its wholly owned subsidiary in Slovakia, U. S. Steel Kosice, s.r.o.² U.S. Steel also stated in its postconference brief that, through its ultimate parent company Nippon Steel Corporation, it is related to the Chinese tin mill producer WISCO-Nippon Steel Tinsplate Co., Ltd.³ ***.

In addition, as discussed in more detail below, no U.S. producer reported directly importing tin mill products or purchasing imported tin mill products from subject sources; however, Nippon Steel Trading Americas, Inc. (related to U.S. Steel through U.S. Steel's parent company Nippon Steel Corporation), reported imports of tin mill products from *** during the period for which data were collected.

Table 3.2 Tin mill products: U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

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

Table 3.3 presents events in the U.S. industry since January 1, 2023.

Table 3.3 Tin mill products: Important industry events since 2023

Item	Firm	Event
Layoffs	Cleveland-Cliffs	In May 2023, Cleveland-Cliffs announced plans to lay off approximately 300 of the 950 employees at its tin mill facility in Weirton, West Virginia. Lourenco Goncalves, the company's Chairman, President, and CEO, cited unfair trade practices as the reason for the layoffs.

¹ <https://esmark.com/ohio-coatings-company-an-esmark-and-tcc-steel-jv-appoints-david-luptak-new-ceo/>, retrieved May 15, 2026.

² <https://www.ussteel.com/prereleases/-/blogs/nippon-steel-corporation-and-u-s-steel-finalize-historic-partnership-old>, retrieved May 15, 2026.

³ Petitioner's postconference brief, p. 7.

Item	Firm	Event
Plant closing interventions	U.S. Steel, UPI	In November 2023, three Congressional members representing Northern California’s East Bay Area districts— Mark DeSaulnier, John Garamendi, Barbara Lee, and Katie Porter— jointly called upon U.S. Steel to seek a buyer to keep UPI operating with the existing workers. They also called upon U.S. Steel to keep two support facilities, CEMCO, a producer of steel framing, and Roll Technology West (“RTW”), which provides chrome plates for UPI products, operating with existing workers. The UPI plant produced flat steel and tin mill products.
Idling	U.S. Steel, UPI	In December 2023, U.S. Steel’s UPI plant was idled indefinitely.
Acquisition	Nippon Steel, U.S. Steel	In December 2023, U.S. Steel announced it had entered into an agreement to be acquired by Japanese company Nippon Steel. After the acquisition was initially prohibited by the Biden Administration, it was approved by President Trump in June 2025, under the terms of a confidential national security agreement in which the U.S. government is to maintain certain rights with respect to U.S. Steel “relating to governance, domestic production, and trade matters.”
Idling	Cleveland-Cliffs	In February 2024, Cleveland-Cliffs announced it would be idling its Weirton tin mill plant indefinitely, citing the USITC’s negative determination in the AD/CVD case on tin mill products from Canada, China, Germany, and South Korea. In July 2024, the company announced plans to reopen Weirton for the production of captive transformers made of grain oriented electrical steel (GOES). Although production was initially expected to start in early 2026, the company announced in May 2025 that it would not move forward with the reopening of the Weirton facility.
Production restart	U.S. Steel	In April 2026, U.S. Steel announced plans to restart production of tin mill products at its Gary Works facility in Indiana. The tin mill had been idled since 2022. The restart is expected to occur in early 2027 and bring approximately 225 jobs to the facility. The estimated cost of the restart is between \$15 and \$20 million.

Source: The Weirton Daily Times, “Layoffs Coming to Cleveland-Cliffs in Weirton,” May 13, 2023, <https://www.weirtondailytimes.com/news/local-news/2023/05/layoffs-coming-to-cleveland-cliffs-in-weirton/>; Office of U.S. Congressman John Garamendi, “Garamendi Leads Members of California Congressional Delegation Calling on U.S. Steel to Keep Pittsburg Mill Open,” November 9, 2023, <https://garamendi.house.gov/media/press-releases/garamendi-leads-members-california-congressional-delegation-calling-us-steel>; Congressional Research Service, “Nippon Steel’s Acquisition of U.S. Steel: Potential Implications for the Industry,” March 4, 2026, <https://www.congress.gov/crs-product/R48872>; Cleveland-Cliffs, “Cleveland Cliffs to Idle Weirton Tinplate Facility Following Unfavorable ITC Ruling,” February 15, 2024, <https://www.clevelandcliffs.com/news/news-releases/detail/622/cleveland-cliffs-to-idle-weirton-tinplate-facility>; Eurometal, “Cleveland-Cliffs CEO Continues Quest to Acquire U.S. Steel,” January 14, 2025, <https://eurometal.net/cleveland-cliffs-ceo-continues-quest-to-acquire-us-steel/>; WV Metro News, “Cleveland-Cliffs Pulling the Plug on Development of Transformers Production Plant at Weirton Facility,” May 2025, <https://wvmetronews.com/2025/05/07/cleveland-cliffs-pulling-the-plug-on-development-of-transformers-production-plant-at-weirton-facility/>; Packaging Dive, “U.S. Steel to Restart Gary Tin Mill Production,” April 16, 2026, <https://www.packagingdive.com/news/us-steel-to-restart-gary-tin-mill-production/817838/>; U.S. Steel, “U.S. Steel Announces Plans to Restart Gary Tin Mill,” April 16, 2026, <https://www.ussteel.com/media/newsroom/-/blogs/u-s-steel-announces-plans-to-restart-gary-tin-mill>.

Table 3.4 presents the operational changes relating to the production of tin mill products since 2023 as reported by U.S. producers in their questionnaire responses. As shown, U.S. producers reported several relevant operational developments.

As noted, Cleveland-Cliffs ceased operations at its Weirton, West Virginia tin mill facility in April 2024.

U.S. Steel reported ***.

Ohio Coatings ***.

Table 3.4 Tin mill products: U.S. producers' reported changes in operations since January 1, 2023

Item	Firm name and narrative response on changes in operations
Plant closings	***
Prolonged shutdowns	***
Acquisitions	***
Other	***

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

U.S. production, capacity, and capacity utilization

Table 3.5 presents U.S. producers' installed and practical capacity and production on the same equipment.⁴ The three producers did not report any production of alternate products using the same machinery and/or labor, thus the company's reported practical overall and practical tin mill product capacity data are identical. U.S. producers reported structural changes in capacity and output between 2023 and 2025. Installed overall capacity declined from *** short tons in 2023 to 2024 to *** short tons in 2025, reflecting a contraction in the domestic installed base.⁵ This decline was mirrored in practical capacity, which fell from *** short tons in 2023 to *** short tons in 2025, a reduction of more than half. Over the same period, production decreased from *** to *** short tons, while practical capacity utilization rose from *** percent in 2023 to *** percent in 2025, indicating a tighter alignment between operating assets and output.

⁴ Installed or "theoretical" overall capacity measures the level of production a firm could have attained based solely on existing capital investments and not considering other constraints such as availability of material inputs, labor force, and normal downtime. The two practical capacity measures take into consideration both existing capital investment as well as non-capital investment constraints. Practical overall capacity measures firms' capacity to produce tin mill products as well as any other products produced using the same equipment/machinery, whereas practical tin mill products capacity measures only the practical capacity of a firm to produce tin mill products based on that firms' actual product mixes over the period.

⁵ Cleveland-Cliffs reported installed capacity of *** short tons and practical capacity of *** short tons in 2023 but reported zero capacity and zero production in 2025 following the closure of its Weirton facilities. Despite the reported zero installed capacity figure, Cleveland-Cliffs has publicly stated that the production equipment remains at Weirton and can be restarted if market conditions improve. Conference transcript, p. 14 (Kopf). This complete removal of capacity is the principal driver of the contraction in both installed and practical capacity at the industry level. Additionally, U.S. Steel reported lowered practical capacity from *** short tons in 2023 to *** short tons in 2024 and 2025 following prolonged idlings of certain tin mill lines (see table 3.4).

Table 3.5 Tin mill products: U.S. producers' installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2023	2024	2025
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical tin mill products	Capacity	***	***	***
Practical tin mill products	Production	***	***	***
Practical tin mill products	Utilization	***	***	***

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

Table 3.6 presents U.S. producers' reported narratives regarding practical capacity constraints. U.S. producers reported that capacity constraints since 2023 stemmed from production bottlenecks (e.g., coating-line limitations and unmet capital needs) as well as material input constraints and adverse market conditions that limited utilization of available assets. In addition, firms noted that competitive pricing from offshore suppliers and that resulting losses and underinvestment further restricted practical operating capacity.

Table 3.6 Tin mill products: U.S. producers' reported capacity constraints since January 1, 2023

Item	Firm name and narrative response on constraints to practical overall capacity
Production bottlenecks	***
Production bottlenecks	***
Supply of material inputs	***
Other constraints	***
Other constraints	***

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

Table 3.7 and figure 3.1 present U.S. producers' production, capacity, and capacity utilization. As noted, Cleveland-Cliffs' practical capacity and production dropped to zero in 2025 following the closure of its Weirton facility in April 2024, accounting for the bulk of the decrease in industry-wide capacity. U.S. Steel, the largest U.S. producer, also reported lower practical capacity from *** short tons in 2023 to *** short tons in 2024 and 2025 while the firms' output decreased approximately *** percent from 2023 to 2024 following prolonged idlings of certain U.S. Steel tin mill lines (see table 3.4). Ohio Coatings practical capacity was constant across the period at *** short tons, but the firms' output *** from 2023 to 2025 resulting in higher capacity utilization levels for the firm in 2024 and 2025. Accordingly, industry-wide capacity utilization rose from 2023 to 2025, indicating a tighter alignment between operating assets and output despite industry-wide production decreasing by *** percent during the period for which data were collected.

Table 3.7 Tin mill products: U.S. producers' output, by firm and period

Practical capacity

Capacity in short tons

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 3.7 (Continued) Tin mill products: U.S. producers' output, by firm and period

Production

Production in short tons

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 3.7 (Continued) Tin mill products: U.S. producers' output, by firm and period

Capacity utilization

Capacity utilization in percent

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 3.7 (Continued) Tin mill products: U.S. producers' output, by firm and period
Share of production

Share in percent

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	100.0	100.0	100.0

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

Figure 3.1 Tin mill products: U.S. producers' output, by period

* * * * *

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

Alternative products

None of the three responding U.S. producers reported producing any alternative products using the same machinery or equipment as used to produce tin mill products.

Production capability

Producers were asked to describe any tin mill product types, grades, or widths they cannot or do not produce for potential U.S. customers. The firms were instructed to identify the products they are unable or unwilling to supply, explain whether the limitation is technical (e.g., equipment, width, or grade capability) or commercial (e.g., lack of demand or unwillingness to supply), and indicate whether new investment would be required to produce those products.

Table 3.8 summarizes U.S. producers’ narrative responses to this question. As shown, Cleveland-Cliffs reported that it does not currently produce any tin mill products. Ohio Coatings indicated ***. U.S. Steel reported ***.

Table 3.8 Tin mill products: U.S. producers’ narrative descriptions regarding production capability, by firm

Firm	Narrative on production capability
Cleveland-Cliffs	***
Ohio Coatings	***
U.S. Steel	***

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

U.S. producers' U.S. shipments and exports

Table 3.9 presents U.S. producers' U.S. shipments, export shipments, and total shipments. Virtually all U.S. producers' shipments were shipped domestically during the period (export shipments accounted for less than *** of total shipments by both quantity and value in each year). Additionally, U.S. producers reported *** internal consumption or transfers during the period with all U.S. shipments reported as being commercial.

Table 3.9 Tin mill products: U.S. producers' shipments, by destination and period

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

Item	Measure	2023	2024	2025
U.S. shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
U.S. shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***
U.S. shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
U.S. shipments	Share of quantity	***	***	***
Export shipments	Share of quantity	***	***	***
Total shipments	Share of quantity	100.0	100.0	100.0
U.S. shipments	Share of value	***	***	***
Export shipments	Share of value	***	***	***
Total shipments	Share of value	100.0	100.0	100.0

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

U.S. producers' inventories

Table 3.10 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments. U.S. producers' end-of-period inventories fluctuated over the period, decreasing from *** short tons in 2023 to *** in 2024 before rising to *** in 2025. Inventory ratios relative to U.S. production, U.S. shipments, and total shipments all increased steadily over the period. By 2025, inventories were equivalent to nearly one-third of U.S. shipments and total shipments.

Table 3.10 Tin mill products: U.S. producers' inventories and their ratio to select items, by period

Quantity in short tons; ratio in percent

Item	2023	2024	2025
End-of-period inventory quantity	***	***	***
Inventory ratio to U.S. production	***	***	***
Inventory ratio to U.S. shipments	***	***	***
Inventory ratio to total shipments	***	***	***

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

U.S. producers' imports from subject sources

None of the U.S. producers reported importing tin mill products from subject sources during the investigation period; however, ***, a company related to *** through its parent, ***, reported importing tin mill products from Taiwan, Turkey, and Japan. Table 3.11 shows ***'s production alongside the reported subject imports and the ratio of the subject imports to production. In 2025, *** imported *** short tons from both Taiwan and Turkey, each amounting to *** percent of ***'s domestic tin mill production in that year.

Table 3.11 Tin mill products: *'s U.S. production, subject imports by ***, and ratio of subject imports to production, by source and period**

Quantity in short tons; ratio in percent

Item	Measure	2023	2024	2025
*** U.S. production	Quantity	***	***	***
***'s imports from Taiwan	Quantity	***	***	***
***'s imports from Turkey	Quantity	***	***	***
***'s imports from Taiwan to *** U.S. production	Ratio	***	***	***
***'s imports from Turkey to *** U.S. production	Ratio	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

U.S. producers' purchases of imports from subject sources

No responding U.S. producer reported purchases of imports of tin mill products from subject sources during the period for which data were collected.

U.S. employment, wages, and productivity

Table 3.12 shows U.S. producers' employment-related data. U.S. tin mill producers reported a contraction in the production workforce and hours worked from 2023 to 2025, with production and related workers ("PRWs") declining from *** PRWs in 2023 to *** PRWs in 2025 and total hours falling from *** to *** across this period. Cleveland-Cliffs' closure of its Weirton facility resulted in the loss of *** PRWs between 2023 and 2025 and a reduction of approximately *** hours worked over the same period. U.S. Steel idled certain production lines and *** its tin mill workforce from *** to *** PRWs (a *** of *** PRWs) and reported roughly *** hours worked in 2025 than in 2023. In contrast, Ohio Coatings *** its workforce from *** to *** PRWs and reported about *** hours worked in 2025 compared with 2023.

Despite the overall workforce contraction, hours per PRW first dropped in 2024 (***) and then rose to *** in 2025, indicating that fewer workers carried a larger share of operating time. Total wages paid decreased alongside the overall headcount reduction, while hourly wages declined from \$*** per hour to \$*** per hour. Operational efficiency improved: productivity increased from *** to *** short tons per 1,000 hours, and unit labor costs fell from \$*** to \$*** per short ton between 2023 and 2025. Taken together, the data show a smaller but more intensively utilized workforce, with higher output per hour and lower labor cost per ton by 2025.⁶

Table 3.12 Tin mill products: U.S. producers' employment related information, by period

Item	2023	2024	2025
Production and related workers (PRWs) (number)	***	***	***
Total hours worked (1,000 hours)	***	***	***
Hours worked per PRW (hours)	***	***	***
Wages paid (\$1,000)	***	***	***
Hourly wages (dollars per hour)	\$***	\$***	\$***
Productivity (short tons per 1,000 hours)	***	***	***
Unit labor costs (dollars per short ton)	\$***	\$***	\$***

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

⁶ U.S. Steel operates a fully integrated production process from hot-rolled steel through black plate and electrolytic tinning (Transcript, pp. 12 to 13 (Kopf)), whereas Ohio Coatings *** (Ohio Coatings questionnaire, section 2.3e). These differences mean that changes in labor productivity may also reflect shifts in the industry's overall production model following the closure of the Weirton facility.

Part 4: U.S. imports, apparent U.S. consumption, and market shares

U.S. importers

The Commission issued importer questionnaires to 91 potential importers of tin mill products, as well as to all U.S. producers of tin mill products.¹ Usable questionnaire responses were received from 27 firms.² ³ Comparing the import quantities reported by these firms to official import statistics under HTS statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0020, 7210.50.0090, 7212.10.0000, 7212.50.0000, 7225.99.0090 and 7226.99.0180 yields the following questionnaire coverage estimates:

- China: *** percent
- Taiwan: *** percent
- Turkey: *** percent
- Subject sources: 96.3 percent
- Nonsubject sources: 93.9 percent
- All import sources: 94.4 percent

¹ The Commission issued questionnaires to those firms identified in the petitions; staff research; and proprietary, Census-edited Customs' import records.

² Responses were received from the following firms: ArcelorMittal Dofasco G.P. ("Dofasco"); BWAY Corporation ("BWAY Corp./Mauser"); Duferco Steel LLC ("Duferco"); EP Steel America Inc. ("EP Steel America"); EP Steel Trading Co., Ltd ("EP Steel Trading"); IMG Holding Inc., DBA IMG LLC ("IMG"); JFE Shoji America, LLC ("JFE Shoji"); KG Steel USA ("KG Steel USA"); LLFlex, LLC ("LLFlex"); Macsteel International USA Corp ("MIUSA"); Marubeni-Itochu Steel America Inc. ("MISA"); Metal One America, Inc. ("Metal One America"); Mitsui & Co. (U.S.A.), Inc. ("Mitsui"); Nippon Steel Trading Americas, Inc. ("NSTA"); Reynolds Services, Inc. ("RSI"); StaalX LLC ("StaalX"); Steelforce Packaging BV ("Steelforce"); Tata International Metals (Americas) Ltd. ("TIMA"); Tata Steel IJmuiden BV ("Tata Steel IJmuiden"); ThyssenKrupp Steel North America Inc. ("TKSNA"); Tin Star Resource Inc. ("Tin Star Resource"); Titan Steel Corporation ("Titan Steel"); Unitape (USA) Inc. ("Unitape (USA)"); and Viking Industrial Corporation ("Viking Industrial").

³ Additionally, 18 firms submitted responses certifying that their firm had not imported tin mill products since January 1, 2023: ***.

Table 4.1 lists all responding U.S. importers of tin mill products from China, Taiwan, and Turkey and other sources, their locations, and their shares of U.S. imports, in 2025.

