

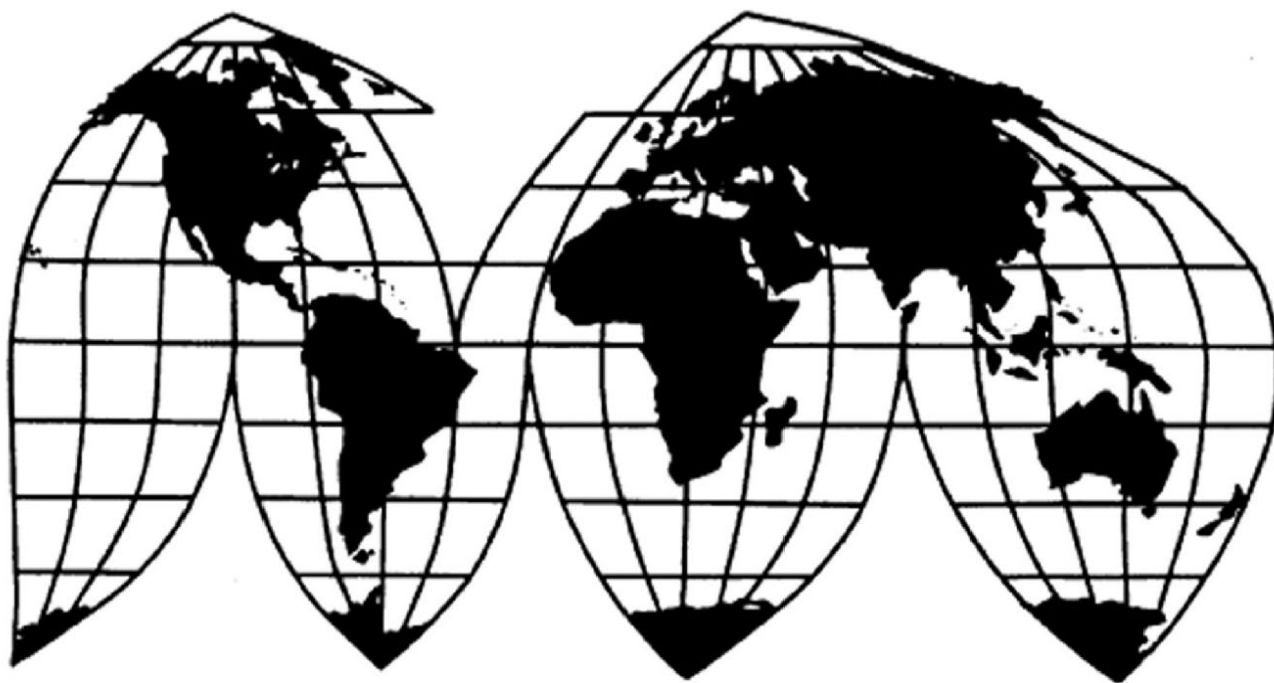
# Quartz Surface Products

Investigation No. TA-201-79

Publication 5738

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**U.S. International Trade Commission**



Washington, DC 20436

# U.S. International Trade Commission

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# U.S. International Trade Commission

Washington, DC 20436  
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## Quartz Surface Products

Investigation No. TA-201-79





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Note: Information that would reveal confidential operations of individual firms may not be published.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 No. TA-201-79

Quartz Surface Products

## DETERMINATION

On the basis of information developed in the subject investigation, the Commission determined pursuant to section 202(b) of the Trade Act of 1974 that quartz surface products are being imported into the United States in such increased quantities as to be a substantial cause of serious injury to the domestic industry producing an article like or directly competitive with the imported article.<sup>1</sup>

Having made an affirmative injury determination pursuant to section 202(b) of the Trade Act of 1974, the Commission was required to make certain additional findings under the implementing statutes of certain free trade agreements (“FTAs”) or under statutory provisions related to certain preferential trade programs. Under section 301(a) of the United States-Mexico-Canada (“USMCA”) Implementation Act (19 U.S.C. § 4551(a)), the Commission found that imports of quartz surface products from neither Canada nor Mexico account for a substantial share of total imports or contribute importantly to the serious injury caused by imports. The Commission further found that imports of quartz surface products from Australia, the U.S.-Dominican Republic – Central America Free Trade Agreement (“CAFTA-DR”) countries, Colombia, Jordan, Panama, Peru, Singapore, and South Korea, individually, are not a substantial cause of serious injury or threat thereof, under the relevant FTA implementing statutes. See 19 U.S.C. § 2112 note (Jordan); 19 U.S.C. § 3805 note (Australia, Colombia, South Korea, Panama, Peru, Singapore); 19 U.S.C. § 4101 (CAFTA-DR). The Commission also found that the serious injury substantially caused by imports to the domestic industry producing a like or directly competitive article does not result from the reduction or elimination of any duty provided for under the U.S.-Israel Free Trade Agreement or from duty-free treatment provided for under the Caribbean Basin Economic Recovery Act (“CBERA”) provisions of the Caribbean Basin Initiative Trade Program or the Generalized System of Preferences (“GSP”) program. See 19 U.S.C. § 2112 note (Israel); 19 U.S.C. § 2703(e) (CBERA); 19 U.S.C. § 2253(e)(6) (GSP).

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<sup>1</sup> Commissioner David S. Johanson made a negative determination on serious injury and threat thereof and did not participate in the remedy phase of the investigation.

## REMEDY RECOMMENDATIONS

In order to address the serious injury to the domestic industry producing quartz surface products and be most effective in facilitating the efforts of the domestic industry to make a positive adjustment to import competition, Chair Amy A. Karpel and Commissioner Jason E. Kearns recommend several actions.

The Commissioners recommend a tariff-rate-quota (TRQ) on imports of quartz surface products, including slabs and fabricated quartz surface products, for a four-year period. The recommended in-quota tariff rate is 25 percent *ad valorem* and the recommended above-quota tariff rate is 40 percent *ad valorem* in Year 1 of the relief period, both of which decrease by one percentage point in each subsequent year of the four-year relief period. The TRQ recommended volume is 140,000,000 square feet in Year 1 of the relief period, 159,000,000 square feet in Year 2, 164,000,000 square feet in Year 3, and 169,000,000 square feet in Year 4; and the annual in-quota volume level is recommended to be allocated on a quarterly basis, with each quarter allowing for 25 percent of the in-quota annual volume, and further allowing for any unused portion of a quarterly allocation to be added to the allocation in the following quarter.

| Summary of Commissioners' Recommended TRQ on Quartz Surface Products |        |        |        |        |
|----------------------------------------------------------------------|--------|--------|--------|--------|
|                                                                      | Year 1 | Year 2 | Year 3 | Year 4 |
| In-Quota Volume Level (in millions of square feet)                   | 140    | 159    | 164    | 169    |
| In-Quota Tariff Rate ( <i>ad valorem</i> )                           | 25%    | 24%    | 23%    | 22%    |
| Out-of-Quota Tariff Rate ( <i>ad valorem</i> )                       | 40%    | 39%    | 38%    | 37%    |

Having made negative findings with respect to imports from Canada and Mexico under section 302 of the USMCA Implementation Act, and having made findings that imports from Australia, Colombia, Costa Rica, the Dominican Republic, El Salvador, Guatemala, Honduras, Israel, Jordan, Nicaragua, Panama, Peru, Singapore, and South Korea, and the beneficiary countries under the Caribbean Basin Economic Recovery Act or the GSP program were not a substantial cause of the serious injury experienced by the domestic industry, the Commissioners recommend that the President exclude such countries from any form of the TRQ.

The Commissioners further recommend that the President consider policy proposals suggested by the Petitioners or another robust mechanism to mitigate potential circumvention via non-covered countries.

