Large Vertical Shaft Engines from China

Investigation Nos. 701-TA-637 and 731-TA-1471 (Review)

Publication 5771 **August 2026**

U.S. International Trade Commission

Washington, DC 20436

U.S. International Trade Commission

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CONTENTS

CONTENTS

Page

Appendixes

Note.—Information that would reveal confidential operations of individual firms may not be published.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-637 and 731-TA-1471 (Review)

Large Vertical Shaft Engines from China

DETERMINATIONS

On the basis of the record[1] developed in the subject five-year reviews, the United States International Trade Commission ("Commission") determines, pursuant to the Tariff Act of 1930 ("the Act"), that revocation of the countervailing and antidumping duty orders on large vertical shaft engines from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.[2] [3]

BACKGROUND

The Commission instituted these reviews on February 2, 2026 (91 FR 4625) and determined on May 8, 2026, that it would conduct expedited reviews (91 FR 35705, June 12, 2026).

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

[2] Chairman Brett Doyle did not participate in the adequacy vote.

[3] Commissioner Peter-Anthony Pappas did not participate in these determinations.

Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended ("the Tariff Act"), that revocation of the antidumping duty and countervailing duty orders on large vertical shaft engines ("LVSEs") from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

I. Background

A. The Prior Proceedings

In response to petitions filed on January 15, 2020, by the Coalition of American Vertical Engine Producers ("Petitioner" or "Coalition"), the Commission determined in February 2021 that a domestic industry was materially injured by reason of imports of LVSEs from China found by the U.S. Department of Commerce ("Commerce") to be sold at less than fair value and to be subsidized by the government of China.[1] Subsequently, in March 2021, the Commerce issued antidumping and countervailing duty orders.[2]

B. The Current Reviews

In February 2026, the Commission instituted these five-year reviews.[3] Domestic producers Briggs & Stratton and Discovery Energy, LLC ("Discovery") (collectively "domestic

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[1] *Large Vertical Shaft Engines from China*, Inv. Nos. 701-TA-637 and 731-TA-1471 (Final), USITC Pub. 5162 (Feb. 2021) ("*Original Investigations*") at 3, 41; Petitions, EDIS Doc. 699264 (Jan. 15, 2020). The Coalition's members were comprised of Kohler Co. ("Kohler") and Briggs & Stratton Corp. ("Briggs & Stratton"). *Original Investigations*, USITC Pub. 5162 at 3; Petitions at 1.

[2] *Certain Large Vertical Shaft Engines Between 225cc and 999cc, and Parts Thereof From the People's Republic of China: Amended Final Antidumping Duty Determination and Antidumping Duty Order*, 86 Fed. Reg. 12623 (Mar. 4, 2021) (amended final antidumping duty determination and antidumping duty order); *Certain Large Vertical Shaft Engines Between 225cc and 999cc, and Parts Thereof From the People's Republic of China: Notice of Correction to the Amended Final Antidumping Duty Determination and Antidumping Duty Order*, 86 Fed. Reg. 13694 (Mar. 10, 2021) (correction notice); *Certain Vertical Shaft Engines Between 225cc and 999cc, and Parts Thereof From the People's Republic of China: Countervailing Duty Order and Amended Final Affirmative Countervailing Duty Determination*, 86 Fed. Reg. 12619 (Mar. 4, 2021) (countervailing duty order and amended final countervailing duty determination).

[3] *Large Vertical Shaft Engines From China; Institution of a Five-Year Reviews*, 91 Fed. Reg. 4625 (Feb. 2, 2026) ("Notice of Institution").

producers") submitted a joint response to the notice of institution.[4] The Commission did not receive a response to the notice of institution from any respondent interested party.[5] On May 8, 2026, the Commission determined that the domestic interested party group response was adequate and the respondent interested party group response was inadequate.[6] Finding no other circumstances that would warrant conducting full reviews, the Commission determined that it would conduct expedited reviews pursuant to section 751(c)(3) of the Tariff Act.[7] The domestic producers filed comments with the Commission pursuant to 19 C.F.R. § 207.61(d) arguing that the Commission should reach affirmative determinations.[8]

U.S. industry data in these reviews are based on information supplied by the domestic producers in their response to the notice of institution, and information from the original investigations.[9] The two responding domestic producers are estimated to account for approximately *** percent of domestic production of LVSEs during 2025.[10] U.S. import data and related information are based on Commerce's official import statistics, and information from the original investigations.[11] Foreign industry data and related information are based on information from the original investigations, information submitted by the domestic producers in these expedited reviews, and publicly available information compiled by the Commission.[12]

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[4] Confidential Report, INV-YY-058 (Apr. 27, 2026), EDIS Doc. 880349 ("CR"); *Large Vertical Shaft Engines from China*, Inv. Nos. 701-TA-637 and 731-TA-1471 (First Review), USITC Pub. 5771 (Aug. 2026) ("PR") (collectively "CR/PR") at 1.19, B.3, Table B.1; Domestic Producers' Response to the Notice of Institution, EDIS Doc. 874275 (Mar. 4, 2026) ("Domestic Producers' NOI Response") at 1. *See also* Domestic Producers' Supplemental Response to the Notice of Institution, EDIS Doc. 874958 (Mar. 31, 2026) ("Domestic Producers' Suppl. NOI Response") at 1.

[5] CR/PR at 1.22, B.3, Table B.1; *see also* Domestic Producers' Comments on Adequacy, EDIS Doc. 878627 (Apr. 13, 2026) ("Adequacy Comments") at 2-5.

[6] Explanation of Commission Determination on Adequacy, EDIS Doc. 883001 (May 22, 2026) ("Commission's Adequacy Explanation") at 1.

[7] Commission's Adequacy Explanation at 1.

[8] Domestic Producers' Final Comments, EDIS Doc. 887939 (July 14, 2026) ("Final Comments") at 1; *see also* CR/PR at B.3; Domestic Producers' NOI Response at 31.

[9] CR/PR at 1.20, 1.24, B.3, Tables 1.6, 1.8 & B.1; Domestic Producers' NOI Response at 1-31; Domestic Producers' Suppl. NOI Response at 1-2, Suppl. Exhs. 1 & 2; Adequacy Comments at 2-3. Data for the years 2017 through 2019 were compiled using data submitted in the original investigations. CR/PR at 1.20, Table 1.6 source.

[10] CR/PR at 1.19, B.3, Table B.1; *see also* Domestic Producers' NOI Response at Exh. 1a; Domestic Producers' Supp. NOI Response, Response to Supplemental Questions at 1, Suppl. Exhs. 1 & 2.

[11] Import data are compiled from official Commerce statistics under Harmonized Tariff Schedule of the United States ("HTS") statistical reporting numbers 8407.90.1020, 8407.90.1060, and 8407.90.1080 which cover assembled engines. CR/PR at Table 1.7 note.

[12] *See* CR/PR at 1.23 to 1.26, Tables 1.7 & 1.8.

II. Domestic Like Product and Industry

A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the "domestic like product" and the "industry."[13] The Tariff Act defines "domestic like product" as "a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this subtitle."[14] The Commission's practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.[15]

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

> The merchandise covered by this *Order* consists of spark-ignited, non-road, vertical shaft engines, whether finished or unfinished, whether assembled or unassembled, primarily for riding lawn mowers and zero-turn radius lawn mowers. Engines meeting this physical description may also be for other non-hand-held outdoor power equipment such as, including but not limited to, tow-behind brush mowers, grinders, and vertical shaft generators. The subject engines are spark ignition, single or multiple cylinder, air cooled, internal combustion engines with vertical power take off shafts with a minimum displacement of 225 cubic centimeters (cc) and a maximum displacement of 999cc. Typically, engines with displacements of this size generate gross power of between 6.7 kilowatts (kw) to 42 kw.

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[13] 19 U.S.C. § 1677(4)(A).

[14] 19 U.S.C. § 1677(10); *see, e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int'l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int'l Trade 1990), *aff'd*, 938 F.2d 1278 (Fed. Cir. 1991); *see also* S. Rep. No. 249, 96th Cong., 1st Sess. 90-91 (1979).

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

Engines covered by this scope normally must comply with and be certified under Environmental Protection Agency (EPA) air pollution controls title 40, chapter I, subchapter U, part 1054 of the Code of Federal Regulations standards for small non-road spark-ignition engines and equipment. Engines that otherwise meet the physical description of the scope but are not certified under 40 CFR part 1054 and are not certified under other parts of subchapter U of the EPA air pollution controls are not excluded from the scope of this proceeding. Engines that may be certified under both 40 CFR part 1054 as well as other parts of subchapter U remain subject to the scope of this *Order*.

For purposes of this *Order*, an unfinished engine covers at a minimum a sub-assembly comprised of, but not limited to, the following components: crankcase, crankshaft, camshaft, piston(s), and connecting rod(s). Importation of these components together, whether assembled or unassembled, and whether or not accompanied by additional components such as an oil pan, manifold, cylinder head(s), valve train, or valve cover(s), constitutes an unfinished engine for purposes of this order. The inclusion of other products such as spark plugs fitted into the cylinder head or electrical devices (*e.g.*, ignition modules, ignition coils) for synchronizing with the motor to supply tension current does not remove the product from the scope. The inclusion of any other components not identified as comprising the unfinished engine subassembly in a third country does not remove the engine from the scope.