Table 4.1 Tin mill products: U.S. importers, their headquarters, and share of total imports within a given source by firm, 2025

Share in percent; CN=China, TW=Taiwan; TK=Turkey; SUB= Subject Sources, NON=Nonsubject sources, ALL=All import sources

Firm	Headquarters	CN	TW	TK	SUB	NON	ALL
ArcelorMittal	Chicago, IL	***	***	***	***	***	***
Companhia Siderurgica Nacional	New York, NY	***	***	***	***	***	***
Dofasco	Hamilton, ON	***	***	***	***	***	***
BWAY Corp./Mauser	Oak Brook, IL	***	***	***	***	***	***
Duferco	Houston, TX	***	***	***	***	***	***
EP Steel America	South River, NJ	***	***	***	***	***	***
EP Steel Trading	Kowloon, HK	***	***	***	***	***	***
IMG	Taylorsville, NC	***	***	***	***	***	***
JFE Shoji	Long Beach,, CA	***	***	***	***	***	***
KG Steel USA	Fountain Valley, CA	***	***	***	***	***	***
LLFlex	Louisville, KY	***	***	***	***	***	***
MIUSA	Rye Brook, NY	***	***	***	***	***	***
MISA	New York, NY	***	***	***	***	***	***
Metal One America	Rosemont, IL	***	***	***	***	***	***
Mistui	New York, NY	***	***	***	***	***	***
NSTA	Schaumburg, IL	***	***	***	***	***	***
StaalX	Chicago, IL	***	***	***	***	***	***
Steelforce	Sewickley, PA	***	***	***	***	***	***
RSI	Greenville, PA	***	***	***	***	***	***
Tata Steel UK	London, United Kingdom	***	***	***	***	***	***
TIMA	Schaumburg, IL	***	***	***	***	***	***
Tata Steel Ijmuiden	Ijmuiden, Netherlands	***	***	***	***	***	***
TKSNA	Southfield, MI	***	***	***	***	***	***
Tin Star Resource	South River, NJ	***	***	***	***	***	***
Titan Steel	Baltimore, MD	***	***	***	***	***	***
Unitape (USA)	Conover, NC	***	***	***	***	***	***
Viking Industrial	Pittsburg, CA	***	***	***	***	***	***
All firms	Various	100.0	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

U.S. imports

Table 4.2 presents annual U.S. import quantities, values, and unit values for tin mill products by source while figure 4.1 illustrates trends in import quantities and average unit values (“AUVs”) for subject and nonsubject sources during the investigation period based on questionnaire responses.

From 2023 through 2025,⁴ U.S. imports of tin mill products increased, with total import quantities rising from approximately 1.1 million short tons in 2023 to 1.7 million short tons in 2025. Imports from each of the subject sources increased by both quantity and by share. Turkey recorded the most growth, with its import volume expanding more than *** over the period. Imports from Taiwan increased by more than *** percent while imports from China increased by more than *** percent over the period by volume. Resultingly, subject imports increased their share of the U.S. import market by quantity.

Import values generally rose alongside quantities, though unit values displayed mixed patterns across sources. China’s unit values declined steadily, while Taiwan’s unit values showed modest fluctuations. Turkey’s unit values dropped sharply from 2023 to 2024 before rising again in 2025. For the overall market, average unit values decreased from 2023 to 2024 and then increased in 2025.

The import shares shifted over the period. Imports of tin mill products from subject sources increased as a share of total tin mill product imports from 14.2 percent in 2023 to 20.0 percent in 2025, while imports from nonsubject sources saw a corresponding decline. Subject source market share increased over the period, particularly Taiwan and Turkey. Nonsubject sources remained the largest source (more than 80.0 percent by quantity in each year), though their share eroded over the three years. By value, subject source market share also increased across the period (from 12.3 percent in 2023 to 17.1 percent in 2025). The ratio of subject source quantities as a ratio of U.S. production increased sharply between 2023 and 2025 (from *** percent in 2023 to *** percent in 2025).

⁴ Respondents EP Steel America, Inc., Macsteel International USA Corp., and Chinese respondents submitted a postconference brief in which they assert that U.S. import data are misleading because 2023 was an artificially low baseline, depressed by prohibitive cash deposit rates resulting from the related tin mill AD/CVD proceeding. When measured instead against normal years prior to the related proceeding, they contend that import levels simply reverted to typical volumes. EP Steel, Macsteel, And Chinese Respondents postconference brief, pp. 2 through 6. App. E presents official import statistics by quarter since 2020.

Table 4.2 Tin mill products: U.S. imports, by source and period

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

Source	Measure	2023	2024	2025
China	Quantity	***	***	***
Taiwan	Quantity	***	***	***
Turkey	Quantity	***	***	***
Subject sources	Quantity	160,249	217,558	344,770
Nonsubject sources	Quantity	972,180	1,224,364	1,376,091
All import sources	Quantity	1,132,429	1,441,922	1,720,861
China	Value	***	***	***
Taiwan	Value	***	***	***
Turkey	Value	***	***	***
Subject sources	Value	237,565	292,614	468,466
Nonsubject sources	Value	1,690,694	1,898,591	2,277,330
All import sources	Value	1,928,259	2,191,205	2,745,796
China	Unit value	***	***	***
Taiwan	Unit value	***	***	***
Turkey	Unit value	***	***	***
Subject sources	Unit value	1,482	1,345	1,359
Nonsubject sources	Unit value	1,739	1,551	1,655
All import sources	Unit value	1,703	1,520	1,596

Table continued.

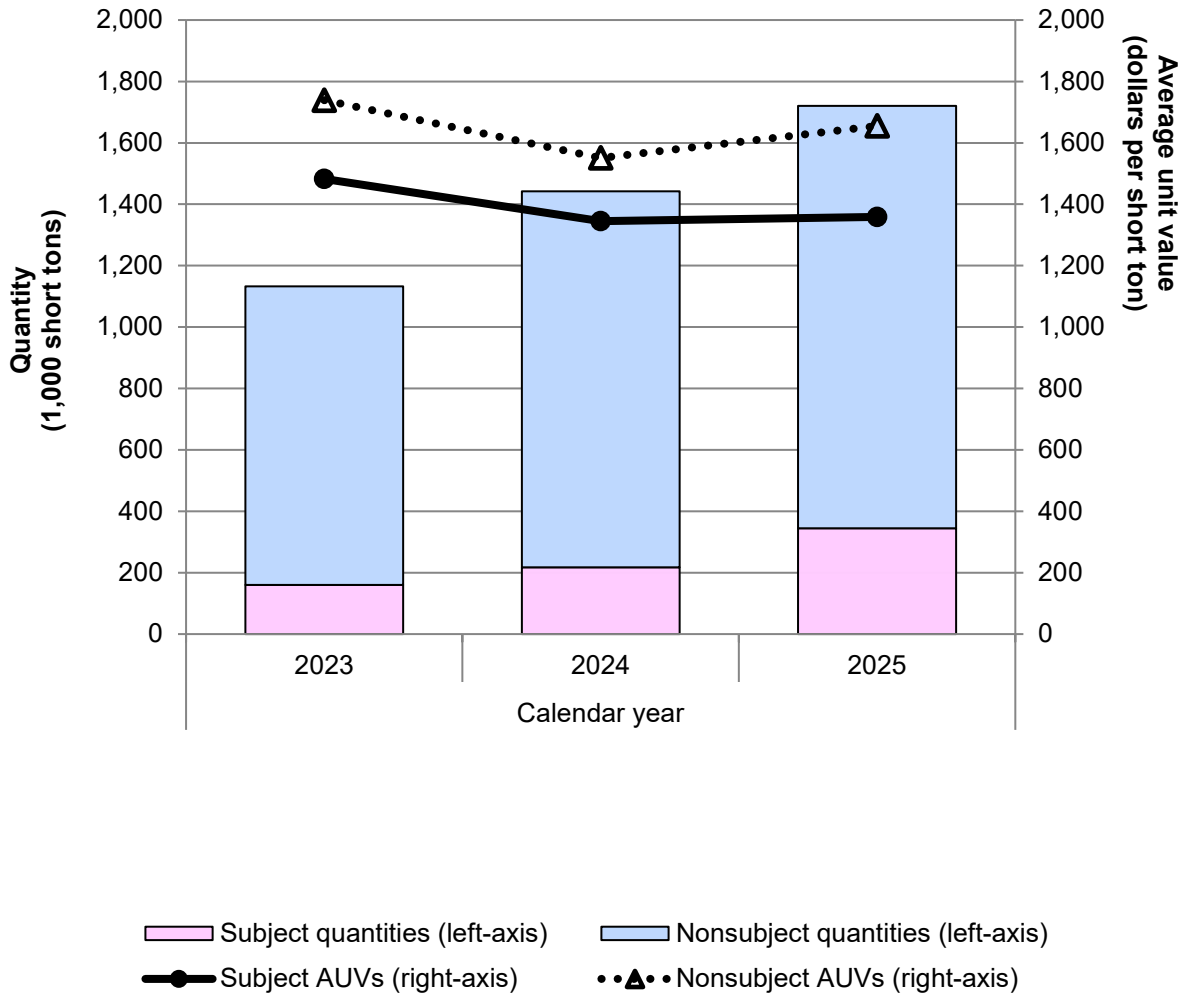
Table 4.2 (Continued) Tin mill products: U.S. imports, by source and period

Shares and ratio in percent

Source	Measure	2023	2024	2025
China	Share of quantity	***	***	***
Taiwan	Share of quantity	***	***	***
Turkey	Share of quantity	***	***	***
Subject sources	Share of quantity	14.2	15.1	20.0
Nonsubject sources	Share of quantity	85.8	84.9	80.0
All import sources	Share of quantity	100.0	100.0	100.0
China	Share of value	***	***	***
Taiwan	Share of value	***	***	***
Turkey	Share of value	***	***	***
Subject sources	Share of value	12.3	13.4	17.1
Nonsubject sources	Share of value	87.7	86.6	82.9
All import sources	Share of value	100.0	100.0	100.0
China	Ratio	***	***	***
Taiwan	Ratio	***	***	***
Turkey	Ratio	***	***	***
Subject sources	Ratio	***	***	***
Nonsubject sources	Ratio	***	***	***
All import sources	Ratio	***	***	***

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

Figure 4.1 Tin mill products: U.S. import quantities and average unit values, by source and period



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

Table 4.3 summarizes changes in import quantities, values, unit values, and market shares, expressed as percent or percentage-point differences from 2023 through 2025 and between individual years. The table highlights the rate and direction of changes across sources, enabling assessment of growth patterns, relative shifts in market presence, and unit value changes over time. Percentage changes in volume and value were significantly higher for subject countries, particularly, indicating accelerated growth.

Table 4.3 Tin mill products: Changes in U.S. imports, by source and period

Changes (Δ) in percent (%) or percentage point (ppt)

Source	Measure	2023–25	2023–24	2024–25
China	% Δ Quantity	▲***	▲***	▲***
Taiwan	% Δ Quantity	▲***	▲***	▲***
Turkey	% Δ Quantity	▲***	▲***	▲***
Subject sources	% Δ Quantity	▲115.1	▲35.8	▲58.5
Nonsubject sources	% Δ Quantity	▲41.5	▲25.9	▲12.4
All import sources	% Δ Quantity	▲52.0	▲27.3	▲19.3
China	% Δ Value	▲***	▲***	▲***
Taiwan	% Δ Value	▲***	▲***	▲***
Turkey	% Δ Value	▲***	▲***	▲***
Subject sources	% Δ Value	▲97.2	▲23.2	▲60.1
Nonsubject sources	% Δ Value	▲34.7	▲12.3	▲19.9
All import sources	% Δ Value	▲42.4	▲13.6	▲25.3
China	% Δ Unit value	▼***	▼***	▼***
Taiwan	% Δ Unit value	▲***	▲***	▼***
Turkey	% Δ Unit value	▼***	▼***	▲***
Subject sources	% Δ Unit value	▼(8.3)	▼(9.3)	▲1.0
Nonsubject sources	% Δ Unit value	▼(4.8)	▼(10.8)	▲6.7
All import sources	% Δ Unit value	▼(6.3)	▼(10.8)	▲5.0

Table continued.

Table 4.3 (Continued) Tin mill products: Changes in U.S. imports, by source and period

Changes (Δ) in percent (%) or percentage point (ppt)

Source	Measure	2023–25	2023–24	2024–25
China	ppt Δ Quantity	▼***	▼***	▲***
Taiwan	ppt Δ Quantity	▲***	▲***	▲***
Turkey	ppt Δ Quantity	▲***	▲***	▲***
Subject sources	ppt Δ Quantity	▲5.9	▲0.9	▲4.9
Nonsubject sources	ppt Δ Quantity	▼(5.9)	▼(0.9)	▼(4.9)
All import sources	ppt Δ Quantity	—	—	—
China	ppt Δ Value	▼***	▼***	▲***
Taiwan	ppt Δ Value	▲***	▲***	▲***
Turkey	ppt Δ Value	▲***	▲***	▲***
Subject sources	ppt Δ Value	▲4.7	▲1.0	▲3.7
Nonsubject sources	ppt Δ Value	▼(4.7)	▼(1.0)	▼(3.7)
All import sources	ppt Δ Value	—	—	—
China	ppt Δ Ratio	▲***	▲***	▲***
Taiwan	ppt Δ Ratio	▲***	▲***	▲***
Turkey	ppt Δ Ratio	▲***	▲***	▲***
Subject sources	ppt Δ Ratio	▲***	▲***	▲***
Nonsubject sources	ppt Δ Ratio	▲***	▲***	▲***
All import sources	ppt Δ Ratio	▲***	▲***	▲***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.⁵ Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.⁶ Imports from China accounted for *** percent, imports from Taiwan for *** percent, and imports from Turkey for *** percent of total tin mill product imports by quantity from April 2025 through March 2026.

Table 4.4 Tin mill products: U.S. imports in the twelve month period preceding the filing of the petition, April 2025 through March 2026

Quantity in short tons; share in percent

Source of imports	Quantity	Share
China	***	***
Taiwan	***	***
Turkey	***	***
All other sources	***	***
All import sources	***	100.0

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

⁵ Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Act (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

⁶ Section 771 (24) of the Act (19 U.S.C § 1677(24)).

Cumulation considerations

In assessing whether imports should be cumulated, the Commission determines whether U.S. imports from the subject countries compete with each other and with the domestic like product and has generally considered four factors: (1) fungibility, (2) presence of sales or offers to sell in the same geographical markets, (3) common or similar channels of distribution, and (4) simultaneous presence in the market. Information regarding channels of distribution, market areas, and interchangeability appears in Part 2. Additional information concerning fungibility, geographical markets, and simultaneous presence in the market is presented as follows.

Fungibility

Shipments by product type⁷

Table 4.5 and figure 4.2 present reported U.S. shipments of imports of tin mill products in 2025, by supply source and by the following product types:

Tinplate products:

- Drawn & Ironed (“D&I tinplate”)
- Other (“Other tinplate”)

Tin-free steel (“TFS”) products:

- Laminated (“Laminated TFS”)
- Other (“Other TFS”)

Across types, U.S. producers’ distribution was limited to two categories, with *** percent of output in other tinplate and *** percent in other TFS. U.S. shipments of imports from subject sources were concentrated in other tinplate (*** percent), with smaller shares in D&I tinplate (*** percent), laminated TFS (*** percent), and other TFS (*** percent). Nonsubject sources’ volumes were distributed with *** percent in D&I tinplate, *** percent in other tinplate, *** percent in laminated TFS, and *** percent in other TFS. When measured as shares down (i.e., relative to total shipments across all sources within each product type), nonsubject sources accounted for the majority of D&I tinplate, laminated TFS, and other TFS. Nonsubject sources representing *** percent of total shipments across all product types, subject sources represented *** percent, and U.S. producers’ share of all types was *** percent.

⁷ App. D also presents further data on shipments by both product type and width.

Table 4.5 Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and coating type, 2025

Quantity in short tons

Source	D&I tinplate	Other tinplate	Laminated TFS	Other TFS	All product types
U.S. producers	***	***	***	***	***
China	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	***

Table continued.

Table 4.5 (Continued) Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and coating type, 2025

Share across in percent

Source	D&I tinplate	Other tinplate	Laminated TFS	Other TFS	All product types
U.S. producers	***	***	***	***	100.0
China	***	***	***	***	100.0
Taiwan	***	***	***	***	100.0
Turkey	***	***	***	***	100.0
Subject sources	***	***	***	***	100.0
Nonsubject sources	***	***	***	***	100.0
All import sources	***	***	***	***	100.0
All sources	***	***	***	***	100.0

Table continued.

Table 4.5 (Continued) Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and coating type, 2025

Share down in percent

Source	D&I tinplate	Other tinplate	Laminated TFS	Other TFS	All product types
U.S. producers	***	***	***	***	***
China	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	100.0	100.0	100.0	100.0	100.0

Table continued

Table 4.5 (Continued) Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and coating type, 2025

Share across, share down in percent

Source	D&I tinplate	Other tinplate	Laminated TFS	Other TFS	All product types
U.S. producers	***	***	***	***	***
China	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Figure 4.2 Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and product type, 2025

* * * * *

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

Shipments by width⁸

Table 4.6 presents 2025 U.S. shipments of tin mill products by source and width. Reported width groups include less than 39 inches, 39 to less than 41 inches, 41 to less than 45 inches, and 45 inches and greater. Figure 4.3 illustrates these patterns by depicting each source's share distribution across the four width groups.

Share-across percentages show that U.S. producers' shipments in 2025 were overwhelmingly concentrated below 39 inches, representing *** percent of U.S. producers' total. Taiwan's reported shipments were *** in the less-than-39-inch category. China and Turkey also showed most shipments below 39 inches, though China had a larger cross-width distribution. By contrast, nonsubject sources displayed a more even distribution across wider categories, with *** percent of their shipments in the 41-to-less-than-45-inch range and *** percent in the 45-and-greater range. Share-down percentages indicate that nonsubject sources accounted for the majority of total shipments in all width categories except those below 39 inches, where U.S. producers maintained a larger share.

⁸ App. D also presents further data on shipments by both product type and width.

Table 4.6 Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and width, 2025

Quantity in short tons

Source	Less than 39"	39" to less than 41"	41" to less than 45"	45" and greater	All widths
U.S. producers	***	***	***	***	***
China	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	***

Table continued.

Table 4.6 (Continued) Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and width, 2025

Share across in percent

Source	Less than 39"	39" to less than 41"	41" to less than 45"	45" and greater	All widths
U.S. producers	***	***	***	***	100.0
China	***	***	***	***	100.0
Taiwan	***	***	***	***	100.0
Turkey	***	***	***	***	100.0
Subject sources	***	***	***	***	100.0
Nonsubject sources	***	***	***	***	100.0
All import sources	***	***	***	***	100.0
All sources	***	***	***	***	100.0

Table continued.

Table 4.6 (Continued) Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and width, 2025

Share down in percent

Source	Less than 39"	39" to less than 41"	41" to less than 45"	45" and greater	All widths
U.S. producers	***	***	***	***	***
China	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	100.0	100.0	100.0	100.0	100.0

Table continued.

Table 4.6 (Continued) Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and width, 2025

Share across and down in percent

Source	Less than 39"	39" to less than 41"	41" to less than 45"	45" and greater	All widths
U.S. producers	***	***	***	***	***
China	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Figure 4.3 Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and width, 2025

* * * * *

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

Shipments by product application type

U.S. producers and U.S. importers were asked to report their shipment broken out by easy open (EZO) applications and by easy peel (EPO) applications.⁹ EZO refers to traditional “easy-open” ends commonly used on beverage cans, food cans, and general-line cans. These ends are made from tinplate or tin-free steel and incorporate a scored opening panel with a riveted pull-tab. EPO refers to “easy-peel” ends that use a thin metal foil or laminate (often tinplate or aluminum) sealed to a metal ring. Instead of a metal panel, the consumer removes a peelable membrane using a tab. Tables 4.7 and 4.8 and figures 4.4 and 4.5 present U.S. shipments of tin mill products in 2025 by source and for these two product types: EZO applications (table 4.7 and figure 4.4) and by EPO applications (table 4.8 and figure 4.5).