In addition, Commissioner Kearns recommends several actions:

That the President “de-stack” the in-quota and out-of-quota tariffs imposed by the TRQ action described above with any other tariffs to prevent multiple additional duties on U.S. imports of quartz surface products, in consideration of the potential impact of the TRQ action on domestic manufacturers of downstream products. This does not apply to antidumping and countervailing duty tariffs because they serve a different purpose of remedying unfair trade.

That the President submit to Congress, pursuant to his authority under section 203(a)(3)(H) of the Trade Act of 1974, a legislative proposal to distribute tariff revenue generated by the TRQ action to mitigate the potential impact of the remedy on fabricators of slab QSP.

That the President, pursuant to his authority under section 203(a)(3)(G) of the Trade Act of 1974, continue international negotiations to reduce overcapacity and global imbalances that drive U.S. imports of quartz surface products and other products to levels that injure domestic producers.

That the President authorize the establishment of an exclusion process to allow for importation of U.S. imports of quartz surface products without application of the TRQ action described above in the case of a demonstrated lack of production in the United States for a particularized quartz surface product or in the case of a critical short supply of a particularized quartz surface product from domestic sources.



## Commission's Views on Injury

Based on the facts in this investigation, we determine pursuant to section 202(b) of the Trade Act of 1974 ("Trade Act")<sup>1</sup> that quartz surface products ("QSP") are being imported into the United States in such increased quantities as to be a substantial cause of serious injury to the domestic industry producing an article like or directly competitive with the imported article.<sup>2</sup> Having made an affirmative determination in this global safeguard investigation, we are required to make certain additional findings under the statutes implementing certain free trade agreements.<sup>3</sup> We find that imports of QSP from neither Canada nor Mexico account for a substantial share of total imports or contribute importantly to the serious injury caused by imports. We also find that imports of QSP from free-trade agreement partner countries Australia, CAFTA-DR countries, Colombia, Jordan, South Korea, Panama, Peru, and Singapore, individually, are not a substantial cause of serious injury or threat thereof. Finally, we determine that the serious injury substantially caused by imports to the domestic industry producing a like or directly competitive article does not result from the reduction or elimination of any duty provided for under the U.S.-Israel Free Trade Agreement<sup>4</sup> or from duty-free treatment provided for under the Caribbean Basin Economic Recovery Act ("CBERA") provisions of the Caribbean Basin Initiative Trade Program or the GSP program.<sup>5</sup>

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<sup>1</sup> 19 U.S.C. § 2252(b).

<sup>2</sup> The Commission's affirmative serious injury determination reflects the views of Chair Amy A. Karpel and Commissioner Jason E. Kearns. Commissioner David S. Johanson made a negative determination on serious injury and threat thereof and joins sections I-II.A of these views. See Dissenting Views of Commissioner David S. Johanson.

<sup>3</sup> Specifically, the Commission is required to make certain additional findings under the implementing statutes for the United States-Mexico-Canada Agreement ("USMCA") (Canada and Mexico), the U.S.-Dominican Republic – Central America Free Trade Agreement ("CAFTA-DR") (Costa Rica, El Salvador, Guatemala, Honduras, Nicaragua, and the Dominican Republic), the U.S.-Australia Free Trade Agreement, the U.S.-Korea Free Trade Agreement ("KORUS"), the U.S.-Colombia Trade Promotion Agreement, the Agreement between the United States of America and the Hashemite Kingdom of Jordan on the Establishment of a Free Trade Area, the U.S.-Panama Trade Promotion Agreement, the U.S.-Peru Free Trade Agreement, the U.S.-Singapore Free Trade Agreement, and the U.S.-Israel Free Trade Agreement or under statutory provisions related to preferential trade programs (Caribbean Basin Economic Recovery Act ("CBERA") and Generalized System of Preferences ("GSP")). See 19 U.S.C. § 2112 note (Jordan, Israel); 19 U.S.C. § 2253(e)(6) (GSP); 19 U.S.C. § 2703(e) (CBERA); 19 U.S.C. §§ 4551 (USMCA); 19 U.S.C. § 3805 note (Australia, Colombia, KORUS, Panama, Peru, Singapore); 19 U.S.C. § 4101 (CAFTA-DR).

<sup>4</sup> 19 U.S.C. § 2112 note, U.S.-Israel FTA Implementing Act §§ 403(b), 403(d).

<sup>5</sup> 19 U.S.C. §§ 2253(e)(6), 2703(e)(2), 2703(e)(4). The GSP program expired on December 31, 2020, and therefore was in operation for only one year of the period of investigation.

## I. Background

On November 17, 2025, the Commission instituted the present investigation, Inv. No. 201-TA-79, in response to a petition properly filed on November 17, 2025, by the Quartz Manufacturing Alliance of America (“QMAA”<sup>6</sup> or “Petitioners”).<sup>7 8</sup> Notice of the institution of

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<sup>6</sup> The QMAA consists of U.S. producers of QSP, Cambria Company, LLC (“Cambria”), Dal-Tile LLC (“Dal-Tile”), and Guidoni USA (“Guidoni”). See Petition at 28. At the time the petition was filed, the QMAA also included Architectural Surfaces, Inc. (“Architectural Surfaces”), the largest U.S. distributor of QSP, but Architectural Surfaces subsequently withdrew. At the same time, Hyundai L&C USA (“Hyundai L&C”), a sister company of a Canadian producer of QSP, became a member of the QMAA and indicated support for the petition. See *Id.*; Letter from Luke A. Meisner, Schagrin Associates, to Lisa R. Barton, Secretary, U.S. International Trade Commission, *Re: Quartz Surface Products – Additional Support for Petition for Safeguard Relief Pursuant to Sections 201 and 202 of the Trade Act of 1974* (Nov. 17, 2025).

<sup>7</sup> The QMAA initially submitted a petition on September 15, 2025. Shortly thereafter, the Commission received a series of submissions containing statements in opposition to the petition from a current producer of QSP slab and more than 700 entities stating that they were independent fabricators of QSP. On September 23, 2025, and November 17, 2025, QMAA supplemented the petition with signed statements on behalf of E-Stone USA Corporation (“Estone”), LX Hausys America, Inc. (“LX Hausys”), and Hendrix Industries, Inc. (“Hendrix”) supporting the petition. The Commission determined that the petition, as supplemented, was supported by entities representative of a domestic industry producing QSP, including an industry producing QSP slabs, and an industry producing both QSP slabs and fabricated slabs. Therefore, the Commission determined that the petition, as supplemented, was properly filed as of November 17, 2025. See 90 Fed. Reg. 55165, 55165-66 (Dec. 1, 2025).

