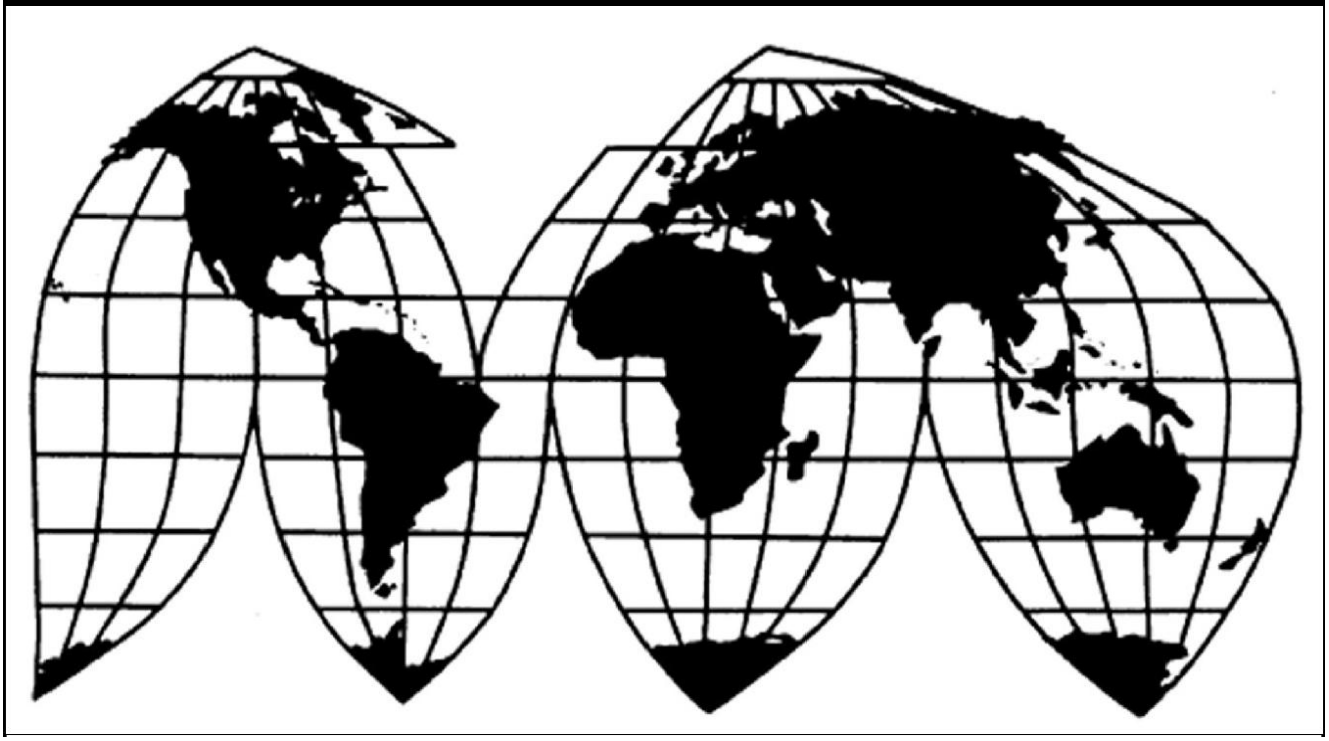
Boltless Steel Shelving Units Prepackaged for Sale from China

Investigation Nos. 701-TA-523 and 731-TA-1259 (Second Review)

Publication 5793 **September 2026**

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual firms may not be published.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

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-523 and 731-TA-1259 (Second Review)

Boltless Steel Shelving Units Prepackaged for Sale 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 duty order and antidumping duty order on boltless steel shelving units prepackaged for sale 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]

BACKGROUND

The Commission instituted these reviews on April 1, 2026 (91 FR 16234) and determined on July 6, 2026, that it would conduct expedited reviews (91 FR 52082, August 12, 2026).

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

[2] Commissioner Samuel T. Negatu not participating.

Views of the Commission

Based on the record in these five-year reviews, we determine under Section 751(c) of the Tariff Act of 1930, as amended ("the Tariff Act"), that revocation of the antidumping and countervailing duty orders on boltless steel shelving units prepackaged for sale from China ("boltless steel shelving") 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

The original investigations resulted from antidumping and countervailing duty petitions filed on August 26, 2014, by Edsal Manufacturing Company, Inc. ("Edsal"), a domestic producer of boltless steel shelving.[1] In October 2015, the Commission determined that an industry in the United States was materially injured by reason of subject imports.[2] On October 21, 2015, the U.S. Department of Commerce ("Commerce") issued antidumping and countervailing duty orders.[3] In the first expedited five-year reviews, the Commission determined that revocation of the orders on boltless steel shelving would be likely to lead to continuation or recurrence of

[1] *Boltless Steel Shelving Units Prepackaged for Sale from China*, Inv. Nos. 701-TA-523 and 731-TA-1259 (Final), USITC Pub. 4565 (Oct. 2015) ("*Original Determinations*") at 1.

[2] *Original Determinations,* USITC Pub. 4565 at 3. Chairman Broadbent and Commissioner Johanson found that an industry in the United States was threatened with material injury by reason of subject imports. They joined the Commission opinion's discussion of domestic like product, domestic industry, and conditions of competition. *Id.* at 25.

[3] *Boltless Steel Shelving Units Prepackaged for Sale From the People's Republic of China: Antidumping Duty Order,* 80 Fed. Reg. 63,741 (Dep't of Commerce Oct. 21, 2015); *Boltless Steel Shelving Units Prepackaged for Sale From the People's Republic of China: Amended Final Affirmative Countervailing Duty Determination and Countervailing Duty Order,* 80 Fed. Reg. 63,745 (Dep't of Commerce Oct. 21, 2015).

material injury to a domestic industry.[4] On May 12, 2021, Commerce issued notices of continuation of the orders on boltless steel shelving from China.[5]

B. The Current Reviews

The Commission instituted these five-year reviews on April 1, 2026.[6] Edsal filed the sole response to the Commission's notice of institution.[7] On July 6, 2026, the Commission determined that Edsal's individual response and the domestic interested party group response were adequate and the respondent interested party group response was inadequate.[8] Finding no other circumstances warranted conducting full reviews, it determined to conduct expedited reviews of the orders.[9] Edsal subsequently filed final comments pursuant to Commission Rule 207.62(d)(1), arguing that the Commission should reach affirmative determinations in these reviews.[10]

U.S. industry data are based on information provided by Edsal, which estimated that it accounted for *** percent of domestic production of boltless steel shelving in 2025.[11] U.S.

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[4] *Boltless Steel Shelving Units Prepackaged for Sale from China*, Inv. Nos. 701-TA-523 and 731-TA-1259 (Review), USITC Pub. 5190 (April 2021) ("*First Review Determinations*").

[5] *Boltless Steel Shelving Units Prepackaged for Sale from the People's Republic of China: Continuation of Antidumping Duty Order and Countervailing Duty Order*, 86 Fed. Reg. 26,000 (Dep't of Commerce May 12, 2021).

[6] *Boltless Steel Shelving Units Prepackaged for Sale From China; Institution of Five-Year Reviews*, 91 Fed. Reg. 16,234 (USITC April 1, 2026).

[7] Edsal Manufacturing Company LLC's Response to the Commission's Notice of Institution, EDIS Doc. 880902 (April 23, 2026) ("Domestic Producer's NOI Response").

[8] Explanation of Commission Determination on Adequacy, EDIS Doc. 887717 (July 10, 2026).

[9] *Boltless Steel Shelving Units Prepackaged for Sale from China; Scheduling of Expedited Five-Year Reviews,* 91 Fed. Reg. 52,082 (Aug. 12, 2026).

[10] Domestic Producer's Confidential Comments, EDIS Doc. 893559 (Sept. 1, 2026) ("Final Comments").

[11] Confidential Staff Report, INV-YY-094, EDIS Doc. 890924 (Aug. 7, 2026) ("CR"); *Boltless Steel Shelving Units Prepacked for Sale from China*, Inv. Nos. 701-TA-523 and 731-TA-1259 (Second Review), USITC Pub. 5793 (Sept. 2026) ("PR") at 1.14 and Table B.1; Domestic Producer's NOI Response at 18.

import data and related information are based on Commerce's official import statistics.[12] Foreign industry data and related information are based on information provided by Edsal, questionnaire responses from the original investigations, as well as publicly available information gathered by staff, such as Global Trade Atlas ("GTA") data.[13] Three U.S. purchasers of boltless steel shelving responded to the Commission's adequacy phase questionnaire.[14]

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."[15] 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."[16] 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.[17]

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[12] *See* CR/PR at Table 1.6 note. Import data for these reviews were compiled from Harmonized Tariff Schedule ("HTS") statistical reporting number 9403.20.0075. In their response to the Notice of Institution, Domestic Producers stated that this HTS reporting number appears to include merchandise that is not subject to the orders and may overstate imports of subject merchandise. *Id.*; Domestic Producers' NOI Response at 6 n.4.

[13] CR/PR at 1.21-1.24. GTA data cover Harmonized System ("HS") subheading 9403.20, which may include products outside the scope of these reviews. *Id.* at Table 1.9 note and Table 1.10 note.

[14] CR/PR at D.3.

[15] 19 U.S.C. § 1677(4)(A).

[16] 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. Dep't of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int'l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *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).