With respect to EZO, table 4.7 and figure 4.4 show that U.S. producers’ shipments were concentrated in non-EZO applications, representing *** percent of their total. Comparatively, subject importers from China reported *** percent of their shipments in EZO applications, while nonsubject source importers showed *** percent in this category. Among subject sources, China accounted for *** short tons of EZO-application shipments (*** of China’s shipments as noted), while Turkey supplied *** short tons (*** percent of Turkey’s shipments); Taiwan reported *** EZO-application shipments in 2025. Share-down percentages show that nonsubject sources accounted for the largest portion of total shipments in EZO-application shipments, representing *** percent of shipments. For all sources combined, EZO applications made up *** percent of total shipments.

With respect to EEP, table 4.8 and figure 4.5 show that EEP applications were a very small share of tin mill shipments in 2025 (about *** percent of 2025 U.S. shipments) and nearly all EEP volume was reported from imports, predominantly from nonsubject sources. U.S. producers reported that *** percent of their U.S. shipments in 2025 were non-EEP shipments. U.S. importers from China and Turkey reported *** U.S. shipments of EEP in 2025, while U.S. importers from Taiwan reported a small quantity amounting to *** percent of 2025 U.S. shipments from Taiwan. U.S. importers from nonsubject sources reported *** percent of 2025 U.S. shipments were EEP; however, this quantity represented *** percent of all U.S. shipments of EEP in 2025.

⁹ Petitioners noted in their postconference brief that there may be other applications for tin mill products that provide evidence of fungibility. Petitioners consider easy open and easy peel applications to be almost entirely related to can packaging applications whereas tin mill products are also used in the automotive space, for example. Petitioner postconference brief, pp. 9 to 10, fn. 10.

Table 4.7 Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and EZO application type, 2025

Quantity in short tons

Source	Easy open (EZO) applications	Other than EZO applications	All product types
U.S. producers	***	***	***
China	***	***	***
Taiwan	***	***	***
Turkey	***	***	***
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	***	***	***

Table continued.

Table 4.7 (Continued) Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and EZO application type, 2025

Share across in percent

Source	Easy open (EZO) applications	Other than EZO applications	All product types
U.S. producers	***	***	100.0
China	***	***	100.0
Taiwan	***	***	100.0
Turkey	***	***	100.0
Subject sources	***	***	100.0
Nonsubject sources	***	***	100.0
All import sources	***	***	100.0
All sources	***	***	100.0

Table continued.

Table 4.7 (Continued) Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and EZO application type, 2025

Share down in percent

Source	Easy open (EZO) applications	Other than EZO applications	All product types
U.S. producers	***	***	***
China	***	***	***
Taiwan	***	***	***
Turkey	***	***	***
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	100.0	100.0	100.0

Table continued.

Table 4.7 (Continued) Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and EZO application type, 2025

Share across and down in percent

Source	Easy open (EZO) applications	Other than EZO applications	All product types
U.S. producers	***	***	***
China	***	***	***
Taiwan	***	***	***
Turkey	***	***	***
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	***	***	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Figure 4.4 Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and EZO application type, 2025

* * * * *

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

Table 4.8 Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and EZP application type, 2025

Quantity in short tons

Source	EZP applications	Other than EZP applications	All product types
U.S. producers	***	***	***
China	***	***	***
Taiwan	***	***	***
Turkey	***	***	***
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	***	***	***

Table continued.

Table 4.8 (Continued) Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and EZP application type, 2025

Share across in percent

Source	EZP applications	Other than EZP applications	All product types
U.S. producers	***	***	100.0
China	***	***	100.0
Taiwan	***	***	100.0
Turkey	***	***	100.0
Subject sources	***	***	100.0
Nonsubject sources	***	***	100.0
All import sources	***	***	100.0
All sources	***	***	100.0

Table continued.

Table 4.8 (Continued) Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and EZP application type, 2025

Share down in percent

Source	EZP applications	Other than EZP applications	All product types
U.S. producers	***	***	***
China	***	***	***
Taiwan	***	***	***
Turkey	***	***	***
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	100.0	100.0	100.0

Table continued.

Table 4.8 (Continued) Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and EZP application type, 2025

Share across and down in percent

Source	EZP applications	Other than EZP applications	All product types
U.S. producers	***	***	***
China	***	***	***
Taiwan	***	***	***
Turkey	***	***	***
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	***	***	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Figure 4.5 Tin mill products: U.S. producers' and U.S. importers' U.S. shipments, by source and EZP application type, 2025

* * * * *

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

Geographical markets

Table 4.9 presents U.S. imports of tin mill products based on official import statistics by border of entry region in 2025. Subject import entries were distributed fairly evenly across the four geographic regions (28.2 percent through the East, 26.8 percent through the North, 27.0 percent through the South, and 18.1 percent through the West), whereas imports from nonsubject imports were more heavily concentrated through East and North regions (42.8 and 40.3 percent of nonsubject import entries, respectively). U.S. imports from China and Taiwan together comprised most subject-entries into the South and West border regions, while virtually all entries from Turkey entered through the North and East border entry regions (50.3 and 47.0 percent of imports from Turkey entered through these two regions, respectively).

Table 4.9 Tin mill products: U.S. imports, by source and by border of entry, 2025

Quantity in short tons

Source	East	North	South	West	All borders
China	30,297	51,114	51,171	14,721	147,303
Taiwan	33,581	5,130	43,542	49,637	131,890
Turkey	36,952	39,548	1,742	461	78,703
Subject sources	100,829	95,792	96,455	64,819	357,896
Nonsubject sources	627,689	590,766	135,287	111,607	1,465,349
All import sources	728,519	686,558	231,742	176,426	1,823,244

Table continued.

Table 4.9 (Continued) Tin mill products: U.S. imports, by source and by border of entry, 2025

Share across in percent

Source	East	North	South	West	All borders
China	20.6	34.7	34.7	10.0	100.0
Taiwan	25.5	3.9	33.0	37.6	100.0
Turkey	47.0	50.3	2.2	0.6	100.0
Subject sources	28.2	26.8	27.0	18.1	100.0
Nonsubject sources	42.8	40.3	9.2	7.6	100.0
All import sources	40.0	37.7	12.7	9.7	100.0

Table continued.

Table 4.9 (Continued) Tin mill products: U.S. imports, by source and by border of entry, 2025

Share down in percent

Source	East	North	South	West	All borders
China	4.2	7.4	22.1	8.3	8.1
Taiwan	4.6	0.7	18.8	28.1	7.2
Turkey	5.1	5.8	0.8	0.3	4.3
Subject sources	13.8	14.0	41.6	36.7	19.6
Nonsubject sources	86.2	86.0	58.4	63.3	80.4
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0020, 7210.50.0090, 7212.10.0000, 7212.50.0000, 7225.99.0090 and 7226.99.0180, accessed April 9, 2026. Imports are based on the imports for consumption data series.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Presence in the market

Table 4.10 presents monthly U.S. import quantities of tin mill products by source for January 2023 through December 2025 based on official import statistics. Figures 4.6 and 4.7 present these data broken out by subject country and by subject and nonsubject sources, respectively. Import presence by month was consistent for China and Taiwan and more intermittent for Turkey. Imports from China were present in every month of 2023, 2024, and 2025 with Taiwan appearing in 10 of 12 months in 2023 (no entries in July and August) and in all months of 2024 and 2025. Imports from Turkey were present in 3 of 12 months in 2023 (January, May, July), 8 of 12 months in 2024, and 11 of 12 months in 2025 (absent in April). Resultingly, imports from subject sources were present in all months of the investigation period. U.S. imports from nonsubject sources were also present in all months of the investigation period.

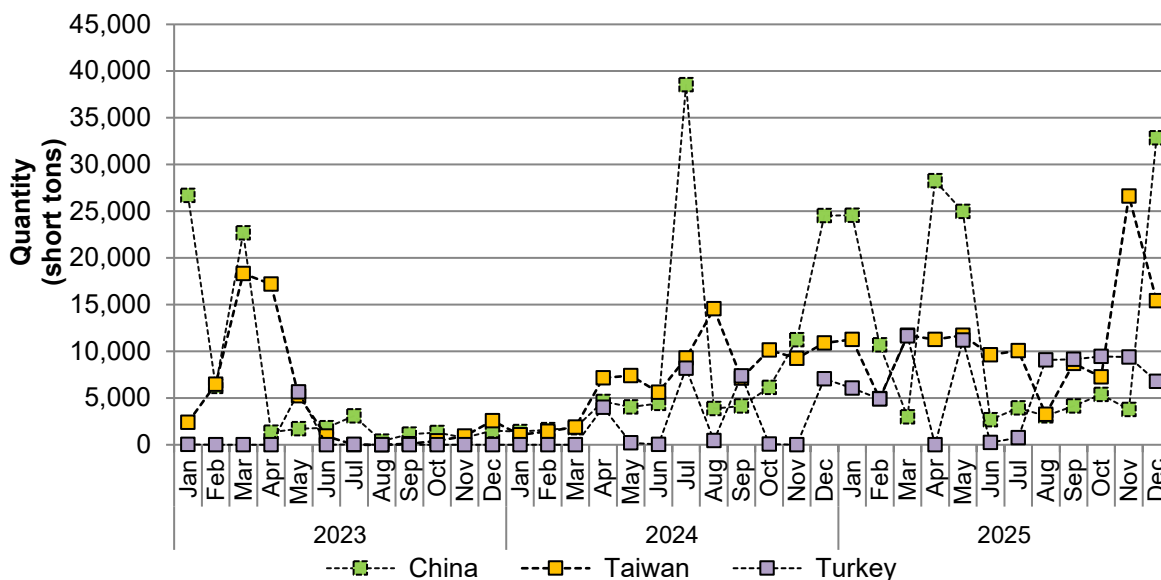
Table 4.10 Tin mill products: U.S. imports, by month and source

Quantity in short tons

Year	Month	China	Taiwan	Turkey	Subject sources	Nonsubject sources	All import sources
2023	January	26,694	2,391	20	29,105	87,278	116,384
2023	February	6,240	6,470	—	12,711	72,302	85,012
2023	March	22,691	18,320	—	41,011	91,799	132,810
2023	April	1,354	17,209	—	18,562	94,488	113,051
2023	May	1,725	5,226	5,666	12,617	123,826	136,442
2023	June	1,804	935	—	2,739	82,238	84,977
2023	July	3,092	—	46	3,138	95,528	98,666
2023	August	393	—	—	393	96,220	96,613
2023	September	1,126	100	—	1,225	63,017	64,242
2023	October	1,317	401	—	1,718	105,675	107,393
2023	November	766	938	—	1,703	76,971	78,674
2023	December	1,514	2,564	—	4,078	84,674	88,752
2024	January	1,398	1,050	—	2,449	71,342	73,791
2024	February	1,615	1,438	—	3,053	101,873	104,926
2024	March	1,810	1,902	—	3,712	99,926	103,637
2024	April	4,641	7,162	4,015	15,817	110,401	126,219
2024	May	4,054	7,394	221	11,670	135,658	147,328
2024	June	4,430	5,634	45	10,110	84,082	94,192
2024	July	38,538	9,289	8,178	56,005	113,116	169,121
2024	August	3,863	14,554	447	18,864	136,799	155,664
2024	September	4,139	7,119	7,381	18,638	116,973	135,611
2024	October	6,134	10,129	61	16,324	130,010	146,335
2024	November	11,252	9,243	—	20,495	84,468	104,963
2024	December	24,527	10,888	7,056	42,471	117,384	159,855
2025	January	24,566	11,286	6,069	41,921	115,385	157,306
2025	February	10,688	4,930	4,914	20,532	125,647	146,179
2025	March	2,990	11,720	11,637	26,346	129,059	155,405
2025	April	28,276	11,287	—	39,563	154,838	194,401
2025	May	24,977	11,732	11,187	47,896	135,197	183,093
2025	June	2,672	9,622	258	12,552	139,039	151,590
2025	July	3,947	10,065	764	14,776	161,252	176,027
2025	August	3,076	3,244	9,082	15,402	120,121	135,523
2025	September	4,139	8,692	9,161	21,992	112,839	134,832
2025	October	5,375	7,275	9,448	22,098	108,497	130,594
2025	November	3,756	26,625	9,390	39,771	99,740	139,511
2025	December	32,842	15,412	6,794	55,048	63,735	118,783

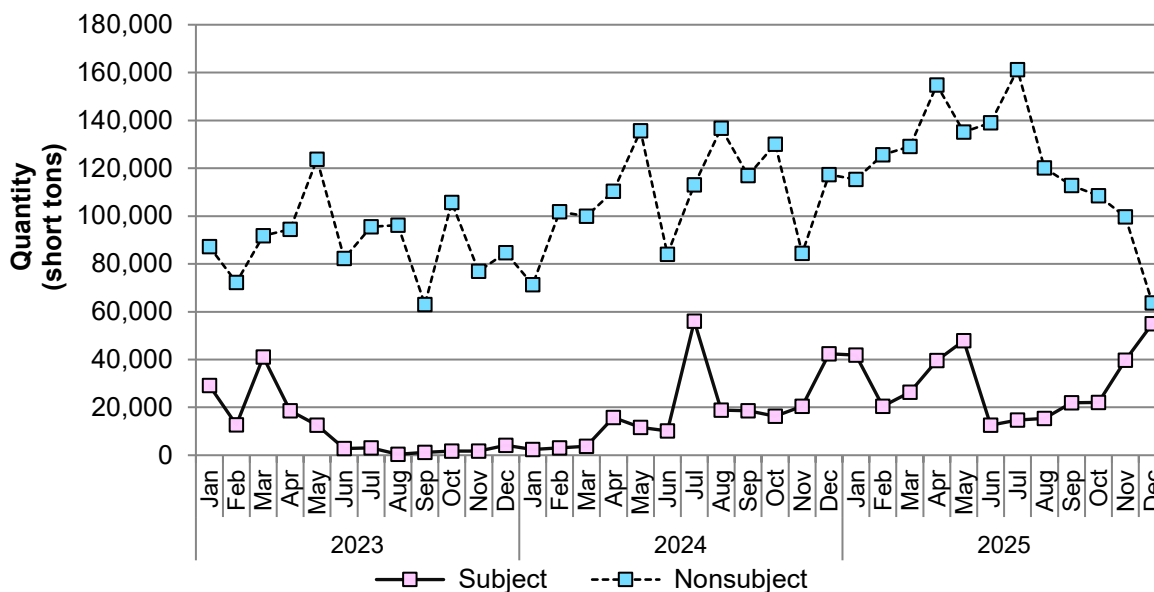
Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0020, 7210.50.0090, 7212.10.0000, 7212.50.0000, 7225.99.0090 and 7226.99.0180, accessed April 9, 2026. Imports are based on the imports for consumption data series.

Figure 4.6 Tin mill products: U.S. imports from individual subject sources, by source and by month



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0020, 7210.50.0090, 7212.10.0000, 7212.50.0000, 7225.99.0090 and 7226.99.0180, accessed April 9, 2026. Imports are based on the imports for consumption data series.

Figure 4.7 Tin mill products: U.S. imports from aggregated subject and nonsubject sources, by month



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0020, 7210.50.0090, 7212.10.0000, 7212.50.0000, 7225.99.0090 and 7226.99.0180, accessed April 9, 2026. Imports are based on the imports for consumption data series.

Apparent U.S. consumption and market shares

Quantity

Table 4.11 reports annual apparent U.S. consumption of tin mill products from 2023 through 2025, measured in short tons, and shows the corresponding market shares of U.S. producers and import sources.¹⁰ Figure 4.8 provides a visual depiction of apparent U.S. consumption volumes for tin mill products from 2023 to 2025.

Apparent U.S. consumption of tin mill products increased from 2023 to 2025, rising from *** short tons to *** short tons. While total consumption grew, domestic producers' shipments declined over the period, falling from *** short tons in 2023 to *** short tons in 2025. This reduction lowered the domestic industry's market share from *** percent in 2023 to *** percent in 2025. Individual producer trends varied: Cleveland-Cliffs exited the market entirely by 2025, while U.S. Steel *** short tons over the full period. Ohio Coatings' shipments *** from 2023 to 2025. Domestic producers collectively saw a *** percent decline in shipment volume from 2023 to 2025, along with a *** percentage-point loss in market share.

U.S. shipments of subject imports rose from 193,955 short tons in 2023 to 297,742 short tons in 2025, increasing their share of total consumption from *** percent to *** percent. U.S. shipments of imports from China decreased in 2024 then recovered by 2025 with shipments being *** percent higher in 2025 than 2023 (market share was *** percentage points lower). U.S. shipments of imports from Taiwan increased steadily, with 2025 shipments being *** percent higher and market share being *** percentage points higher in 2025 than in 2023. U.S. shipments of imports from Turkey increased the most, with 2025 shipments increasing *** percent and market share increasing *** percentage points from 2023 to 2025.

U.S. shipment volumes of nonsubject imports also increased in volume from 1.0 million short tons in 2023 to 1.4 million short tons in 2025 also increasing their market share (from *** percent in 2023 to *** percent in 2025). Resultingly, total U.S. shipments of imports increased over the period. These import trends show a shift in supply composition away from domestic production toward foreign sources.

¹⁰ Staff calculated apparent consumption using import data from questionnaire responses because coverage estimates are high (see p. 4.1), and U.S. shipments of imports are appropriate given that importers reported holding a portion of imports in inventory.

Table 4.11 Tin mill products: Apparent U.S. consumption and market shares based on quantity data, by source and period

Quantity in short tons; Shares in percent.

Source	Measure	2023	2024	2025
U.S. producers: Cleveland-Cliffs	Quantity	***	***	***
U.S. producers: Ohio Coatings	Quantity	***	***	***
U.S. producers: U.S. Steel	Quantity	***	***	***
U.S. producers: All firms	Quantity	***	***	***
China	Quantity	***	***	***
Taiwan	Quantity	***	***	***
Turkey	Quantity	***	***	***
Subject sources	Quantity	193,955	198,327	297,742
Nonsubject sources	Quantity	1,020,849	1,213,544	1,366,065
All import sources	Quantity	1,214,804	1,411,871	1,663,807
All sources	Quantity	***	***	***
U.S. producers: Cleveland-Cliffs	Share	***	***	***
U.S. producers: Ohio Coatings	Share	***	***	***
U.S. producers: U.S. Steel	Share	***	***	***
U.S. producers: All firms	Share	***	***	***
China	Share	***	***	***
Taiwan	Share	***	***	***
Turkey	Share	***	***	***
Subject sources	Share	***	***	***
Nonsubject sources	Share	***	***	***
All import sources	Share	***	***	***
All sources	Share	100.0	100.0	100.0

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

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

Figure 4.8 Tin mill products: Apparent U.S. consumption based on quantity data, by source and period

* * * * *

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

Value

Table 4.12 presents annual apparent U.S. consumption of tin mill products measured in value terms (thousand dollars) from 2023 to 2025. It reports the shipment values of individual U.S. producers, aggregated domestic producer value, import values from China, Taiwan, and Turkey, and total subject and nonsubject import values and displays associated market shares. Figure 4.9 provides a visual depiction of apparent U.S. consumption in value terms from 2023 through 2025.

Apparent U.S. consumption of tin mill products by value increased irregularly from 2023 to 2025 decreasing from \$*** in 2023 to \$*** in 2024 before increasing to \$*** in 2025. During this period, domestic producers experienced declines in shipment values. The total value U.S. producers' shipments dropped from \$*** in 2023 to \$*** in 2025, reducing domestic market share from *** percent to *** percent. This contraction reflects pronounced reductions at Cleveland-Cliffs and U.S. Steel (Cleveland-Cliffs exited the market in April 2024, resulting in a 100.0 percent decline in shipment value), while Ohio Coatings was *** across the period. U.S. Steel experienced *** from 2024 to 2025, while Ohio Coatings *** in both 2023 to 2024 and 2024 to 2025. However, taken together, domestic producers' total shipment value fell by more than *** percent over the period, accompanied by a *** percentage-point decline in market share.