<sup>8</sup> For purposes of determining whether the petition was representative of an industry under Section 202(a)(1) of the Trade Act, the Commission considered the information available as of November 17, 2025. The submissions received through November 17, 2025, contained data indicating the volume in square feet produced by supporters of the petition, and the volume in square feet of slab and fabricated QSP produced by entities that oppose the petition. Although commentators did not provide values for either set of shipments data, we considered that official U.S. Department of Commerce (“Commerce”) import statistics on imports of QSP slabs and imports of fabricated QSP provided useful, albeit conservative, proxies for the average unit values (“AUVs”) of domestically produced slabs and fabricated QSP. We consider that the AUV data provide a conservative estimate of the value of domestic QSP production in support of the petition, as information from previous proceedings indicates that prices for domestic slab are typically higher than prices for imported QSP. See *Quartz Surface Products from India and Turkey*, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451 (Final), USITC Pub. 5061 (June 2020) at 35, Table C-2. Furthermore, the petition alleged, based on Petitioners’ data and Commerce data, that the AUVs of imports were substantially lower than those of domestically produced QSP. Petition at 43-44, Ex. 18. This information led us to conclude that if the domestic industry consisted exclusively of production of slab in the United States, firms supporting the petition constituted the large majority of the value of domestic production, and that if the domestic industry consisted of production of slab and fabricated QSP in the United States, firms supporting the petition constituted a major proportion of the value of domestic production of slab and fabricated QSP. We note in this regard that section 202(a)(1) does not provide an explicit numerical threshold. See, e.g., (Continued...)



the Commission's investigation was published in the *Federal Register* on December 1, 2025.<sup>9</sup> The Commission held a public hearing on injury issues on February 24, 2026.<sup>10</sup> Petitioners submitted prehearing and posthearing briefs, made final comments, and participated in the hearing.<sup>11</sup>

Several interested parties also participated in the investigation in opposition to the imposition of a safeguard measure.<sup>12</sup> U.S. importers Arizona Tile LLC ("Arizona Tile") and M S International, Inc. ("MSI") and U.S. producer Elite Quartz Manufacturing ("Elite Quartz") filed joint prehearing and posthearing briefs, made final comments, and participated in the hearing.<sup>13</sup> Foreign producer and exporter Casablanca Vietnam Joint Stock Company ("Casablanca") and U.S. importer Wilsonart LLC ("Wilsonart") filed joint a prehearing brief and

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*See Crabmeat from Swimming Crabs; Institution of Safeguard Investigation*, 65 Fed. Reg. 15,008 (Mar. 20, 2000); Petition at Exh. 35 (excerpts of *Crabmeat* petition) (The Commission instituted a section 201 safeguard investigation based on a petition that stated that petitioner represented 33 percent of domestic production and that "additional companies that have already agreed to join the {petitioning} Coalition upon submission of further financial data represent roughly another 13 percent of production", for a total of 46 percent.); *Certain Passenger Vehicle and Light Truck Tires from China*, 74 Fed. Reg. 19,593 (Apr. 29, 2009); Petition at Exh. 36 (excerpts of *Tires* petition) (The Commission instituted a section 421 safeguard investigation based on a petition providing evidence that the plants in which the petitioning union members worked accounted for 46.96 percent of production capacity in the industry.).

<sup>9</sup> See 90 Fed. Reg. 55165 (Dec. 1, 2025).

<sup>10</sup> See Transcript of Commission's February 24, 2026 Hearing on Injury Issues ("Hearing Tr.").

<sup>11</sup> See Letter from Luke A. Meisner, Schagrin Associates, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products – Petitioner's Submission of Injury Pre-Hearing Brief* (Feb. 17, 2026) ("Petitioners' Prehearing Br."); Letter from Luke A. Meisner, Schagrin Associates, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products – Petitioner's Submission of Injury Post-Hearing Brief* (March 3, 2026) ("Petitioners' Posthearing Br."); Letter from Luke A. Meisner, Schagrin Associates, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products – Petitioner's Final Comments on Injury* (March 23, 2026) ("Petitioners' Final Comments").

<sup>12</sup> In our discussion below, we attribute to "Respondents" those arguments supported by all or most of the parties who oppose the imposition of a safeguard measure. We attribute arguments made exclusively by a discrete group of those parties to the parties that made those arguments.

<sup>13</sup> See Letter from Jonathan T. Stoel, Hogan Lovells US LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products Global Safeguard Investigation: Pre-Hearing Brief of Arizona Tile LLC, Elite Quartz Mfg., and M S International, Inc.* (Feb. 17, 2026) ("Arizona, Elite & MSI's Prehearing Br."); Letter from Jonathan T. Stoel, Hogan Lovells US LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products Global Safeguard Investigation: Posthearing Brief of Arizona Tile LLC, Elite Quartz Mfg., and M S International, Inc.* (March 3, 2026) ("Arizona, Elite & MSI's Posthearing Br."); See Letter from Jonathan T. Stoel, Hogan Lovells US LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products Global Safeguard Investigation: Final Comments of Arizona Tile LLC, Elite Quartz Mfg., and M S International, Inc.* (March 23, 2026) ("Arizona, Elite & MSI's Final Comments").

participated in the hearing.<sup>14</sup> Foreign producer and exporter Technistone, S.R.O. (“Technistone”) and U.S. importer Wilsonart filed a joint prehearing brief.<sup>15</sup> U.S. importer C&C North America, Inc. (“C&C North America”), foreign producer and exporter Cosentino Industrial S.A.U. (“Cosentino Industrial”), and fabricator Stone Suppliers, Inc. (“Stone Suppliers”) filed joint prehearing and posthearing briefs.<sup>16 17</sup> U.S. importer Global Surfaces FZE (“Global”) and foreign producer and exporter Madhav Surfaces FZC LLC (“Madhav”) filed joint prehearing and posthearing briefs and participated in the hearing.<sup>18</sup> Foreign producer and exporter Hyundai L&C Canada, Inc. (“Hyundai L&C Canada”) filed prehearing and posthearing briefs and participated in the hearing.<sup>19 20</sup> Trade association the Federation of the Indian Quartz Surface Industry (“Federation”) filed prehearing and posthearing briefs and participated in the hearing.<sup>21</sup> Trade association Alliance of Vietnamese Quartz Surface Products Manufacturers

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<sup>14</sup> See Letter from Lizbeth R. Levinson, Fox Rothschild LLP, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products, Inv. No. TA-201-79: Submission of the Pre-Hearing Brief* (Feb. 17, 2026) (“Casablanca & Wilsonart’s Prehearing Br.”).

<sup>15</sup> See Letter from Lizbeth R. Levinson, Fox Rothschild LLP, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products, Inv. No. TA-201-79: Submission of the Pre-Hearing Brief* (Feb. 17, 2026) (“Wilsonart & Technistone Prehearing Br.”).

<sup>16</sup> See Letter from Michael E. Murphy, Sidley Austin LLP, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products: Prehearing Brief of C&C North America, Inc., Cosentino Industrial S.A.U., and Stone Supplier, Inc.* (Feb. 17, 2026) (“Cosentino Prehearing Br.”); Letter from Michael E. Murphy, Sidley Austin LLP, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products: Posthearing Brief of C&C North America, Inc., Cosentino Industrial S.A.U., and Stone Supplier, Inc.* (March 3, 2026) (“Cosentino Posthearing Br.”).

<sup>17</sup> A representative for C&C North America participated in the hearing neither in support nor in opposition to the petition.

<sup>18</sup> See Letter from Robert L. LaFrankie, Crowell & Moring LLP, to The Honorable Lisa R. Barton, Secretary, *Re: Global Safeguard Investigation of Quartz Surface Products: Prehearing Brief on behalf of Respondents from Oman and United Arab Emirates* (Feb. 17, 2026) (“Global & Madhav Prehearing Br.”); See Letter from Robert L. LaFrankie, Crowell & Moring LLP, to The Honorable Lisa R. Barton, Secretary, *Re: Global Safeguard Investigation of Quartz Surface Products: Posthearing Brief on behalf of Respondents from Oman and United Arab Emirates* (March 3, 2026) (“Global & Madhav Posthearing Br.”).

<sup>19</sup> See *Pre-Hearing Brief of Hyundai L&C Canada, Inc.*, submitted by Andrew J. Lee and Eunji Kang, Nelson Mullins Riley & Scarborough LLP (Feb. 17, 2026) (“Hyundai Canada’s Prehearing Br.”); *Post-Hearing Brief of Hyundai L&C Canada, Inc.*, submitted by Andrew J. Lee and Eunji Kang, Nelson Mullins Riley & Scarborough LLP (March 3, 2026) (“Hyundai Canada’s Posthearing Br.”).

<sup>20</sup> A representative for Hyundai L&C Canada participated in the hearing neither in support nor in opposition to the petition.