The engines subject to this *Order* are typically classified in the Harmonized Tariff Schedule of the United States (HTSUS) at subheadings: 8407.90.1020, 8407.90.1060, and 8407.90.1080. The engine subassemblies that are subject to this *Order* enter under HTSUS 8409.91.9990. Engines subject to this order may also enter under HTSUS 8407.90.9060 and 8407.90.9080. The HTSUS subheadings are provided for convenience and customs purposes only, and the written description of the merchandise subject to this *Order* is dispositive.[16]

[16] *Certain Large Vertical Shaft Engines Between 225cc and 999cc, and Part Thereof From the People's Republic of China: Final Results of the Expedited First Sunset Review of the Antidumping Duty*

LVSEs are spark-ignited, single or multiple cylinder, air cooled, internal combustion, non-road engines with vertical power take off shafts with a minimum displacement of 225cc and a maximum displacement of 999cc.[17] Most engines with this size displacement generate a gross power between 6.7 kW and 42 kW.[18] The scope also includes subassemblies (unassembled or unfinished vertical shaft engines) but does not include engines with a displacement of 224cc or less or engines with a horizontal shaft.[19] The subassemblies are used in completed vertical shaft engines; they have no independent use and no separate markets.[20] LVSEs are primarily used in riding lawn mowers and zero-turn radius lawn mowers, although engines meeting this physical description may also be used in other non-hand-held outdoor power equipment.[21]

In the original investigations, the Commission defined a single domestic like product consisting of LVSEs and subassemblies, coextensive with Commerce's scope.[22] Specifically, it applied a semi-finished like product analysis and found that subassemblies should be included in the same domestic like product as finished LVSEs.[23]

In the current reviews, the domestic producers argue that the Commission should define

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Order, 91 Fed. Reg. 23955 (May 28, 2026) ("*Commerce's First Five-Year Review Final Results – Antidumping Duty Order*") and accompanying Issues and Decision Memorandum, Case No. A-570-119 (May 29, 2026) ("AD IDM") at 2-3; *see also Certain Large Vertical Shaft Engines Between 225cc and 999cc, and Part Thereof From the People's Republic of China: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order,* 91 Fed. Reg. 33141 (June 3, 2026) ("*Commerce's First Five-Year Review Final Results – Countervailing Duty Order*") and accompanying Issues and Decision Memorandum, Case No. C-570-120 (May 29, 2026) ("CVD IDM") at 2-3. *See also* CR/PR at 1.4—1.5. The scope of the orders has not changed since the original investigations. *See Original Investigations*, USITC Pub. 5162 at 6-9. *See also* CR/PR at 1.4—1.5, 1.10—1.14.

[17] CR/PR at 1.10; *see also Original Investigations*, USITC Pub. 5162 at 7.

[18] CR/PR at 1.10; *see also Original Investigations*, USITC Pub. 5162 at 7.

[19] CR/PR at 1.10; *see also Original Investigations*, USITC Pub. 5162 at 7.

[20] CR/PR at 1.10; *see also Original Investigations*, USITC Pub. 5162 at 7.

[21] CR/PR at 1.10; *see also Original Investigations*, USITC Pub. 5162 at 7. Engine displacements between 225cc and 999cc correspond to horsepower ranges for riding lawn mowers and are generally not used for non-riding lawn mowers or other types of vehicles. *Original Investigations*, USITC Pub. 5162 at 7. LVSEs are primarily sold to original equipment manufacturers ("OEMs") of riding lawn mowers, who then primarily sell to "big box" retailers such as Home Depot. *See* CR/PR at 1.10.

[22] *Original Investigations*, USITC Pub. 5162 at 9; *see also* CR/PR at 1.21.

[23] *Original Investigations*, USITC Pub. 5162 at 9. The Commission found that subassemblies were dedicated for use as finished LVSEs or sold as replacement parts, that subassemblies were not sold in any markets other than the market for LVSEs, that subassemblies had no function separate from their eventual inclusion in a finished engine, that the short block subassembly reportedly constituted 50 percent of the value of a finished engine, and that subassemblies required additional parts and further processing to be transformed into finished engines. *Id.*

a single domestic like product as it did in the original investigations.[24] The record does not contain any new information suggesting that the pertinent product characteristics and uses of LVSEs have changed since the prior proceedings.[25] Accordingly, we again define a single domestic like product consisting of LVSEs and subassemblies, coextensive with Commerce's scope.

B. Domestic Industry

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."[26] 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.

In the original investigations, the Commission found that the domestic industry consisted of all U.S. producers of LVSEs but that firms that supplied and machined components for U.S. producers' production of LVSEs did not engage in sufficient production-related activities to be considered domestic producers of LVSE.[27]

In the current reviews, the domestic producers agree that the domestic industry should be defined as it was in the original investigations.[28] Given our domestic like product definition, and because there is no new information obtained during these reviews that would suggest any reason to revisit the prior domestic industry definition,[29] we define a single domestic industry consisting of all domestic producers of LVSEs.

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[24] Domestic Producers' NOI Response at 31.

[25] *See generally* CR/PR at 1.4—1.5, 1.10—1.14. *See also* Domestic Producers' NOI Response at 31.

[26] 19 U.S.C. § 1677(4)(A). The definitions in 19 U.S.C. § 1677 are applicable to the entire subtitle containing the antidumping and countervailing duty laws, including 19 U.S.C. §§ 1675 and 1675a. *See* 19 U.S.C. § 1677.

[27] *Original Investigations*, USITC Pub. 5162 at 9-10.

[28] *See* Domestic Producers' NOI Response at 31.

[29] *See* Domestic Producers' Suppl. NOI Response at Suppl. Exh. 2 (pg. 4).

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

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order "would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time."[30] The SAA states that "under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports."[31] Thus, the likelihood standard is prospective in nature.[32] The U.S. Court of International Trade has found that "likely," as used in the five-year review provisions of the Act, means "probable," and the Commission applies that standard in five-year reviews.[33]

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

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[30] 19 U.S.C. § 1675a(a).

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

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

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

time."[34] According to the SAA, a "'reasonably foreseeable time' will vary from case-to-case, but normally will exceed the 'imminent' timeframe applicable in a threat of injury analysis in original investigations."[35]

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to "consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated."[36] It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).[37] The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission's determination.[38]

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.[39] In doing so, the Commission must consider "all relevant economic factors," including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to

[34] 19 U.S.C. § 1675a(a)(5).

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

[36] 19 U.S.C. § 1675a(a)(1).

[37] 19 U.S.C. § 1675a(a)(1). Commerce has made no duty absorption finding concerning LVSEs from China in the current reviews. *See Commerce's Five-Year Review Final Results – AD Order*, 91 Fed. Reg. at 31702-03, and accompanying AD IDM at 1-7.

[38] 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

[39] 19 U.S.C. § 1675a(a)(2).

produce other products.[40]

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.[41]

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.[42] All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the orders under review and whether the industry is vulnerable to material injury upon revocation.[43]

As noted, the Commission did not receive a response to the notice of institution from any respondent interested party.[44] The record, therefore, contains limited new information with respect to the LVSEs industry in China. There also is limited information on the LVSEs market in the United States during the period of review ("POR"). Accordingly, for our determination, we rely as appropriate on the facts available from the original investigations,

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[40] 19 U.S.C. § 1675a(a)(2)(A-D).

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

[42] 19 U.S.C. § 1675a(a)(4).

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

[44] Commission's Adequacy Explanation at 1; *see also* Adequacy Comments at 2-4.

and the limited new information on the record in these reviews.

B. Conditions of Competition and the Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[45] We have considered our findings regarding the conditions of competition in the original investigations.[46] The following conditions of competition inform our determinations in these reviews.

i. Demand

The information available in these reviews indicates that demand for LVSEs is driven by demand for the downstream products in which they are contained — traditional riding mowers (also referred to as tractors) and zero-turn mowers, which are commonly used by professional landscapers (collectively "riding mowers").[47] Apparent U.S. consumption of LVSEs was *** units in 2025. This was lower than in 2019, the last full year of the original investigations, at ***; however the data in this review is not directly comparable with data in the original

[45] 19 U.S.C. § 1675a(a)(4).

[46] *Original Investigations*, USITC Pub. 5162 at 13-18; Confidential Views Original Investigations, EDIS Doc. 735203 (Feb. 25, 2021) ("Conf. Views Original Investigations") at 16-24.

[47] *Original Investigations*, USITC Pub. 5162 at 13; Domestic Producers' Suppl. NOI Response at Exh. 1 at 1; *see also* Domestic Producers' NOI Response, at 30.

investigations.[48] The domestic producers assert that *** since the original investigations in 2019, overall demand for riding mowers in the U.S. market has *** since that time.[49] [50]

ii. Supply

Domestic producers were the largest source of LVSEs in the U.S. market in 2025, accounting for *** percent of apparent U.S. consumption that year.[51] During the period of review ("POR"), one domestic production line was relocated following the closure of a production plant.[52]

Subject imports were the smallest source of LVSEs in the U.S. market in 2025, accounting for approximately *** percent of apparent U.S. consumption that year.[53]

Nonsubject imports were the second largest source of LVSEs in the U.S. market in 2025, accounting for *** percent of apparent U.S. consumption that year.[54] The largest sources of nonsubject imports were Mexico and Canada in 2025.[55]

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[48] CR/PR at 1.24, Table 1.8. In the original investigations, apparent U.S. consumption was calculated based on questionnaire responses from four U.S. producers accounting for *** percent of U.S. production of LVSEs in 2018 and from U.S. imports accounting for 130.7 percent of imports under LSVEs from China and 17.1 percent of imports from nonsubject countries under the three primary HTS statistical reporting numbers (8407.90.1020, 8407.90.1060, and 8407.90.1080). CR/PR at Tables 1.7 source, 1.8 source, & Table B.1; *Original Investigations*, USITC Pub. 5162 at 4 & n.6, I-4, n.6. In these reviews, apparent U.S. consumption was calculated based on questionnaire responses from two U.S. producers accounting for approximately *** percent of U.S. production of LVSEs and official import statistics for imports of LSVEs under the three primary HTS reporting numbers. LSVEs may also be imported under HTS reporting numbers 8407.91.5085, 8409.91.9990, 8407.90.9060, and 8407.90.9080. *Id*.; *Original Investigations*, USITC Pub. 5162 at 4. Thus, in these reviews as compared to the original investigations, coverage of U.S. producer shipments is substantially less and official imports statistics may understate subject imports of LSVEs as they do not capture imports under the non-primary HTS statistical reporting numbers. As such, data for U.S. producer shipments, U.S. import shipments and resulting market share calculations are not directly comparable as between these reviews and the original investigations. CR/PR at Tables 1.7 source & 1.8 source.

[49] Domestic Producers' Suppl. NOI Response at Exh. 1, at 1.

[50] The Commission sent purchasers questionnaires to the five top firms identified by the domestic producers, but none responded. CR/PR at D.3.

[51] CR/PR at 1.24, Table 1.8.

[52] CR/PR at 1.19, Table 1.5.

[53] CR/PR at Table 1.8.

[54] CR/PR at Table 1.8.