[17] *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-

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

> {B}oltless steel shelving units prepackaged for sale, with or without decks (boltless steel shelving). The term "prepackaged for sale" means that, at a minimum, the steel vertical supports (*i.e*., uprights and posts) and steel horizontal supports (*i.e.*, beams, braces) necessary to assemble a completed shelving unit (with or without decks) are packaged together for ultimate purchase by the end-user. The scope also includes add-on kits. Add-on kits include, but are not limited to, kits that allow the end-user to add an extension shelving unit onto an existing boltless steel shelving unit such that the extension and the original unit will share common frame elements (*e.g.*, two posts). The term "boltless" refers to steel shelving in which the vertical and horizontal supports forming the frame are assembled primarily without the use of nuts and bolts, or screws. The vertical and horizontal support members for boltless steel shelving are assembled by methods such as, but not limited to, fitting a rivet, punched or cut tab, or other similar connector on one support into a hole, slot or similar receptacle on another support. The supports lock together to form the frame for the shelving unit, and provide the structural integrity of the shelving unit separate from the inclusion of any decking. The incidental use of nuts and bolts, or screws to add accessories, wall anchors, tie-bars or shelf supports does not remove the product from scope. Boltless steel shelving units may also come packaged as partially assembled, such as when two upright supports are welded together with front-to-back supports, or are otherwise connected, to form an end unit for the frame. The boltless steel shelving covered by this investigation may be commonly described as rivet shelving, welded frame shelving, slot and tab shelving, and punched rivet (quasi-rivet) shelving as well as by other trade names. The term "deck" refers to the shelf that sits on or fits into the horizontal supports (beams or braces) to provide the horizontal storage surface of the shelving unit.
>
> The scope includes all boltless steel shelving meeting the description above, regardless of (1) vertical support or post type (including but not limited to open post, closed post and tubing); (2) horizontal support or beam/brace profile (including but not limited to Z-beam, C-beam, L-beam, step beam and cargo rack); (3) number of supports; (4) surface coating (including but not

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).

> limited to paint, epoxy, powder coating, zinc and other metallic coating); (5) number of levels; (6) weight capacity; (7) shape (including but not limited to rectangular, square, and corner units); (8) decking material (including but not limited to wire decking, particle board, laminated board or no deck at all); or (9) the boltless method by which vertical and horizontal supports connect (including but not limited to keyhole and rivet, slot and tab, welded frame, punched rivet and clip).[18]

The scope definition is substantively unchanged since the original investigations.[19]

Boltless steel shelving includes relatively high load-capacity, stand-alone shelving that may be assembled without tools. Boltless steel shelving provides a sturdy frame for functional, non-aesthetic storage in garages, basements, and similar locations. Since boltless steel shelving is prepackaged, the end user may purchase the unit at home improvement stores or mass-merchandise retailers, handle the product, and transport the unit to its ultimate location.[20]

Boltless steel shelving is manufactured using hot rolled, flat-rolled carbon steel, slit to widths for producing horizontal beam, brace, and vertical post profiles. The slit steel blanks are

[18] CR/PR at 1.3-1.5; *see also Boltless Steel Shelving Units Prepackaged for Sale From the People's Republic of China: Final Results of the Expedited Sunset Review of the Antidumping Duty Order*, 91 Fed. Reg. 48,373 (Dep't of Commerce July 31, 2026) and accompanying Issues and Decision Memorandum ("IDM"), EDIS Doc. No. 891159, Att. No. 2605032 (July 29, 2026) ("AD IDM") at 2-3; *Boltless Steel Shelving Units Prepackaged for Sale From the People's Republic of China: Final Results of the Expedited Sunset Review of the Countervailing Duty Order*, 91 Fed. Reg. 49,410 (Dep't of Commerce Aug. 4, 2026) and accompanying IDM EDIS Doc. No. 891159, Att. No. 2605033 (July 29, 2026) ("CVD IDM") at 2-3. Commerce specifically excluded several products from the scope of the orders under review: (1) wall-mounted shelving, defined as shelving that is hung on the wall and does not stand on, or transfer load to, the floor; (2) wire shelving units, which consist of shelves made from wire that incorporates both a wire deck and wire horizontal supports (taking the place of the horizontal beams and braces) into a single piece with tubular collars that slide over the posts and onto plastic sleeves snapped on the posts to create the finished shelving unit; (3) bulk-packed parts or components of boltless steel shelving units; and (4) made-to-order shelving systems. *Id.*

[19] *See Original Determinations,* USITC Pub. 4565 at 5-6.

[20] CR/PR at 1.8-1.9.

then punched with notch holes and cut to length, formed to the final shapes and profiles, and packaged together with component pieces for sale as a complete shelving unit.[21]

We considered our analyses of the domestic like product in the original investigations and first reviews.[22] In the original investigations, the Commission found a clear dividing line between boltless steel shelving and other forms of shelving that did not correspond to the scope of investigations. It did not find a clear dividing line between low- and high-capacity boltless steel shelving, a distinction proposed by a respondent in the preliminary phase.[23] No party disputed the domestic like product definition in the final phase of the original investigations or the first reviews. The Commission thus defined a single domestic like product coextensive with the scope definition in the prior proceedings.[24]

In these reviews, there is no new information to suggest changes in the characteristics and uses of domestically produced boltless steel shelving since the original investigations.[25] Edsal agrees with the definition of the domestic like product adopted by the Commission in its original determinations.[26] Accordingly, we again define a single domestic like product consisting of boltless steel shelving units, coextensive with the scope.

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[21] CR/PR at 1.12-1.13.

[22] *See Boltless Steel Shelving Units Prepackaged for Sale from China*, Inv. Nos. 701-TA-523 and 731-TA-1259 (Preliminary), USITC Pub. 4495 at 8-10 (Oct. 2014) ("*Preliminary Determinations*"); *Original Determinations,* USITC Pub. 4565 at 6-7; *First Review Determinations*, USITC Pub. 5190 at 7.

[23] *See Preliminary Determinations*, USITC Pub. 4495 at 8-10.

[24] *Original Determinations,* USITC Pub. 4565 at 6-7; *First Review Determinations*, USITC Pub. 5190 at 7.

[25] *See generally* CR/PR at 1.8-1.13.

[26] Domestic Producer's NOI Response at 19.

B. Domestic Industry

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."[27] In defining the domestic industry, the Commission's general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

We considered our analysis of the domestic industry in the original investigations and first reviews.[28] In the prior proceedings, the Commission found that Edsal was potentially subject to exclusion under the related parties provision because Edsal *** a boltless steel shelving production facility in China, Edsal Sandusky, and it imported or arranged for other firms to import subject merchandise from China.[29] In both the original investigations and the first reviews, the Commission concluded that appropriate circumstances did not exist to exclude Edsal from the domestic industry. Accordingly, the Commission defined a single domestic industry consisting of all producers of the domestic like product in the prior proceedings.[30]

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[27] 19 U.S.C. § 1677(4)(A). The definitions in 19 U.S.C. § 1677 are applicable to the entire subtitle containing the antidumping and countervailing duty laws, including 19 U.S.C. §§ 1675 and 1675a. *See* 19 U.S.C. § 1677.

[28] *Original Determinations*, USITC Pub. 4565 at 8-9; *First Review Determinations*, USITC Pub. 5190 at 8-9.

[29] *Original Determinations,* USITC Pub. 4565 at 8-9; *First Review Determinations*, USITC Pub. 5190 at 8-9; Confidential Views, *Boltless Steel Shelving Units Prepackaged for Sale from China*, Inv. Nos. 701-TA-523 and 731-TA-1259 (Review), EDIS Doc. No. 883937 ("Confidential First Reviews") at 9-10; Confidential Views, *Boltless Steel Shelving Units Prepackaged for Sale from China*, Inv. Nos. 701-TA-523 and 731-TA-1259 (Final), EDIS Doc. No. 883851 ("Confidential Original Determinations") at 10.

[30] *Original Determinations,* USITC Pub. 4565 at 9; *First Review Determinations*, USITC Pub. 5190 at 9.

In these reviews, we consider whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.[31] Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.[32]

In these reviews, Edsal asks the Commission to adopt the domestic industry definition from the prior proceedings and does not argue for the exclusion of any producers from the domestic industry under the related parties provision.[33] The record indicates that, during the current review period, Edsal *** , which produced and exported subject merchandise during the period of review, until this *** .[34] Edsal states that it is not an importer of subject merchandise, nor is it related to such an importer.[35]

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[31] *See Torrington Co. v. United States,* 790 F. Supp. 1161, 1168 (Ct. Int'l Trade 1992), *aff'd without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States,* 721 F. Supp. 1322, 1331-32 (Ct. Int'l Trade 1989), *aff'd mem.,* 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States,* 675 F. Supp. 1348, 1352 (Ct. Int'l Trade 1987).

[32] The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

(1) the percentage of domestic production attributable to the importing producer;

(2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);

(3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;

(4) the ratio of import shipments to U.S. production for the imported product; and

(5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. U.S. Int'l Trade Comm'n*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int'l. Trade 2015); *see also Torrington Co. v. United States*, 790 F. Supp. at 1168.

[33] Domestic Producer's NOI Response at 17 and Ex. 1.

[34] Domestic Producer's NOI Response at 17 and Ex. 1. *See also* Confidential First Reviews at 9-10.

[35] Domestic Producer's NOI Response at 17 and Ex. 1.

We find that appropriate circumstances do not exist to exclude Edsal from the domestic industry. The record indicates that Edsal's *** , a small portion of the period of review.[36] Further, as the only domestic producer that responded to the Commission's notice of institution in these reviews, Edsal accounted for an estimated *** percent of domestic production of boltless steel shelving in 2025 and otherwise demonstrated its primary interest in its U.S. production operations.[37] Excluding Edsal from the domestic industry would skew the information about the domestic industry and effectively deprive the Commission of industry data for purposes of these reviews. Accordingly, we again define the domestic industry as all domestic producers of boltless steel shelving products units.

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

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will 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."[38] The Uruguay Round Agreements Act Statement of Administrative Action ("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

[36] Domestic Producer's NOI Response at 17 and Ex. 1.
[37] CR/PR at 1.14 and Table B.1; Domestic Producer's NOI Response at 2 and Ex. 1.
[38] 19 U.S.C. § 1675a(a).

status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports."[39] Thus, the likelihood standard is prospective in nature.[40] 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.[41]

The statute states that "the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time."[42] 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."[43]

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[39] SAA, H.R. Rep. 103-316, vol. I at 883-84 (1994). 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.

[40] 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.