<sup>21</sup> See Letter from R. Will Planert, Taft Stettinius & Hollister LLP, to Lisa R. Barton, Secretary, *Re: Quartz Surface Products, Inv. No. TA-201-79 (Injury): Prehearing Brief of the Federation of the Indian Quartz Industry* (Feb. 17, 2026) (“Indian Federation’s Prehearing Br.”); Letter from R. Will Planert, Taft (Continued...)

filed prehearing and posthearing briefs, made final comments, and participated in the hearing.<sup>22</sup> U.S. importer Stone Showcase, Inc. (“Stone Showcase”) filed a prehearing brief.<sup>23</sup> Foreign producer MXM Surfaces SND BHD and U.S. importer MXM Surfaces Inc. (collectively, “MXM”) filed a posthearing brief.<sup>24</sup> U.S. importer EOS Surfaces, LLC (“EOS”) filed posthearing comments.<sup>25</sup>

Several governments have also participated in the injury phase of the investigation. The government of Spain filed a prehearing brief and made oral statements at the hearing.<sup>26 27</sup> The governments of Canada and Vietnam filed prehearing briefs.<sup>28</sup> The governments of China, India, and Korea filed prehearing and posthearing briefs and made oral statements at the

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Stettinius & Hollister LLP, to Lisa R. Barton, Secretary, *Re: Quartz Surface Products, Inv. No. TA-201-79 (Injury): Posthearing Brief of the Federation of the Indian Quartz Industry* (March 3, 2026) (“Indian Federation’s Posthearing Br.”).

<sup>22</sup> See Letter from Eric C. Emerson, Steptoe & Johnson LLP, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products; Inv. No. TA-201-79 (Injury): Alliance of Vietnamese Quartz Surface Products Manufacturers Prehearing Brief* (Feb. 17, 2026) (“Vietnamese Manufacturers’ Prehearing Br.”); Letter from Eric C. Emerson, Steptoe & Johnson LLP, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products; Inv. No. TA-201-79 (Injury): Alliance of Vietnamese Quartz Surface Products Manufacturers Post-hearing Brief* (March 3, 2026) (“Vietnamese Manufacturers’ Posthearing Br.”); Letter from Eric C. Emerson, Steptoe & Johnson LLP, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products; Inv. No. TA-201-79 (Injury): Alliance of Vietnamese Quartz Surface Products Manufacturers Final Comments* (March 23, 2026) (“Vietnamese Manufacturers’ Final Comments”).

<sup>23</sup> See Letter from Robert L. LaFrankie, Crowell & Moring LLP, to The Honorable Lisa R. Barton, Secretary, *Re: Global Safeguard Investigation of Quartz Surface Products: Prehearing Brief on behalf of Stone Showcase* (Feb. 17, 2026) (“Stone Showcase’s Prehearing Br.”).

<sup>24</sup> See Letter from Jessica R. DiPietro, ArentFox Schiff LLP, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products; Inv. TA-201-79 (Injury); EOS Surfaces, LLC Post-Hearing Comments* (March 3, 2026) (“EOS’s Posthearing Comments”).

<sup>25</sup> See Letter from Diana Dimitriuc Quaia, ArentFox Schiff LLP, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products; Inv. TA-201-79 (Injury); MXM Post-Hearing Brief* (March 3, 2026) (“MXM’s Posthearing Br.”).

<sup>26</sup> See Letter from María Pilar de Carlos, Embassy of Spain, to The Honorable Lisa R. Barton, Secretary, *Re: Global Safeguard Investigation of Quartz Surface Products (Inv. Nos. 201-79); Prehearing brief of the Government of Spain* (Feb. 17, 2026) (“Government of Spain’s Prehearing Br.”).

<sup>27</sup> The European Union also made oral statements at the hearing.

<sup>28</sup> See Letter from Eric C. Emerson, Steptoe & Johnson LLP, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products; Inv. No. TA-201-79 (Injury): Government of Canada’s Prehearing Brief* (Feb. 17, 2026) (“Government of Canada’s Prehearing Br.”); Letter from Luong Hoang Thai, Ministry of Industry and Trade of Viet Nam, to Amy A. Karpel, Chair, *Re: Global Safeguard Investigation No. TA-201-79 against Quartz Surface Products* (Feb. 12, 2026) (“Government of Vietnam’s Prehearing Br.”).

hearing.<sup>29</sup> The governments of Malaysia and Turkey filed posthearing briefs and made oral statements at the hearing.<sup>30</sup> The government of Mexico filed a posthearing brief.<sup>31</sup>

U.S. industry data are based on questionnaire responses from seven producers of slab QSP and one integrated U.S. producer of QSP (*i.e.*, a producer which produces and fabricates slabs) that are estimated to have accounted for the vast majority of U.S. production of QSP slab in 2024.<sup>32</sup> Information on imports is based on adjusted official Commerce import statistics for imports for consumption and questionnaire responses from 94 firms providing usable questionnaire responses that represented 90.9 percent of U.S. imports from Canada, 1.6 percent of U.S. imports from China, 89.1 percent of U.S. imports from Czechia, 52.8 percent of U.S. imports from India, 147.4 percent of U.S. imports from Israel, 74.7 percent of U.S. imports

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<sup>29</sup> See Letter from Wang Jianfeng, Ministry of Commerce of the People's Republic of China, to The Honorable Lisa R. Barton, Secretary, *Re: Global Safeguard of Quartz Surface Products, No. TA-201-79: the Government of People's Republic of China's Prehearing Brief* (Feb. 13, 2026) ("Government of China's Prehearing Br."); Letter from Wang Jianfeng, Ministry of Commerce of the People's Republic of China, to The Honorable Lisa R. Barton, Secretary, *Re: Global Safeguard of Quartz Surface Products, No. TA-201-79: the Government of People's Republic of China's Posthearing Brief* (March 3, 2026) ("Government of China's Posthearing Br."); Letter from Mayank Singhal, Dua Associates, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products: Pre-Hearing brief on behalf of the Government of India* (Feb. 17, 2026) ("Government of India's Prehearing Br."); Letter from Mayank Singhal, Dua Associates, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products: Post Injury Hearing Brief on behalf of Gol* (March 3, 2026) ("Government of India's Posthearing Br."); Letter from Dongwon Jung, Yoon & Yang, LLC, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products, Inv. No. TA-201-79: Pre-Hearing Brief* (Feb. 13, 2026) ("Government of Korea's Prehearing Br."); Letter from Dongwon Jung, Yoon & Yang, LLC, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products, Inv. No. TA-201-79: Post Injury Hearing Brief* (March 3, 2026) ("Government of Korea's Posthearing Br.").

<sup>30</sup> See Letter from Azyyati Ibrahim, Ministry of Investment, Trade and Industry Malaysia, to The Honorable Lisa R. Barton, Secretary, *Re: The Safeguard Investigation With Regard to the Imports of Quartz Surface Products* (March 3, 2026) ("Malaysia's Posthearing Br."); Letter from Önder Duman, Directorate General for Imports, to Lisa R. Barton, Secretary, *Re: Global Safeguard Investigation of Quartz Surface Products Inv. No: TA-201-079 Government of Türkiye Post-Hearing Brief* (March 3, 2026) ("Government of Turkey's Posthearing Br.").

<sup>31</sup> See Letter from Rafael Roberto Flores Diaz, Ministry of the Economy, to The Honorable Lisa R. Barton, Secretary, *Re: Global Safeguard Investigation of Quartz Surface Products: Post-conference Brief Submitted by the Government of Mexico* (March 2, 2026) ("Government of Mexico's Posthearing Br.").