[55] CR/PR at 1.23, Table 1.7. U.S. importer questionnaire responses accounting for 17.1 percent of nonsubject imports under the primary HTS statistical reporting numbers were used in the original investigations to measure nonsubject imports, whereas in these reviews official import statistics were used. *See* CR/PR at Tables 1.7 source, 1.8 source, & Table B.1; *Original Investigations*, USITC Pub. 5162 at 4 & n.6, I-4, n.6. This may make nonsubject import volumes in these reviews not directly comparable to nonsubject import volumes in the original investigations. *See id*.

iii. Substitutability and Other Conditions

In the original investigations, the Commission found that there is at least a moderate degree of substitutability between domestically produced LVSEs and subject imports, with higher substitutability among engines with similar power and performance characteristics for specific mower platforms.[56] It also found that price is an important factor in purchasing decisions for LVSEs.[57]

The record of these reviews contains no new information indicating that the degree of substitutability between the domestic like product and subject imports or the importance of price has changed since the original investigations.[58] The domestic producers contend that there is a moderate-to high degree of substitutability between the domestic like product and the subject imports, and that price continues to be an important factor in purchasing decisions in the U.S. market.[59] In their view, the U.S. market for LVSEs continues to be highly competitive and price sensitive.[60]

Based on the limited information available, we again find that there continues to be at least a moderate degree of substitutability between domestically produced LVSEs and subject imports, and that price is an important factor in purchasing decisions for LVSEs.

Effective April 6, 2026, pursuant to section 232 of the Trade Expansion Act of 1962, as amended, LVSEs originating in China and provided for in HTS subheading 8407.90.10 were subject to an additional 25 percent *ad valorem* duty, applied to the full customs value of the imported article, provided the weight of the steel is at least 15 percent of the weight of the imported article.[61] Effective May 10, 2019, LVSEs originating in China for HTS subheadings 8407.90.10, 8409.90.50, and 8409.91.99 were subject to an additional 25 percent *ad valorem* duty under section 301 of the Trade Act of 1974.[62] Effective April 6, 2026, pursuant to section 122 of the Trade Act of 1974, LVSEs originating in China provided for in HTS subheadings

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[56] *Original Investigations*, USITC Pub. 5162 at 17; *see also* Conf. Views Original Investigations at 21-22.

[57] *Original Investigations*, USITC Pub. 5162 at 17; *see also* Conf. Views Original Investigations at 21.

[58] *See generally* CR/PR; Domestic Producers' NOI Response at 10, 14-15; Final Comments at 3.

[59] *See* Domestic Producers' NOI Response at 10, 14-15; *see also* Final Comments at 6.

[60] Domestic Producers' NOI Response at 10, 15; *see also* Final Comments at 6.

[61] CR/PR at 1.6—1.7, Table 1.3. Between August 18, 2025, and April 6, 2026, LVSEs originating in China were subject to an additional 50 percent *ad valorem* duty under Section 232, applied to the declared value of the steel content of the imported Article. *Id.* Section 232 duties do not apply to HTS subheadings 8409.91.50 and 8409.91.9. *Id*.

[62] CR/PR at 1.6—1.7, Table 1.3. Between August 23, 2018, and May 10, 2019, LVSEs originating in China were subject to varying *ad valorem* duties under section 301. *Id*. at 1.7.

8409.90.50 and 8409.91.99 were subject to an additional 10 percent *ad valorem* duty, applied to the full customs value of the products.[63] [64]

C. Likely Volume of Subject Imports

We have considered our findings regarding the volume of subject imports in the original investigations.[65] In the original investigations, the volume of subject imports increased from *** units in 2017 to *** units in 2018 and *** units in 2019.[66] Subject imports' share of apparent U.S. consumption was *** percent in 2017, *** percent in 2018, and *** percent in 2019.[67] In these reviews, the volume of subject imports decreased from 306,588 units in 2020 to 170,575 units in 2021, 85,521 units in 2022, 8,465 units in 2023, and 8,021 units in 2024, and then increased to 20,323 units in 2025.[68] Subject imports accounted for approximately *** percent of apparent U.S. consumption in 2025.[69] Accordingly, the information available on the record indicates that the orders have had a restraining effect on the volume of subject imports.

While the record in these five-year reviews contains limited information on the subject foreign industry, the available information also indicates that the subject industry is very large with significant export volumes and that the United States continues to be an attractive market. The domestic producers identified 77 potential U.S. importers of Chinese LVSEs and 32 potential producers of LVSEs in China.[70] The record in these reviews shows that, since the original investigations, the LVSEs industry in China has maintained significant production capacity and could shift production from out-of-scope product to subject merchandise, enabling it to ship

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[63] CR/PR at 1.6, 1.8, Table 1.3. Between February 24, 2026, and April 6, 2026, LVSEs originating in China provided for in HTS subheadings 8409.90.50 and 8409.91.99 were subject to an additional 10 percent *ad valorem* duty, applied to the full value of non-steel content. *Id.* Between February 24, 2026, and April 6, 2026, LVSEs originating in China provided for in HTS subheading 8407.90.10 were subject to an additional ten percent *ad valorem* duty under section 122. *Id*. at 1.6, 1.10, Table 1.3.

[64] In addition, between February 4, 2025, and February 20, 2026, LVSEs originating in China were subject to varying additional duties under the International Emergency Economic Powers Act ("IEEPA"). CR/PR at 1.6, 1.9—1.10, Table 1.3.

[65] *Original Investigations*, USITC Pub. 5162 at 19-21; *see also* Conf. Views Original Investigations at 25-27.

[66] *Original Investigations*, USITC Pub. 5162 at 19-21; *see also* Conf. Views Original Investigations at 25-27. The volume of subject imports was it was *** units in January through June ("interim") 2019 and *** units in interim 2020. *Id.*

[67] *Original Investigations*, USITC Pub. 5162 at 19-21; *see also* Conf. Views Original Investigations at 25-27. Subject import market share was *** percent in interim 2019 and *** percent in interim 2020. *Id.*

[68] CR/PR at 1.23—1.24, Tables 1.7 & 1.8.

[69] CR/PR at Table 1.8.

[70] CR/PR at 1.22, 1.25; Domestic Producers' NOI Response at Exh. 1.

large volumes of LVSEs to the U.S. market, if the orders were revoked.[71] The domestic producers also assert that the Chinese LVSEs industry continues to export large volumes of LVSEs.[72] According to the domestic producers, China exported 14.2 million engines to global markets under HS subheading 8407.90 in 2025, and estimate that China exported 5.8 million LVSEs, which the domestic producers claim corresponds to *** percent of their commercial U.S. shipments.[73] As discussed above, subject imports were present in the U.S. market throughout the POR,[74] which further demonstrates that the market remains attractive to subject producers.

Thus, the record in these reviews indicates that subject producers have the means and the incentive to export subject merchandise to the U.S. market in significant volumes within a reasonably foreseeable time if the orders were revoked. In light of these considerations, including the significant and increasing volume of subject imports during the original investigations, the disciplining effect of the orders with subject imports' presence in the U.S. market substantially reduced though continuing during the POR, the subject foreign industry's substantial capacity, and large volume of exports as well as the attractiveness of the U.S. market to subject producers, we find that the volume of subject imports would likely be significant, both in absolute terms and relative to consumption in the United States, if the orders were revoked.[75]

D. Likely Price Effects of Subject Imports

We have considered our findings regarding the price effects of subject imports in the original investigations.[76] As noted, in the original investigations the Commission found that LVSEs were at least moderately substitutable with domestic LVSEs, and that price was an important factor in purchasing decisions.[77]

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[71] *See* Domestic Producers' NOI Response at 19-23; *see also* Final Comments at 5.

[72] *See* Domestic Producers' NOI Response at 18-19; *see also* Final Comments at 5.

[73] Domestic Producers' NOI Response at 18-19; *see also* Final Comments at 5. This HS subheading includes many products outside the scope of these reviews. CR/PR at 1.25.

[74] CR/PR at 1.23—1.24, Tables 1.7 & 1.8.

[75] We recognize that additional tariffs imposed under a number of authorities in 2025 and 2026, identified above in section IV.B.iii, may have had an effect on the volume of imports of subject merchandise in those years. However, they do not explain reduced volumes of subject imports in earlier years. We also note that tariffs under these authorities are not directed at remedying the injurious effects of dumped and subsidized imports, and subject to change. Therefore, we find that the additional tariffs will not prevent imports from increasing if the antidumping and countervailing duty orders were revoked.

[76] *Original Investigations*, USITC Pub. 5162 at 21-27; Conf. Views Original Investigations at 28-36.

[77] *Original Investigations*, USITC Pub. 5162 at 16, 21; Conf. Views Original Investigations at 20-21, 28.

In the original investigations, the Commission found that subject imports undersold the domestic like product in all available quarterly price comparisons.[78] In addition, the Commission found that purchase cost data for subject imports were substantially lower than prices for the domestic like product and that most purchasers reported that subject imports were lower priced than the domestic like product.[79] In light of this evidence, the Commission found that the underselling by subject imports was significant and that the significant underselling caused a shift in market share from the domestic industry to subject imports during the period of investigation.[80]

The Commission also found that low-priced subject imports prevented increases in the prices for the domestic like product which otherwise would have occurred to a significant degree.[81] Specifically, the Commission found that, while the domestic industry's net unit sales values increased, the increases did not keep pace with rising costs.[82] Accordingly, the Commission found that the domestic industry was unable to increase its prices sufficiently to cover its increased costs.[83]

Based on the foregoing, Commission found that the subject imports had significant effects on prices for the domestic like product.[84]

The record in these expedited five-year reviews does not contain product-specific pricing information for the POR. Based on the at least a moderate degree of substitutability between subject imports and the domestic like product and the importance of price in purchasing decisions, we find that the likely significant volume of subject imports would likely significantly undersell the domestic like product, as occurred in the original investigations.[85] Absent the discipline of the orders, the likely significant volumes of low-priced subject imports would likely take sales and market share from the domestic industry and/or force the domestic industry to lower prices or forgo any needed price increases, thereby significantly depressing or

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[78] *Original Investigations*, USITC Pub. 5162 at 22; Conf. Views Original Investigations at 29. More specifically, subject imports undersold the domestic like product in all 28 quarterly comparisons at an average underselling margin of *** percent; the quantity of subject imports in these underselling comparisons was *** units or 100 percent of all units reported. Conf. Views Original Investigations at 29; Confidential Staff Report Original Investigations, EDIS Doc. 731673 (Jan. 25, 2021) at V-26, Table V-8; *see also Original Investigations*, USITC Pub. 5162 at 22.