[41] *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. App. 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'").

[42] 19 U.S.C. § 1675a(a)(5).

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

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to "consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated."[44] 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).[45] 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.[46]

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.[47] 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

[44] 19 U.S.C. § 1675a(a)(1).

[45] 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings. *See* AD IDM at 4.

[46] 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

[47] 19 U.S.C. § 1675a(a)(2).

existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.[48]

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.[49]

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

[48] 19 U.S.C. § 1675a(a)(2)(A-D).

[49] *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.

more advanced version of the domestic like product.[50] 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.[51]

No respondent interested party participated in these expedited reviews. The record, therefore, contains limited new information with respect to the boltless steel shelving industries in China and the United States during the review period. Accordingly, for our determinations, we rely as appropriate on the facts available from the original investigations, the first reviews, and the limited new information on the record in these reviews.

B. Conditions of Competition and the Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[52] We considered our findings regarding the conditions of competition in the original investigations and first five-year reviews.[53] The following conditions of competition inform our determinations.

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[50] 19 U.S.C. § 1675a(a)(4).

[51] 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.

[52] 19 U.S.C. § 1675a(a)(4).

[53] *Original Determinations,* USITC Pub. 4565 at 13-16; First Review Determinations, USITC Pub. 5190 at 12-15.

1. Demand Conditions

Manufacturers prepackage boltless steel shelving in a kit for sale as a final good, ready for assembly and installation by the consumer for storage use in basements, garages, laundry rooms, and similar locations.[54] In addition, demand for boltless steel shelving generally accords with overall economic conditions, with typical spikes during spring and fall cleanup activities.[55] U.S. purchaser *** reported that *** .[56] Edsal states that U.S. consumption of boltless shelving fluctuated during the review period but remained relatively stable since 2023; it projects that demand will stay flat over the next several years.[57]

Apparent U.S. consumption of boltless steel shelving by value ($*** in 2025) exceeds the levels in the final years of the periods examined in the original investigations ($*** in 2014) and in the first five-year reviews ($*** in 2019).[58]

2. Supply Conditions

Domestically produced boltless steel shelving units represented the second-largest source of supply to the U.S. market, accounting for *** percent of apparent U.S. consumption by quantity in 2025.[59] During the review period, Edsal closed its Bloomington, California,

[54] *Original Determinations,* USITC Pub. 4565 at 13; *First Review Determinations*, USITC Pub. 5190 at 12; CR/PR at 1.9 and 1.12.

[55] *Original Determinations,* USITC Pub. 4565 at 13-14; *First Review Determinations*, USITC Pub. 5190 at 12; Domestic Producer's NOI Response at 18.

[56] CR/PR at D.3.

[57] Domestic Producer's NOI Response at 18.

[58] CR/PR at Table 1.7. We present value data for apparent U.S. consumption above due to the absence of quantity data from the first reviews; for 2019 imports, official Commerce statistics did not provide quantity data for the HTS statistical reporting numbers 9403.20.0025 and 9403.20.0075, the numbers referenced during the first reviews. *Id.* at note. Accordingly, we lack a comparative data series for apparent U.S. consumption by quantity since the original investigations. The available information show apparent U.S. consumption by quantity of *** units in 2025, which exceeded the level in 2014 (*** units). *Id.* at Table 1.7.

[59] CR/PR at Table 1.7.

packaging facility for riveted and welded boltless steel shelving in March 2023, and in February 2021 it recalled 2.2 million units of its 5-Tier Muscle Rack Heavy Duty Steel Shelving units.[60] In addition, Tenesco, another U.S. producer, acquired property in Dickson, Tennessee, that it previously leased and where it manufactures its Z-Line Boltless Rivet Shelving product, along with other types of steel storage and filing units.[61]

Subject imports represented the smallest source of supply to the U.S. market during the review period, accounting for *** percent of apparent U.S. consumption by quantity in 2025.[62]

Nonsubject imports represented the largest source of supply to the U.S. market during the review period, accounting for *** percent of apparent U.S. consumption by quantity in 2025.[63] Thailand, Taiwan, and Vietnam represented the largest sources of nonsubject imports.[64]

U.S. purchasers *** and *** reported that *** .[65] Purchaser *** reported that this transition in production resulted in ***.[66]

3. Substitutability and Other Conditions

There is no new information to indicate that the degree of substitutability between the domestic like product and subject imports or the importance of price has changed since the

[60] CR/PR at Table 1.4.
[61] CR/PR at Table 1.4.
[62] CR/PR at Table 1.7.
[63] CR/PR at Table 1.7.
[64] CR/PR at Table 1.6. Imports from four countries, Malaysia, Taiwan, Thailand, and Vietnam, have been under antidumping duty orders since mid-2024. *Boltless Steel Shelving Units Prepackaged for Sale from Malaysia, Taiwan, Thailand, and Vietnam*, Inv. Nos. 731-TA-1608-1611 (Final), USITC Pub. 5508 (June 2024).
[65] CR/PR at D.3.
[66] CR/PR at D.3.

prior proceedings.[67] Edsal contends that the U.S. market for boltless steel shelving products continues to be competitive and highly price-sensitive based on the continued substitutable nature of imported and U.S.-produced boltless shelving.[68] Based upon the limited information on the record, we continue to find a moderate to high degree of substitutability between subject imports and the domestic like product and that price remains an important factor in purchasing decisions.

Effective September 24, 2018, boltless steel shelving from China became subject to an additional 10 percent *ad valorem* duty under Section 301 of the Trade Act of 1974.[69] Effective September May 10, 2019, the additional section 301 duty for boltless steel shelving originating in China increased to 25 percent.[70]

Beginning in 2025, boltless steel shelving originating in China faced varying rates of tariffs pursuant to the International Emergency Economic Powers Act ("IEEPA"). A February 20, 2026 announcement ended tariffs initiated under IEEPA and the associated duties imposed under IEEPA.[71]

Effective February 24, 2026, boltless steel shelving originating in China faces an additional 10 percent *ad valorem* duty under section 122 of the Trade Act of 1974.[72]

[67] *Original Determinations,* USITC Pub. 4565 at 15; *First Review Determinations*, USITC Pub. 5190 at 14-15.

[68] Domestic Producer's NOI Response at 13-14.

[69] CR/PR at 1.7.

[70] CR/PR at 1.7.

[71] CR/PR at 1.7-1.8.

[72] CR/PR at 1.7.

C. Likely Volume of Subject Imports

We considered our findings regarding the volume of subject imports in the original investigations and first five-year reviews.[73] In the original investigations, the Commission characterized the volume of subject imports, as well as the increase in that volume, as significant both in absolute terms and relative to apparent U.S. consumption.[74] Specifically, the Commission observed that the quantity of subject imports increased from *** units in 2012 to *** units in 2013 and *** units in 2014, and subject imports' share of apparent U.S. consumption declined from *** percent in 2012 to *** percent in 2013 before increasing to *** percent in 2014.[75] In the first reviews, the available data show that the value of subject imports fluctuated between 2015 and 2018 and then declined considerably from 2018 to 2019, peaking in 2016 at $29.7 million and declining irregularly to $12.6 million in 2019.[76] Observing that the value of subject imports in the first reviews fell considerably below the peak value of $*** reached in 2014 during the original investigations, the Commission found that the orders have a disciplining effect on subject import volume.[77]

In the current reviews, the volume of subject imports fluctuated over the review period but increased overall, rising from 1.0 million units in 2020 to 1.4 million units in 2021 and 2.4 million units in 2022, then decreasing to 1.0 million units in 2023, and increasing to 1.4 million

[73] *Original Determinations,* USITC Pub. 4565 at 16-17; *First Review Determinations*, USITC Pub. 5190 at 16-17.

[74] *Original Determinations,* USITC Pub. 4565 at 17.

[75] *Original Determinations,* USITC Pub. 4565 at 16; *Confidential Original Determinations* at 22. The Commission observed a considerably lower the volume and market share of subject imports in January-March (interim) 2015 than in interim 2014 and found those changes largely resulted from the filing of the petitions and pendency of the investigations. The Commission therefore accorded reduced weight to interim 2015 data. *Original Determinations,* USITC Pub. 4565 at 16-17, 19, 22.

[76] *First Review Determinations*, USITC Pub. 5190 at 16-17.

[77] *First Review Determinations*, USITC Pub. 5190 at 16-17.

units in 2024 and 2025, equivalent to *** percent of apparent U.S. consumption by quantity in 2025.[78] Although subject imports from China entered in higher volumes in the current review period than in the original investigations, we continue to find that the orders have a disciplining effect on subject imports, given subject imports' lower market than in the original investigations.

The information available indicates that subject foreign producers have the ability and incentive to increase significantly their exports of boltless steel shelving to the U.S. market if the orders were revoked. Edsal identified 45 possible producers of boltless steel shelving in China and 21 active producers.[79] Edsal estimates that the Chinese industry's capacity reached over six million units, exceeding annual U.S. consumption, and noted many Chinese producers claim substantial production capacity on their respective websites.[80] Two Chinese producers merged and a third (Huade) in Jiangsu, China, upgraded its robot welding and epoxy-powder electrostatic coating lines.[81] Thus, subject producers continue to possess a large amount capacity from which they could imminently increase their exports of boltless steel shelving to the United States if the orders were revoked.

The record in these reviews also indicates that the subject industry exports substantial quantities of subject merchandise and views the United States as an attractive export market. As discussed above, subject imports remained present in the U.S. market throughout the review period despite the disciplining effect of the orders. Additionally, GTA data for HS

[78] CR/PR at Tables 1.6 and 1.7.
[79] CR/PR at 1.20; Domestic Producer's NOI Response at Ex. 3.
[80] Domestic Producer's NOI Response at 6-9 and Ex. 4.
[81] CR/PR at Table 1.8.

subheading 9403.20, a category that includes boltless steel shelving and out-of-scope products, identify China as the largest global exporter of boltless steel shelving by value throughout the review period.[82] China's global exports of such merchandise increased from $10.0 billion in 2020 to $11.1 billion in 2025.[83] GTA data also identify the United States as the top export destination by far for such products from China by value throughout the review period, even though China's exports to the United States of such merchandise fluctuated and declined irregularly during the review period, falling from $2.9 billion in 2020 to $2.5 billion in 2025.[84] Indeed, numerous Chinese producers confirmed their export-orientation, exporting the majority of their merchandise, including to North America and the United States.[85] [86]

Thus, 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 continued presence of subject imports in the U.S. market during the period of review, the subject industry's large size, substantial capacity, and exports, and 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.[87]

[82] CR/PR at Table 1.10.