<sup>32</sup> Confidential Staff Report, INV-YY-037 (March 18, 2026) ("CR") at 1.4, 1.35; *Quartz Surface Products*, Inv. No. TA-201-79 (Safeguard), USITC Pub. 5738 (May 2026) ("PR") at 1.4, 1.35. In certain circumstances, U.S. industry data are based on questionnaire responses from 25 independent fabricators of QSP that are estimated to have accounted for approximately 3.8 percent of U.S. production of fabricated QSP slabs in 2024. *Id.* at n.117, Appendix I n.2. Unless indicated otherwise, references in this memorandum to data on the domestic industry cover only slab producers, including the one integrated producer.

from Italy, 73.0 percent of U.S. imports from Malaysia, 0.0 percent of U.S. imports from Mexico, 99.8 percent of U.S. imports from Spain, 42.3 percent of U.S. imports from Taiwan, 73.7 percent of U.S. imports from Thailand, 88.1 percent of U.S. imports from Turkey, 56.3 percent of U.S. imports from Vietnam, 44.9 percent of U.S. imports from all other sources, and 65.6 percent of U.S. imports from all import sources in 2024.<sup>33</sup> The Commission also received questionnaire responses from 71 foreign producers/exporters of QSP, which, accounting for resale exports, accounted for 88.3 percent of U.S. imports of QSP in 2024.<sup>34</sup>

## **II. Domestic Industry Producing a Product that is Like or Directly Competitive with the Imported Article**

In making determinations in global safeguard investigations, the Commission examines three statutory criteria. Specifically, to make an affirmative determination, the Commission must find –

- (1) an article is being imported into the United States in increased quantities;
- (2) the domestic industry producing an article that is like or directly competitive with the imported article is seriously injured or threatened with serious injury;
- and
- (3) the article is being imported in such increased quantities as to be a substantial cause of serious injury or threat of serious injury to the domestic industry.<sup>35</sup>

Before considering whether the three statutory criteria are satisfied, the Commission first defines the domestic industry. The statute defines the term “domestic industry” as “the producers as a whole of the like or directly competitive article or those producers whose collective production of the like or directly competitive article constitutes a major proportion of the total domestic production of such article.”<sup>36</sup> The Commission defines the domestic industry

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<sup>33</sup> CR/PR at 1.4, 1.36 & Table 2.1. Information on imports is based on official Commerce imports for consumption using subheadings 6810.99.0010, 6810.99.0020, and 6810.99.0040 of the Harmonized Tariff Schedule of the United States (“HTSUS”) adjusted to remove out-of-scope imports and add in-scope imports under other HTSUS numbers according to data submitted in the questionnaire responses. CR/PR at 1.36 n.119.

<sup>34</sup> CR/PR at 1.4, Table 5.5.

<sup>35</sup> See 19 U.S.C. § 2252(b)(1)(A).

<sup>36</sup> 19 U.S.C. § 2252(c)(6)(A)(1).

in terms of each like or directly competitive product and evaluates the impact of the pertinent imports on the facilities and workers producing each article.<sup>37</sup>

#### **A. Like or Directly Competitive Domestic Product**

The legislative history distinguishes between products that are “like” and products that are “directly competitive” with the imported articles, explaining that “like” articles are those that are “substantially identical in inherent or intrinsic characteristics (*i.e.*, materials from which made, appearance, quality, texture, etc.),” whereas “directly competitive” articles are those that “are substantially equivalent for commercial purposes, that is, are adapted to the same uses and are essentially interchangeable therefor.”<sup>38</sup>

In determining what constitutes the like or directly competitive product, the Commission has considered a number of factors. The list of factors considered is not fixed, and the weight given to any one factor may vary from case to case depending upon the facts.<sup>39</sup> The list, which derives from Commission practice, has included the physical properties of the article, its customs treatment, its manufacturing process (where and how it is made, *e.g.*, in a separate facility, using what machines and labor skills), the product’s uses, and the marketing channels through which the product is sold.<sup>40</sup> The statute does not prescribe these specific factors and

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<sup>37</sup> See, *e.g.*, *Steel*, Inv. No. TA-201-073, USITC Pub. 3479 (Dec. 2001) at 29 n.25; *Extruded Rubber Thread*, Inv. No. TA-201-072, USITC Pub. 3375 (Dec. 2000) at I-8; *Crabmeat from Swimming Crabs*, Inv. No. TA-201-71, USITC Pub. 3349 (Aug. 2000) at I-8 to I-9; *Circular Welded Carbon Quality Pipe*, Inv. No. TA-201-070, USITC Pub. 3261 (Dec. 1999) at I-12 to I-13; *Certain Steel Wire Rod*, Inv. No. TA-201-069, USITC Pub. 3207 (Jul. 1997) at I-10, I-36.

<sup>38</sup> H.R. Rep. No. 571, 93<sup>rd</sup> Cong., 1<sup>st</sup> Sess. 45 (1973); Senate Finance Committee, Report on Trade Reform Act of 1974 H.R. 10710, S. Rep. No. 1298, 93<sup>rd</sup> Cong., 2d Sess. at 121-22 (1974). See, *e.g.*, *Mushrooms*, Inv. No. TA-201-43, USITC Pub. 1089 (Aug. 1980) at 8, 11-12 (“the intent of the drafting committees was that ‘like’ has to do with the physical identity of the articles themselves, while ‘directly competitive’ relates more to the notion of commercial interchangeableness”); see also *United Shoe Workers of Am. v. Bedell*, 506 F.2d 174, 185-86, 190-91 (D.C. Cir. 1974) (discussing meaning of “like” and “directly competitive” in the context of request for adjustment assistance under the Trade Expansion Act).

<sup>39</sup> See, *e.g.*, *Certain Steel Wire Rod*, Inv. No. TA-201-69, USITC Pub. 3207 (Jul. 1999) at I-8; *Lamb Meat*, Inv. No. TA-201-68, USITC Pub. 3176 (Apr. 1999) at I-10; *Wheat Gluten*, Inv. No. TA-201-67, USITC Pub. 3088 (Mar. 1998) at I-9.

<sup>40</sup> See, *e.g.*, *Extruded Rubber Thread*, Inv. No. TA-201-72, USITC Pub. 3375 (Dec. 2000) at I-5 to I-6; *Circular Welded Carbon Quality Line Pipe*, Inv. No. TA-201-70, USITC Pub. 3261 (Dec. 1999) at I-10; *Apple Juice*, Inv. No. TA-201-69, USITC Pub. 1861 (June 1986) at 3-10; *Fresh Winter Tomatoes*, Inv. No. TA-201-64 (Provisional Relief Phase), USITC Pub. 2881 (Apr. 1995) at I-7 (Views of Watson, Crawford, and Bragg); *Broom Corn Brooms*, Inv. No. 302-NAFTA-1 (Provisional Relief Phase), USITC Pub. 2963 (May 1996) at I-14.

does not limit the factors that the Commission may consider in making its determination.<sup>41</sup> The Commission looks for clear dividing lines among possible products, and disregards minor variations.<sup>42</sup> Thus, in conducting its analysis, the Commission (1) considers the list of factors, (2) evaluates the factors in terms of the facts in the investigation, and (3) looks for clear dividing lines between products, disregarding minor variations.