[79] *Original Investigations*, USITC Pub. 5162 at 24; Conf. Views Original Investigations at 31.

[80] Conf. Views Original Investigations at 32; *Original Investigations*, USITC Pub. 5162 at 24.

[81] *Original Investigations*, USITC Pub. 5162 at 27; Conf. Views Original Investigations at 36.

[82] *Original Investigations*, USITC Pub. 5162 at 27; Conf. Views Original Investigations at 36.

[83] *Original Investigations*, USITC Pub. 5162 at 27; Conf. Views Original Investigations at 36.

[84] *Original Investigations*, USITC Pub. 5162 at 27; Conf. Views Original Investigations at 36.

[85] *See Original Investigations*, USITC Pub. 5162 at 24; Conf. Views Original Investigations at 32.

suppressing prices for the domestic like product. Consequently, we find that if the orders were to be revoked, subject imports would likely have significant price effects.

E. Likely Impact of Subject Imports[86]

We have considered our findings regarding the impact of subject imports in the original investigations, and the likely impact of subject imports in these reviews.[87] The record in these five-year reviews contains limited information concerning the domestic industry's performance since the period examined in the original investigations.[88]

In these reviews, the industry's capacity was *** units, production, was *** units, and capacity utilization was *** percent[89] Additionally, the domestic industry's U.S. shipments by quantity and value were *** units and $***, respectively.[90] The domestic industry's net sales value was $*** and its cost of goods sold ("COGS") was $***; its ratio of COGS to net sales, was *** percent.[91] In addition, the domestic industry's gross profits, operating income and operating income margin were ***, ***, and *** percent, respectively.[92] As noted there are *** in data coverage between the original investigations and the current reviews that render the data from these reviews regarding the domestic industry's performance (particularly absolute numbers) not directly comparable to the domestic industry's performance in the original investigation. However, we observe the domestic industry's capacity utilization and

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[86] In its expedited five-year review of the antidumping duty order on LVSEs from China, Commerce determined that revocation of the antidumping duty order would likely result in the continuation or recurrence of dumping with margins of up to 468.33 percent. *Commerce's Five-Year Review Final Results – AD Order*, 91 Fed. Reg. at 31703, and accompanying AD IDM at 7. In its expedited five-year review of the countervailing duty order on LVSEs from China, Commerce determined that revocation of the countervailing duty order would likely result in the continuation or recurrence of subsidy rates of up to 20.38 percent *ad valorem*. *Commerce's Five-Year Review Final Results – CVD Order*, 91 Fed. Reg. at 33142, and accompanying CVD IDM at 8.

[87] *Original Investigations*, USITC Pub. 5162 at 27-36; Conf. Views Original Investigations at 36-50.

[88] CR/PR at Table 1.6. The data used in the original investigations accounted for 100 percent of U.S. production, while the data for the current reviews accounted for *** percent of U.S. production. *Compare Original Investigations*, USITC Pub. 5162 at 4 (data coverage), 10 (definition of domestic industry), I-4 (data coverage); Conf. Views Original Investigations at 4, 12; CR/PR at 1.19, B.3, Table B-1; *see also* Domestic Producers' NOI Response at 29 n. 126 (Briggs & Stratton, Discovery and Kawasaki remained the only three U.S. producers of LVSEs in 2025). Accordingly, the data from the original investigations and current reviews may not be comparable for purposes of evaluating the domestic industry's trade and financial indicators. *See* CR/PR at 1.20, Table 1.6.

[89] CR/PR at Table 1.6.

[90] CR/PR at Table 1.6.

[91] CR/PR at Table 1.6.

[92] CR/PR at Table 1.6.

operating income margin were both lower in 2025 than in 2019, and its COGS to net sales ratio was higher in 2025 than in 2019.[93] The limited information on the record of these expedited reviews is insufficient for us to make a finding on whether the domestic industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of the orders.

Based on the information available on the record, we find that revocation of the orders would likely result in a significant volume of subject imports that would significantly undersell the domestic like product, as occurred in the original investigations. Given the at least moderate degree of substitutability between subject imports and the domestic like product and the importance of price to purchasers, the significant volumes of low-priced subject imports would likely capture sales and market share from the domestic industry and/or force domestic producers to lower their prices or forgo any needed price increases in order to maintain their sales, thereby significantly depressing or suppressing prices for the domestic like product. The domestic industry would thus experience negative effects on its capacity, production, capacity utilization, shipments, and market share, which would in turn negatively impact the industry's profitability and employment. Consequently, we conclude that if the orders were revoked, subject imports would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

We have also considered the role of factors other than subject imports, including the presence of nonsubject imports, so as to not attribute likely injury from other factors to subject imports. Nonsubject imports' share of the LVSEs market *** since the original investigations.[94] The record in these reviews, however, provides no indication that the presence of nonsubject imports would prevent low priced subject imports from significantly increasing their presence in the U.S. market, as occurred in the original investigations, upon revocation of the orders. Consequently, we find that any future effects of nonsubject imports would not preclude the likely effects attributable to subject imports.

Given that there is at least a moderate degree of substitutability between the domestic like product and subject imports and that price is important in purchasing decisions, any declining U.S. demand for LVSEs would not prevent low-priced subject imports from significantly increasing their presence in the U.S. market after revocation of the orders; indeed, a declining market would exacerbate the likely adverse impact of subject imports on the domestic industry.

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[93] The domestic industry's capacity utilization and operating income margin were *** percent and *** percent, respectively, and its COGS to net sales ratio was *** percent in 2019. CR/PR at Table 1.6.

[94] CR/PR at 1.23, 1.24, Tables 1.7 & 1.8.

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

IV. Conclusion

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

Information obtained in these reviews

Background

On February 2, 2026, the U.S. International Trade Commission ("Commission") gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended ("the Act"),[1] that it had instituted reviews to determine whether revocation of the antidumping and countervailing duty orders on large vertical shaft engines ("LVSEs") from China would likely lead to the continuation or recurrence of material injury to a domestic industry.[2] All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.[3] [4] Table 1.1 presents information relating to the background and schedule of this proceeding:

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

Effective date	Action
February 2, 2026	Notice of initiation by Commerce (91 FR 4499, February 2, 2026)
February 2, 2026	Notice of institution by Commission (91 FR 4625, February 2, 2026)
May 8, 2026	Commission's vote on adequacy
May 28, 2026	Commerce's results of its expedited review of the antidumping duty order (91 FR 31702)
June 3, 2026	Commerce's results of its expedited review of the countervailing duty order (91 FR 33141)
July 28, 2026	Commission's vote
August 6, 2026	Commission's determinations and views

[1] 19 U.S.C. 1675(c).

[2] 91 FR 4625, February 2, 2026. In accordance with section 751(c) of the Act, the U.S. Department of Commerce ("Commerce") published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. 91 FR 4499, February 2, 2026. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission's website (www.usitc.gov).

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

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

The original investigations

The original investigations resulted from petitions filed on January 15, 2020, with Commerce and the Commission by Coalition of American Vertical Engine Producers (Kohler Co., Kohler, Wisconsin and Briggs & Stratton Corporation, Wauwatosa, Wisconsin).[5] On January 11, 2021, Commerce determined that imports of LVSEs from China were being sold at less than fair value ("LTFV")[6] and subsidized by the Government of China.[7] The Commission determined on February 24, 2021, that the domestic industry was materially injured by reason of LTFV imports of LVSEs from China and subsidized imports of LVSEs from China.[8] On March 4, 2021, Commerce issued its antidumping duty order with final weighted-average dumping margins ranging from 185.65 to 468.33 percent for China[9] and its countervailing duty order with net subsidy rates ranging from 18.96 to 20.38 percent for China.[10]

[5] Large Vertical Shaft Engines from China, Inv. Nos. 701-TA-637 and 731-TA-1471 (Final), USITC Publication 5162, February 2021 ("Original publication"), p. 1.1.
[6] 86 FR 1936, January 11, 2021, amended by 86 FR 13694, March 10, 2021.
[7] 86 FR 1933, January 11, 2021.
[8] 86 FR 12206, March 2, 2021. The Commission also found that imports subject to Commerce's affirmative critical circumstances determination were not likely to undermine seriously the remedial effect of the order on China.
[9] 86 FR 12623, March 4, 2021, amended margins by 86 FR 13694, March 10, 2021.
[10] 86 FR 12619, March 4, 2021.

Previous and related investigations

The Commission conducted a previous import relief proceeding on small vertical shaft engines, as presented in table 1.2.

Table 1.2 LVSEs: Previous and related Commission proceedings and current status

Date	Product	Number	Country	ITC original determination	Current status
2020	Small vertical shaft engines	701-TA-643	China	Affirmative	Order in place (First five-year review active as of April 1, 2026)
2020	Small vertical shaft engines	731-TA-1493	China	Affirmative	Order in place (First five-year review active as of April 1, 2026)

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

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

Commerce's five-year reviews

Commerce announced that it would conduct expedited reviews with respect to the orders on imports of LVSEs from China with the intent of issuing the final results of these reviews based on the facts available not later than June 2, 2026.[11] Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at https://access.trade.gov/frnotices and subsequently on the Commission's Electronic Document Information System ("EDIS"). Issues and Decision Memoranda contain complete and up-to-date information regarding the background and history of the order, including scope rulings, duty absorption, changed circumstances reviews, and anticircumvention, as well as any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping and countervailing duty orders on imports of LVSEs from China are noted in the sections titled "The original investigations" and "U.S. imports," if applicable.

[11] Letter from Eric Greynolds, Director, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, March 27, 2026.