[83] CR/PR at Table 1.10.

[84] CR/PR at Table 1.9.

[85] Response at 7-9 and Ex. 4.

[86] Further, of the subsidy programs it found were likely to continue or recur, Commerce identified 4 export subsidy programs within the meaning of Article 3.1 of the World Trade Organization Agreement on Subsidies and Countervailing Measures. CVD IDM at 8. Such programs serve as an incentive for export activity if the orders were revoked.

[87] We note further that Section 301 duties of 25 percent *ad valorem*, as identified above, have been in place since 2019 and did not deter the importation of subject imports during either the prior five-year reviews or the current review period, and no evidence on this expedited record shows that the additional, temporary 10 percent duties currently in effect under Section 122 would make the

D. Likely Price Effects

We considered our findings regarding the price effects of subject imports in the original investigations, and likely price effects of subject imports in the first five-year reviews.[88] In particular, in the original investigations the Commission observed that shipments of subject imports to resellers undersold prices for the domestic like product in 33 of 55 quarterly comparisons, encompassing *** units (***), at margins as high as 87.0 percent. In the remaining 22 comparisons, encompassing *** units (***), prices for subject imports exceeded prices for the domestic like product by 2.6 to 20.4 percent.[89] Overall, the Commission found mixed underselling and overselling.[90]

The Commission observed that prices for the domestic like product declined during 2012, and prices for both the domestic like product and subject imports fluctuated within a narrow range during 2013 and 2014.[91] It stated that, the increasing volume of subject imports in 2014 prevented U.S. producers from increasing prices to cover increasing costs, even as

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U.S. market less of a target for dumped and subsidized boltless steel shelving from China in the event of revocation of the subject antidumping and countervailing duty orders.

We observe that the record in these expedited reviews contains no information concerning inventories of the subject merchandise or the potential for product shifting. The Chinese industry does not face antidumping or countervailing duty orders or investigations in markets other than the United States. CR/PR at 1.22.

[88] *Original Determinations*, USITC Pub. 4565 at 17-20; *First Review Determinations*, USITC Pub. 5190 at 18-19.

[89] *Original Determinations,* USITC Pub 4565 at 18; *Confidential Original Determinations* at 25. The Commission also collected purchase cost data from firms that imported boltless steel shelving and sold these items directly to retail customers, and U.S. importers generally reported higher costs than those prices charged by either U.S. producers or other importers of subject merchandise. The Commission deemed such estimates inconsistent with direct importers' assertions that they directly imported due to a cost benefit, and the Commission noted that responding firms appeared to inconsistently report costs for direct imports. Based on these inconsistencies, the Commission accorded less weight to data concerning direct import purchase costs in its price effects analysis. *Original Determinations,* USITC Pub 4565 at 18-19.

[90] *Original Determinations,* USITC Pub 4565 at 19.

[91] *Original Determinations,* USITC Pub 4565 at 19.

apparent U.S. consumption increased.[92] The domestic industry's ratio of cost of goods sold ("COGS") to net sales increased from *** percent in 2012 to *** percent in 2013 and to *** percent in 2014. The Commission found that intense price competition by subject imports prevented price increases for the domestic like product that otherwise would have occurred to a significant degree.[93] Record evidence showed that U.S. purchasers switched from domestic sources to subject sources for price reasons, and that the domestic industry had to lower its prices to compete with subject imports. Moreover, confirmed lost sales allegations indicated that the domestic industry lost business to lower-priced subject imports.[94] In light of the evidence of lost sales due to lower prices of the subject imports and its finding that the subject imports prevented price increases for the domestic like product that otherwise would have occurred to a significant degree, the Commission found that subject imports had significant price effects.[95]

In the expedited first five-year reviews, the Commission found that if the orders were revoked, the likely significant volume of subject imports would likely result in a recurrence of intense price competition between the domestic like product and subject imports leading subject imports to gain sales and market share at the expense of the domestic industry and depress or suppress prices of the domestic like product. [96]

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[92] *Original Determinations,* USITC Pub 4565 at 19.

[93] *Original Determinations,* USITC Pub 4565 at 19-20; *Confidential Original Determinations* at 27-28.

[94] *Original Determinations,* USITC Pub 4565 at 20.

[95] *Original Determinations,* USITC Pub 4565 at 20.

[96] *First Review Determinations*, USITC Pub. 5190 at 18-19.

The record does not contain recent product-specific pricing information due to the expedited nature of these reviews. Based on the moderate to high degree of substitutability between subject imports and the domestic like product and the importance of price in purchasing decisions discussed in section III.B.3 above, we find that the likely significant volume of subject imports would likely result in intense price competition, as occurred during the original investigations. Absent the discipline of the order, the likely significant volumes of low or competitively priced subject imports would likely take sales and market share from the domestic industry and force the domestic industry to lower prices or restrain any needed price increases, thereby depressing or suppressing prices for the domestic like product. Consequently, we find that if the orders were revoked, subject imports would likely have significant price effects.

E. Likely Impact

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

The available data show that, although its trade indicators are mixed, the domestic industry's financial indicators have *** compared to the prior proceedings.[97]

[97] CR/PR at Table 1.5.

The domestic industry's boltless steel shelving capacity and U.S. shipments in 2025, at *** units and *** units, respectively, exceed levels in the prior proceedings.[98] The industry's capacity utilization and production in 2025, at *** percent and *** units, respectively, fell below levels in prior proceedings.[99] Although apparent U.S. consumption by value of $*** in 2025, exceeded levels in the prior proceedings, the industry's share of apparent U.S. consumption by value at *** percent, exceeded its level in the original investigations but fell below its level in the first five-year reviews.[100] The industry's unit value for U.S. shipments ($***) exceeded its unit values in 2019 and 2014.[101] Although the industry's COGS ($***) exceeded levels in 2019 or 2014, the industry's ratio of COGS to net sales at *** percent improved over levels in those years.[102] Likewise, the industry's operating income, operating income margin, and gross profits at $***, *** percent, and $***, respectively, all exceeded levels in prior proceedings.[103]

[98] CR/PR at Table 1.5. The industry reported boltless shelving capacity of *** units in 2019 and *** units in 2014. *Id.* The industry reported U.S. shipments of *** units in 2019 and *** units in 2014. *Id.*

[99] CR/PR at Table 1.5. The industry reported capacity utilization and production of *** percent and *** units, respectively, in 2019 and *** percent and *** units in 2014. *Id.*

[100] CR/PR at Table 1.7. As stated above, we examined apparent U.S. consumption by value due to the lack of a continuous quantitative data series covering the terminal year of the first reviews. By quantity, U.S. consumption was *** units, which exceeded the level in the original investigations (*** units). *Id.* By quantity, U.S. producers held a *** percent share of apparent consumption in 2025, which fell below its share in the original investigations of *** percent. *Id.* By value, U.S. consumption measured $*** in 2014 and $*** in 2019. *Id.* By value, U.S. producers held a share of apparent consumption of *** percent in 2014 and *** percent in 2019. *Id.*

[101] CR/PR at Table 1.5. The industry reported a unit value for its U.S. shipments of $*** in 2019 and $*** in 2014. *Id.*

[102] CR/PR at Table 1.5. The industry reported COGS and ratio of COGS to net sales of $*** and *** percent, respectively, in 2019 and $*** and *** in 2014. *Id.*

[103] CR/PR at Table 1.5. The industry reported operating income, operating margin, and gross profits of $***, ** percent, and $***, respectively, in 2019 and $***, *** percent, and $*** in 2014. *Id.*

Based on the information available in these reviews, we find that revocation of the orders would likely lead to a significant volume of subject imports that would likely result in intense price competition with the domestic like product, leading subject imports to gain market share and depress or suppress prices of the domestic like product. Subject imports' significant volume and price effects would consequently likely have a significant adverse effect on the domestic industry's production, capacity utilization, shipments, employment, and profitability.

We also considered the role of factors other than subject imports, including the presence of nonsubject imports, so as not to attribute injury from other factors to subject imports. As discussed previously, the facts available show that nonsubject imports increased their presence in the U.S. market since the prior proceedings. Nonetheless, the increasing presence of nonsubject imports did not preclude the domestic industry from increasing the average unit value of its U.S. shipments and improving its financial condition since the prior proceedings.[104] Given the substitutability between the domestic like product and subject imports, and in light of likely price competition between subject imports and the domestic like product, we find it likely that any increase in subject imports would come at least in part at the expense of the domestic industry and result significant adverse price effects. Consequently, subject imports would likely have adverse effects distinct from any that may be caused by nonsubject imports.

[104] CR/PR at Table 1.5.

Accordingly, we conclude that if the antidumping and countervailing duty orders were revoked, subject imports from China would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

IV. Conclusion

For the reasons discussed above, we determine that revocation of the antidumping and countervailing duty orders on boltless steel shelving units prepackaged for sale 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 April 1, 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 antidumping and countervailing duty orders on boltless steel shelving units prepackaged for sale ("boltless steel shelving") from China would likely lead to the continuation or recurrence of material injury.[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 Boltless steel shelving: Information relating to the background and schedule of this proceeding

Effective date	Action
April 1, 2026	Notice of initiation by Commerce (91 FR 16181 April 1, 2026)
April 1, 2026	Notice of institution by Commission (91 FR 16234, April 1, 2026)
July 6, 2026	Commission's vote on adequacy
July 31, 2026	Commerce's results of its expedited review (antidumping duty)
August 4, 2026	Commerce's results of its expedited review (countervailing duty)
September 24, 2026	Commission's determinations and views

The original investigations

The original investigations resulted from petitions filed on August 26, 2014 with Commerce and the Commission by Edsal Manufacturing Company, Inc. ("Edsal"), Chicago,

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

[2] 91 FR 16234, April 1, 2026. In accordance with section 751(c) of the Act, the U.S. Department of Commerce ("Commerce") published a notice of initiation of a five-year review of the subject antidumping and countervailing duty orders. 91 FR 16181, April 1, 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.