## **1. The Imported Article**

The notice of institution described the imported article(s) under investigation as follows:

The imported article covered by this investigation is QSP, which consists of slabs and other surfaces created from a mixture of materials that includes predominately silica (e.g., quartz, quartz powder, cristobalite, glass powder) as well as a resin binder (e.g., an unsaturated polyester). The incorporation of other materials, including, but not limited to, pigments, cement, or other additives does not remove the merchandise from the scope. However, the scope only includes products where the silica content is greater than any other single material, by actual weight. QSP is typically sold as rectangular slabs with a total surface area of approximately 45 to 60 square feet and a nominal thickness of one, two, or three centimeters. However, the scope includes surface products of all other sizes, thicknesses, and shapes. In addition to slabs, the scope includes, but is not limited to, other surfaces such as countertops, backsplashes, vanity tops, bar tops, work tops, tabletops, flooring, wall facing, shower surrounds, fireplace surrounds, mantels, and tiles. QSP may be polished or unpolished, cut or uncut, fabricated or not fabricated, cured or uncured, edged or not edged, finished or unfinished, thermoformed or not thermoformed, packaged or unpackaged, and may have any type of surface finish. In addition, QSP is covered by the scope whether or not it is imported attached to, or in conjunction with, nonsubject merchandise such as sinks, sink bowls, vanities, cabinets, and furniture. If QSP is imported attached to, or in conjunction with, such nonsubject merchandise, only the QSP is covered by the scope.

Subject merchandise includes material matching the above description that has been finished, packaged, or otherwise fabricated in a third country, including by cutting, polishing, curing, edging, thermoforming, attaching to, or packaging with another product, or any other finishing, packaging, or fabrication that would not otherwise remove the merchandise from the scope if performed in the country

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<sup>41</sup> See, e.g., *Crystalline Silicon Photovoltaic Cells*, Inv. No. TA-201-75, USITC Pub. 4739 (Nov. 2017) (“CSPVs, USITC Pub. 4739”) at 11.

<sup>42</sup> See, e.g., *Stainless Steel Table Flatware*, Inv. No. TA-201-49, USITC Pub. 1536 (June 1984) at 3-4.

of manufacture of the QSP. The scope does not cover quarried stone surface products, such as granite, marble, soapstone, or quartzite.<sup>43</sup>

The scope of this investigation is identical to that of the 2025 five-year reviews concerning *Quartz Surface Products from China* and *Quartz Surface Productions from India and Turkey*, except that certain crushed glass surface products are specifically excluded from the scope of the 2025 five-year reviews.<sup>44</sup>

Quartz surface products are compacted stone composite building materials used for countertop surfaces or aesthetic accents in residential, commercial, and industrial properties.<sup>45</sup> Quartz surface products compete with quarried natural stone products, such as granite, marble, and quartzite.<sup>46</sup> The scope of this investigation covers both raw material slabs and finished products (*i.e.*, fabricated quartz surface products).<sup>47</sup>

## **2. Parties' Arguments**

Petitioners argue that the Commission should define a single domestic product that is like or directly competitive with imported QSP.<sup>48</sup> They argue that the Commission should define the domestic like product to encompass all QSP described in the scope of the investigation — including both QSP slabs and fabricated QSP — as it did in the original investigations and 2025 five-year reviews in *Quartz Surface Products from China* and *Quartz Surface Products from India and Turkey*.<sup>49</sup>

Petitioners maintain that such domestically produced QSP is “like” the imported articles described in the scope, because it shares substantially identical physical properties and uses as confirmed by the customs treatment of imported articles, is produced using essentially the same production processes, competes directly in the same end-use applications, and is sold through the same channels of distribution.<sup>50</sup>

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<sup>43</sup> CR/PR at 1.12.

<sup>44</sup> CR/PR at 1.14; *Quartz Surface Products from China*, Inv. Nos. 701-TA-606 and 731-TA-1416 (Review), USITC Pub. 5578 (Jan. 2025) at 5-6; *Quartz Surface Products from India and Turkey*, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451 (Review), USITC Pub. 5691 (Dec. 2025) at 5-6.

<sup>45</sup> CR/PR at 1.16 & 1.19.

<sup>46</sup> CR/PR at 1.19.

<sup>47</sup> CR/PR at 1.12

<sup>48</sup> Petitioners' Prehearing Br. at 7.

<sup>49</sup> Petitioners' Prehearing Br. at 7-8.

<sup>50</sup> Petitioners' Prehearing Br. at 9-13. U.S. Customs and Border Protection (“Customs”) has ruled that fabrication of QSP does not change the product’s country of origin. For example, in Customs Ruling N101559, Customs ruled that the country of origin of QSP slabs produced in Korea remains Korea after (Continued...)



One respondent party presented arguments at the post-hearing stage concerning the exclusion of crushed glass surface products, which the U.S. industry does not produce, from the scope of the investigation.<sup>51</sup>

### 3. Analysis

The starting point for our analysis is the scope language referenced above. We find the like article to be domestically produced QSP co-extensive with the scope language, including QSP slabs and fabricated QSP. All parties agree with the definition of the like article as co-extensive with the scope, and there is nothing in the record to suggest that domestically produced QSP is not like, *i.e.*, substantially identical in inherent or intrinsic characteristics to, in-scope imported QSP slabs and fabricated QSP.

Accordingly, we define a single like or directly competitive article consisting of all domestically produced QSP coextensive with the scope.<sup>52</sup>

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fabrication in the United States, because no substantial transformation takes place through fabrication. *See also* Customs Classification Ruling H303280 (April 25, 2019) (country of origin of quartz countertops); Customs Classification Ruling N299117 (July 31, 2018) (country of origin determination of agglomerated quartz slabs); and Customs Classification Ruling N101559 (May 10, 2010) (country of origin marking of imported articles of agglomerated stone).

<sup>51</sup> CR/PR at 1.21. No party in opposition to safeguard measures requested that the Commission collect data concerning other possible domestic like products in their comments on the Commission's draft questionnaires in this safeguard investigation. *Id.* EOS argues that the Commission should exclude imports of crushed glass products in its injury analysis of the U.S. industry in this safeguard investigation, as the U.S. industry does not produce crushed glass products, the amount imported is too small to impact the market, and EOS, the main supplier of these products, is importing to meet a niche, high-end need. EOS's Posthearing Br. at 7-8. As discussed previously, unlike the scopes in the 2025 five-year reviews, certain crushed glass surface products are *not* excluded from the scope of this investigation. CR/PR at 1.14.

<sup>52</sup> Although the like product factors that the Commission typically considers in safeguard investigations are somewhat different from those it considers in Title VII investigations and reviews, we note that finding a single like or directly competitive article in this safeguard investigation is consistent with the Commission's like product analysis in the 2019 and 2020 original investigations and 2025 five-year reviews concerning *Quartz Surface Products from China* and *Quartz Surface Products from India and Turkey*. The scope in the original investigations and five-year reviews were substantively identical to the scope in this safeguard investigation. *See* CR/PR 1.12; *Quartz Surface Products from China*, Inv. Nos. 701-TA-606 and 731-TA-1416 (Final), USITC Pub. 4913 at 6-7; *Quartz Surface Products from India and Turkey*, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451 (Final), USITC Pub. No. 5061 (June 2020) at 5-7; *First Reviews*, USITC Pubs. 5578 & 5691 at 5-6.

In the preliminary phase of the *Quartz Surface Products from China* original investigations, the Commission examined whether fabricated QSP and QSP slab should be defined as separate domestic like products under its semi-finished product test. It found that all slabs are dedicated to production of (Continued...)