The product

Commerce’s scope

Commerce has defined the scope as follows:

> The merchandise covered by this order consists of spark-ignited, non-road, vertical shaft engines, whether finished or unfinished, whether assembled or unassembled, primarily for riding lawn mowers and zero-turn radius lawn mowers. Engines meeting this physical description may also be for other non-hand-held outdoor power equipment such as, including but not limited to, tow-behind brush mowers, grinders, and vertical shaft generators. The subject engines are spark ignition, single or multiple cylinder, air cooled, internal combustion engines with vertical power take off shafts with a minimum displacement of 225 cubic centimeters (cc) and a maximum displacement of 999cc. Typically, engines with displacements of this size generate gross power of between 6.7 kilowatts (kw) to 42 kw.
>
> Engines covered by this scope normally must comply with and be certified under Environmental Protection Agency (EPA) air pollution controls title 40, chapter I, subchapter U, part 1054 of the Code of Federal Regulations standards for small nonroad spark-ignition engines and equipment. Engines that otherwise meet the physical description of the scope but are not certified under 40 CFR part 1054 and are not certified under other parts of subchapter U of the EPA air pollution controls are not excluded from the scope of this proceeding. Engines that may be certified under both 40 CFR part 1054 as well as other parts of subchapter U remain subject to the scope of this proceeding.
>
> For purposes of this order, an unfinished engine covers at a minimum a sub-assembly comprised of, but not limited to, the following components: Crankcase, crankshaft, camshaft, piston(s), and connecting rod(s). Importation of these components together, whether assembled or unassembled, and whether or not accompanied by additional components such as an oil pan, manifold, cylinder head(s), valve train, or

valve cover(s), constitutes an unfinished engine for purposes of this order. The inclusion of other products such as spark plugs fitted into the cylinder head or electrical devices (e.g., ignition modules, ignition coils) for synchronizing with the motor to supply tension current does not remove the product from the scope. The inclusion of any other components not identified as comprising the unfinished engine subassembly in a third country does not remove the engine from the scope.[12]

[12] 86 FR 12619 and 12623, March 4, 2021.

U.S. tariff treatment

LVSEs (including any unfinished good that has the essential characteristics of a complete engine) are currently imported under Harmonized Tariff Schedule of the United States ("HTS") statistical reporting numbers 8407.90.1020, 8407.90.1060, and 8407.90.1080 while the covered less-than complete engines are imported under statistical reporting numbers 8409.91.5085 and 8409.91.9990.[13] The general rate of duty is "free" for HTS subheadings 8407.90.10 and 8407.90.90 and 2.5 percent ad valorem for HTS subheadings 8409.91.50 and 8409.91.99.[14] 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 LVSEs from China. Table 1.3 provides a summary of additional tariffs in place as of April 7, 2026. Historical information is summarized beneath the table.

Table 1.3 LVSEs: Additional tariffs on imports originating in China as of April 7, 2026

Duty rates in percent ad valorem

Additional tariff	8407.90.1020	8407.90.1060	8407.90.1080	8409.91.5085	8409.91.9990
Section 232	25	25	25	NA	NA
Section 301	25	25	25	25	25
Section 122	NA	NA	NA	10	10
Total additional ad valorem rate	50	50	50	35	35

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 China 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.

[13] The subject merchandise in this proceeding may also be imported under HTS statistical reporting numbers 8407.90.9060 and 8407.90.9080.

[14] USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 84.13 and 84.15.

Section 232 tariffs

LVSEs provided for in 8407.90.10 originating in China are subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended.[15] LVSEs provided for in 8409.91.50 and 8409.91.99 originating in China are not subject to additional duties under section 232 of the Trade Expansion Act of 1962, as amended.[16]

Section 301 tariffs

Effective August 23, 2018, LVSEs provided for in subheading 8407.90.10 originating in China are subject to an additional 25 percent ad valorem duty under section 301 of the Trade Act of 1974.[17] Effective September 24, 2018, LVSEs provided for in subheadings 8409.90.50 and 8409.91.99 originating in China were subject to an additional 10 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective May 10, 2019, the section 301 duty for LVSEs provided for in subheadings 8409.90.50 and 8409.91.99 increased to 25 percent.[18]

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[15] Effective August 18, 2025, LVSEs provided for in 8407.90.10 originating in China were subject to an additional 50 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended, applied to the declared value of the steel content of the imported article. Effective April 6, 2026, the additional section 232 duty on LVSEs originating in China provided for in 8407.90.10 changed to an additional 25 percent ad valorem duty, applied to the full customs value of the imported article, provided the weight of the steel is at least 15 percent of the weight of the imported article. 90 FR 9817, February 18, 2025; 90 FR 40326, August 19, 2025. See also HTS heading 9903.81.91 and U.S. note 16(n) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, USITC Publication 5711, February 2026, pp. 99.3.70 and 99.3.450. 91 FR 18201, April 9, 2026. See also HTS subheading 9903.82.09 and US note 16(c) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment, HTS revision 5, USITC publication 5762, April 2026, 99.3.64 to 99.3.70, and 99.3.421.

[16] Effective August 18, 2025, LVSEs provided for in 8409.91.50 and 8409.91.99 originating in China were subject to an additional 50 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended, applied to the declared value of the steel content of the imported article. Effective April 6, 2026, LVSEs originating in China provided for in 8409.91.50 and 8409.91.99 were no longer subject to section 232 duties. 90 FR 9817, February 18, 2025; 90 FR 40326, August 19, 2025. See also HTS heading 9903.81.91 and U.S. note 16(n) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, USITC Publication 5711, February 2026, pp. 99.3.70 and 99.3.450. 91 FR 18201, April 9, 2026. See also U.S. note 16 to subchapter 3 of chapter 99 HTS Revision 5, USITC publication 5726, April 2026, 99.3.64 to 99.3.70.

[17] 83 FR 40823, August 16, 2018. See also HTS heading 9903.88.02 and U.S. notes 20(c) and 20(d) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 8, Publication 5613, April 2025, pp. 99.3.43 to 99.3.46, 99.3.352.

[18] 83 FR 47974, September 21, 2018; 84 FR 20459, May 9, 2019. See also HTS headings 9903.88.03 and 9903.88.04 and U.S. notes 20(e), 20(f), and 20(g) to subchapter 3 of chapter 99 and related tariff

(*continued*...)

Section 122 tariffs

Effective February 24, 2026, LVSEs provided for in 8407.90.10 originating in China were subject to an additional 10 percent ad valorem duty under section 122 of the Trade Act of 1974, applied to the value of the non-steel content. Effective April 6, 2026, LVSEs provided for in 8407.90.10 originating in China are not subject to tariffs initiated in February 2026 under section 122 of the Trade Act of 1974.[19]

Effective February 24, 2026, LVSEs provided for in 8409.91.50 and 8409.91.99 originating in China were subject to an additional 10 percent ad valorem duty under section 122 of the Trade Act of 1974, applied to the value of the non-steel content. Effective April 6, 2026, the additional 10 percent ad valorem duty initiated in February 2026 under section 122 of the Trade Act of 1974 applies to the full customs value of the products.[20]

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provisions for this duty treatment. USITC, HTS (2025) Revision 8, Publication 5613, April 2025, pp. 99.3.46 to 99.3.71, 99.3.352. Goods exported from China to the United States prior to May 10, 2019, and entering the United States prior to June 1, 2019, were not subject to the escalated 25 percent duty (84 FR 21892, May 15, 2019).

[19] 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 LVSEs provided for in 8407.90.10, are not subject to the tariffs initiated under section 122. From February 24, 2026, to April 5, 2026, for LVSEs provided for in 8407.90.10, the section 122 duty did not apply to the steel content of the products because that content was subject to section 232 tariffs. Effective April 6, 2026, the full value of LVSEs provided for in 8407.90.10 was subject to section 232 tariffs, and therefore the full value of the product is not subject to section 122 tariffs. 91 FR 9339, February 25, 2026. See also HTS heading 9903.03.01 and 9903.03.06 and U.S. note 2(aa) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.49, 99.3.51, 99.3.58, 99.3.59, 99.3.410, and 99.3.411.

[20] 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 LVSEs provided for in 8409.91.50 and 8409.91.99, are not subject to the tariffs initiated under section 122. From February 24, 2026, to April 5, 2026, for LVSEs provided for in 8409.91.50 and 8409.91.99, the section 122 duty did not apply to the steel content of the products because that content was subject to section 232 tariffs. Effective April 6, 2026, the full value of LVSEs provided for in 8409.91.50 and 8409.91.99 was subject to section 232 tariffs, and therefore the full value of the product is not subject to section 122 tariffs. 91 FR 9339, February 25, 2026. See also HTS heading 9903.03.01 and 9903.03.06 and U.S. note 2(aa) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.49, 99.3.51, 99.3.58, 99.3.59, 99.3.410, and 99.3.411.

Tariffs initiated under the International Emergency Economic Powers Act ("IEEPA")[21]

Effective February 20, 2026, all tariffs initiated under IEEPA were terminated. Below is a history of the IEEPA tariffs relevant to LVSEs originating in China that were in effect until February 20, 2026.[22]

Country specific IEEPA tariffs

Effective February 4, 2025, LVSEs 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.[23] Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.[24]

Tariffs initiated in April 2025 under IEEPA

When they were in effect, the tariffs initiated in April 2025 under IEEPA applied to the non-steel content of LVSEs. Effective April 5, 2025, the non-steel content of LVSEs originating in China were subject to an additional 10 percent ad valorem duty as part of tariffs initiated in April 2025 under IEEPA. That duty rose to 84 percent ad valorem effective April 9, 2025, and rose again to 125 percent effective April 10, 2025. However, effective May 14, 2025, the duty rate for tariffs initiated in April 2025 under IEEPA on products originating in China was reduced

[21] Multiple tariffs were enacted under the authority of the International Emergency Economic Powers Act ("IEEPA"), including tariffs that applied to countries not subject to these reviews. 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.

[22] 91 FR 9437, February 25, 2026.

[23] 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 (2025) Revision 19, Publication 5659, August 2025, pp. 99.3.315 to 99.3.316.

[24] 91 FR 9437, February 25, 2026.

to 10 percent.[25] Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.[26]

Description and uses[27]

LVSEs are spark-ignited, single or multiple cylinders, air cooled, internal combustion, nonroad engines with vertical power take off shafts with a minimum displacement of 225cc and a maximum displacement of 999cc (figure 1.1). Most engines with this size displacement generate a gross power between 6.7 kW and 42 kW. LVSEs also include subassemblies (unassembled or unfinished VSEs) but do not include engines with a displacement of 224cc or less, or engines with a horizontal shaft. The subassemblies are designed for dedicated use in becoming a completed VSE or as a replacement assembly and have no independent use and no separate markets.