Imports, by contrast, expanded their role in the U.S. market. The value of U.S. shipments of subject imports rose from \$350.4 million in 2023 to \$512.1 million in 2025, increasing their market share from *** percent to *** percent. Between 2023 and 2025, the value of U.S. shipments of imports from China decreased *** percent with a slight market share dip of *** percentage points. The value of U.S. shipments of imports from Taiwan's increased by *** percent alongside a market share gain of *** percentage points. The value of U.S. shipments of imports from Turkey saw the largest increase, with shipment values up *** percent and market share increasing *** percentage points over the period.

The value of U.S. shipments of imports from nonsubject sources also increased, rising from \$1.9 billion to \$2.4 billion across the period, and maintained the largest share of U.S. apparent consumption (over *** percent in 2025). These trends shifted the value composition of the market toward imported tin mill products.

Table 4.12 Tin mill products: Apparent U.S. consumption and market shares based on value data, by source and period

Value in 1,000 dollars; Shares in percent.

Source	Measure	2023	2024	2025
U.S. producers: Cleveland-Cliffs	Value	***	***	***
U.S. producers: Ohio Coatings	Value	***	***	***
U.S. producers: U.S. Steel	Value	***	***	***
U.S. producers: All firms	Value	***	***	***
China	Value	***	***	***
Taiwan	Value	***	***	***
Turkey	Value	***	***	***
Subject sources	Value	350,417	320,253	512,099
Nonsubject sources	Value	1,892,798	2,003,302	2,385,747
All import sources	Value	2,243,215	2,323,555	2,897,846
All sources	Value	***	***	***
U.S. producers: Cleveland-Cliffs	Share	***	***	***
U.S. producers: Ohio Coatings	Share	***	***	***
U.S. producers: U.S. Steel	Share	***	***	***
U.S. producers: All firms	Share	***	***	***
China	Share	***	***	***
Taiwan	Share	***	***	***
Turkey	Share	***	***	***
Subject sources	Share	***	***	***
Nonsubject sources	Share	***	***	***
All import sources	Share	***	***	***
All sources	Share	100.0	100.0	100.0

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

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

Figure 4.9 Tin mill products: Apparent U.S. consumption based on value data, by source and period

* * * * *

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

Part 5: Pricing data

Factors affecting prices

Raw material costs

Raw materials for tin mill products include black plate, hot welded steel, and coating materials.¹ As shown in figure 5.1 (and tables 5.1 and 5.2), raw material prices for hot rolled and cold rolled coil fluctuated but increased by *** and *** percent respectively, between January 2023 and December 2025. Hot-rolled and cold-rolled coil continued to increase into early 2026. Raw materials, as a share of U.S. producers' cost of goods sold (COGS), increased from *** percent in 2023 to *** percent in 2025. Petitioner stated that electricity rates are also increasing.

Figure 5.1 Tin mill products: Raw material prices for hot-rolled coil and cold-rolled coil, by month

* * * * *

Source: ***, accessed April 22, 2026.

¹ Conference transcript, p. 41 (Kim).

Table 5.1 Tin mill products: Raw materials: Hot-rolled coil, monthly average prices

Price in dollars per short ton

Month	2023	2024	2025	2026
January	***	***	***	***
February	***	***	***	***
March	***	***	***	***
April	***	***	***	NA
May	***	***	***	NA
June	***	***	***	NA
July	***	***	***	NA
August	***	***	***	NA
September	***	***	***	NA
October	***	***	***	NA
November	***	***	***	NA
December	***	***	***	NA

Source: ***, accessed April 22, 2026.

Table 5.2 Tin mill products: Raw materials: Cold-rolled coil, monthly average prices

Price in dollars per short ton

Month	2023	2024	2025	2026
January	***	***	***	***
February	***	***	***	***
March	***	***	***	***
April	***	***	***	NA
May	***	***	***	NA
June	***	***	***	NA
July	***	***	***	NA
August	***	***	***	NA
September	***	***	***	NA
October	***	***	***	NA
November	***	***	***	NA
December	***	***	***	NA

Source: ***, accessed April 22, 2026.

Transportation costs to the U.S. market

Transportation costs for tin mill products shipped from subject countries to the United States averaged 6.8 percent for China, 6.9 percent for Taiwan, and 1.3 percent for Turkey during 2025. These estimates were derived from official import data and represent the transportation and other charges on imports.²

² The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2025 and then dividing by the customs value based on the HTS statistical reporting number 7210.11.0000, 7210.12.0000, 7210.50.0020, 7210.50.0090, 7212.10.0000, 7212.50.0000, 7225.99.0090, 7226.99.0180, accessed April 15, 2026.

U.S. inland transportation costs

All three responding U.S. producers and importers reported that they typically arrange transportation to their customers. U.S. producers reported that their U.S. inland transportation costs ranged from *** to *** percent while most importers reported costs of 2.0 to 5.0 percent.

Pricing practices

Pricing methods

U.S. producers and importers reported setting prices using primarily transaction-by-transaction negotiations and contracts (table 5.3). Importer *** reported that its price setting is determined through a combination of contracts and spot pricing. Annual contract negotiations generally begin in the third quarter for the next year.³

Table 5.3 Tin mill products: Count of U.S. producers' and importers' reported price setting methods

Count in number of firms reporting

Method	U.S. producers	U.S. importers
Transaction-by-transaction	2	16
Contract	3	15
Set price list	0	2
Other	0	1
Responding firms	3	25

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

Note: The sum of responses down may not add up to the total number of responding firms as each firm was instructed to check all applicable price setting methods employed.

U.S. producers and importers reported selling most of their tin mill products under annual contracts, with most of the remaining share being sold under long-term contracts (table 5.4). Importers reported selling more than *** of their tin mill products on the spot market, with *** percent being sold under short-term contracts.

³ Conference transcript, p. 16 (Kopf).

Table 5.4 Tin mill products: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2025

Share in percent

Sale type	U.S. producers	Subject U.S. importers
Long-term contracts	***	***
Annual contract	***	***
Short-term contracts	***	***
Spot sales	***	***
All sales types	100.0	100.0

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

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

U.S. producers reported that annual contracts do not allow for price renegotiation, fix price or both price and quantity, and are not indexed to raw material costs. One U.S. producer reported that long-term contracts ***. Petitioner stated that there are no penalties if their purchasers do not meet their minimum purchase requirements.⁴ Two of four importers reporting annual contracts reported that they allow price renegotiation, and most importers reported that their short-term contracts do not allow it. Importers reported that both their short term and annual contracts do not allow for price renegotiation, fix both price and quantity, and are not indexed to raw material costs.

Sales terms and discounts

U.S. producers typically quote prices on an f.o.b. basis and importers report quoting prices on a delivered basis. Two of three U.S. producers and most importers reported that they have no discount policy. U.S. producer *** reported offering annual volume incentives, and two importers each reported offering quantity or total volume discounts. Three importers reported offering other discounts including case-by-case order volumes, annual purchase commitments, overall customer relationships, and rebates.

⁴ Conference transcript, p. 17 (Kopf).

Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following tin mill products shipped to unrelated U.S. customers during January 2023 to December 2025.

Product 1: Single reduced, electrolytic tinplate with base box weights of 75 lbs.–95 lbs. inclusive, in coils.

Product 2: Double reduced, electrolytic tinplate with base box weights of 55 lbs.–65lbs. inclusive, in coils.

Product 3: Single reduced, electrolytic chromium-coated steel with base box weights of 65 lbs.–80 lbs. inclusive, in coils.

Product 4: Double reduced, electrolytic chromium-coated steel with base box weights of 55 lbs.–65 lbs. inclusive, in coils.

Two U.S. producers and 14 importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.⁵ Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. commercial shipments of tin mill products, *** percent of U.S. commercial shipments of subject imports from China, *** percent of U.S. commercial shipments of subject imports from Taiwan, *** percent of U.S. commercial shipments of subject imports from Turkey.⁶ Price data for products 1 to 4 are presented in tables 5.5 to 5.8 and figures 5.2 to 5.5.

⁵ Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

⁶ Pricing coverage is based on U.S. shipments reported in questionnaires.

Table 5.5 Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	Taiwan price	Taiwan quantity	Taiwan margin
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***	***	***
2024 Q3	***	***	***	***	***	***	***	***
2024 Q4	***	***	***	***	***	***	***	***
2025 Q1	***	***	***	***	***	***	***	***
2025 Q2	***	***	***	***	***	***	***	***
2025 Q3	***	***	***	***	***	***	***	***
2025 Q4	***	***	***	***	***	***	***	***

Table continued.

Table 5.5 (Continued) Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Turkey price	Turkey quantity	Turkey margin
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***
2025 Q3	***	***	***	***	***
2025 Q4	***	***	***	***	***

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

Note: Product 1: Single reduced, electrolytic tinplate with base box weights of 75 lbs.–95 lbs. inclusive, in coils.

Note: Staff removed the data provided by *** for pricing product 1 from China, Taiwan, and Turkey because the firm was unable to isolate financials by pricing product and reported its combined sales for all products. Importer *** reported a small quantity of pricing product 1 from Turkey at a high price during Q2 2024, and this was the only data provided for that quarter.

Figure 5.2 Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter

Price of product 1

* * * * *

Volume of product 1

* * * * *

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

Note: Product 1: Single reduced, electrolytic tinplate with base box weights of 75 lbs.–95 lbs. inclusive, in coils.

Table 5.6 Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	Taiwan price	Taiwan quantity	Taiwan margin
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***	***	***
2024 Q3	***	***	***	***	***	***	***	***
2024 Q4	***	***	***	***	***	***	***	***
2025 Q1	***	***	***	***	***	***	***	***
2025 Q2	***	***	***	***	***	***	***	***
2025 Q3	***	***	***	***	***	***	***	***
2025 Q4	***	***	***	***	***	***	***	***

Table continued.

Table 5.6 (Continued) Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Turkey price	Turkey quantity	Turkey margin
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***
2025 Q3	***	***	***	***	***
2025 Q4	***	***	***	***	***

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

Note: Product 2: Double reduced, electrolytic tinplate with base box weights of 55 lbs.–65lbs. inclusive, in coils.

Figure 5.3 Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter

Price of product 2

* * * * *

Volume of product 2

* * * * *

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

Note: Product 2: Double reduced, electrolytic tinplate with base box weights of 55 lbs.–65lbs. inclusive, in coils.

Table 5.7 Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	Taiwan price	Taiwan quantity	Taiwan margin
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***	***	***
2024 Q3	***	***	***	***	***	***	***	***
2024 Q4	***	***	***	***	***	***	***	***
2025 Q1	***	***	***	***	***	***	***	***
2025 Q2	***	***	***	***	***	***	***	***
2025 Q3	***	***	***	***	***	***	***	***
2025 Q4	***	***	***	***	***	***	***	***

Table continued.

Table 5.7 (Continued) Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Turkey price	Turkey quantity	Turkey margin
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***
2025 Q3	***	***	***	***	***
2025 Q4	***	***	***	***	***

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

Note: Product 3: Single reduced, electrolytic chromium-coated steel with base box weights of 65 lbs.–80 lbs. inclusive, in coils.

Figure 5.4 Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter

Price of product 3

* * * * *

Volume of product 3

* * * * *

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

Note: Product 3: Single reduced, electrolytic chromium-coated steel with base box weights of 65 lbs.–80 lbs. inclusive, in coils.

Table 5.8 Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	Taiwan price	Taiwan quantity	Taiwan margin
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***	***	***
2024 Q3	***	***	***	***	***	***	***	***
2024 Q4	***	***	***	***	***	***	***	***
2025 Q1	***	***	***	***	***	***	***	***
2025 Q2	***	***	***	***	***	***	***	***
2025 Q3	***	***	***	***	***	***	***	***
2025 Q4	***	***	***	***	***	***	***	***

Table continued.

Table 5.8 (Continued) Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	Turkey price	Turkey quantity	Turkey margin
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***
2025 Q3	***	***	***	***	***
2025 Q4	***	***	***	***	***

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

Note: Product 4: Double reduced, electrolytic chromium-coated steel with base box weights of 55 lbs.–65 lbs. inclusive, in coils.

Figure 5.5 Tin mill products: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by source and quarter

Price of product 4

* * * * *

Volume of product 4

* * * * *

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

Note: Product 4: Double reduced, electrolytic chromium-coated steel with base box weights of 55 lbs.–65 lbs. inclusive, in coils.

Price trends

In general, prices decreased for tin mill products produced in the United States and from Taiwan (and increased for one tin mill product from China) during January 2023 to December 2025. Table 5.9 summarizes the price trends, by country and by product. As shown in the table, domestic price decreases ranged from *** percent to *** percent during January 2023 to December 2025 while import price decreases for Taiwan ranged from *** percent to *** percent. Prices increased by *** percent for pricing product *** from China.

Table 5.9 Tin mill products: Summary of price data, by product and source, January 2023 to December 2025

Quantity in short tons, price in dollars per short ton

Product	Source	Number of quarters	Quantity	Low price	High price	First quarter price	Last quarter price	Change over period
Product 1	United States	12	***	***	***	***	***	***
Product 1	China	8	***	***	***	***	***	***
Product 1	Taiwan	12	***	***	***	***	***	***
Product 1	Turkey	9	***	***	***	***	***	***
Product 2	United States	12	***	***	***	***	***	***
Product 2	China	7	***	***	***	***	***	***
Product 2	Taiwan	5	***	***	***	***	***	***
Product 2	Turkey	5	***	***	***	***	***	***
Product 3	United States	12	***	***	***	***	***	***
Product 3	China	1	***	***	***	***	***	***
Product 3	Taiwan	9	***	***	***	***	***	***
Product 3	Turkey	—	***	***	***	***	***	***
Product 4	United States	12	***	***	***	***	***	***
Product 4	China	3	***	***	***	***	***	***
Product 4	Taiwan	—	***	***	***	***	***	***
Product 4	Turkey	1	***	***	***	***	***	***

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

Note: Percent change column is percentage change from the first quarter 2023 to the last quarter in 2025.

Price comparisons

As shown in table 5.10, prices for product imported from subject countries were below those for U.S.-produced product in 44 of 60 instances (** short tons); margins of underselling ranged from ** to ** percent. In the remaining 16 instances (** short tons), prices for product from subject sources were between ** and ** percent above prices for the domestic product.

Table 5.10 Tin mill products: Instances of underselling and overselling and the range and average of margins, by product

Quantity in short tons; margin in percent

Products	Type	Number of instances	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	16	**	**	**	**
Product 2	Underselling	15	**	**	**	**
Product 3	Underselling	10	**	**	**	**
Product 4	Underselling	3	**	**	**	**
All products	Underselling	44	**	**	**	**
Product 1	Overselling	13	**	**	**	**
Product 2	Overselling	2	**	**	**	**
Product 3	Overselling	—	**	**	**	**
Product 4	Overselling	1	**	**	**	**
All products	Overselling	16	**	**	**	**

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

As shown in table 5.11, tin mill products from all three subject countries undersold tin mill products produced in the United States in terms of quantity. Table 5.12 presents price comparisons by year. The quantities of underselling exceeded the quantities of overselling in every year.

Table 5.11 Tin mill products: Instances of underselling and overselling and the range and average of margins, by source

Quantity in short tons; margin in percent

Sources	Type	Number of instances	Quantity	Average margin	Min margin	Max margin
China	Underselling	18	***	***	***	***
Taiwan	Underselling	20	***	***	***	***
Turkey	Underselling	6	***	***	***	***
All subject sources	Underselling	44	***	***	***	***
China	Overselling	1	***	***	***	***
Taiwan	Overselling	6	***	***	***	***
Turkey	Overselling	9	***	***	***	***
All subject sources	Overselling	16	***	***	***	***

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table 5.12 Tin mill products: Instances of underselling and overselling and the range and average of margins, by year

Quantity in short tons; margin in percent

Period	Type	Number of instances	Quantity	Average margin	Min margin	Max margin
2023	Underselling	5	***	***	***	***
2024	Underselling	19	***	***	***	***
2025	Underselling	20	***	***	***	***
All periods	Underselling	44	***	***	***	***
2023	Overselling	5	***	***	***	***
2024	Overselling	4	***	***	***	***
2025	Overselling	7	***	***	***	***
All periods	Overselling	16	***	***	***	***

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Lost sales and lost revenue

The Commission requested that U.S. producers of tin mill products report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of tin mill products from China, Taiwan, and/or Turkey from January 2023 to December 2025. Of the three responding U.S. producers, three reported that they had to reduce prices, two reported that they had to roll back announced price increases, and three firms reported that they had lost sales. One U.S. producer submitted lost sales and lost revenue allegations,

identifying 12 firms with which they *** spanning the period of investigation.

Staff contacted 12 purchasers and received responses from 12 purchasers. Responding purchasers reported purchasing or importing 6.4 million short tons of tin mill products during January 2023 to December 2025 (table 5.13).

During 2025, responding purchasers purchased or imported *** percent from U.S. producers, *** percent from China, *** percent from Taiwan, *** percent from Turkey, and *** percent from nonsubject countries.

Table 5.13 Tin mill products: Purchasers' reported purchases and imports, by firm and source

Quantity in short tons, share in percent

Firm	Domestic quantity	Subject quantity	All other quantity	Change in domestic share	Change in subject share	Change in all other share
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
All firms	1,755,821	714,905	3,960,130	(17.7)	11.4	6.3

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

Note: "All other" includes all other sources and unknown sources. Change is the percentage point change in the share of the firm's total purchases of domestic and/or subject country imports between the first and last years.

Purchasers were asked about changes in their purchasing patterns from different sources since 2023 (table 5.14). Of the responding purchasers, nine reported decreasing (steadily or fluctuating) purchases from domestic producers, one reported increasing (fluctuating up) purchases, one reported no change, and one did not purchase any domestic product. Explanations for decreasing purchases of domestic product included limited availability of tin mill products, with five firms specifically noting the closure of Cleveland-Cliffs Weirton mill. The majority of purchasers of tin mill products from subject countries reported increased (steadily or fluctuating) purchases.

Table 5.14 Tin mill products: Count of changes in purchase patterns from U.S., subject, and nonsubject countries

Count in number of firms reporting

Source of purchases	Steadily Increase	Fluctuate Up	No change	Fluctuate Down	Steadily Decrease	Did not purchase
United States	0	1	1	4	5	1
China	2	3	2	0	2	3
Taiwan	3	2	1	1	3	2
Turkey	5	3	2	0	0	2
All other sources	1	4	3	3	0	1
Sources unknown	0	0	4	1	0	5

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

Of the 12 responding purchasers, 8 reported that, since 2023, they had purchased imported tin mill products from China, Taiwan, and/or Turkey instead of U.S.-produced product (tables 5.15 and 5.16). Six of these purchasers reported that subject import prices were lower than U.S.-produced product, and three of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product. Three purchasers estimated the quantity of tin mill products from subject countries purchased instead of domestic product; quantities ranged from *** short tons to *** short tons. Purchasers reported non-price reasons for purchasing imports rather than U.S.-produced product including availability, size ranges, product quality, rates of rejection, on-time delivery, and lead times.

Of the 12 responding purchasers, 2 reported that U.S. producers had reduced prices in order to compete with lower-priced imports from subject countries; 5 reported that they did not know (table 5.17). The reported estimated price reduction for domestically produced tin mill products was as follows: *** (China), *** percent (Taiwan), and *** percent (Turkey).