Illinois.[5] On August 26, 2015, Commerce determined that imports of boltless steel shelving from China were being sold at less than fair value ("LTFV") and subsidized by the Government of China.[6] The Commission determined on October 7, 2015 that the domestic industry was materially injured by reason of LTFV imports of boltless steel shelving from China and subsidized imports of boltless steel shelving from China.[7] On October 21, 2015, Commerce issued its antidumping duty orders and countervailing duty orders with final weighted-average dumping margins ranging from 17.55 to 112.68 and net subsidy rates ranging from 12.40 to 80.39 percent for boltless steel shelving from China.[8]

The first five-year reviews

On December 7, 2020, the Commission determined that it would conduct expedited reviews of the antidumping the countervailing duty orders on boltless steel shelving from China.[9] On January 4, 2021, Commerce determined that revocation of the antidumping duty and the countervailing duty orders on boltless steel shelving from China would be likely to lead to continuation or recurrence of dumping and subsidization.[10] On April 29, 2021, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.[11] Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective May 12, 2021, Commerce issued a continuation of the antidumping duty and the countervailing duty orders on imports of boltless steel shelving from China.[12]

Previous and related investigations

The Commission has conducted one previous import relief investigation on boltless steel shelving or similar merchandise, as presented in table 1.2.

[5] Boltless Steel Shelving Units Prepackaged for Sale from China, Inv. Nos. 701-TA-523 and 731-TA-1259 (Final), USITC Publication 4565, October 2015 ("Original publication"), p. 1.1.
[6] 80 FR 51775 and 80 FR 51779, August 26, 2015.
[7] 80 FR 61841, October 14, 2015.
[8] 80 FR 63741 and 80 FR 63745, October 21, 2015.
[9] 86 FR 18295, April 8, 2021.
[10] 86 FR 58, January 4, 2021.
[11] 86 FR 23981, May 5, 2021.
[12] 86 FR 26000, May 12, 2021.

Table 1.2 Boltless steel shelving: Previous and related Commission proceedings and current status

Date	Number	Country	ITC original determination	Current status
2024	731-TA-1607-1611	India, Malaysia, Taiwan, Thailand, and Vietnam	Affirmative	Orders issued June 7, 2024.

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 boltless steel shelving from China with the intent of issuing the final results of these reviews based on the facts available not later than July 30, 2026.[13] Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at https://access.trade.gov/public/FRNoticesListLayout.aspx and subsequently on the Commission's Electronic Document Information System ("EDIS"). Issues and Decision Memoranda contain complete and up-to-date information regarding the background and history of the order, including scope rulings, duty absorption, changed circumstances reviews, and anticircumvention, and 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 boltless steel shelving from China are noted in the sections titled "The original investigations" and "U.S. imports," if applicable.

The product

Commerce's scope

Commerce has defined the scope as follows:

> The scope of this investigation covers boltless steel shelving units prepackaged for sale, with or without decks (boltless steel shelving). The term "prepackaged for sale" means that, at a minimum, the steel vertical supports (i.e., uprights and posts) and steel horizontal supports (i.e., beams, braces) necessary to assemble a completed shelving unit (with or

[13] Letter from Eric Greynolds, Director, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, May 20, 2026.

without decks) are packaged together for ultimate purchase by the end-user. The scope also includes add-on kits. Add-on kits include, but are not limited to, kits that allow the end-user to add an extension shelving unit onto an existing boltless steel shelving unit such that the extension and the original unit will share common frame elements (e.g., two posts). The term “boltless” refers to steel shelving in which the vertical and horizontal supports forming the frame are assembled primarily without the use of nuts and bolts, or screws. The vertical and horizontal support members for boltless steel shelving are assembled by methods such as, but not limited to, fitting a rivet, punched or cut tab, or other similar connector on one support into a hole, slot or similar receptacle on another support. The supports lock together to form the frame for the shelving unit and provide the structural integrity of the shelving unit separate from the inclusion of any decking. The incidental use of nuts and bolts, or screws to add accessories, wall anchors, tie-bars or shelf supports does not remove the product from scope. Boltless steel shelving units may also come packaged as partially assembled, such as when two upright supports are welded together with front to-back supports, or are otherwise connected, to form an end unit for the frame. The boltless steel shelving covered by the orders may be commonly described as rivet shelving, welded frame shelving, slot and tab shelving, and punched rivet (quasi-rivet) shelving as well as by other trade names. The term “deck” refers to the shelf that sits on or fits into the horizontal supports (beams or braces) to provide the horizontal storage surface of the shelving unit.

The scope includes all boltless steel shelving meeting the description above, regardless of (1) vertical support or post type (including but not limited to open post, closed post and tubing); (2) horizontal support or beam/brace profile (including but not limited to ZI-5 beam, C-beam, L-beam, step beam and cargo rack); (3) number of supports; (4) surface coating (including but not limited to paint, epoxy, powder coating, zinc and other metallic coating); (5) number of levels; (6) weight capacity; (7) shape (including but not limited to rectangular, square, and corner units); (8) decking material (including but not limited to wire decking, particle

board, laminated board or no deck at all); or (9) the boltless method by which vertical and horizontal supports connect (including but not limited to keyhole and rivet, slot and tab, welded frame, punched rivet and clip).

Specifically excluded from the scope are:

- Wall-mounted shelving, defined as shelving that is hung on the wall and does not stand on, or transfer load to, the floor;
- Wire shelving units, which consist of shelves made from wire that incorporates both a wire deck and wire horizontal supports (taking the place of the horizontal beams and braces) into a single piece with tubular collars that slide over the posts and onto plastic sleeves snapped on the posts to create the finished shelving unit;
- bulk-packed parts or components of boltless steel shelving units; and
- made-to-order shelving systems.[14]

[14] 86 FR 26000, May 12, 2021.

U.S. tariff treatment

Boltless steel shelving is currently imported under Harmonized Tariff Schedule of the United States ("HTS") statistical reporting number 9403.20.0075. The general rate of duty is "free" for HTS subheading 9403.20.00.[15] 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 boltless steel shelving from China. Table 1.3 provides a summary of additional tariffs in place as of May 26, 2026. Historical information is summarized beneath the table.

Table 1.3 Boltless steel shelving: Additional tariffs on imports originating in China as of May 26, 2026

Duty rates in percent ad valorem

Additional tariff	China
Section 232	NA
Section 301	25
Section 122	10
Total additional ad valorem rate	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 that subject country is not subject to the tariff for any reason.

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

Section 232 tariffs

Boltless steel shelving originating in China is not subject to additional duties under section 232 of the Trade Expansion Act of 1962, as amended.[16]

[15] The subject merchandise in this proceeding may also be imported under HTS subheading/statistical reporting number 9403.10.0040, which contains products outside of the scope of these reviews. USITC, HTS (2026) Revision 9, Publication 5747, May 2026, pp. 94-8, 99.3.95 to 99.3.120, and 99.3.425.

[16] Effective March 12, 2025, boltless steel shelving originating in China became subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended. Effective June 4, 2025, that additional duty increased to 50 percent. However, effective April 6, 2026, boltless steel shelving was removed from the list of products subject to section 232 duties. 90 FR 9817, February 18, 2025; 90 FR 24199, June 9, 2025; 91 FR 18201, April 9, 2026. See also U.S. note 16(c) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 9, USITC Publication 5747, May 2026, p. 99.3.64.

Section 301 tariffs

Effective September 24, 2018, boltless steel shelving originating in China was 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 boltless steel shelving increased to 25 percent.[17]

Section 122 tariffs

Effective February 24, 2026, boltless steel shelving originating in China is subject to an additional 10 percent ad valorem duty under section 122 of the Trade Act of 1974.[18]

Tariffs initiated under the International Emergency Economic Powers Act ("IEEPA")[19]

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

Country specific IEEPA tariffs

Effective February 4, 2025, boltless steel shelving originating in China was subject to an additional 10 percent ad valorem duty 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,

[17] 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 provisions for this duty treatment. USITC, HTS (2026) Revision 9, Publication 5747, May 2026, pp. 99.3.95 to 99.3.20, and 99.3.425. 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).

[18] 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. 91 FR 9339, February 25, 2026. See also HTS heading 9903.03.01 and U.S. note 2(aa) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 9, USITC Publication 5747, May 2026, p. 99.3.49.

[19] Multiple tariffs were enacted under the authority of the International Emergency Economic Powers Act ("IEEPA"), including tariffs that applied to countries that may not be subject in this proceeding. Tariffs specific to Canada, China, and Mexico were initiated in February 2025. Tariffs initiated in April 2025 under IEEPA were applied globally. Tariffs specific to Brazil were initiated in July 2025. Tariffs specific to India were initiated in August 2025 and terminated effective February 7, 2026. Tariffs under IEEPA were amended over time. All tariffs initiated under IEEPA were terminated effective February 20, 2026. 91 FR 9437, February 25, 2026.

[20] 91 FR 9437, February 25, 2026.

effective May 14, 2025, the duty rate for tariffs initiated in April 2025 under IEEPA on products originating in China was reduced to 10 percent. As noted previously, effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.[21]

Tariffs initiated in April 2025 under IEEPA

Effective April 5, 2025, boltless steel shelving originating in China was 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 to 10 percent. As noted previously, effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.[22]

Description and uses[23]

Boltless steel shelving units are high load-capacity, free-standing shelving in which horizontal support members connect to vertical posts without the use of nuts, bolts, screws,

[21] 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. 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; 91 FR 9437, February 25, 2026. 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 9, USITC Publication 5747, May 2026, pp. 99.3.4, 99.3.368, and 99.3.375.