LVSEs are primarily used in riding lawn mowers and zero-turn radius lawn mowers, although engines meeting this physical description may also be used in other non-handheld outdoor power equipment.[28] LVSEs are therefore primarily sold to original equipment manufacturers ("OEMs") of these riding lawn mowers, who then primarily sell to "big box" retailers such as Home Depot.[29]

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[25] For China, the duty as part of tariffs initiated in April 2025 under IEEPA was in addition to the 10 percent ad valorem duty under IEEPA that went into effect on November 10, 2025. Articles of steel, derivative articles of steel, articles of aluminum, and derivative articles of aluminum subject to section 232 tariffs were generally not subject to tariffs initiated in April 2025 under IEEPA. However, in some cases, the non-aluminum and non-steel content of those articles was subject to tariffs initiated in April 2025 under IEEPA. 90 FR 15041, April 7, 2025; 90 FR 15509, April 14, 2025; 90 FR 15625, April 15, 2025; 90 FR 21831, May 21, 2025; 90 FR 39305, August 14, 2025; 90 FR 50729, November 7, 2025. See also HTS headings 9903.01.25 and 9903.01.63 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.4 to 99.3.14, 99.3.375, and 99.3.382.

[26] 91 FR 9437, February 25, 2026.

[27] Unless otherwise noted, this information is based on Original publication pp. 1.10 to 1.13.

[28] LVSEs used in other applications account for less than one percent of all LVSEs in the U.S. market.

[29] The engine displacements in this range correspond to horsepower ranges for riding lawn mowers and are generally not used for non-riding lawn mowers or other types of vehicles (such as automobiles). Engines with a displacement of less than 225cc or with a horizontal shaft have different characteristics and uses and therefore have different customers. Similarly, horizontal shaft engines have different customers, distribution channels, and price points, and are primarily used in generators and various construction equipment.

Figure 1.1: Briggs & Stratton 656 – 810cc engines

Source: Briggs & Stratton, "Riding Mower Engines", https://www.briggsandstratton.com/en-us/products/riding-mower-engines, retrieved April 9, 2026.

LVSEs must comply with and be certified to meet U.S. Environmental Protection Agency ("EPA") air pollution control standards, with the most recent standards coming into effect in 2011. LVSEs covered by the scope of these reviews are all EPA class II engines, which are defined as "non-handheld equipment engines greater than or equal to 225cc in displacement."[30] These regulations have specific requirements for residential, extended life residential (general purpose), and commercial LVSEs.[31] The engines must meet these standards over the full period of the useful life of the engine.[32] The useful life is based on five years or the number of hours of operation, whichever comes first.[33] For class II engines (which encompasses the LVSEs covered by the scope of these reviews), useful life is typically the number of engine operating hours specified in the regulations that most closely matches the expected median in-use life of the engine (table 1.4).[34] Commercial grade engines tend to be larger when compared to residential ones, as well as consisting of extra features and higher quality components which

[30] EPA class II engines also include horizontal shaft engines, and could include engines with greater than the 999cc, both of which are not covered by the scope of these reviews. EPA Website, https://www.epa.gov/ve-certification/small-nonroad-spark-ignition-engines, retrieved April 9, 2026.

[31] 40 C.F.R. §1054.107.

[32] 40 C.F.R. §1054.103.

[33] 40 C.F.R. §1054.107.

[34] 40 C.F.R. §1054.107.

extend their average useful life. The EPA has rated commercial engines to have four times the average useful life of the residential grade engines.

Table 1.4: EPA nominal useful life provisions for non-handheld class II engines

Class	Residential	Extended life residential (or general purpose)	Commercial
Class II	250	500	1,000

Source: 40 C.F.R. §1054.107.

There are several different ways that engine power for LVSEs is rated, including displacement, torque, and kilowatts.[35] Power measurements are typically done according to Society of Automotive Engineers ("SAE") standards.[36] Displacement is the "intended swept volume of all the engine's cylinders. The swept volume of the engine is the product of the internal cross-section area of the cylinders, the stroke length, and the number of cylinders."[37] Torque is the amount of rotational power that can be created to, in the case of a lawn mower, turn the blades that cut the grass.[38]

Subject LVSEs certified by the EPA for model year 2025 have displacements ranging from 252cc to 999cc. The maximum engine power of certified LVSEs ranges from 4.8 to 29.3 kW.[39] The size and displacement of EPA certified engines is shown in figure 1.2. Figure 1.3 shows the range of displacement and maximum engine power for residential, extended life residential, and commercial engines in model year 2025.

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[35] Ratings may also be expressed as net power and gross power. "Net power values are taken with exhaust and air cleaner installed whereas gross power values are collected without these attachments. Actual gross engine power will be higher than net engine power and is affected by, among other things, ambient operating conditions and engine to engine variability." Briggs & Stratton, https://www.briggsandstratton.com/na/en_us/support/faqs/browse/engine-horsepower-or-torque-value.html, retrieved April 9, 2026.

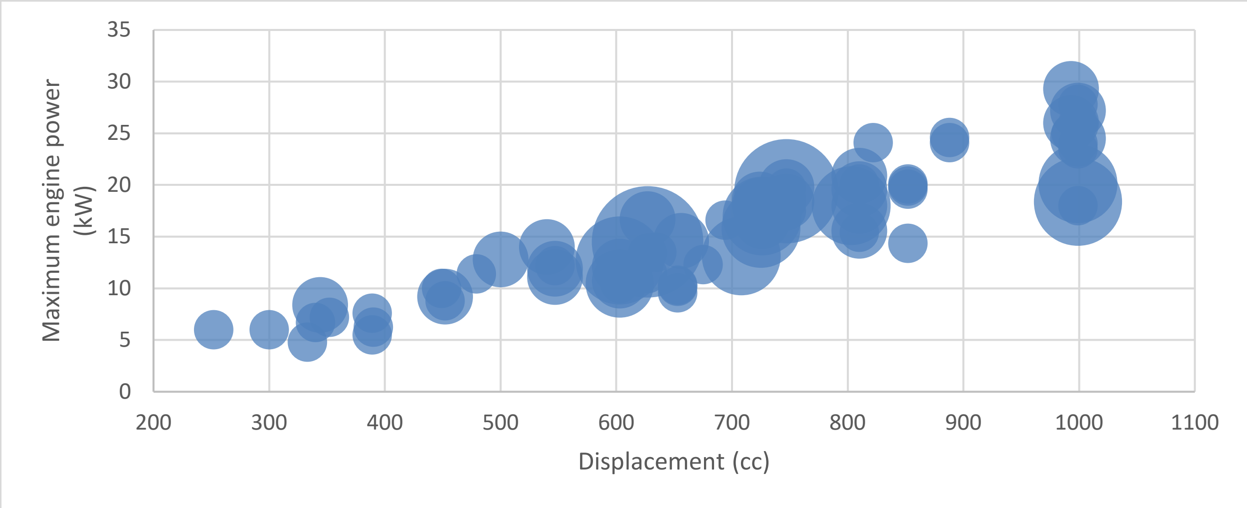
[36] Briggs & Stratton, https://www.briggsandstratton.com/na/en_us/support/faqs/browse/mower-power-measurement.html, retrieved April 9, 2026.

[37] 40 C.F.R. §1054.140.

[38] Williams, Diana K., "Torque Vs. Horsepower in Small Engine Lawn Mowers," *San Francisco Chronicle*, https://homeguides.sfgate.com/torque-vs-horsepower-small-engine-lawn-mowers-87440.html, retrieved April 9, 2026; Briggs & Stratton, https://www.briggsandstratton.com/na/en_us/support/faqs/browse/engine-horsepower-or-torque-value.html, retrieved April 9, 2026.

[39] EPA, Annual Certification Data for Vehicles, Engines, and Equipment, Small NRSI Engine Certification Data (Model years: 2011–Present), January 24, 2020, https://www.epa.gov/compliance-and-fuel-economy-data/annual-certification-data-vehicles-engines-and-equipment, retrieved April 9, 2026.

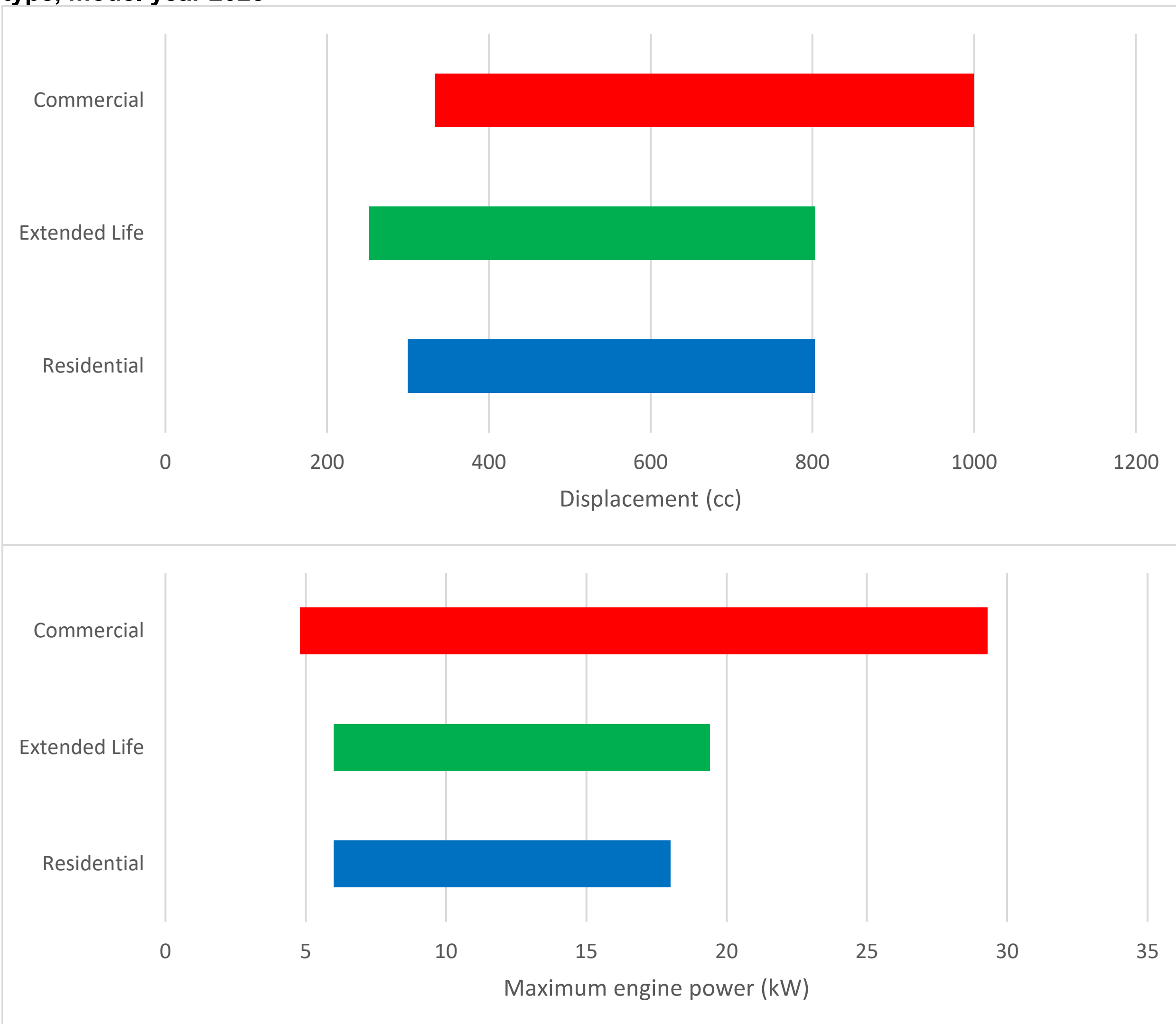
Figure 1.2: LVSEs: Displacement and power of EPA certified LVSEs, model year 2025