In responding to the lost sales lost revenue survey, some purchasers provided additional information on purchases and market dynamics, highlighting availability issues with U.S. producers, certain products (such as ***) not being available domestically, a very competitive market, and high prices in the United States.

Purchaser *** stated that because there are fewer can manufacturers in the United States purchasing tin mill products, U.S. producers are “seeking market share” in the oil filter segment of the market, and also added that it buys imports because of the competition and lower costs and that there is “plenty of capacity and availability to service the entire market with domestic material, which we would prefer.”

Table 5.15 Tin mill products: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in short tons

Firm	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Narrative on reasons for purchasing imports
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued.

Table 5.15 (Continued) Tin mill products: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in short tons

Firm	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Narrative on reasons for purchasing imports
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	Yes: 8; No: 4	Yes: 6; No: 2	Yes: 3; No: 3	***	NA

Source: Compiled from data submitted in response to Commission questionnaires. Note: Purchaser *** indicated ***. Staff revised its response to "Choice based on Price."

Table 5.16 Tin mill products: Purchasers' responses to purchasing subject imports instead of domestic product, by source

Quantity in short tons

Source	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity
China	4	3	2	***
Taiwan	6	3	3	***
Turkey	7	5	3	***
Subject sources	8	6	3	***

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

Table 5.17 Tin mill products: Purchasers' responses to U.S. producer price reductions, by firm

Price reduction in percent

Firm	Producers lowered prices	Price reduction	Narrative on producer price reductions
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
All firms	Yes: 2; No: 5	***	NA

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

Note: Purchaser *** indicated "Don't Know" but provided estimated price reductions and an explanation such that staff revised its response to "Yes."

Part 6: Financial experience of U.S. producers

Background¹

Three U.S. producers, Cleveland-Cliffs, Ohio Coatings, and U.S. Steel, reported financial results and related information on their U.S. tin mill products operations. All of the responding U.S. producers provided their financial data on the basis of GAAP.

With respect to their overall operations, publicly traded Cleveland-Cliffs and U.S. Steel are both vertically integrated, to varying degrees, while Ohio Coatings, a privately held company, is not.² As described in Part 3 of this report, Cleveland-Cliffs shut down its tin mill production facility in Weirton, West Virginia, in April 2024.

Figure 6.1 presents each responding firm's share of the total reported net sales quantity in 2025.

¹ The following abbreviations are used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development expenses ("R&D expenses"), return on assets ("ROA"), and London Metal Exchange ("LME").

² U.S. producer questionnaire responses, section 1.2b. <https://www.clevelandcliffs.com/operations> and <https://www.ussteel.com/2023-sustainability-report/introduction/about-u.-s.-steel>, retrieved April 30, 2026.

Figure 6.1 Tin mill products: U.S. producers' share of net sales quantity, by firm, by period

* * * * *

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

Operations on tin mill products

Table 6.1 presents aggregated data on U.S. producers' operations in relation to tin mill products, while table 6.2 presents corresponding changes in AUVs. Table 6.3 presents selected company-specific financial data.

Table 6.1 Tin mill products: U.S. producers' results of operations, by item and period

Quantity in short tons; Value in 1,000 dollars; Ratio in percent.

Item	Measure	2023	2024	2025
Total net sales	Quantity	***	***	***
Total net sales	Value	***	***	***
COGS: Raw materials	Value	***	***	***
COGS: Direct labor	Value	***	***	***
COGS: Other factory	Value	***	***	***
COGS: Total	Value	***	***	***
Gross profit or (loss)	Value	***	***	***
SG&A expenses	Value	***	***	***
Operating income or (loss)	Value	***	***	***
Other expense / (income), net	Value	***	***	***
Net income or (loss)	Value	***	***	***
Depreciation/amortization	Value	***	***	***
Cash flow	Value	***	***	***
COGS: Raw materials	Ratio to NS	***	***	***
COGS: Direct labor	Ratio to NS	***	***	***
COGS: Other factory	Ratio to NS	***	***	***
COGS: Total	Ratio to NS	***	***	***
Gross profit	Ratio to NS	***	***	***
SG&A expense	Ratio to NS	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***
Net income or (loss)	Ratio to NS	***	***	***

Table continued.

Table 6.1 (Continued) Tin mill products: U.S. producers' results of operations, by item and period

Shares in percent; Unit values in dollars per short ton; Count in number of firms reporting.

Item	Measure	2023	2024	2025
COGS: Raw materials	Share	***	***	***
COGS: Direct labor	Share	***	***	***
COGS: Other factory	Share	***	***	***
COGS: Total	Share	100.0	100.0	100.0
Total net sales	Unit value	***	***	***
COGS: Raw materials	Unit value	***	***	***
COGS: Direct labor	Unit value	***	***	***
COGS: Other factory	Unit value	***	***	***
COGS: Total	Unit value	***	***	***
Gross profit or (loss)	Unit value	***	***	***
SG&A expenses	Unit value	***	***	***
Operating income or (loss)	Unit value	***	***	***
Net income or (loss)	Unit value	***	***	***
Operating losses	Count	***	***	***
Net losses	Count	***	***	***
Data	Count	3	3	2

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

Note: Shares represent the share of COGS.

Table 6.2 Tin mill products: Changes in AUVs between comparison periods

Changes in percent

Item	2023-25	2023-24	2024-25
Total net sales	***	***	***
COGS: Raw materials	***	***	***
COGS: Direct labor	***	***	***
COGS: Other factory	***	***	***
COGS: Total	***	***	***

Table continued.

Table 6.2 (Continued) Tin mill products: Changes in AUVs between comparison periods

Changes in dollars per short ton

Item	2023-25	2023-24	2024-25
Total net sales	***	***	***
COGS: Raw materials	***	***	***
COGS: Direct labor	***	***	***
COGS: Other factory	***	***	***
COGS: Total	***	***	***
Gross profit or (loss)	***	***	***
SG&A expense	***	***	***
Operating income or (loss)	***	***	***
Net income or (loss)	***	***	***

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

Note: Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

Table 6.3 Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in short tons

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales value

Value in 1,000 dollars

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS

Value in 1,000 dollars

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss)

Value in 1,000 dollars

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses

Value in 1,000 dollars

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss)

Value in 1,000 dollars

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss)

Value in 1,000 dollars

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS to net sales ratio

Ratios in percent

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss) to net sales ratio

Ratios in percent

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses to net sales ratio

Ratios in percent

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss) to net sales ratio

Ratios in percent

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss) to net sales ratio

Ratios in percent

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net sales value

Unit values in dollars per short ton

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit raw material costs

Unit values in dollars per short ton

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit direct labor costs

Unit values in dollars per short ton

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit other factory costs

Unit values in dollars per short ton

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit COGS

Unit values in dollars per short ton

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit gross profit or (loss)

Unit values in dollars per short ton

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit SG&A expenses

Unit values in dollars per short ton

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit operating income or (loss)

Unit values in dollars per short ton

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Tin mill products: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net income or (loss)

Unit values in dollars per short ton

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

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

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

Net sales

Commercial sales, primarily reflecting U.S. commercial shipments, was the *** category of sales reported, accordingly, a single line item for sales is presented in the relevant tables above.³

As shown in table 6.1, the industry’s total net sales quantity and value declined from 2023 to 2025. On a company-by-company basis as shown in table 6.3, *** reported an overall increase in sales quantity and value from 2023 to 2025 while *** reported an overall decline during the same period. ***.⁴ The average unit sales value irregularly declined from 2023 to 2025, with all firms *** reporting a decline in unit sales values from 2023 to 2024 followed by an increase from 2024 to 2025, and an overall decrease from 2023 to 2025. ***.

³ A relatively small quantity of commercial export sales was reported by ***. *** U.S. producer questionnaire response, section 2.8. Tolling was limited to ***, which reported that this activity accounted for *** percent of its 2025 net sales quantity. *** U.S. producer questionnaire, section 2.6.

⁴ ***. Email from ***, April 28, 2026.

Cost of goods sold and gross profit or loss

In addition to tin and/or chromium coating materials, which were reported by all U.S. producers, total raw material costs reported in table 6.1 reflect a combination of primary steel-making inputs, as well as purchased black plate. Total raw material costs ranged from *** percent of total COGS (2023) to *** percent of total COGS (2025). *** was the *** U.S. producer to report input purchases from related suppliers.⁵

As shown in table 6.3, ***, whose average raw material cost reflects ***, reported the highest average raw material cost throughout the period. With regard to the steel component specifically, non-integrated producer *** reported that it *** consumed black plate, accounting for *** percent of its total 2025 raw material cost, while the two integrated producers produced and consumed either hot-rolled steel only (***) or black plate only (***) to manufacture tin mill products.⁶

The U.S. industry's average per short ton raw material costs declined from 2023 to 2024 then increased in 2025 leading to an overall increase from 2023 to 2025.⁷ As shown in table 6.3, *** reported an overall decline in per short ton raw material costs from 2023 to 2025 and ***. Similar to average sales value, changes in average raw material cost were generally attributed to underlying input prices/costs, as opposed to changes in product mix. With respect to inputs related to tin mill products, ***

⁵ ***. Email from ***, May 6, 2026.

⁶ *** U.S. producer questionnaire responses, section 3.9c and email from ***, May 6, 2026.

⁷ ***. Petitioner's postconference brief, pp. 27-28.

***⁸ ***⁹ ***¹⁰

Table 6.4 presents raw materials, by type.

Table 6.4 Tin mill products: U.S. producers' raw material costs in 2025

Values in 1,000 dollars; Share of value in percent

Item	Value	Share of value
Black plate	***	***
Tin and/or chromium coating materials	***	***
All raw materials	***	100.0

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

The U.S. industry's direct labor cost, the smallest primary component of total COGS, declined as a share of total COGS throughout the period, ranging from *** percent of total COGS (2025) to *** percent (2023). Other factory costs, the second largest primary component of COGS, also declined irregularly as a share of total COGS during the period, ranging from *** percent (2024) to *** percent (2023).¹¹ Direct labor and other factory

⁸ ***. Email from ***, May 7, 2026.

⁹ Email from ***, May 5, 2026.

¹⁰ Email from ***, May 8, 2026.

¹¹ While *** decreased overall from 2023 to 2025 petitioner stated that ***. Petitioner's postconference brief, p. 28

costs reported by *** reflect ***.¹²

On a company-specific basis average per short ton direct labor cost and other factory costs reflect relatively wide ranges (see table 6.3: *** reporting the lowest average direct labor cost and lowest average other factory costs throughout the period;¹³ *** with the exception of 2023, reporting the highest average factory costs during the reporting period.

Table 6.1 shows that U.S. producers' aggregate gross profit increased from 2023 to 2025 as the reduction in total cost of goods sold was greater than the decrease in total net sales value. As a ratio to net sales, gross profit increased from 2023 to 2025. As shown in Table 6.3, ***.

SG&A expenses and operating income or loss

The U.S. industry's total SG&A expenses irregularly decreased from 2023 to 2025, ***. Company-specific SG&A expense ratios (total SG&A expenses divided by total sales value) varied and generally occupied distinct ranges (see table 6.3): *** SG&A expense ratio exhibiting the least amount of variability; *** increasing to its

¹² ***.

¹³ ***. Email from ***, May 5, 2026.

highest level in 2024 and then declining in 2025; *** declining in 2024 and remaining at a relatively low level thereafter.¹⁴

Table 6.1 shows that U.S. producers' aggregate operating income increased from 2023 to 2025. The operating income margin (operating income as a ratio to net sales) followed the same trend as operating income. Table 6.3 shows that all firms' operating income or loss matched the direction of their gross profit.

All other expenses and net income or loss

Interest expense, other expense, and other income are classified below the operating income level. In table 6.1, these items are aggregated and only the net amount is shown. In these investigations, the net amount for 2023 is negative, indicating net other income. Net other income decreased from 2023, resulting in net other expenses in 2024.¹⁵ Additionally, net other expenses declined from 2024 to 2025.

Table 6.1 shows that U.S. producers' aggregate net income decreased from *** in 2023, to a *** in 2024 (primarily reflecting ***, before recovering to a *** net income in 2025. Overall, net income demonstrated an upward trend from 2023 through 2025. The net income margin (operating income as a ratio to net sales) followed the same trend as net income. Table 6.3 shows that ***.

¹⁴ ***. Email from ***, April 29, 2026.

¹⁵ ***. *** U.S. producers questionnaire response, sections 3.10a and 3.10b.

Variance analysis

A variance analysis for the operations of U.S. producers of tin mill products is presented in table 6.5.¹⁶ The information for this variance analysis is derived from table 6.1. The analysis shows that the increase in operating income from 2023 to 2025 is primarily attributable to a favorable net cost/expense variance that was greater than an unfavorable price variance (indicating the decrease in unit costs was greater than the decrease in sales AUVs).

Table 6.5 Tin mill products: Variance analysis on the operations of U.S. producers between comparison periods

Value in 1,000 dollars

Item	2023-25	2023-24	2024-25
Net sales price variance	***	***	***
Net sales volume variance	***	***	***
Net sales total variance	***	***	***
COGS cost variance	***	***	***
COGS volume variance	***	***	***
COGS total variance	***	***	***
Gross profit variance	***	***	***
SG&A cost variance	***	***	***
SG&A volume variance	***	***	***
SG&A total variance	***	***	***
Operating income price variance	***	***	***
Operating income cost variance	***	***	***
Operating income volume variance	***	***	***
Operating income total variance	***	***	***

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

Note: These data are derived from the data in table 6.1. Unfavorable variances (which are negative) are shown in parentheses, all others are favorable (positive).

¹⁶ The Commission's variance analysis is calculated in three parts: Net sales variance, COGS variance, and SG&A expense variance. Each part consists of a price variance (in the case of the net sales variance) or a cost or expense variance (in the case of the COGS and SG&A expense variance), and a volume variance. The sales or cost/expense variances are calculated as the change in unit price or per-unit cost/expense, respectively, times the new volume, while the volume variance is calculated as the change in volume times the old unit price or per-unit cost/expense. Summarized at the bottom of the table, the operating income price variance is from sales; the operating income cost/expense variance is the sum of the cost components in the COGS and SG&A expense variances, and the operating income volume variance is the sum of the volume components of the net sales, COGS, and SG&A expense variances.

Capital expenditures and research and development expenses

Table 6.6 presents capital expenditures, by firm, and table 6.8 presents R&D expenses, by firm. Tables 6.7 and 6.9 present the firms' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively.

Table 6.6 Tin mill products: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

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

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

Table 6.7 Tin mill products: U.S. producers' narrative descriptions of their capital expenditures, by firm

Firm	Narrative on capital expenditures
Cleveland-Cliffs	***
Ohio Coatings	***
U.S. Steel	***

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

Table 6.8 Tin mill products: U.S. producers' R&D expenses, by firm and period

Value in 1,000 dollars

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

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

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

Table 6.9 Tin mill products: U.S. producers' narrative descriptions of their R&D expenses, by firm

Firm	Narrative on R&D expenses
Cleveland-Cliffs	***
Ohio Coatings	***
U.S. Steel	***

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

Assets and return on assets

Table 6.10 presents data on the U.S. producers' total assets while table 6.11 presents their operating ROA.¹⁷ Table 6.12 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time.

Table 6.10 Tin mill products: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

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

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

Table 6.11 Tin mill products: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2023	2024	2025
Cleveland-Cliffs	***	***	***
Ohio Coatings	***	***	***
U.S. Steel	***	***	***
All firms	***	***	***

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

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

¹⁷ The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

Table 6.12 Tin mill products: U.S. producers' narrative descriptions of their total net assets, by firm

Firm	Narrative on assets
Cleveland-Cliffs	***
Ohio Coatings	***
U.S. Steel	***

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

Capital and investment

The Commission requested U.S. producers of tin mill products to describe any actual or potential negative effects of imports of tin mill products from China, Taiwan, and Turkey on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table 6.13 presents the number of firms reporting an impact in each category and table 6.14 provides the U.S. producers' narrative responses.

Table 6.13 Tin mill products: Count of firms indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2023, by effect

Number of firms reporting

Effect	Category	Count
Cancellation, postponement, or rejection of expansion projects	Investment	0
Denial or rejection of investment proposal	Investment	0
Reduction in the size of capital investments	Investment	0
Return on specific investments negatively impacted	Investment	0
Other investment effects	Investment	3
Any negative effects on investment	Investment	3
Rejection of bank loans	Growth	0
Lowering of credit rating	Growth	0
Problem related to the issue of stocks or bonds	Growth	0
Ability to service debt	Growth	0
Other growth and development effects	Growth	3
Any negative effects on growth and development	Growth	3
Anticipated negative effects of imports	Future	2

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

Note: *** responded "no" to anticipated negative effects of imports.

Table 6.14 Tin mill products: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2023, by firm and effect

Item	Firm name and narrative on impact of imports
Other negative effects on investments	Cleveland-Cliffs: Cleveland-Cliffs closed its tin mill production facility at Weirton because of imports.
Other negative effects on investments	***
Other negative effects on investments	***
Other effects on growth and development	Cleveland-Cliffs: Cleveland-Cliffs closed its tin mill production facility at Weirton because of imports.
Other effects on growth and development	***
Other effects on growth and development	***
Anticipated effects of imports	Cleveland-Cliffs: Cleveland-Cliff no longer produces tin mill steel.
Anticipated effects of imports	***
Anticipated effects of imports	***

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

Part 7: Threat considerations and information on nonsubject countries

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors¹⁻⁻

- (I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,
- (II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,
- (III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,
- (IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,
- (V) inventories of the subject merchandise,

¹ Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that “The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition.”

- (VI) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,
- (VII) in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),
- (VIII) the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and
- (IX) any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).²

Information on the nature of the alleged subsidies was presented earlier in this report; information on the volume and pricing of imports of the subject merchandise is presented in Parts 4 and 5; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in Part 6. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

² Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, ". . . the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

Subject countries

The Commission issued foreign producers' or exporters' questionnaires to 71 firms believed to possibly produce and/or export tin mill products in China, 6 firms believed to produce and/or export tin mill products in Taiwan, and 4 firms believed to produce and/or export tin mill products in Turkey.³ Usable responses to the Commission's questionnaire were received from 6 firms in China⁴ and 2 firms in Turkey.⁵ ⁶ No responses were received from firms that indicated that they produced or exported tin mill products in Taiwan. Table 7.1 presents the number of producers/exporters that responded to the Commission's questionnaire, their estimated share of total production of tin mill products, and their exports to the United States as a share of U.S. imports, by each subject country in 2025.

Table 7.1 Tin mill products: Number of responding producers/exporters, approximate share of production, and exports to the United States as a share of U.S. imports, by subject foreign industry, 2025

Subject foreign industry	Number of responding firms	Approximate share of production (percent)	Exports as a share of U.S. imports from subject country (percent)
China	6	***	***
Taiwan	—	***	***
Turkey	2	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Approximate share of production data for each subject foreign industry are from self-reported estimates in foreign producer questionnaires. Exports as a share of U.S. imports by source are 2025 reported exports to the U.S. from foreign producer questionnaire responses divided by U.S. imports as reported in Table 4.2.

³ These firms were identified through a review of information submitted in the petition and presented in third-party sources.