[22] 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. 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; 91 FR 9437, February 25, 2026. 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 9, USITC Publication 5747, May 2026, pp. 99.3.4, 99.3.368, 99.3.375.

[23] Unless otherwise noted, this information is based on Boltless Steel Shelving Units Prepackaged for Sale from China (Review), USITC Publication 5190, April 2021 ("First review publication"), pp. 1.7 to 1.10. See also, Boltless Steel Shelving Units Prepackaged for Sale from Malaysia, Taiwan, Thailand, and Vietnam (Final), USITC Publication 5508, June 2024, pp. 1.9 to 1.13.

tubular collars, or other fasteners (figure 1.1).[24] Designed for user convenience, these units employ a boltless assembly method that requires no tools, and they are sold as prepackaged units containing all necessary components in a variety of common sizes. Because the units come prepackaged, consumers can easily purchase them at major home-improvement or mass-merchandise retailers, handle and transport them on their own, and assemble them at the final location. The units may be sold either with or without decking (i.e., shelves).

Figure 1.1 Boltless steel shelving: Boltless steel shelving unit



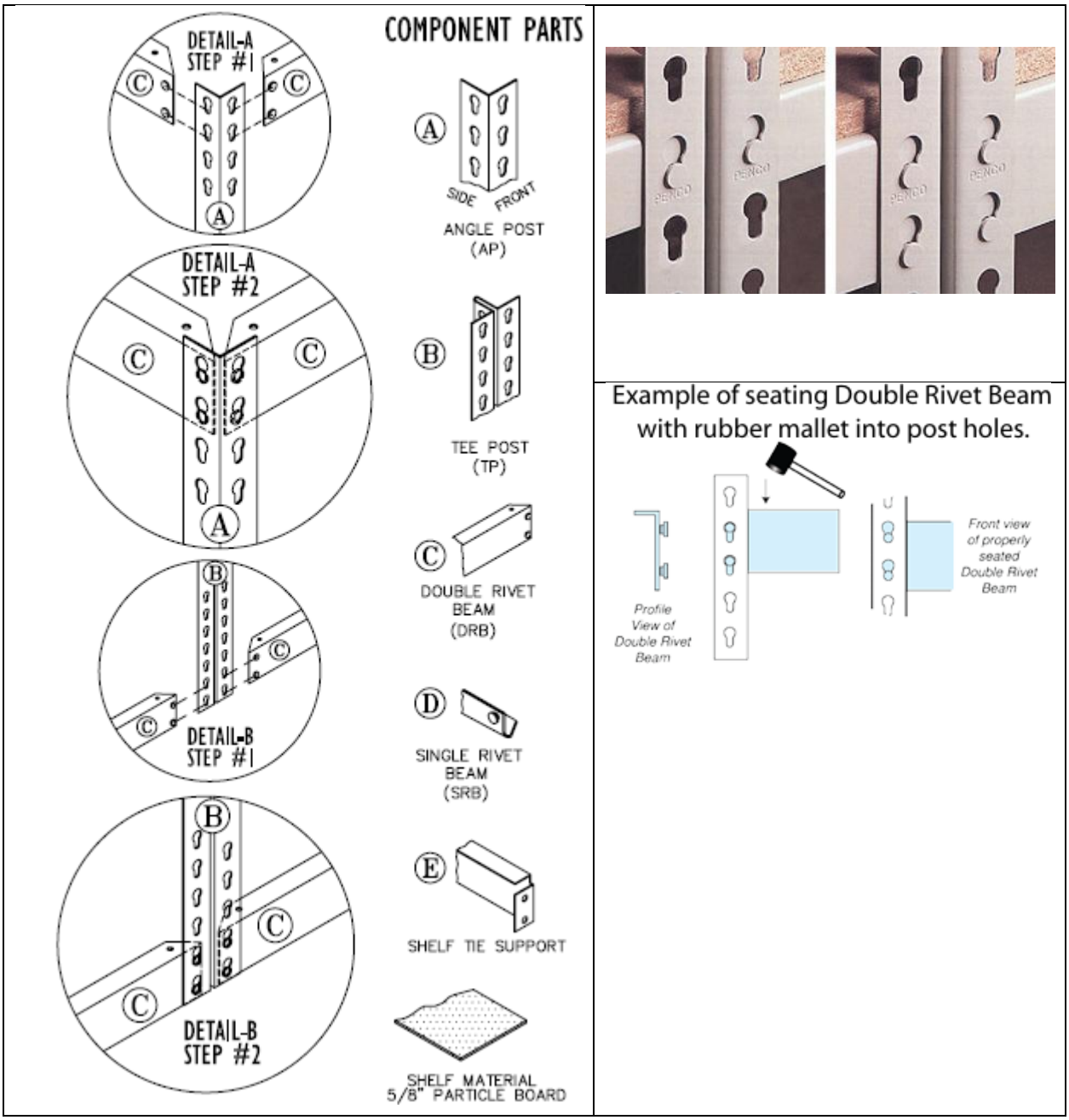
Source: Edsal, "Boltless Steel Shelving with Laminate Decking," https://edsal.com/products/musclerack%E2%84%A2-heavy-duty-z-beam%E2%84%A2-steel-boltless-shelving-with-laminate-decking, accessed May 5, 2026.

[24] "Boltless" refers to a system of assembly that uses rivets or other protrusions on horizontal support members that fit into slots in the vertical posts (also called "uprights") of the units and thereby avoids the use of nuts and bolts, screws, or tubular collars on posts. The boltless system does not require tools for assembly.

Generally, there are three types of components: uprights, support beams, and shelves. However, some shelving systems may use other components such as braces, tie bars, or center supports (figure 1.2). Uprights are the vertical support posts. The boltless system uses rivets or punched or cut tabs on beams (horizontal support) or braces (lateral stability) that fit into corresponding slots punched or cut into the uprights at set intervals. To achieve high load capacity and support decking, boltless steel shelving incorporates several beam and brace profile configurations. The most common beam profiles include C-beams, L-beams, V-beams and Z-beams.[25]

[25] Quality Material Handing Inc, "FAQ Episode 20: What are the different types of boltless shelving beams?" https://www.youtube.com/watch?v=bnOmhZnQyd8, accessed May 6, 2026.

Figure 1.2 Boltless steel shelving: Common component parts



Source: (left) Shelf Master, "Assembly Instructions," https://www.shelfmaster.com/wp-content/uploads/2018/05/rapid_rack.pdf, accessed May 5, 2026; (right top) BMH, "Rivet shelving installation guide," https://bmhinc.com/a/warehouse-resources/rivet-shelving-installation-guide?srsltid=AfmBOoqOaYvEVPDdPOh05061VriA8Z2MiksL0VmgjMRPv4cHf5wqBKuL, accessed May 7, 2026; (right bottom) Cisco-Eagle, "Penco Rivetrite® shelving unit assembly instructions," https://www.cisco-eagle.com/uploads/Penco-Assembly-Instructions/RivetRiteInstructions26.pdf?srsltid=AfmBOoqUu5Qpfdh18xWm3FgrVC2qpzM4PWVWhbK61BDEEu7K3M2BxT_M, accessed May 7, 2026.

Boltless steel shelving units are manufactured and sold in common sizes, with typical per-shelf weight capacities. Shelf size and load capacities influence the design and configuration of key components, including horizontal support members and the vertical posts, as well as additional supports such as front-to-back braces and tie bars or center supports.

Typical shelving widths include 36, 48, 60, or 77 inches; standard depths include 18 or 24 inches; and common heights are 60, 72, 78, or 84 inches. Among the five products examined in the original investigations as representing a "significant volume of U.S. sales and imports," the two products with a 77-inch width had per-shelf load capacities ranging between 1,000 and 2,500 pounds. The three products with widths of 34 and 48 inches had per-shelf load capacities between 250 and 1,000 pounds.

Boltless steel shelving units are often sold with 4 or 5 levels of decking (shelves). Popular decking materials include particleboard, laminated boards, and steel wire. Some units are sold without decking, allowing users to select their preferred material. Additional accessories may include extension kits that enable an add-on unit to connect to an existing shelving system, sharing frame components such as uprights (posts). Users may also purchase additional beams, braces, and decking—sold separately rather than in prepackaged form—to add shelves beyond those included in the original unit.

Boltless steel shelving is used for storage in homes, garages, offices, and commercial and industrial settings. However, because it is prepackaged, with limited sizes and specifications, it may not be appropriate for settings requiring more specialized dimensions and specifications. Designed primarily for utility rather than appearance, boltless steel shelving is commonly used in garages, basements, or back-room areas, rather than in kitchens, living rooms, or retail display spaces.

Manufacturing process[26]

Boltless steel shelving is produced through a multi-stage manufacturing process that transforms hot-rolled, flat-rolled steel into finished, prepackaged shelving units. Production generally involves six major steps: slitting, punching and cutting, forming, welding and assembly of the structural supports, surface treatment, and final packaging.

Producers begin by slitting hot-rolled, flat-rolled carbon steel to the widths required for the various horizontal beams and vertical post profiles. Slitting may be performed in-house or

[26] Unless otherwise noted, this information is based on first review publication, pp. 1.11 to 1.12. See also, Boltless Steel Shelving Units Prepackaged for Sale from Malaysia, Taiwan, Thailand, and Vietnam (Final), USITC Publication 5508, June 2024, pp. 1.14 and 1.15.

outsourced to a service center or other third party. The slit steel blanks are then fed into presses that punch notch holes and cut the steel to the specified length for uprights (posts) and beams. The punched and cut pieces are then roll- or press-formed into their final shapes.