Note: Size of the bubble is proportional to the number of engines with the same displacement and power.

Source: EPA, Annual Certification Data for Vehicles, Engines, and Equipment, Small NRSI Engine Certification Data (Model years: 2011–Present), March 2026, https://www.epa.gov/compliance-and-fuel-economy-data/annual-certification-data-vehicles-engines-and-equipment, retrieved April 9, 2026.

Figure 1.3: LVSEs: Range of displacement (top) and power (bottom) of EPA certified LVSEs, by type, model year 2025

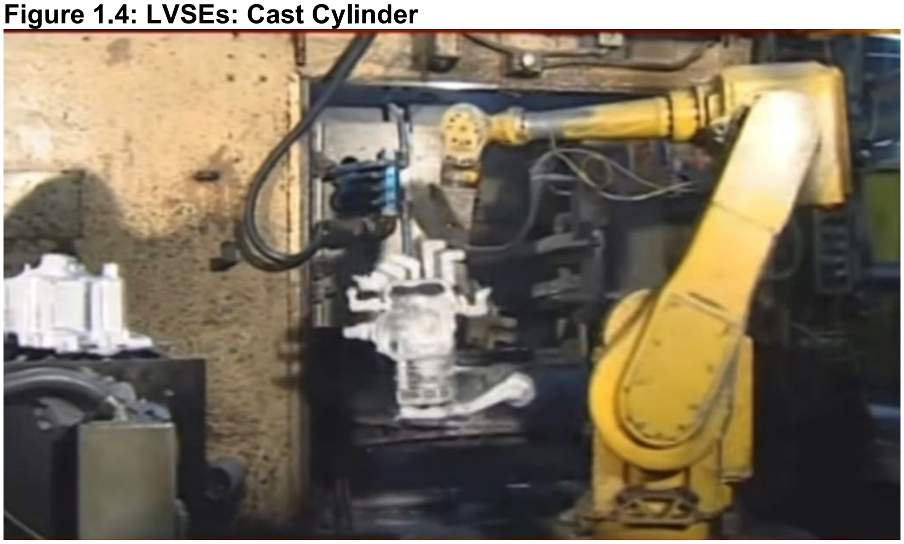


Source: EPA, Annual Certification Data for Vehicles, Engines, and Equipment, Small NRSI Engine Certification Data (Model years: 2011–Present), March 2026, https://www.epa.gov/compliance-and-fuel-economy-data/annual-certification-data-vehicles-engines-and-equipment, retrieved April 9, 2026.

Manufacturing process[40]

The manufacturing process for LVSEs is a continuous and lengthy operation, consisting of five production stages: (1) casting major components; (2) machining these components; (3) assembling the short block; (4) assembling the long block; and (5) finishing. The first two stages are casting and machining. The process begins by casting (figure 1.4) various major cast iron and aluminum components (i.e. the crankcases, cylinder heads, oil pans, crankshafts, camshafts, balance shafts, connecting rods, pistons, and flywheels) that make up the predominant portions of the engines. Some engine producers are vertically integrated such that this is done using their own aluminum cast houses and iron foundries, while others use external foundries.

Figure 1.4: LVSEs: Cast Cylinder



Source: "How Lawnmower Engines are Made," August 10, 2015, https://www.youtube.com/watch?v=uBPbSUUkTck, retrieved April 9, 2026.

The next stage is to machine these casted components. Machining includes the process of milling, turning, drilling, boring, grinding, honing, deburring, balancing, and washing, as well as any other step required to transform the casted parts into components that can be used in a finished engine. The exact number of components that are machined varies from producer to producer, but most engine manufacturers perform machining "in-house."[41]

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[40] Unless otherwise noted, this information is based on Large Vertical Shaft Engines from China (Final), Confidential Report, INV-TT-008, January 25, 2021, as revised in INV-TT-013, January 27, 2021, ("Original confidential report") pp. 1.14 to 1.17 and original publication, pp. 1.14 to 1.17.

[41] Some producers source components from external machine shops instead of machining the components internally.

After casting and machining, the primary assembly process occurs on an assembly line. Most of the major cast iron and aluminum components produced in the prior two steps (including the engine crankcase, oil pan, crankshaft, camshaft, balance shafts, connecting rods, and pistons) (figures 1.5 and 1.6) create the “short block” subassembly. The assembly process then continues by adding the valvetrain, cylinder heads, valve covers, and breather system components to the short block to create the “long block” assembly (figure 1.7).

Figure 1.5: LVSEs: Crank shaft assembly inserted into the cylinder box

Source: “How Lawnmower Engines are Made,” August 10, 2015, https://www.youtube.com/watch?v=uBPbSUUkTck, retrieved April 9, 2026.

Figure 1.6: LVSEs: Piston installed into the cylinder

Source: "How Lawnmower Engines are Made," August 10, 2015, https://www.youtube.com/watch?v=uBPbSUUkTck, retrieved April 9, 2026.

Figure 1.7: LVSEs: Head fitted to the cylinder block

Source: "How Lawnmower Engines are Made," August 10, 2015, https://www.youtube.com/watch?v=uBPbSUUkTck, retrieved April 9, 2026.

The final phase of the assembly process requires adding the remaining engine parts to create a finished engine. These additional components include an intake manifold, carburetor, starter, flywheel, spark plugs, ignition modules, cooling fan, and any other component required to power the engine and meet emissions requirements. Moreover, various testing occurs to ensure quality control and EPA compliance. In addition to numerous internal testing and quality control, all engines covered by the scope of these LVSEs reviews should also comply with and be certified under the EPA air pollution controls title 40, chapter I, subchapter U, part 1054 of the Code of Federal Regulations standards for small non-road spark-ignition engines and equipment.[42] There is also an additional certification required for engines in California set forth by the California Air Resources Board and, in general, engines are certified to meet both sets of regulations.

[42] However, engines that otherwise meet the physical description of the scope but are not certified under 40 CFR part 1054 and are not certified under other parts of subchapter U of the EPA air pollution controls are not excluded from the scope.

The industry in the United States

U.S. producers

During the final phase of the original investigations, the Commission received U.S. producer questionnaires from three firms, which were estimated to have accounted for all production of LVSEs in the United States during 2019.[43]

In response to the Commission's notice of institution in these current reviews, domestic interested parties provided a list of three known and currently operating U.S. producers of LVSEs. Two firms providing U.S. industry data in response to the Commission's notice of institution accounted for approximately *** percent of production of LVSE in the United States during 2025.[44]

Recent developments

Table 1.5 presents events in the U.S. industry since the Commission's original investigations.[45]

Table 1.5 LVSEs: Developments in the U.S. industry

Item	Firm	Event
Closure	Briggs & Stratton	In January 2023, Briggs & Stratton relocated a production line to Alabama and Missouri by closing a production plant in Wauwatosa, Wisconsin.

Source: Marshall, "Briggs & Stratton to lay off 160 Wisconsin employees", January 27, 2023. https://www.tmj4.com/news/local-news/briggs-stratton-to-layoff-160-wisconsin-employees-cease-production-at-wauwatosa-location.

[43] Original publication, p. 3.1.

[44] Domestic interested parties' response to the notice of institution, March 4, 2026, exh. 1a and supplemental response of March 31, 2026, exh. 1 and 2, respectively.

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

U.S. producers' trade and financial data

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year reviews. Table 1.6 presents a compilation of the trade and financial data submitted from responding U.S. producers in the original investigations and current reviews.

Table 1.6 LVSEs: Trade and financial data submitted by U.S. producers, by period

Quantity in units; value in 1,000 dollars; unit value in dollars per unit; ratio in percent

Item	Measure	2017	2018	2019	2025
Capacity	Quantity	***	***	***	***
Production	Quantity	***	***	***	***
Capacity utilization	Ratio	***	***	***	***
U.S. shipments	Quantity	***	***	***	***
U.S. shipments	Value	***	***	***	***
U.S. shipments	Unit value	***	***	***	***
Net sales	Value	***	***	***	***
COGS	Value	***	***	***	***
COGS to net sales	Ratio	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***
SG&A expenses	Value	***	***	***	***
Operating income or (loss)	Value	***	***	***	***
Operating income or (loss) to net sales	Ratio	***	***	***	***

Source: For the years 2017, 2018, and 2019, data are compiled using data submitted in the Commission's original investigations. For the year 2025, data are compiled using data submitted by domestic interested parties. Domestic interested parties' response to the notice of institution, March 4, 2026, exh. 1.