⁴ Responses were received from the following firms in China: Burnist Industrial Group Limited (“Burnist”); Handan Jintai Packing Material Co., Ltd. (“Handan Jintai”); Jiangsu Ninesky Optoelectronics Technology Co., Ltd. (“Jiangsu Ninesky”); Jiangsu Suxun New Material Co., Ltd. (“Jiangsu Suxun”); Shou Gang Casey Steel Co., Ltd. (“Shou Gang Casey”); and Shougang Jingtang United Iron & Steel Co., Ltd. (“Shougang Jingtang”).

⁵ Responses were received from the following firms in Turkey: Ereğli Demir ve Çelik Fab. T.A.Ş. (“Erdemir”) and Tosyali Toyo Çelik A.Ş. (“Tosyali Toyo”).

⁶ Additionally, two firms submitted a response certifying that it had not produced and/or exported tin mill products since January 1, 2023: *** of China and *** of Taiwan.

Table 7.2 presents information on the tin mill products operations of the responding producers in China, Taiwan, and Turkey.

Table 7.2 Tin mill products: Summary data for subject foreign producers, by firm, 2025

Subject foreign industry and producer name	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
China: Handan Jintai	***	***	***	***	***	***
China: Jiangsu Ninesky	***	***	***	***	***	***
China: Jiangsu Suxun	***	***	***	***	***	***
China: Shou Gang Casey	***	***	***	***	***	***
China: Shougang Jingtang	***	***	***	***	***	***
Turkey: Erdemir	***	***	***	***	***	***
Turkey: Tosyali Toyo	***	***	***	***	***	***
All individual producers	***	100.0	***	100.0	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Table 7.3 presents summary information on the one responding reseller of subject tin mill products (***) of China).

Table 7.3 Tin mill products: Summary data for subject foreign resellers, by firm, 2025

Subject foreign industry and reseller name	Resales exported to the United States (short tons)	Share of resales exported to the United States (percent)
China: Burnist Industrial	***	***
All individual resellers	***	100.0

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

Table 7.4 presents summary data by source for 2025. Subject producers in China accounted for the majority of reported production (***) percent) and exports to the United States (***) percent).

Table 7.4 Tin mill products: Summary data for subject foreign producers, by source, 2025

Subject foreign industry	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
China	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***
Turkey	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***

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

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

Changes in operations

Subject producers were asked to report any change in the character of their operations or organization relating to the production of tin mill products since 2023 with two subject producers reporting such changes as shown in table 7.5.

*** in China increased its capacity from 2023 to 2025 ***, while *** in Turkey reported the ***. In addition to expansion activity, *** reported weather-related/force majeure disruptions reporting that ***.

Table 7.5 Tin mill products: Reported changes in operations in the subject countries since January 1, 2023, by change, subject foreign industry, and firm

Item	Subject foreign industry, firm name, and accompanying narrative response regarding changes in operations
Expansions	***
Expansions	***
Weather-related or force majeure events	***

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

Table 7.6 presents events in the subject countries' industries since January 1, 2023, as reported in publicly available sources.

Table 7.6 Tin mill products: Important industry events in the subject foreign industry since 2023

Country	Item	Firm: Event
Turkey	Expansion	Toysali: In August 2022, Toysali announced it would invest \$200 million to double annual tinplate production from 325,000 to 650,000 metric tons at its facility in southern Turkey. As of the most recent available reports, trial production began in November 2024 and the new capacity was expected to be fully operational by the end of 2024.
Turkey	Force Majeure	Toysali: In February 2023, Toysali declared a force majeure following an earthquake in southern Turkey. Toysali and other affected steel mills were expected to stay closed through at least the end of February 2023.
Turkey	Production suspension	Toysali: In March 2025, Toysali suspended production on one of its rolling lines, following a fire at the facility. The production suspension was expected to last approximately three months.

Source: Nikkei Asia, "Japanese-Turkish Steelmaker to Invest \$200m to Double Tin Plate Output," August 30, 2022 <https://asia.nikkei.com/business/companies/japanese-turkish-steelmaker-to-invest-200m-to-double-tin-plate-output>; South East Asia Iron and Steel Institute, "Toysali Toyo Begins Production to Double Tinplate Capacity," November 12, 2024, <https://www.seaisi.org/details/25723?type=news-rooms>; GMK Center, "The Earthquake Paralyzed a Third of the Steel Production Capacity in Turkiye," February 14, 2023, <https://gmk.center/en/news/the-earthquake-paralyzed-a-third-of-the-steel-production-capacity-in-turkiye/>; GMK Center, "Turkey's Toysali Toyo Shuts Down Rolling Line After Fire," March 7, 2025, <https://gmk.center/en/news/turkeys-tosyali-toyo-shuts-down-rolling-line-after-fire-argus/>.

Installed and practical overall capacity

Table 7.7 presents data on subject producers' installed capacity, practical overall capacity, and practical tin mill products capacity and production.⁷ Responding subject producers maintained relatively stable installed capacity between 2023 and 2025, at around *** short tons in 2024 and 2025. Installed capacity utilization rose from *** percent in 2023 to *** percent in 2024 before decreasing to *** percent in 2025, with output of products using the same machinery or employees as used to produce tin mill products increasing irregularly over the period.⁸

Practical overall capacity, representing the equipment's effective operating capability, remained below installed capacity but decreased irregularly, while practical overall utilization increased irregularly, reaching *** percent in 2025. For tin mill production specifically, practical capacity increased across the period but remained in the range of *** short tons. Tin mill production levels increased irregularly remaining in the range of *** and *** short tons over the period. Resultingly, practical tin mill capacity utilization ranged from *** percent to *** percent increasing irregularly over the period. Overall, responding producers reported operated at practical capacity levels above 85 percent throughout the period.

⁷ Installed or "theoretical" overall capacity measures the level of production a firm could have attained based solely on existing capital investments and not considering other constraints such as availability of material inputs, labor force, and normal downtime. The two practical capacity measures take into consideration both existing capital investment as well as non-capital investment constraints. Practical overall capacity measures firms' capacity to produce tin mill products as well as any other products produced using the same equipment/machinery, whereas practical tin mill products capacity measures only the practical capacity of a firm to produce hexamine based on that firms' actual product mixes over the period.

⁸ Two of the six responding subject producers (*** of Turkey and *** of China) reported producing additional, out-of-scope products on the same equipment or using the same employees as used for tin mill production. *** stated that it also produces ***. *** reported producing *** using the same machinery/employees.

Table 7.7 Tin mill products: Producers' in subject foreign industries installed and practical capacity and production on the same equipment as subject production, by period

Capacity and production in short tons; utilization in percent.

Item	Measure	2023	2024	2025
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical tin mill products	Capacity	***	***	***
Practical tin mill products	Production	***	***	***
Practical tin mill products	Utilization	***	***	***

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

Constraints on capacity

Subject producers identified several constraints affecting practical overall capacity during the investigation period, as shown in table 7.8.

*** reported production bottlenecks caused by reduced cold-rolling line capacity when producing thinner gauges, while *** bottlenecks caused by its electrolytic coating line. *** and *** both cited limitations in the reliability and timing of raw material supplies, which can delay production or prevent equipment from operating at full speed. Two Chinese producers (***) and (***) also noted limited warehouse space that restricts storage of raw materials and finished products, creating pressure when production increases.

Logistics constraints were reported by both *** and ***, who stated that shipping capacity and truck parking limitations restrict timely product movement and would intensify if production expanded. Additional constraints included routine downtime for maintenance and inspections. Chinese firms reported maintenance-related shutdowns ranging from 22 days to two months per year.

Table 7.8 Tin mill products: Producers' in subject foreign industries reported constraints to practical overall capacity since January 1, 2023 by type of subject foreign industry, firm, and type of constraint

Type of constraint	Subject foreign industry, firm name, and narrative response on constraints to practical overall capacity
Production bottlenecks	***
Production bottlenecks	***
Supply of material inputs	***
Supply of material inputs	***
Storage capacity	***
Storage capacity	***
Logistics/transportation	***
Logistics/transportation	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***

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

Operations on tin mill products

Aggregate tin mill products operations in the subject countries

Table 7.9 presents information on the tin mill products operations for the subject foreign industries. Subject producers' tin mill product capacity ranged between *** and *** short tons from 2023 through 2025, with increases projected for 2026 and 2027. Production increased irregularly, fluctuating between *** short tons over the investigation period with projected increases for 2026 and 2027. End-of-period inventories increased between 2023 and 2025 with declining projections for 2026 and 2027. Internal consumption remained stable at roughly *** to *** short tons annually. Home-market shipments declined between 2023 and 2025, but with increased projections for 2026 and 2027, while exports to the United States increased throughout the period. Exports to all other markets also fluctuated, with projected increases in both 2026 and 2027.

Shares and ratios indicate that capacity utilization ranged from *** to *** percent in the investigation period and remained above *** percent in projections. Inventory ratios increased from 2023 to 2025 before falling to lower levels in projected years. The share of home-market shipments declined between 2023 and 2025 but are projected to stabilize in 2026 and 2027. Export shipments accounted for roughly *** to *** percent of total shipments across all years. The adjusted share of exports shipped to the United States increased from *** percent in 2023 to *** percent in 2025, with lower projected shares in subsequent years. Virtually all reported exports to the United States were shipped directly by producers rather than resellers (*** percent or greater in all years).

Table 7.9 Tin mill products: Data on subject foreign industries, by item and period

Quantity in short tons

Item	2023	2024	2025	Projection 2026	Projection 2027
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Internal consumption	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Home market shipments	***	***	***	***	***
Exports to the United States	***	***	***	***	***
Exports to all other markets	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
Resales exported to the United States	***	***	***	***	***
Total exports to the United States	***	***	***	***	***

Table continued.

Table 7.9 (Continued) Tin mill products: Data on subject foreign industries, by period

Shares and ratios in percent.

Item	2023	2024	2025	Projection 2026	Projection 2027
Capacity utilization ratio	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***
Internal consumption share	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***
Home market shipments share	***	***	***	***	***
Exports to the United States share	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***
Export shipments share	***	***	***	***	***
Total shipments share	100.0	100.0	100.0	100.0	100.0
Share of total exports to the United States exported by producers	***	***	***	***	***
Share of total exports to the United States exported by resellers	***	***	***	***	***
Adjusted share of total shipments exported to the United States	***	***	***	***	***

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

Practical tin mill products capacity and production by subject foreign industry

Table 7.10 presents information on subject producers' production, capacity, and capacity utilization by subject country. China accounted for the majority of reported subject capacity throughout the period, with levels remaining between approximately *** and *** short tons from 2023 through the projections for 2026 and 2027.⁹ Turkey's practical capacity ranged from about *** to *** short tons from 2023 and 2025 with projected increases in 2026 and 2027. Combined subject foreign industry practical capacity increased from 2023 through 2025 and is projected to rise in 2026 and 2027.

Production data followed a similar pattern. China's production ranged from around *** short tons across the investigation period, with slight increases projected for 2026 and 2027 as compared to 2025. Turkey's production increased from 2023 to 2024, declined in 2025, and is projected to increase in subsequent years. Across all subject exporters, total production increased irregularly from 2023 to 2025 and is projected to increase in both 2026 and 2027.

Capacity utilization ratios indicate relatively stable operating rates. China's utilization remained above 90 percent in all years, while Turkey's increased from *** in 2023 to *** percent in 2025 with a projected increase to *** percent in 2027. The share of total production attributed to China declined from *** percent in 2023 to *** percent in 2025 and is projected to decrease to *** percent in 2027 with corresponding shares shifting in the opposite direction for Turkey.

⁹ Petitioners point to a market report indicating that China's effective tinsplate and tin-free steel capacity reached 10.98 million tons as of November 2025. Petitioner's postconference brief, p. 38, exh. 11.

Table 7.10 Tin mill products: Subject foreign industries' output: Practical capacity, by subject foreign industry and period

Practical capacity

Quantity in short tons.

Subject foreign industry	2023	2024	2025	Projection 2026	Projection 2027
China	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
All subject foreign industries	***	***	***	***	***

Table continued.

Table 7.10 (Continued) Tin mill products: Subject foreign industries' output: Production, by subject foreign industry and period

Production

Quantity in short tons.

Subject foreign industry	2023	2024	2025	Projection 2026	Projection 2027
China	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
All subject foreign industries	***	***	***	***	***

Table continued.

Table 7.10 (Continued) Tin mill products: Subject foreign industries' output: Capacity utilization ratio, by subject foreign industry and period

Capacity utilization

Ratio in percent.

Subject foreign industry	2023	2024	2025	Projection 2026	Projection 2027
China	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
All subject foreign industries	***	***	***	***	***

Table continued.

Table 7.10 (Continued) Tin mill products: Subject foreign industries' output: Share of production, by subject foreign industry and period

Share of production

Share in percent

Subject foreign industry	2023	2024	2025	Projection 2026	Projection 2027
China	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
All subject foreign industries	100.0	100.0	100.0	100.0	100.0

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

Tin mill products exports, by subject country

Table 7.11 presents information on subject producers' exports of tin mill products by subject country. Exports to the United States from subject foreign industries increased between 2023 and 2025, rising from *** short tons in 2023 to *** short tons in 2025. China's shipments to the United States increased from *** short tons in 2023 to *** short tons in 2025, while Turkey's shipments increased from *** short tons to *** short tons over the same period. Projected exports show a decline for China in both 2026 and 2027, whereas Turkey's exports are projected to rise to *** short tons in 2027. Across all subject industries, total exports to the United States are projected to decrease in both 2026 and 2027 after a 2025 peak.

The share of total shipments exported to the United States followed a similar pattern, increasing for all subject exporters from *** percent in 2023 to *** percent in 2025, before declining in the projections for 2026 and 2027. China's share rose from *** percent in 2023 to *** percent in 2025, then is projected to decrease in subsequent years, while Turkey's share increased more sharply, reaching *** percent in 2025 and remaining above *** percent in the projections. Total export volumes from all subject producers ranged from *** to *** short tons during the investigation period, with projected increases in 2026 and 2027. The share of total shipments exported remained between *** and *** percent across all years.

Table 7.11 Tin mill products: Subject foreign industries' exports: Exports to the United States, by subject foreign industry and period

Exports to the United States

Quantity in short tons.

Subject foreign industry	2023	2024	2025	Projection 2026	Projection 2027
China	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
All subject foreign industries	***	***	***	***	***

Table continued.

Table 7.11 (Continued) Tin mill products: Subject foreign industries' exports: Share of total shipments exported to the United States, by subject foreign industry and period

Share of total shipments exported to the United States

Share in percent.

Subject foreign industry	2023	2024	2025	Projection 2026	Projection 2027
China	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
All subject foreign industries	***	***	***	***	***

Table continued.

Table 7.11 (Continued) Tin mill products: Subject foreign industries' exports: Total exports, by subject foreign industry and period

Total exports

Quantity in short tons

Subject foreign industry	2023	2024	2025	Projection 2026	Projection 2027
China	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
All subject foreign industries	***	***	***	***	***

Table continued.

Table 7.11 (Continued) Tin mill products: Subject foreign industries' exports: Share of total shipments exported, by subject foreign industry and period

Share of total shipments exported

Share in percent

Subject foreign industry	2023	2024	2025	Projection 2026	Projection 2027
China	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
All subject foreign industries	***	***	***	***	***

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

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

Tin mill products inventories, by subject foreign industry

Table 7.12 presents information on ending inventory of the responding producers by subject foreign country. Subject foreign industry end-of-period inventories increased from *** short tons in 2023 to *** short tons in 2025, followed by projected declines to *** short tons in 2026 and *** short tons in 2027. By source, China’s inventories rose from *** to *** short tons between 2023 and 2025 and are projected at *** and *** short tons in 2026 and 2027, respectively. Turkey’s inventories increased from *** to *** short tons over 2023 to 2025, with lower projected levels of *** and *** short tons in 2026 and 2027.

Inventory ratios to total shipments increased irregularly from 2023 through 2025. For all subject foreign industries combined, the ratio was *** percent in 2023 and *** percent in 2024, increased to *** percent in 2025, and is projected to decline to *** percent in 2026 and *** percent in 2027. China’s ratio moved from *** percent in 2023 to *** percent in 2025, then to projected levels of *** and *** percent. Turkey’s ratio decreased from *** percent in 2023 to *** percent in 2024, rose to *** percent in 2025, and is projected at *** and *** percent in 2026 and 2027, respectively.

Table 7.12 Tin mill products: Subject foreign industries' inventories: End of period inventories, by subject foreign industry and period

Quantity in short tons.

Subject foreign industry	2023	2024	2025	Projection 2026	Projection 2027
China	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
All subject foreign industries	***	***	***	***	***

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

Table 7.12 (Continued) Tin mill products: Subject foreign industries' inventories: Ratio of inventories to total shipments, by subject foreign industry and period

Ratio in percent.

Subject foreign industry	2023	2024	2025	Projection 2026	Projection 2027
China	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
All subject foreign industries	***	***	***	***	***

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

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

Alternative products

Two of the six responding subject producers (***) of Turkey and (***) of China) reported producing additional, out-of-scope products on the same equipment or using the same employees as used for tin mill production. (***) stated that it also produces (***) on this equipment. (***) reported producing (***) on the same machinery. (***) indicated that tin mill products accounted for (***) to (***) percent of the output produced on the shared machinery. (***) reported a smaller share, with (***) to (***) percent of production on the same machinery consisting of tin mill products.

As shown in table 7.13, tin mill products represented over (***) percent of the combined production of the six subject producers using shared equipment in all periods, while out-of-scope products accounted for no more than (***) percent of production by volume.

Table 7.13 Tin mill products: Producers' in subject foreign industries overall production on the same equipment as subject production, by product type and period

Quantities in short tons; shares and Ratios in percent.

Product type	Measure	2023	2024	2025
Tin mill products	Quantity	***	***	***
Other products	Quantity	***	***	***
All products	Quantity	***	***	***
Tin mill products	Share	***	***	***
Other products	Share	***	***	***
All products	Share	100.0	100.0	100.0

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

Exports

Table 7.14 presents Global Trade Atlas (“GTA”) data for exports under HS subheadings 7210.11, 7210.12, 7210.50, and 7212.10 from subject countries to the United States and to all destination markets from 2023 through 2025.

Global exports of tin- and chromium-coated steel sheet to the United States increased from all three subject countries between 2023 and 2025. Exports from China to the United States more than doubled from 47,806 short tons to 101,928 tons, while exports from Taiwan to the United States increased even more, rising from 48,825 short tons to 155,178 short tons. Exports from Turkey to the United States showed the steepest growth, expanding from 5,712 short tons to 83,002 short tons, helping drive total subject-industry exports from 102,343 short tons in 2023 to 340,108 short tons in 2025.

Global exports of tin-and chromium-coated steel sheet from the subject countries to all sources increased each year from 2023 to 2025. Exports from China accounted for the largest export volumes, rising from 1.9 million short tons in 2023 to 2.8 million in 2025. Exports from Taiwan grew from 147,038 to 251,028 short tons over the same period, while exports from Turkey increased from 119,836 to 180,619 short tons between 2023 and 2024 before declining to 157,845 short tons in 2025. Combined exports from all three subject exporters rose from 2.2 million short tons in 2023 to 3.2 million short tons in 2025.

Resultingly, the share of exports destined for the United States varied by country and over time. The share of exports from China exported to the United States ranged from 2.5 to 4.4 percent, while the share of exports from Taiwan exported to the United States increased from 33.2 percent in 2023 to 61.8 percent in 2025. The share of exports from Turkey exported to the United States also rose, from 4.8 percent in 2023 to 52.6 percent in 2025. Across all subject exporters combined, the share of exports exported to the United States increased from 4.7 percent in 2023 to 10.6 percent in 2025.