Higher-capacity boltless steel shelving may require additional reinforcement: for example, a small frame which has punched or cut out tabs may be welded to each end of the beams, and front-to-back supports may be welded to vertical posts to create end units.

Next, the components undergo surface preparation and coating. The steel parts typically pass through a phosphating process that converts the surface to iron phosphate, improving corrosion resistance and providing a strong bonding surface for painting or other coatings.[27] Components may then be painted, galvanized, powder coated, enameled, or otherwise treated.[28] Rivets are attached to each end of beams (and braces).

Decking—commonly particle board, other composite materials (painted, printed, or laminated), or steel wire mesh—is often sourced from outside vendors. Producers gather the appropriate posts, beams, braces, decking for a complete unit, plastic end pieces, center supports, accessories, and assembly instructions, then package and label these components for shipment as complete shelving units.

Manufacturing processes in China are likely similar to those used in the United States. However, in contrast to U.S. producers that design and produce their own boltless steel shelving products, some Chinese producers manufacture under contract for U.S. importers or marketers. These arrangements often involve the U.S. partner providing product designs and support related to manufacturing, quality control, logistics, and product testing.

[27] Corrosionpedia, "Phosphating," http://www.corrosionpedia.com/definition/876/phosphating, accessed May 7, 2026.

[28] Powder coating is a durable, high-quality finish used on a wide range of products. In this process, electrostatic spray deposition (ESD) charges the powdered coating material as it is applied that then is attracted and coats the target part that is grounded for the charge. After coating, the part is baked in a curing oven. Powder Coating Institute, "What is powder coating," https://www.powdercoating.org/page/WhatIsPC, accessed May 7, 2026.

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 four firms, which are believed to account for all production of boltless steel shelving in the United States during 2015.[29] During the first five-year reviews, the domestic interested party provided a list of three known and currently operating U.S. producers of boltless steel shelving. One responding firm accounted for approximately *** percent of production of boltless steel shelving in the United States during 2019.[30]

In response to the Commission's notice of institution in these current reviews, the domestic interested party provided a list of three known and currently operating U.S. producers of boltless steel shelving. One firm providing U.S. industry data in response to the Commission's notice of institution accounted for approximately *** percent of production of boltless steel shelving in the United States during 2025.[31]

Recent developments

Table 1.4 presents events in the U.S. industry since the Commission's last five-year reviews.[32]

[29] Original publication, p. 3.

[30] Boltless Steel Shelving Prepackaged for Sale from China (Review), Confidential Report, INV-SS-138, November 23, 2020 ("First review confidential report"), p. 1.12.

[31] Domestic interested party's response to the notice of institution, April 30, 2026, p. 18.

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

Table 1.4 Boltless steel shelving: Developments in the U.S. industry

Item	Firm	Event
Plant closure	Edsal	Edsal closed its Bloomington, California packaging facility for riveted and welded boltless steel shelving in March 2023, citing declining U.S. sales attributed to "unfair imports."
Recall	Edsal	Edsal recalled roughly 2.2 million units of 5-Tier Muscle Rack Heavy Duty Steel Shelving Units in February 2021. Edsal offered full refunds to consumers and instructed them to stop using the shelving.
Property acquisition	Tennsco	In October 2022, the City Council of Dickson, Tennessee, approved an ordinance authorizing the sale of a development trust property to Tennsco that it has been leasing for $600 annually over the past 60 years. Under the 1962 lease agreement, Tennsco can purchase the property after January 1, 1972, for $3,000. The leased property is the location for Plant 1, which is one of three that manufactures Tennsco's Z-Line Boltless Rivet Shelving along with various other types of steel storage and filing units.

Source: Frazier, Francine, News4Jax.com, "Edsal recalls 2.2M shelves after reports that they crumpled under heavy weight," https://www.news4jax.com/news/local/2021/02/11/edsal-recalls-22m-shelves-after-reports-that-they-crumpled-under-heavy-weight/ February 11, 2021; Dickson County Source, "Dickson City Council Approves Sale of Property to Tennsco," https://dicksoncountysource.com/council-approves-sale-of-property-to-tennsco/, October 10, 2022; Tennsco, "Manufacturing Capabilities", https://www.tennsco.com/manufacturercapabilities, accessed June 18, 2026; Regulations.gov, "Note," https://downloads.regulations.gov/ITA-2023-0010-0053/attachment_11.pdf, accessed June 18, 2026.

U.S. producers' trade and financial data

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

Table 1.5 Boltless steel shelving: 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	2014	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 2014 and 2019, data are compiled using data submitted in the Commission's original investigations and first five-year reviews. For the year 2025, data are compiled using data submitted by the domestic interested party. Domestic interested party's response to the notice of institution, April 30, 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.[33]

In its original determinations and expedited five-year review determinations, the Commission defined a single domestic like product consisting of boltless steel shelving units prepackaged for sale coextensive with Commerce's scope.[34] In its original determinations and

[33] Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).
[34] 91 FR 16234, April 1, 2026.

expedited five-year review determinations, the Commission defined the domestic industry to include all domestic producers of boltless steel shelving units prepackaged for sale.[35]

U.S. importers

During the final phase of the original investigation, the Commission received U.S. importer questionnaires from 20 firms, which accounted for the vast majority of total U.S. imports of boltless steel shelving from China during 2014.[36] Import data presented in the original investigations are based on official questionnaire responses.

Although the Commission did not receive responses from any respondent interested parties in its first five-year reviews, the domestic interested party provided a list of 46 firms that may have imported boltless steel shelving from China.[37] Import data presented in the first reviews are based on official Commerce statistics responses.

Although the Commission did not receive responses from any respondent interested parties in these current reviews, in its response to the Commission's notice of institution, the domestic interested party provided a list of 44 potential U.S. importers of boltless steel shelving.[38]

U.S. imports

Table 1.6 presents the quantity, value, and unit value of U.S. imports from China as well as the other top sources of U.S. imports (shown in descending order of 2025 imports by quantity).

[35] 91 FR 16234, April 1, 2026.
[36] Original publication, p. 1.4.
[37] First review publication, p. 1.15.
[38] Domestic interested party's response to the notice of institution, April, 30, 2026, exh. 6.

Table 1.6 Boltless steel shelving: U.S. imports, by source and period

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

U.S. imports from	Measure	2020	2021	2022	2023	2024	2025
China	Quantity	1,024,449	1,369,928	2,446,120	1,036,542	1,397,426	1,367,371
Thailand	Quantity	271,141	407,556	588,755	567,901	474,515	1,125,628
Taiwan	Quantity	612,993	783,116	755,765	484,015	336,205	413,717
Vietnam	Quantity	426,801	492,560	436,463	219,113	240,301	869,185
All other sources	Quantity	1,278,850	1,719,452	1,839,321	1,339,530	1,504,824	1,351,192
Nonsubject sources	Quantity	2,589,785	3,402,684	3,620,304	2,610,559	2,555,845	3,759,722
All import sources	Quantity	3,614,234	4,772,612	6,066,424	3,647,101	3,953,271	5,127,093
China	Value	17,276	23,539	54,590	18,910	28,485	24,129
Thailand	Value	13,113	23,041	39,801	36,528	22,919	42,745
Taiwan	Value	32,078	43,765	48,142	26,332	22,127	29,454
Vietnam	Value	29,627	32,555	37,125	17,488	3,691	13,399
All other sources	Value	16,732	35,652	61,432	27,442	40,200	39,513
Nonsubject sources	Value	91,550	135,012	186,500	107,791	88,936	125,112
All import sources	Value	108,826	158,551	241,090	126,701	117,421	149,241
China	Unit value	16.86	17.18	22.32	18.24	20.38	17.65
Thailand	Unit value	48.36	56.53	67.60	64.32	48.30	37.97
Taiwan	Unit value	52.33	55.89	63.70	54.40	65.81	71.19
Vietnam	Unit value	69.42	66.09	85.06	79.81	15.36	15.42
All other sources	Unit value	13.08	20.73	33.40	20.49	26.71	29.24
Nonsubject sources	Unit value	35.35	39.68	51.51	41.29	34.80	33.28
All import sources	Unit value	30.11	33.22	39.74	34.74	29.70	29.11

Source: Compiled from official Commerce statistics for HTS statistical reporting number 9403.20.0075, accessed May 6, 2026. These data may be overstated as HTS statistical reporting number 9403.20.0075 may contain products outside the scope of this review. See domestic interested party's response to the notice of institution, April 30, 2026, p.6, n.4.

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

Apparent U.S. consumption and market shares

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

Table 1.7 Boltless steel shelving: Apparent U.S. consumption and market shares, by source and period

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

Source	Measure	2014	2019	2025
U.S. producers	Quantity	***	***	***
China	Quantity	***	NA	1,367,371
Nonsubject sources	Quantity	***	NA	3,759,722
All import sources	Quantity	***	NA	5,127,093
Apparent U.S. consumption	Quantity	***	NA	***
U.S. producers	Value	***	***	***
China	Value	***	12,591	24,129
Nonsubject sources	Value	***	65,379	125,112
All import sources	Value	***	77,971	149,241
Apparent U.S. consumption	Value	***	***	***
U.S. producers	Share of quantity	***	NA	***
China	Share of quantity	***	NA	***
Nonsubject sources	Share of quantity	***	NA	***
All import sources	Share of quantity	***	NA	***
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 2014 and 2019, data are compiled using data submitted in the Commission's original investigations and first five-year reviews. For the year 2025, U.S. producers' U.S. shipments are compiled from the domestic interested party's response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting number 9403.20.0075, accessed May 6, 2026.

Note: For 2019 imports, official Commerce statistics did not provide quantity data for HTS statistical reporting numbers 9403.20.0025 and 9403.20.0075, the numbers referenced during the first reviews.