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

Definitions of the domestic like product and domestic industry

The domestic like product is defined as the domestically produced product or products which are like, or in the absence of like, most similar in characteristics and uses with, the subject merchandise. The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like product constitutes a major proportion of the total domestic production of the product. Under the related parties provision, the Commission may exclude a U.S. producer from the domestic industry for purposes of its injury determination if "appropriate circumstances" exist.[46]

In its original determinations, the Commission found a single domestic like product corresponding to Commerce's scope of investigation, and it defined the domestic industry to include all domestic producers of large vertical shaft engines.[47]

[46] Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).
[47] 91 FR 4625, February 2, 2026.

U.S. importers

During the final phase of the original investigations, the Commission received U.S. importer questionnaires from 10 firms. The imports reported by these firms accounted for 130.7 percent of total U.S. imports of LVSEs from China in 2019 as reported in official import statistics. Import data presented in the original investigations are based on questionnaire responses.[48]

Although the Commission did not receive responses from any respondent interested parties in these current reviews, in its response to the Commission's notice of institution, the domestic interested parties provided a list of 77 potential U.S. importers of LVSEs.[49]

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[48] Original publication, p. 4.

[49] Domestic interested parties' response to the notice of institution, March 4, 2026, exh. 1.

U.S. imports

Table 1.7 presents the quantity, value, and unit value of U.S. imports from China as well as the other top sources of U.S. imports (shown in descending order of 2025 imports by quantity) for HTS codes 8407.90.1020, 8407.90.1060, and 8407.90.1080 covering certain spark-ignition reciprocating or rotary internal combustion piston for installation in agricultural or horticultural machinery or equipment.

Table 1.7 Certain spark-ignition reciprocating or rotary internal combustion piston engines: U.S. imports, by source and period

Quantity in units; value in 1,000 dollars; unit value in dollars per unit

U.S. imports from	Measure	2020	2021	2022	2023	2024	2025
China	Quantity	306,588	170,575	85,521	8,465	8,021	20,323
Mexico	Quantity	6	2	1	3	—	87,724
Canada	Quantity	38	54	327	45	101	1,334
Germany	Quantity	272	91	59	13	231	566
All other sources	Quantity	5,675	3,511	1,098	1,212	2,754	634
Nonsubject sources	Quantity	5,991	3,658	1,485	1,273	3,086	90,258
All import sources	Quantity	312,579	174,233	87,006	9,738	11,107	110,581
China	Value	62,346	40,458	15,181	1,588	1,573	3,461
Mexico	Value	14	13	10	3	—	30,021
Canada	Value	124	116	249	2,469	1,954	37
Germany	Value	130	3	55	48	693	1,917
All other sources	Value	546	395	1,574	3,436	3,742	491
Nonsubject sources	Value	814	624	2,370	3,657	4,809	35,003
All import sources	Value	63,161	41,082	17,551	5,246	6,382	38,464
China	Unit value	203	237	178	188	196	170
Mexico	Unit value	2,282	6,738	10,074	859	—	342
Canada	Unit value	3,254	3,942	2,236	3,808	3,704	1,930
Germany	Unit value	479	36	935	3,656	3,001	3,387
All other sources	Unit value	96	112	1,433	2,835	1,359	775
Nonsubject sources	Unit value	136	171	1,596	2,873	1,558	388
All import sources	Unit value	202	236	202	539	575	348

Source: Compiled from official Commerce statistics for HTS statistical reporting numbers 8407.90.1020, 8407.90.1060, and 8407.90.1080, accessed April 2, 2026.

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

Note: Import figures may be understated because these HTS numbers cover only assembled engines, while the scope also includes unfinished engines when key components are imported together (see Commerce's scope section). HTS categories covering parts and subassemblies are broad basket provisions that would overstate imports if included.

Apparent U.S. consumption and market shares

Table 1.8 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

Table 1.8 LVSEs: Apparent U.S. consumption and market shares, by source and period

Quantity in units; value in 1,000 dollars; shares in percent

Source	Measure	2017	2018	2019	2025
U.S. producers	Quantity	***	***	***	***
China	Quantity	***	***	***	20,323
Nonsubject sources	Quantity	***	***	***	90,258
All import sources	Quantity	***	***	***	110,581
Apparent U.S. consumption	Quantity	***	***	***	***
U.S. producers	Value	***	***	***	***
China	Value	***	***	***	3,461
Nonsubject sources	Value	***	***	***	35,003
All import sources	Value	***	***	***	38,464
Apparent U.S. consumption	Value	***	***	***	***
U.S. producers	Share of quantity	***	***	***	***
China	Share of quantity	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***
All import sources	Share of quantity	***	***	***	***
U.S. producers	Share of value	***	***	***	***
China	Share of value	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***
All import sources	Share of value	***	***	***	***

Source: For the years 2017, 2018, and 2019, data are compiled using data submitted in the Commission's original investigations. For the year 2025, U.S. producers' U.S. shipments are compiled from the domestic interested parties' response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting numbers 8407.90.1020, 8407.90.1060, and 8407.90.1080, accessed April 2, 2026.

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

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

Note: For the years 2017, 2018, and 2019, apparent U.S. consumption is derived from U.S. shipments of imports, rather than U.S. imports.

The industry in China

Producers in China

During the original investigations, the Commission received foreign producer/exporter questionnaires from five firms. These firms' reported exports to the United States accounted for approximately 137.5 percent total of U.S. imports from China under HTS statistical reporting numbers 8407.90.1020, 8407.90.1060, and 8407.90.1080 in 2019 by quantity during 2019.[50]

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of 32 possible producers of LVSEs in China.[51]

Recent developments

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

Exports

Global Trade Atlas ("GTA") publishes data on global exports of engines, including those for subheadings 8407.90 (other engines) and 8409.91 (parts for spark-ignition, internal combustion engines). However, both subheadings are large categories that, in addition to products covered by the scope of these reviews, also include many products outside the scope of these reviews. Due to these limitations, GTA data on China's exports by destination market are not included here.

Third-country trade actions

Based on available information, LVSEs from China have not been subject to other antidumping or countervailing duty investigations outside the United States.

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[50] Original publication, p. 7.3.
[51] Domestic interested parties' response to the notice of institution, March 4, 2026, exh. 1.

The global market

As previously noted, GTA publishes data on global exports of engines, including those for subheadings 8407.90 (other engines) and 8409.91 (parts for spark-ignition, internal combustion engines). However, both of these subheadings are large categories that, in addition to products covered by the scope of these reviews, also include many products outside the scope of these reviews. Due to this data limitation, GTA data on nonsubject countries are not included.

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 4625 February 2, 2026	Large Vertical Shaft Engines From China; Institution of Five-Year Reviews	https://www.govinfo.gov/content/pkg/FR-2026-02-02/pdf/2026-02044.pdf
91 FR 4499 February 2, 2026	Initiation of Five-Year (Sunset) Reviews	https://www.govinfo.gov/content/pkg/FR-2026-02-02/pdf/2026-02090.pdf

APPENDIX B

RESPONSES TO THE NOTICE OF INSTITUTION

Responses to the Commission's notice of institution

Individual responses

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

1. Briggs & Stratton, LLC ("Briggs & Stratton") and Discovery Energy, LLC ("Discovery"), domestic producers of LVSE (collectively referred to herein as "domestic interested parties").

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

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

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

Note: The U.S. producer coverage figure presented is the domestic interested parties' estimate of their share of total U.S. production of LVSEs during 2025. Domestic interested parties' supplemental response to the notice of institution, March 31, 2026, exh. 1 and 2.

Party comments on adequacy

The Commission received party comments on the adequacy of responses to the notice of institution and whether the Commission should conduct expedited or full reviews from the domestic interested parties. The domestic interested parties request that the Commission conduct expedited reviews of the antidumping and countervailing duty orders on LVSEs.[1]

[1] Domestic interested parties' comments on adequacy, April 13, 2026, p. 2.

Company-specific information

Table B.2 LVSEs: Response checklist for U.S. producers

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

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

APPENDIX C

SUMMARY DATA COMPILED IN ORIGINAL INVESTIGATIONS

Table C-1
LVSEs: Summary data concerning the U.S. market, 2017-19, January to June 2019, and January to June 2020
(Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year			January to June		Comparison years			Jan-Jun
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. consumption quantity:									
Amount	***	***	***	***	***	▼***	▲***	▼***	▼***
Producers' share (fn1)	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. consumption value:									
Amount	***	***	***	***	***	▲***	▲***	▼***	▼***
Producers' share (fn1)	***	***	***	***	***	▼***	▼***	▲***	▼***
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources	***	***	***	***	***	▲***	▲***	▼***	▲***
U.S. importers' U.S. shipments of imports from:									
China:									
Quantity	***	***	***	***	***	▲***	▲***	▼***	▲***
Value	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value	***	***	***	***	***	▼***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▼***	▲***
All import sources:									
Quantity	***	***	***	***	***	▲***	▲***	▼***	▲***
Value	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value	***	***	***	***	***	▼***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. producers':									
Average capacity quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
Production quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
Capacity utilization (fn1)	***	***	***	***	***	▼***	▲***	▼***	▼***
U.S. shipments:									
Quantity	***	***	***	***	***	▼***	▲***	▼***	▼***
Value	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
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 (units per 1,000 hours)	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit labor costs	***	***	***	***	***	▲***	▼***	▲***	▲***

Table continued on next page.

Table C-1--Continued
LVSEs: Summary data concerning the U.S. market, 2017-19, January to June 2019, and January to June 2020
(Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year			January to June		Comparison years			Jan-Jun
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. producers'--Continued:									
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	***	***	***	***	***	▼***	▼***	▲***	▼***
Net assets	***	***	***	***	***	▲***	▲***	▲***	***

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

fn1.--Reported data are in percent and period changes are in percentage points.
fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

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

APPENDIX D

PURCHASER QUESTIONNAIRE RESPONSES

As part of their response to the notice of institution, interested parties were asked to provide a list of three to five leading purchasers in the U.S. market for the domestic like product. A response was received from domestic interested parties, and the domestic interested parties identified five firms that they believe to be the top five purchasers of LVSEs: ***. The Commission sent purchaser questionnaires to these five firms, but none of the five firms responded.