Table 7.14 Tin- and chromium-coated steel sheet: Global exports from subject exporters: Exports to the United States, by exporter and period

Quantity in short tons

Exporter	Measure	2023	2024	2025
China	Quantity	47,806	103,802	101,928
Taiwan	Quantity	48,825	95,104	155,178
Turkey	Quantity	5,712	38,294	83,002
Subject exporters	Quantity	102,343	237,200	340,108

Table continued.

Table 7.14 (Continued) Tin- and chromium-coated steel sheet: Global exports from subject exporters: Exports to all destination markets, by exporter and period

Quantity in short tons

Exporter	Measure	2023	2024	2025
China	Quantity	1,931,227	2,381,314	2,812,596
Taiwan	Quantity	147,038	221,215	251,028
Turkey	Quantity	119,836	180,619	157,845
Subject exporters	Quantity	2,198,101	2,783,148	3,221,469

Table continued.

Table 7.14 (Continued) Tin- and chromium-coated steel sheet: Global exports from subject exporters: Share of exports exported to the United States, by exporter and period

Share in percent

Exporter	Measure	2023	2024	2025
China	Share	2.5	4.4	3.6
Taiwan	Share	33.2	43.0	61.8
Turkey	Share	4.8	21.2	52.6
Subject exporters	Share	4.7	8.5	10.6

Source: Official export statistics as reported by China customs, Taiwan Directorate General of Customs and Turkey's State Institute of Statistics official global imports statistics) under HS subheadings 7210.11, 7210.12, 7210.50, and 7212.10 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed April 17, 2026.

Note: These data do not include HS subheadings 7212.50, 7225.99, and 7226.99 as they are believed to contain a large share of products outside the scope of these investigations.

Note: Shares represent the shares of value exported to the United States out of all destination markets.

U.S. inventories of imported merchandise

Table 7.15 presents data on U.S. importers' reported inventories of tin mill products. U.S. importers' inventories from subject sources rose across the period. Subject inventories from China increased from *** short tons in 2023 to *** short tons in 2025, with corresponding ratios to imports, U.S. shipments of imports, and total shipments of imports rising from ***, ***, and *** percent in 2023 to ***, ***, and *** percent in 2025. Subject inventories from Taiwan increased from *** to *** short tons, and its ratios increased to *** percent (imports), *** percent (U.S. shipments), and *** percent (total shipments) by 2025. Subject inventories from Turkey moved from *** short tons in 2023 to *** short tons in 2025; its ratios rose sharply between 2023 and 2024 and then decreased slightly in 2025.

Aggregated subject inventories rose from *** to *** short tons between 2023 and 2025. Their ratios to imports, U.S. shipments of imports, and total shipments of imports increased to ***, ***, and *** percent, respectively, by 2025. In contrast, nonsubject inventories increased from 2023 to 2025 (from *** to *** short tons) while ratios declined over the period, ranging from *** to *** percent by 2025. Across all import sources combined, inventories increased from *** to *** short tons, and the three ratios rose to the range of *** to *** percent in 2025.

Table 7.15 Tin mill products: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in short tons; Ratio in percent.

Measure	Source	2023	2024	2025
Inventories quantity	China	***	***	***
Ratio to imports	China	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***
Ratio to total shipments of imports	China	***	***	***
Inventories quantity	Taiwan	***	***	***
Ratio to imports	Taiwan	***	***	***
Ratio to U.S. shipments of imports	Taiwan	***	***	***
Ratio to total shipments of imports	Taiwan	***	***	***
Inventories quantity	Turkey	***	***	***
Ratio to imports	Turkey	***	***	***
Ratio to U.S. shipments of imports	Turkey	***	***	***
Ratio to total shipments of imports	Turkey	***	***	***
Inventories quantity	Subject sources	***	***	***
Ratio to imports	Subject sources	***	***	***
Ratio to U.S. shipments of imports	Subject sources	***	***	***
Ratio to total shipments of imports	Subject sources	***	***	***
Inventories quantity	Nonsubject sources	***	***	***
Ratio to imports	Nonsubject sources	***	***	***
Ratio to U.S. shipments of imports	Nonsubject sources	***	***	***
Ratio to total shipments of imports	Nonsubject sources	***	***	***
Inventories quantity	All import sources	***	***	***
Ratio to imports	All import sources	***	***	***
Ratio to U.S. shipments of imports	All import sources	***	***	***
Ratio to total shipments of imports	All import sources	***	***	***

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

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of tin mill products from China, Taiwan, Turkey, or other sources after December 31, 2025. Importers' arranged imports data are presented in table 7.16 by quarter (arranged imports reported by U.S. importers for 2026 show that arranged subject volumes were concentrated in the first two quarters of the year).

Combined arranged imports from all sources were *** short tons of which *** percent are from subject sources (*** short tons). Arranged imports from China totaled *** short tons (*** percent of arranged subject imports). Taiwan's arranged imports amounted to *** short tons (*** percent of arranged subject imports). Turkey's arranged imports totaled *** short tons (*** percent of arranged subject imports). Arranged imports from nonsubject sources were larger in every quarter, totaling *** short tons for the year.

Table 7.16 Tin mill products: U.S. importers' arranged imports, by source and period

Quantity in short tons

Source	Q1 2026	Q2 2026	Q3 2026	Q4 2026	Total
China	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

Third-country trade actions

Based on available information, tin mill products from subject countries have not been subject to countervailing duties in other countries. The following countries have imposed antidumping duties, safeguard measures, or both on imports of tin mill products from the subject sources (table 7.17).

Table 7.17 Tin mill products: Third-country trade actions

Authority	Subject products	Actions and effective dates
Brazil	Coated flat steel products (including tin mill products) from China	In April 2025, Brazil announced an affirmative preliminary determination of dumping. No preliminary duties have been imposed and the final investigation is ongoing.
European Union (“EU”)	Certain steel mill products, including tin mill products, from most trading partners including China, Taiwan, and Turkey	In July 2024, the European Commission (“EC”) extended its safeguard measures on certain steel mill products, including tin mill products, through June 30, 2026. Steel imports classifiable in 26 product categories were subject to annual tariff rate quotas (“TRQs”) based on historical import levels for each product category. For each category, import volumes within the TRQ levels entered free of additional duty but further imports were subject to an additional duty of 25 percent ad valorem. On April 17, 2026, the EC again agreed to extend its safeguard measures, increasing the TRQ rate to 50 percent, and lowering total quota volumes.
EU	Electrolytic chromium coated steel (“ECCS”) products from China	In November 2022, the EC imposed antidumping duties ranging from €240 (\$281) to €608 (\$711) per metric ton.
EU	Flat-rolled products of iron or non-alloy steel plated or coated with tin (‘tinplate’) from China	In May 2025, the EC imposed antidumping duties ranging from 13.1 to 62.3 percent ad valorem.
Indonesia	Tinplated coils and cut-length sheets from China and Taiwan	In December 2023, Indonesia extended antidumping duties ranging from 6.1 to 7.4 percent ad valorem for imports from China and 4.4 percent ad valorem for imports from Taiwan.
Malaysia	Flat-rolled products of iron or non-alloy steel, of a width of 600mm or more, clad, plated, or coated with tin (electrolytic tinplate or tinplate) from China	In May 2025, Malaysia imposed antidumping duties ranging from 4.48 to 20.42 percent ad valorem.
Pakistan	Tinplate from China	In January 2019, Pakistan imposed duties of 6.87 percent ad valorem. The antidumping measures were terminated in January 2022.
Thailand	Tin Free Steel (also known as ECCS) from China	In November 2021, Thailand imposed duties ranging from 0 to 24.73 percent ad valorem.
Thailand	Tinplate from China and Taiwan	In November 2021, Thailand imposed duties ranging from 0 to 17.46 percent ad valorem for China and 4.28 to 20.45 percent ad valorem for Taiwan.
Turkey	Flat-rolled products of iron or non-alloy steel, plated or coated with tin (tin plated products) from China	In December 2025, Turkey imposed duties ranging from 23.88 to 50.08 percent ad valorem.
United Kingdom (UK)	Tin mill products from China	In December 2025, the UK imposed duties ranging from 27.85 to 49.98 percent ad valorem.
UK	Certain steel mill products, including tin mill products, from most trading partners including China, Taiwan, and Turkey	In July 2024, the UK extended its safeguard measures on certain steel mill products, including tin mill products through June 30 th 2026. Steel imports classifiable in 15 product categories were subject to annual tariff rate quotas (“TRQs”) based on historical import levels for

Authority	Subject products	Actions and effective dates
		each product category. For each category, import volumes within the TRQ levels entered free of additional duty but further imports were subject to an additional duty of 25 percent ad valorem. Effective July 1, 2026, the safeguard will be replaced with a new steel trade measure in which an expanded list of steel mill products, including tin mill products, will be subject to TRQs with a reduced quota volume. For each category, import volumes within the TRQ levels will enter free of additional duty while further imports will be subject to an additional duty of 50 percent ad valorem.

Source: European Commission, "Commission Implementing Regulation (EU) 2024/1782," June 24, 2024, https://eur-lex.europa.eu/eli/reg_impl/2024/1782/oj; Council of the European Union, Interinstitutional File: 2025 0726 (COD), April 23, 2026, https://www.parlament.gv.at/dokument/XXVIII/EU/68975/imfname_11608084.pdf; GMK Center, "The European Council has Issued a Statement on New Protective Measures in the Steel Market," April 26, 2026, <https://gmk.center/en/news/the-european-council-has-issued-a-statement-on-new-protective-measures-in-the-steel-market/>; WTO Trade Remedies Data Portal, Anti-dumping, "Original Investigation 2415160," <https://trade-remedies.wto.org/en/antidumping/investigations/investigation/bra-2415160>, retrieved April 29, 2026; WTO Trade Remedies Data Portal, Anti-dumping, "Original Investigation AD683 CN," <https://trade-remedies.wto.org/en/antidumping/investigations/investigation/eu-ad683-cn>; retrieved April 29, 2026; WTO Trade Remedies Data Portal, Anti-dumping, "Original Investigation AD705 CN," <https://trade-remedies.wto.org/en/antidumping/investigations/investigation/eu-ad705-cn>, retrieved April 29, 2026; WTO Trade Remedies Data Portal, Anti-dumping, "Original Investigation AD05-2012 CHN," <https://trade-remedies.wto.org/en/antidumping/investigations/investigation/idn-ad05-2012chn-1>, retrieved April 29, 2026; WTO Trade Remedies Data Portal, Anti-dumping, "Original Investigation AD06-2012 TPKM," <https://trade-remedies.wto.org/en/antidumping/investigations/investigation/idn-ad06-2012tpkm-1>, retrieved April 29, 2026; WTO Trade Remedies Data Portal, Anti-dumping, "Original Investigation AD02/24/CHN," <https://trade-remedies.wto.org/en/antidumping/investigations/investigation/mys-ad0224chn>, retrieved April 29, 2026; WTO Trade Remedies Data Portal, Anti-dumping, "Original Investigation 53/2018/NTC/TP/CHI," <https://trade-remedies.wto.org/en/antidumping/investigations/investigation/pak-532018ntctpci-1>, retrieved April 29, 2026; WTO Trade Remedies Data Portal, Anti-dumping, "Original Investigation AD2020-06," <https://trade-remedies.wto.org/en/antidumping/investigations/investigation/tha-ad2020-06-2>, retrieved April 29, 2026; WTO Trade Remedies Data Portal, Anti-dumping, "Original Investigation AD2020-02," <https://trade-remedies.wto.org/en/antidumping/investigations/investigation/tha-ad2020-02-2>, retrieved April 29, 2026; WTO Trade Remedies Data Portal, Anti-dumping, "Original Investigation AD2020-03," <https://trade-remedies.wto.org/en/antidumping/investigations/investigation/tha-ad2020-03-2>, retrieved April 29, 2026; WTO Trade Remedies Data Portal, Anti-dumping, "Original Investigation 292.CHN," <https://trade-remedies.wto.org/en/antidumping/investigations/investigation/tur-292chn>, retrieved April 29, 2026; WTO Trade Remedies Data Portal, Anti-dumping, "Original Investigation 2024/04 CN," <https://trade-remedies.wto.org/en/antidumping/investigations/investigation/gbr-202404-cn>, retrieved April 29, 2026; S&P Global, "UK Extends Steel Safeguard Measure for Two Years," June 26, 2024, <https://www.spglobal.com/energy/en/news-research/latest-news/metals/062624-uk-extends-steel-safeguard-measure-for-two-years>; Government of the United Kingdom, Department for Business & Trade, "Trade Remedies Notice 2024/06: Safeguard Measure: Tariff-rate Quota on Steel Goods," Updated March 31, 2026, <https://www.gov.uk/government/publications/trade-remedies-notices-tariff-rate-quotas-on-steel-goods/trade-remedies-notice-202406-safeguard-measure-tariff-rate-quota-on-steel-goods>, retrieved April 29, 2026; Government of the United Kingdom, Department for Business & Trade, "Decision: UK's Steel Trade Measure from 1 July 2026," April 2, 2026, <https://www.gov.uk/government/publications/uks-steel-trade-measure-from-1-july-2026/uks-steel-trade-measure-from-1-july-2026>.

Information on nonsubject countries

Table 7.18 presents global export data for tin- and chromium-coated steel sheet, a category that includes tin mill products and out-of-scope products (by source in descending order of quantity for 2025).

Table 7.18 Tin- and chromium-coated steel sheet: Global exports, by reporting country and by period

Quantity in short tons; Value in 1,000 dollars

Exporting country	Measure	2023	2024	2025
United States	Quantity	113,874	82,641	51,706
China	Quantity	1,931,227	2,381,314	2,812,596
Taiwan	Quantity	147,038	221,215	251,028
Turkey	Quantity	119,836	180,619	157,845
Subject exporters	Quantity	2,198,101	2,783,148	3,221,469
Germany	Quantity	941,665	1,113,875	1,102,605
Japan	Quantity	580,523	708,814	707,623
France	Quantity	191,317	262,053	253,642
Netherlands	Quantity	469,965	575,865	554,647
Slovakia	Quantity	308,291	203,701	344,851
Belgium	Quantity	206,611	210,052	140,000
Spain	Quantity	143,066	259,609	231,284
Canada	Quantity	234,471	220,478	242,632
United Kingdom	Quantity	83,175	141,871	111,651
All other exporters	Quantity	1,044,811	1,234,242	983,430
Nonsubject exporters	Quantity	4,203,896	4,930,560	4,672,365
All reporting exporters	Quantity	6,515,871	7,796,349	7,945,541
United States	Value	108,156	80,014	51,409
China	Value	1,825,439	2,057,308	2,313,644
Taiwan	Value	154,635	218,935	265,353
Turkey	Value	134,302	179,545	163,047
Subject exporters	Value	2,114,377	2,455,788	2,742,044
Germany	Value	1,370,930	1,424,207	1,462,855
Japan	Value	616,020	647,034	670,737
France	Value	269,360	324,262	338,015
Netherlands	Value	719,404	814,316	824,291
Slovakia	Value	426,215	250,640	446,585
Belgium	Value	254,113	225,228	154,774
Spain	Value	205,602	311,536	300,164
Canada	Value	418,235	358,205	397,135
United Kingdom	Value	116,619	173,888	154,052
All other exporters	Value	1,233,196	1,140,906	1,078,391
Nonsubject exporters	Value	5,629,696	5,670,222	5,826,999
All reporting exporters	Value	7,852,229	8,206,024	8,620,451

Table continued.

Table 7.18 (Continued) Tin- and chromium-coated steel sheet: Global exports, by reporting country and by period

Unit values in dollars per short tons; Shares in percent

Exporting country	Measure	2023	2024	2025
United States	Unit value	950	968	994
China	Unit value	945	864	823
Taiwan	Unit value	1,052	990	1,057
Turkey	Unit value	1,121	994	1,033
Subject exporters	Unit value	962	882	851
Germany	Unit value	1,456	1,279	1,327
Japan	Unit value	1,061	913	948
France	Unit value	1,408	1,237	1,333
Netherlands	Unit value	1,531	1,414	1,486
Slovakia	Unit value	1,383	1,230	1,295
Belgium	Unit value	1,230	1,072	1,106
Spain	Unit value	1,437	1,200	1,298
Canada	Unit value	1,784	1,625	1,637
United Kingdom	Unit value	1,402	1,226	1,380
All other exporters	Unit value	1,180	924	1,097
Nonsubject exporters	Unit value	1,339	1,150	1,247
All reporting exporters	Unit value	1,205	1,053	1,085
United States	Share of quantity	1.7	1.1	0.7
China	Share of quantity	29.6	30.5	35.4
Taiwan	Share of quantity	2.3	2.8	3.2
Turkey	Share of quantity	1.8	2.3	2.0
Subject exporters	Share of quantity	33.7	35.7	40.5
Germany	Share of quantity	14.5	14.3	13.9
Japan	Share of quantity	8.9	9.1	8.9
France	Share of quantity	2.9	3.4	3.2
Netherlands	Share of quantity	7.2	7.4	7.0
Slovakia	Share of quantity	4.7	2.6	4.3
Belgium	Share of quantity	3.2	2.7	1.8
Spain	Share of quantity	2.2	3.3	2.9
Canada	Share of quantity	3.6	2.8	3.1
United Kingdom	Share of quantity	1.3	1.8	1.4
All other exporters	Share of quantity	16.0	15.8	12.4
Nonsubject exporters	Share of quantity	64.5	63.2	58.8
All reporting exporters	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7210.11, 7210.12, 7210.50, and 7212.10 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed April 17, 2026.

Note: These data do not include HS subheadings 7212.50, 7225.99, and 7226.99 as they are believed to contain a large share of products outside the scope of these investigations.

Note: United States is shown at the top followed by the countries under investigation, all remaining top exporting countries in descending order of 2025 data.

APPENDIX A
FEDERAL REGISTER NOTICES

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

Citation	Title	Link
91 FR 19201, April 14, 2026	Tin Mill Products From China, Taiwan, and Turkey; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations	https://www.govinfo.gov/content/pkg/FR-2026-04-14/pdf/2026-07146.pdf
91 FR 24157, May 5, 2026	Tin Mill Products From the People's Republic of China, Taiwan, and the Republic of Türkiye: Initiation of Less-Than-Fair-Value Investigations	https://www.govinfo.gov/content/pkg/FR-2026-05-05/pdf/2026-08745.pdf
91 FR 24170, May 5, 2026	Tin Mill Products From the People's Republic of China: Initiation of Countervailing Duty Investigation	https://www.govinfo.gov/content/pkg/FR-2026-05-05/pdf/2026-08744.pdf

APPENDIX B

LIST OF CONFERENCE WITNESSES

CALENDAR OF PUBLIC PRELIMINARY CONFERENCE

Those listed below appeared as witnesses at the United States International Trade Commission’s preliminary conference:

- Subject:** Tin Mill Products from China, Taiwan, and Turkey
- Inv. Nos.:** 701-TA-792 and 731-TA-1786-1788 (Preliminary)
- Date and Time:** April 30, 2026 – 9:30 a.m.

A session was held in connection with these preliminary phase investigations in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, D.C.