## B. Domestic Industry

### 1. Legal Standards and Statutory Requirements

The term “domestic industry” is defined in section 202(c)(6)(A)(i) of the Trade Act to mean:

with respect to an article, the domestic producers as a whole of the like or directly competitive article or those producers whose collective production of the like or directly competitive article constitutes a major proportion of the total domestic production of such article.<sup>53</sup>

This definition was added by the Uruguay Round Agreements Act (“URAA”) and codified existing Commission practice.<sup>54</sup>

The Commission has broad discretion to determine what constitutes the domestic industry producing a like or directly competitive article in global safeguard investigations, generally adhering to the principal that “{t}he industry should be defined in a manner which allows for a meaningful analysis of the statutory criteria in light of the legislative history of section 201.”<sup>55</sup> The concept of industry employed in section 201 of the Trade Act is not the same as that used in the antidumping and countervailing duty provisions of Title VII.<sup>56</sup> As the Commission has stated,

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fabs. It noted that while the functions of the products differ, their essential physical characteristics remain the same, whether the QSP is fabricated or not. Consequently, notwithstanding separate markets for slab and fabs, the Commission found quartz slab and fabricated QSP to be a single domestic like product. USITC Pub. 4794 at 10. In the final phase of the investigations in *Quartz Surface Products from China*, the Commission gathered additional information concerning slabs and fabs. The information gathered concerning the semi-finished product factors was largely unchanged from the preliminary phase with the exception of differences in value. Therefore, the Commission found a single domestic like product consisting of all QSP coextensive with Commerce’s scope in the final determinations in *Quartz Surface Products from China*. USITC Pub. 4913 at 9. *See also Quartz Surface Products from India and Turkey*, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451 (Prelim), USITC Pub. No. 4919 (July 2019) at 8; *Quartz Surface Products from India and Turkey*, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451 (Final), USITC Pub. No. 5061 (June 2020) at 7-8.

<sup>53</sup> 19 U.S.C. § 2252(c)(6)(A)(i).

<sup>54</sup> Uruguay Round Agreements Act Statement of Administrative Action (“URAA SAA”), H. Doc. 103-316, vol. I (103<sup>rd</sup> Cong. 2<sup>nd</sup> Sess.) at 961.

<sup>55</sup> *Steel*, Inv. No. TA-201-075, USITC Pub. 3479 at 30 (quoting *Stainless Steel and Alloy Tool Steel*, 201-TA-048, USITC Pub. 1377 (May 1983) at 12).

<sup>56</sup> The statutory definitions of “domestic industry” are different. *Compare* 19 U.S.C. § 2252(c)(6)(A)(1) (defining the term for purposes of global safeguard investigations as “domestic producers as a whole of the like or directly competitive article ...”) *with* 19 U.S.C. §§ 1677(4)(A), 1677(10) (Continued...)

Title VII is narrowly aimed at remedying the specific advantages imports may be receiving from unfair trade practices. The purpose of section 201 either is to prevent or remedy serious injury to domestic productive resources from all imports. In light of the purpose of section 201 and in contrast to Title VII, the sharing of productive processes and facilities is a fundamental concern in defining the scope of the domestic industry under section 201.<sup>57</sup>

The legislative history to the Trade Act indicates that the concern in a safeguard investigation is “the question of serious injury to the productive resources (*e.g.*, employees, physical facilities, and capital) employed in the divisions or plants in which the article in question is produced.”<sup>58</sup>

## **2. Parties’ Arguments**

Petitioners argue that independent fabricators should be excluded from the domestic industry. They concede that the Commission has discretion on how to define the domestic industry, and that it has not established a uniform approach in safeguard investigations. While Petitioners do not object to the application in a safeguard context of the “sufficient production-related activities” analysis that the Commission has used in AD/CVD proceedings, they argue that there should be subtle but important differences in its application.<sup>59</sup>

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(defining “domestic industry” in antidumping and countervailing duty investigations as “the producers as a whole of a domestic like product ...,” and in turn is defining “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses” with the imports subject to investigation).

<sup>57</sup> *Steel*, Inv. No. TA-201-075, USITC Pub. 3479 at 30 (quoting *Stainless Steel and Alloy Tool Steel*, 201-TA-048, USITC Pub. 1377 (May 1983) at 16 n.21).

<sup>58</sup> H.R. Rep. 93-71 (1973) at 46; *see also* H.R. Rep. 100-576 (1988) at 661-62; S. Rep. 100-71 (1987) at 46-47; H.R. Rep. 100-40 (1987) at 86-96.

<sup>59</sup> Petitioners’ Posthearing Br. at Exh. 1, p. 14-15. In deciding whether a firm qualifies as a domestic producer of the domestic like product for the purpose of determining material injury in an AD/CVD context, the Commission generally analyzes the overall nature of a firm’s U.S. production-related activities, although production-related activity at minimum levels could be insufficient to constitute domestic production. The Commission generally considers six factors: (1) source and extent of the firm’s capital investment; (2) technical expertise involved in U.S. production activities; (3) value added to the product in the United States; (4) employment levels; (5) quantity and type of parts sourced in the United States; and (6) any other costs and activities in the United States directly leading to production of the like product. No single factor is determinative and the Commission may consider any other factors it deems relevant in light of the specific facts of any investigation. *Crystalline Silicon Photovoltaic Cells and Modules from China*, Inv. Nos. 701-TA-481 and 731-TA-1190 (Final), USITC Pub. 4360 at 12-13 (Nov. 2012).

Petitioners argue that, as only a small number of fabricators responded to the Commission's questionnaires, there is not sufficient evidence on the record to analyze independent fabricators in the aggregate.<sup>60</sup> They contend that each of the six factors of the sufficient production-related activities analysis show that the subset of independent fabricators that did respond do not engage in sufficient production-related activities.<sup>61</sup> In particular, Petitioners contend that "the Commission should place heavy weight on the fact that fabricators rely primarily on imported QSP slabs for their processing operations" and that "fabricators process not only QSP but many other surfaces such as granite, marble, and quartzite." According to Petitioners, "{u}nder these circumstances, only a small portion the fabricators' capital expenditures, equipment, employees, and other resources are truly dedicated to domestic QSP operations."<sup>62</sup> With respect to value added, Petitioners argue that the QSP slab production process "imparts the finished QSP with its essential physical characteristics (*e.g.*, raw materials, color and design, hardness, strength, smoothness, and porosity), which do not change during the fabrication process." This, according to Petitioners, is a qualitative aspect of any analysis of value added, and it should not be ignored. Petitioners estimate that \*\*\*.<sup>63</sup>

Respondents argue that independent fabricators should be included in the Commission's definition of the domestic industry. They contend that Congress intended that the domestic industry be defined more broadly in a safeguard investigation than it is defined for the purposes of antidumping ("AD") and countervailing duty ("CVD") investigations, as the definition of domestic industry in the safeguard context includes producers of an "article like or directly competitive with the imported article."<sup>64</sup> According to Respondents, "Congress designed Section 201 to capture the entire domestic industry's overall condition."<sup>65</sup>

Respondents further contend that, if the Commission considers the sufficiency of production-related activities, it should consider the employees and facilities used in productive processes to be most relevant in a safeguard context.<sup>66</sup> They further contend that the Commission should apply the test with "appropriate breadth and flexibility, consistent with the

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<sup>60</sup> Petitioners' Posthearing Br. at Exh. 1, p. 15.

<sup>61</sup> Petitioners' Prehearing Br. at 14-22.

<sup>62</sup> Petitioners' Posthearing Br. at Exh. 1, p. 11, 17-18.

<sup>63</sup> Petitioners' Posthearing Br. at Exh. 1, p. 16.

<sup>64</sup> Arizona, Elite, and MSI's Posthearing Br. at Responses to Commission Questions, p. 72 (emphasis in original).

<sup>65</sup> Arizona, Elite, and MSI's Posthearing Br. at Responses to Commission Questions, p. 74-75.

<sup>66</sup> Arizona, Elite, and MSI's Posthearing Br. at Responses to Commission Questions, p. 77.

safeguard statute's remedial purpose.”<sup>67</sup> In any event, they argue that fabricators meet the Commission's criteria for sufficient-production related activities, as found multiple times in the AD/CVD context, and argue that nothing has changed since the most recent AD/CVD determinations that would justify changing the Commission's analysis.<sup>68</sup>

Respondents further contend that, to the extent that the Commission employs the sufficient production-related activities test, it should not discount the equipment and capital investments of fabricators who fabricate multiple types of stone as well as imported QSP, as it has never done so in prior proceedings employing this test.<sup>69</sup> They further point out that, in the safeguard proceeding for *Crystalline Silicon Photovoltaic Cells*, the Commission defined the domestic industry to include independent module manufacturers, despite the fact that they used imported cells in their production activities, as the Commission's focus was on the “productive resources” deployed by the module manufacturers.<sup>70</sup>

### **3. Analysis**

We define the domestic industry as all U.S. producers of QSP, not including independent fabricators, as explained below.