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

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

The industry in China

Producers in China

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from four firms, which accounted for approximately *** percent of capacity of boltless steel shelving in China during 2014, and approximately *** percent of boltless steel shelving exports from China (as a ratio to U.S. imports of boltless steel shelving as calculated from questionnaire responses) to the United States during 2014.[39]

Although the Commission did not receive responses from any respondent interested parties in its first five-year reviews, the domestic interested party provided a list of 37 possible producers of boltless steel shelving in China in that proceeding.[40]

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested party provided a list of 45 possible producers of boltless steel shelving in China.[41]

Recent developments

Table 1.8 presents events in China's industry since the Commission's last five-year reviews.

[39] Boltless Steel Shelving Units Prepackaged for Sale from China (Final), Confidential Report, INV-NN-063, September 2, 2015, as revised in INV-NN-067, September 8, 2025 ("Original confidential report"), pp. 7.4 to 7.5.

[40] First review publication, p. 1.17.

[41] Domestic interested party's response to the notice of institution, April 30, 2026, exh. 3

Table 1.8 Boltless steel shelving: Developments in the China industry

Item	Firm	Event
Merger	Suzhou Iwaya Metal Products Co., Ltd.	In January 2020, Suzhou Iwaya Metal Products Co., Ltd. and Suzhou ISR Electronic Film Co., Ltd. merged and were renamed as Suzhou Iwaya Metal Products Co., Ltd. (Jiangsu, China).
Line upgrade	Huade Racking	In 2021, Huade (Jiangsu, China) upgraded its robot welding and epoxy powder electrostatic coating lines.

Source: Huade Racking, "Robot welding work station under rectification and reform, and epoxy powder electrostatic pain coating lines under upgrading," https://www.huaderack.com/news/robot-welding-work-station-under-rectification-and-reform-and-epoxy-powder-electrostatic-paint-coating-lines-under-upgrading/, October 11, 2021; Domestic interested party's response to the notice of institution, April 3, 2026, exh. 4; SZIwatani Group, "Suzhou Iwaya Metal Products Co, Ltd.," http://www.sziwatani.com.cn/, accessed May 13, 2026.

Exports

Table 1.9 presents export data for GTA HTS subheading 9403.20, a category that includes boltless steel shelving and out-of-scope products, from China (by export destination in descending order of value in 2025). China's leading export market for this merchandise from 2020 to 2025 was the United States, which accounted for 22.4 percent of the value of such exports in 2025, down from 29.4 percent in 2020. China's second largest export market was the United Kingdom, which represented approximately 4.1 percent of such exports, by value, in 2025.

Table 1.9 Other furniture and parts thereof, other metal furniture: Value of exports from China, by destination and period

Value in 1,000 dollars

Destination market	2020	2021	2022	2023	2024	2025
United States	2,942,476	3,845,269	3,594,179	2,984,718	3,080,108	2,481,302
United Kingdom	442,450	542,099	464,419	452,055	466,956	451,920
Germany	356,030	444,409	395,717	319,373	397,431	420,898
Japan	455,128	544,350	522,072	432,415	433,573	405,287
Thailand	217,652	256,459	277,005	309,668	411,563	395,394
Malaysia	330,624	380,833	459,169	493,320	529,654	391,360
Australia	426,554	499,331	471,770	391,892	399,207	360,345
Netherlands	271,968	352,812	329,968	272,324	330,000	345,377
Indonesia	112,610	137,003	149,988	176,721	257,272	337,943
Canada	329,420	406,614	375,464	286,155	288,801	299,514
All other markets	4,119,648	4,366,863	4,467,145	4,323,967	4,923,963	5,195,476
All markets	10,004,561	11,776,040	11,506,894	10,442,609	11,518,528	11,084,815

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 9403.20, accessed April 27, 2026. These data may be overstated as HS subheading 9403.20 may contain products outside the scope of these reviews.

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

Third-country trade actions

Since the original investigations, there has been one known trade remedy action on boltless steel shelving from China in third-country markets. On January 4, 2015, Australia imposed an antidumping duty order on boltless steel shelving from China that was terminated on February 23, 2017.[42]

The global market

Table 1.10 presents global export data for "other metal furniture," a category that includes boltless steel shelving and out-of-scope products (by source in descending order of quantity for 2025). The leading global exporters of "other metal furniture" classified under HTS subheading 9403.20—which includes boltless steel shelving and certain out-of-scope

[42] World Trade Organization ("WTO"), Committee on Anti-Dumping Practices, Semi-Annual Report Under Article l6.4 of the WTO Antidumping Agreement: Australia, G/ADP/N/300/AUS, p. 2, https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/ADP/N300AUS.pdf&Open=True, August 28, 2017.

products—were China (48.7 percent), Germany (8.3 percent), the Netherlands (3.8 percent), the United States (3.5 percent), Poland (3 percent), and Italy (3.3 percent) in 2025. Between 2020 and 2025, the value of global exports rose by 19.9 percent, with China contributing 28.7 percent of that growth.

Table 1.10 Other furniture and parts thereof, other metal furniture: Value of global exports by country and period

Value in 1,000 dollars

Exporting country	2020	2021	2022	2023	2024	2025
China	10,004,561	11,776,040	11,506,894	10,442,609	11,518,528	11,084,815
Germany	1,392,319	1,750,536	1,694,352	1,814,258	1,811,458	1,879,461
Netherlands	525,489	712,173	807,754	714,561	844,963	865,657
United States	636,274	697,833	811,985	815,934	843,411	797,866
Poland	414,038	523,292	575,475	607,677	667,606	772,549
Italy	607,284	798,406	836,323	848,181	763,356	755,522
United Kingdom	194,564	241,374	318,721	337,009	436,685	502,572
France	207,847	278,281	301,818	379,385	423,338	473,684
Canada	404,015	474,706	632,443	674,632	642,654	416,786
Spain	260,640	378,473	409,016	385,434	380,424	414,062
All other exporters	4,341,812	5,499,206	5,788,068	5,673,277	4,938,595	4,795,649
All exporters	18,988,842	23,130,320	23,682,850	22,692,958	23,271,018	22,758,624

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 9403.20, accessed April 27, 2026. These data may be overstated as HS subheadings 9403.20 may contain products outside the scope of these reviews.

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

APPENDIX A

FEDERAL REGISTER NOTICES

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

Citation	Title	Link
91 FR 16181 April 1, 2026	Initiation of Five-Year (Sunset) Reviews	https://www.govinfo.gov/content/pkg/FR-2026-04-01/pdf/2026-06326.pdf
91 FR 16234 April 1, 2026	Boltless Steel Shelving Units Prepackaged for Sale from China; Institution of Five-Year Reviews	https://www.govinfo.gov/content/pkg/FR-2026-04-01/pdf/2026-06287.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. They were filed on behalf of the following entity:

1. Edsal Manufacturing Company LLC ("Edsal"), domestic producers of boltless steel shelving (collectively referred to herein as "domestic interested party")

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

Table B.1 Boltless Steel Shelving: Summary of responses to the Commission's notice of institution

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

Note: The U.S. producer coverage figure presented is the domestic interested party's estimate of its share of total U.S. production of boltless steel shelving during 2025. Domestic interested party's response to the notice of institution, April 30, 2026, p. 18.

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 Edsal. Edsal requests that the Commission conduct expedited reviews of the antidumping and countervailing duty orders on boltless steel shelving.[1]

Company-specific information

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

[1] Domestic interested party's comments on adequacy, April 30, 2026, p. 2.

APPENDIX C

SUMMARY DATA COMPILED IN PRIOR PROCEEDINGS

Table C-1
Boltless steel shelving: Summary data concerning the U.S. market, 2012-14, January-March 2014, and January-March 2015
(Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent--exceptions noted)

	Report data					Period changes			
	Calendar year			January-March		Calendar year			Jan-March
	2012	2013	2014	2014	2015	2012-14	2012-13	2013-14	2014-2015
U.S. consumption quantity:									
Amount	***	***	***	***	***	***	***	***	***
Producers' share (fn1)	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
China	***	***	***	***	***	***	***	***	***
All others sources	***	***	***	***	***	***	***	***	***
Total imports	***	***	***	***	***	***	***	***	***
U.S. consumption value:									
Amount	***	***	***	***	***	***	***	***	***
Producers' share (fn1)	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
China	***	***	***	***	***	***	***	***	***
All others sources	***	***	***	***	***	***	***	***	***
Total imports	***	***	***	***	***	***	***	***	***
U.S. importers' U.S. imports from:									
China:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
All other sources:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Total imports:									
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)	***	***	***	***	***	***	***	***	***
Productivity (units per hour)	***	***	***	***	***	***	***	***	***
Unit labor costs	***	***	***	***	***	***	***	***	***
Net Sales:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS)	***	***	***	***	***	***	***	***	***
Gross profit of (loss)	***	***	***	***	***	***	***	***	***
SG&A expenses	***	***	***	***	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***	***	***	***	***
Net income or (loss)	***	***	***	***	***	***	***	***	***
Capital expenditures	***	***	***	***	***	***	***	***	***
Unit COGS	***	***	***	***	***	***	***	***	***
Unit SG&A expenses	***	***	***	***	***	***	***	***	***
Unit operating income or (loss)	***	***	***	***	***	***	***	***	***
COGS/sales (fn1)	***	***	***	***	***	***	***	***	***
Operating income or (loss)/sales (fn1)	***	***	***	***	***	***	***	***	***

Notes:

fn1.--Report data are in percent and period changes are in percentage points.
fn2.--***.

APPENDIX D

PURCHASER QUESTIONNAIRE RESPONSES

As part of their response to the notice of institution, interested parties were asked to provide a list of three to five leading purchasers in the U.S. market for the domestic like product. A response was received from domestic interested parties, and it identified these three firms that it believes to be the top three purchasers of boltless steel shelving units ***. Purchaser questionnaires were sent to these three firms and all three provided responses which are presented below.

1. Have there been any significant changes in the supply and demand conditions for boltless steel shelving units that have occurred in the United States or in the market for boltless steel shelving units in China since January 1, 2020?

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

2. Do you anticipate any significant changes in the supply and demand conditions for boltless steel shelving units in the United States or in the market for boltless steel shelving units in China within a reasonably foreseeable time?

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