OPENING REMARKS:

In Support of Imposition (**Margaret E. Monday**, Cassidy Levy Kent (USA) LLP)

**In Support of the Imposition of the
Antidumping and Countervailing Duty Orders:**

Cassidy Levy Kent (USA) LLP
Washington, D.C.
on behalf of

United States Steel Corporation (“U. S. Steel”)
United Steel, Paper and Forestry, Rubber, Manufacturing, Energy,
Allied Industrial and Service Workers Union (“USW”)

Robert Y. Kopf III, Vice President for Sales, U. S. Steel

Roy Houseman, Legislative Director & Assistant to the President, USW

Aya Hall, Data Analyst, Cassidy Levy Kent (USA) LLP

Thomas M. Beline)
) – OF COUNSEL
Margaret E. Monday)

CLOSING REMARKS:

In Support of Imposition (**Thomas M. Beline**, Cassidy Levy Kent (USA) LLP)

APPENDIX C
SUMMARY DATA

Table C.1

Tin mill products: Summary data concerning the U.S. market, by item and period

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

Item	Reported data			Period change comparisons		
	2023	Calendar year 2024	2025	2023–25	Calendar year 2023–24	2024–25
U.S. consumption quantity:						
Amount.....	***	***	***	▲***	▼***	▲***
Producers' share (fn1).....	***	***	***	▼***	▼***	▼***
Importers' share (fn1):						
China.....	***	***	***	▼***	▼***	▲***
Taiwan.....	***	***	***	▲***	▲***	▲***
Turkey.....	***	***	***	▲***	▲***	▲***
Subject sources.....	***	***	***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	▲***	▲***	▲***
All import sources.....	***	***	***	▲***	▲***	▲***
U.S. consumption value:						
Amount.....	***	***	***	▲***	▼***	▲***
Producers' share (fn1).....	***	***	***	▼***	▼***	▼***
Importers' share (fn1):						
China.....	***	***	***	▼***	▼***	▲***
Taiwan.....	***	***	***	▲***	▲***	▲***
Turkey.....	***	***	***	▲***	▲***	▲***
Subject sources.....	***	***	***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	▲***	▲***	▲***
All import sources.....	***	***	***	▲***	▲***	▲***
U.S. importers' U.S. shipments of imports from:						
China:						
Quantity.....	***	***	***	▲***	▼***	▲***
Value.....	***	***	***	▼***	▼***	▲***
Unit value.....	***	***	***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Taiwan:						
Quantity.....	***	***	***	▲***	▲***	▲***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Turkey:						
Quantity.....	***	***	***	▲***	▲***	▲***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Subject sources:						
Quantity.....	193,955	198,327	297,742	▲53.5	▲2.3	▲50.1
Value.....	350,417	320,253	512,099	▲46.1	▼(8.6)	▲59.9
Unit value.....	\$1,807	\$1,615	\$1,720	▼(4.8)	▼(10.6)	▲6.5
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Nonsubject sources:						
Quantity.....	1,020,849	1,213,544	1,366,065	▲33.8	▲18.9	▲12.6
Value.....	1,892,798	2,003,302	2,385,747	▲26.0	▲5.8	▲19.1
Unit value.....	\$1,854	\$1,651	\$1,746	▼(5.8)	▼(11.0)	▲5.8
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
All import sources:						
Quantity.....	1,214,804	1,411,871	1,663,807	▲37.0	▲16.2	▲17.8
Value.....	2,243,215	2,323,555	2,897,846	▲29.2	▲3.6	▲24.7
Unit value.....	\$1,847	\$1,646	\$1,742	▼(5.7)	▼(10.9)	▲5.8
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***

Table continued.

Table C.1 Continued

Tin mill products: Summary data concerning the U.S. market, by item and period

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

Item	Reported data			Period change comparisons		
	2023	2024	2025	2023–25	2023–24	2024–25
U.S. producers':						
Practical capacity quantity.....	***	***	***	▼***	▼***	▼***
Production quantity.....	***	***	***	▼***	▼***	▼***
Capacity utilization (fn1).....	***	***	***	▲***	▲***	▲***
U.S. shipments:						
Quantity.....	***	***	***	▼***	▼***	▼***
Value.....	***	***	***	▼***	▼***	▼***
Unit value.....	***	***	***	▼***	▼***	▲***
Export shipments:						
Quantity.....	***	***	***	▲***	▲***	▼***
Value.....	***	***	***	▲***	▲***	▼***
Unit value.....	***	***	***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	▲***	▼***	▲***
Inventories/total shipments (fn1).....	***	***	***	▲***	▲***	▲***
Production workers.....	***	***	***	▼***	▼***	▼***
Hours worked (1,000s).....	***	***	***	▼***	▼***	▼***
Wages paid (\$1,000).....	***	***	***	▼***	▼***	▼***
Hourly wages (dollars per hour).....	***	***	***	▼***	▼***	▼***
Productivity (short tons per 1,000 hours)...	***	***	***	▲***	▲***	▲***
Unit labor costs (dollars per short ton).....	***	***	***	▼***	▼***	▼***
Net sales:						
Quantity.....	***	***	***	▼***	▼***	▼***
Value.....	***	***	***	▼***	▼***	▼***
Unit value.....	***	***	***	▼***	▼***	▲***
Cost of goods sold (COGS).....	***	***	***	▼***	▼***	▼***
Gross profit or (loss) (fn2).....	***	***	***	▲***	▲***	▲***
SG&A expenses.....	***	***	***	▼***	▲***	▼***
Operating income or (loss) (fn2).....	***	***	***	▲***	▲***	▲***
Net income or (loss) (fn2).....	***	***	***	▲***	▼***	▲***
Unit COGS.....	***	***	***	▼***	▼***	▲***
Unit SG&A expenses.....	***	***	***	▲***	▲***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	▲***	▲***	▲***
Unit net income or (loss) (fn2).....	***	***	***	▲***	▼***	▲***
COGS/sales (fn1).....	***	***	***	▼***	▼***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	▲***	▲***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	▲***	▼***	▲***
Capital expenditures.....	***	***	***	▼***	▼***	▼***
Research and development expenses.....	***	***	***	▼***	▼***	▲***
Total assets.....	***	***	***	▼***	▼***	▼***

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables for these data are contained in parts 3, 4, 6, and 7 of this report.

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.

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

APPENDIX D

U.S. SHIPMENTS BY TYPE AND WIDTH

Table D.1 Tin mill products: U.S. producers' U.S. shipments, by type and width, 2025

Quantity in short tons; Shares and ratios in percent

Width	Measure	Tin plate: D&I	Tin plate: Other	TFS: Laminated	TFS: Other	All product types
Less than 39"	Quantity	***	***	***	***	***
39" to less than 41"	Quantity	***	***	***	***	***
41" to less than 45"	Quantity	***	***	***	***	***
45" and greater	Quantity	***	***	***	***	***
All widths	Quantity	***	***	***	***	***
Less than 39"	Share across, share down	***	***	***	***	***
39" to less than 41"	Share across, share down	***	***	***	***	***
41" to less than 45"	Share across, share down	***	***	***	***	***
45" and greater	Share across, share down	***	***	***	***	***
All widths	Share across, share down	***	***	***	***	100.0
Less than 39"	Ratio	***	***	***	***	***
39" to less than 41"	Ratio	***	***	***	***	***
41" to less than 45"	Ratio	***	***	***	***	***
45" and greater	Ratio	***	***	***	***	***
All widths	Ratio	***	***	***	***	***

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

Table D.2 Tin mill products: U.S. importers from China U.S. shipments, by type and width , 2025

Quantity in short tons; Shares and ratios in percent

Width	Measure	Tin plate: D&I	Tin plate: Other	TFS: Laminated	TFS: Other	All product types
Less than 39"	Quantity	***	***	***	***	***
39" to less than 41"	Quantity	***	***	***	***	***
41" to less than 45"	Quantity	***	***	***	***	***
45" and greater	Quantity	***	***	***	***	***
All widths	Quantity	***	***	***	***	***
Less than 39"	Share across, share down	***	***	***	***	***
39" to less than 41"	Share across, share down	***	***	***	***	***
41" to less than 45"	Share across, share down	***	***	***	***	***
45" and greater	Share across, share down	***	***	***	***	***
All widths	Share across, share down	***	***	***	***	100.0
Less than 39"	Ratio	***	***	***	***	***
39" to less than 41"	Ratio	***	***	***	***	***
41" to less than 45"	Ratio	***	***	***	***	***
45" and greater	Ratio	***	***	***	***	***
All widths	Ratio	***	***	***	***	***

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

Table D.3 Tin mill products: U.S. importers from Taiwan U.S. shipments, by type and width , 2025

Quantity in short tons; Shares and ratios in percent

Width	Measure	Tin plate: D&I	Tin plate: Other	TFS: Laminated	TFS: Other	All product types
Less than 39"	Quantity	***	***	***	***	***
39" to less than 41"	Quantity	***	***	***	***	***
41" to less than 45"	Quantity	***	***	***	***	***
45" and greater	Quantity	***	***	***	***	***
All widths	Quantity	***	***	***	***	***
Less than 39"	Share across, share down	***	***	***	***	***
39" to less than 41"	Share across, share down	***	***	***	***	***
41" to less than 45"	Share across, share down	***	***	***	***	***
45" and greater	Share across, share down	***	***	***	***	***
All widths	Share across, share down	***	***	***	***	100.0
Less than 39"	Ratio	***	***	***	***	***
39" to less than 41"	Ratio	***	***	***	***	***
41" to less than 45"	Ratio	***	***	***	***	***
45" and greater	Ratio	***	***	***	***	***
All widths	Ratio	***	***	***	***	***

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

Table D.4 Tin mill products: U.S. importers from Turkey U.S. shipments, by type and width , 2025

Quantity in short tons; Shares and ratios in percent

Width	Measure	Tin plate: D&I	Tin plate: Other	TFS: Laminated	TFS: Other	All product types
Less than 39"	Quantity	***	***	***	***	***
39" to less than 41"	Quantity	***	***	***	***	***
41" to less than 45"	Quantity	***	***	***	***	***
45" and greater	Quantity	***	***	***	***	***
All widths	Quantity	***	***	***	***	***
Less than 39"	Share across, share down	***	***	***	***	***
39" to less than 41"	Share across, share down	***	***	***	***	***
41" to less than 45"	Share across, share down	***	***	***	***	***
45" and greater	Share across, share down	***	***	***	***	***
All widths	Share across, share down	***	***	***	***	100.0
Less than 39"	Ratio	***	***	***	***	***
39" to less than 41"	Ratio	***	***	***	***	***
41" to less than 45"	Ratio	***	***	***	***	***
45" and greater	Ratio	***	***	***	***	***
All widths	Ratio	***	***	***	***	***

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

Table D.5 Tin mill products: U.S. importers from subject sources U.S. shipments, by type and width , 2025

Quantity in short tons; Shares and ratios in percent

Width	Measure	Tin plate: D&I	Tin plate: Other	TFS: Laminated	TFS: Other	All product types
Less than 39"	Quantity	***	***	***	***	***
39" to less than 41"	Quantity	***	***	***	***	***
41" to less than 45"	Quantity	***	***	***	***	***
45" and greater	Quantity	***	***	***	***	***
All widths	Quantity	***	***	***	***	***
Less than 39"	Share across, share down	***	***	***	***	***
39" to less than 41"	Share across, share down	***	***	***	***	***
41" to less than 45"	Share across, share down	***	***	***	***	***
45" and greater	Share across, share down	***	***	***	***	***
All widths	Share across, share down	***	***	***	***	100.0
Less than 39"	Ratio	***	***	***	***	***
39" to less than 41"	Ratio	***	***	***	***	***
41" to less than 45"	Ratio	***	***	***	***	***
45" and greater	Ratio	***	***	***	***	***
All widths	Ratio	***	***	***	***	***

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

Table D.6 Tin mill products: U.S. importers from nonsubject sources U.S. shipments, by type and width , 2025

Quantity in short tons; Shares and ratios in percent

Width	Measure	Tin plate: D&I	Tin plate: Other	TFS: Laminated	TFS: Other	All product types
Less than 39"	Quantity	***	***	***	***	***
39" to less than 41"	Quantity	***	***	***	***	***
41" to less than 45"	Quantity	***	***	***	***	***
45" and greater	Quantity	***	***	***	***	***
All widths	Quantity	***	***	***	***	***
Less than 39"	Share across, share down	***	***	***	***	***
39" to less than 41"	Share across	***	***	***	***	***
41" to less than 45"	Share across	***	***	***	***	***
45" and greater	Share across	***	***	***	***	***
All widths	Share across	***	***	***	***	100.0
Less than 39"	Ratio	***	***	***	***	***
39" to less than 41"	Ratio	***	***	***	***	***
41" to less than 45"	Ratio	***	***	***	***	***
45" and greater	Ratio	***	***	***	***	***
All widths	Ratio	***	***	***	***	***

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

Figure D.1 Tin mill products: U.S. producers' U.S. shipments, by type and width, 2025

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

Figure D.2 Tin mill products: Subject U.S. importers' U.S. shipments, by type and width, 2025

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

Figure D.3 Tin mill products: Nonsubject U.S. importers' U.S. shipments, by type and width, 2025

* * * * *

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

APPENDIX E

OFFICIAL IMPORT STATISTICS SINCE 2020

Table E.1 Tin mill products: Historical U.S. imports, by category and quarter, 2025

Quantity in short tons

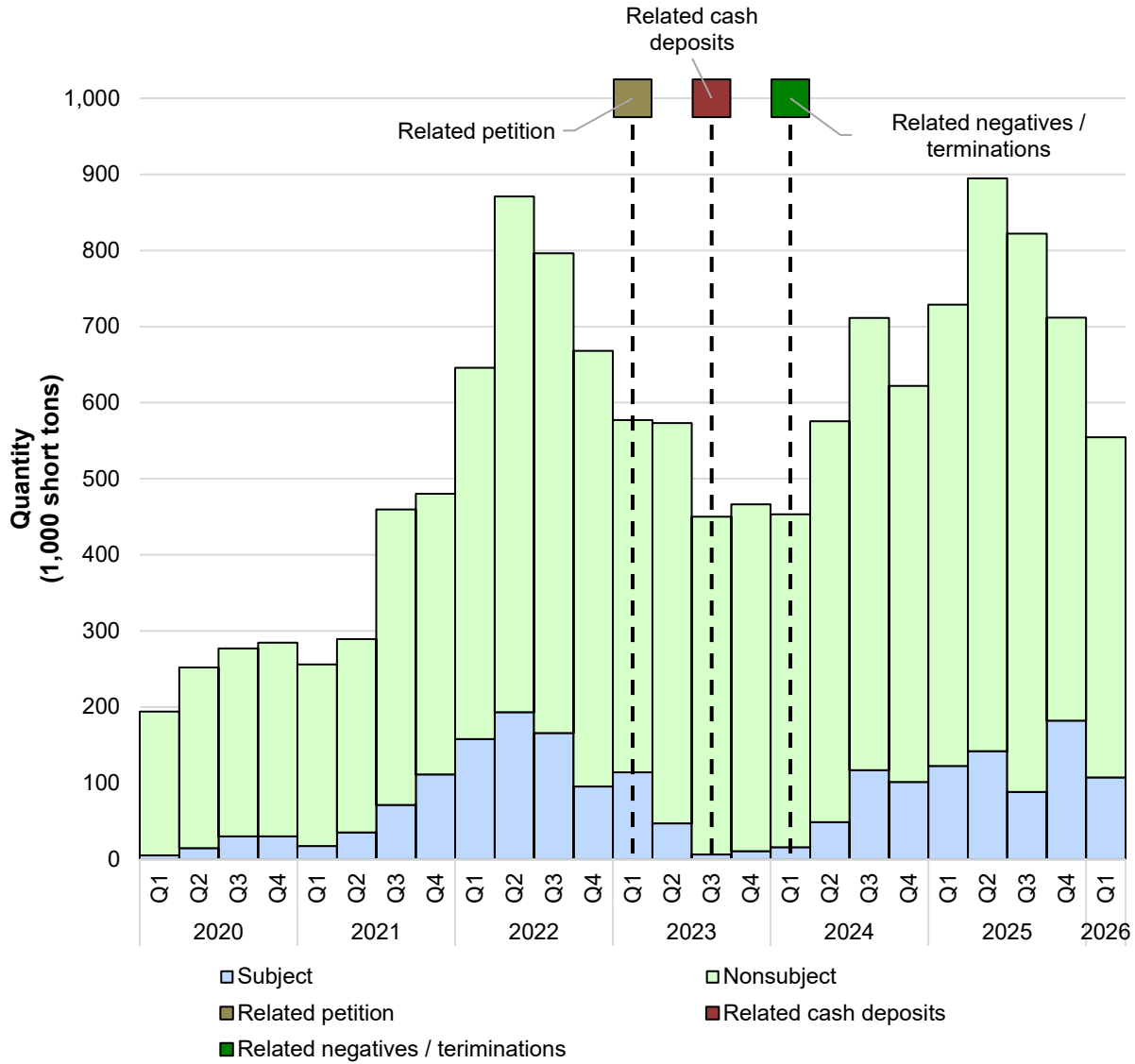
Period	Subject sources	Nonsubject sources	All import sources
2020 Q1	4,934	189,000	193,934
2020 Q2	14,639	237,565	252,203
2020 Q3	30,190	246,678	276,868
2020 Q4	30,232	254,440	284,672
2021 Q1	17,472	238,357	255,828
2021 Q2	35,417	253,944	289,362
2021 Q3	71,235	388,317	459,552
2021 Q4	111,619	368,555	480,175
2022 Q1	157,877	487,948	645,825
2022 Q2	193,324	677,736	871,060
2022 Q3	165,758	630,601	796,359
2022 Q4	95,692	572,527	668,219
2023 Q1	114,395	462,754	577,149
2023 Q2	47,223	526,135	573,358
2023 Q3	6,096	443,989	450,085
2023 Q4	10,761	455,796	466,556
2024 Q1	15,700	437,576	453,276
2024 Q2	48,796	526,770	575,566
2024 Q3	117,142	594,244	711,386
2024 Q4	101,547	520,635	622,182
2025 Q1	122,619	606,372	728,991
2025 Q2	142,039	752,563	894,602
2025 Q3	88,546	733,374	821,920
2025 Q4	182,153	529,428	711,581
2026 Q1	107,676	446,773	554,448

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0020, 7210.50.0090, 7212.10.0000, 7212.50.0000, 7225.99.0090 and 7226.99.0180, accessed May 10, 2026. Imports are based on the imports for consumption data series.

Note: Petitions were filed on China, Taiwan, and Turkey on January 18, 2023, for the same product as the current subject investigations. In those related investigation, Commerce published triple digit preliminary and final subsidy and dumping margins within respective to China, on June 26, 2023 (China CVD), and August 22, 2023 (China AD), and preliminary and final findings of no dumping with respect to Taiwan and Turkey. As a result of the final findings of no dumping from Taiwan and Turkey, the Commission terminated its investigations on those countries on January 10, 2025, whereas, the Commission made a negative determination on the merits with regards to injury to a domestic industry by reason of imports from China on February 6, 2024. As a result of these actions, no AD/CVD orders were issued with respect to tin mill products from the three countries that are currently subject to investigation.

Figure E.1 Tin mill products: Historical U.S. imports, by category and quarter

Quantity in short tons



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0020, 7210.50.0090, 7212.10.0000, 7212.50.0000, 7225.99.0090 and 7226.99.0180, accessed May 10, 2026. Imports are based on the imports for consumption data series.