We have defined the like or directly competitive article as consisting of all QSP corresponding to the scope, which includes both slab and fabricated QSP. Thus, applying the definition of the term “domestic industry” in section 202(c)(6)(A)(i) of the Trade Act requires a determination as to which firms qualify as producers of that product in the United States.

The dictionary meaning of “producer” as “one that ... manufactures crude materials into articles of use.”<sup>71</sup> The Commission has addressed whether processors of semifinished products qualify as producers in a safeguard context in limited circumstances.<sup>72</sup> However, it developed the sufficient production-related activities factors in the context of antidumping and countervailing duty investigations to determine whether a firm qualifies as a “producer” subject to material injury by reason of dumped or subsidized imports, which is similar to the use of the

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<sup>67</sup> Arizona, Elite, and MSI's Posthearing Br. at Responses to Commission Questions, p. 77.

<sup>68</sup> Arizona, Elite, and MSI's Posthearing Br. at Responses to Commission Questions, p. 77; Indian Federation's Posthearing Br. at 1-4.

<sup>69</sup> Arizona, Elite, and MSI's Posthearing Br. at Responses to Commission Questions, p. 79-80.

<sup>70</sup> Arizona, Elite, and MSI's Posthearing Br. at Responses to Commission Questions, p. 78-79.

<sup>71</sup> <https://www.merriam-webster.com/dictionary/producer> (last accessed Nov. 18, 2025).

<sup>72</sup> See *Steel*, Inv. No. TA-201-73, USITC Pub. 3479 (Dec. 2001) at 195-96 n.1210; *Certain Cameras*, Inv. No. TA-201-62, USITC Pub. 2315 (Sept. 1990) at 15-16; *Heavyweight Motorcycles and Engines and Power Train Subassemblies Therefor*, Inv. No. TA-201-47, USITC Pub. 1342 (Feb. 1983) at 9-10; *CSPVs*, USITC Pub. 4739 at 18 (Nov. 2017).

term “producer” in section 202(c). Therefore, in the absence of more detailed statutory guidance, we find that the factors considered in the sufficient production-related activities analysis are at least relevant to determining whether an entity satisfies the ordinary meaning of “producers” in the “domestic industry” for purposes of section 202(c)(6)(A)(i).

According to the parties, there are approximately 10,000 independent fabricators of QSP in the United States, but the record in this investigation contains full responses from only a small number of independent fabricators.<sup>73</sup>

*Source and Extent of the Firm’s Capital Investment.* The Commission received usable questionnaire responses from 25 independent fabricators, only three of which answered the sufficient production-related activities questions.<sup>74</sup> These three independent fabricators reported annual capital expenditures totaling \$\*\*\* in 2020, \$\*\*\* in 2021, \$\*\*\* in 2022, \$\*\*\* in 2023, and \$\*\*\* in 2024. Capital expenditures were \$\*\*\* in interim 2024 and \$\*\*\* in interim 2025.<sup>75</sup> Slab producers reported annual capital expenditures totaling \$49.3 million in 2020, \$89.6 million in 2021, \$95.7 million in 2022, \$80.5 million in 2023, and \$31.0 million in 2024. Capital expenditures were \$22.7 million in interim 2024 and \$44.4 million in interim 2025.<sup>76</sup> On a per firm basis, the three responding fabricators reported capital expenditures during 2020 to 2024 ranging from \*\*\* to \*\*\*, while slab producers reported capital expenditures ranging from \*\*\* to \*\*\*.<sup>77</sup>

The three responding fabricators estimated the total amount of capital investments that would be required today on a greenfield basis to replicate their firms’ current quartz surface operations as \$\*\*\*, whereas slab producers estimated the total amount of capital investments as \$1.7 billion.<sup>78</sup> On a per firm basis, the three responding fabricators’ estimates of the total amount of capital investments required on a greenfield basis to replicate operations

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<sup>73</sup> Respondents submitted declarations from nearly 1,000 fabricators attesting their opposition to this investigation. See CR/PR at I.3, n.1; Arizona, Elite & MSI’s Prehearing Br. at 2, Ex. 1-A. Yet, when the Commission issued a U.S. fabricator questionnaire, with only a limited number of questions, to approximately 500 independent fabricators, only 25 firms provided usable data, with another 26 firms providing questionnaire responses more than two-months after the submission deadline with significant data and reconciliation issues. CR/PR at I.3 & n.3. These firms collectively account for a relatively small portion of domestic QSP fabrication activity (estimated at approximately 3.8 percent), and the record contains no information suggesting that they are representative of that activity. *Id.* at n.2.

<sup>74</sup> CR/PR at I.3.

<sup>75</sup> CR/PR at Tables J.11 & I.1.

<sup>76</sup> CR/PR at Tables 4.6 & I.1.

<sup>77</sup> CR/PR at Tables I.2 & I.3.

<sup>78</sup> CR/PR at Table I.1.

ranged from \$\*\*\* to \$\*\*\*, while slab producers estimates ranged from \$\*\*\* to \$\*\*\*.<sup>79</sup>

*Technical Expertise Involved in U.S. Production Activities.* The production of slabs is a multi-step manufacturing process involving mixing, combining, dispensing and molding, pressing, curing, cooling, polishing, and inspection. Slabs are produced to specific design elements which are often considered proprietary or patented designs.<sup>80</sup> The QSP slab production process imparts the finished QSP with its essential physical characteristics (*e.g.*, raw materials, color and design, hardness, strength, smoothness, and porosity), which do not change during the fabrication process. In the dispensing and molding stage, the material is poured into a rubber mold and distributed to produce the desired appearance and thickness needed before getting pressed into the final shape. A high-pressure spray can be used to create the appearance of veins in the slab. In the pressing stage, the material in the mold may be placed under a vacuum inside a press chamber and the physical force of the press compacts the material into slabs of varying sizes and thicknesses. This pressing process might also involve the use of vibration to remove gases from the mixture, increasing the strength of the final slab. After pressing, the slabs are heated (cured) in a kiln at 194 degrees Fahrenheit for 45 minutes, a process that hardens the slabs and forms a solid surface while instilling desirable physical qualities like stain resistance. The slabs are then cooled for 24 hours and then the slab is measured, calibrated, and worked (as needed) to make sure it meets the desired dimensions before polishing. The slab is then polished to produce the desired surface finish, such as smooth or matte appearance.<sup>81</sup>

Fabrication involves a less transformative manufacturing process insofar as fabrication gives the product a new shape but does not alter its chemistry or physical properties and the resulting fabricated slab retains the essential characteristics of the slab from which it was produced.<sup>82</sup> A technician with the fabricator creates a design file that specifies features like the type of edge, desired configuration, various cutouts and openings, and the backsplash of the surface.<sup>83</sup> The technician then sends the design file to a production facility where workers program machines so that a diamond blade saw will cut straight lines and waterjets will cut arcs

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<sup>79</sup> CR/PR at Tables I.2 & I.3. Cambria, an integrated slab and fab producer, asserts that substantially less investment is required to establish a fabrication facility than a slab production facility. Petitioners' Prehearing Br. at 17-18.

<sup>80</sup> CR/PR at 6.22-6.23.

<sup>81</sup> CR/PR at 1.17.

<sup>82</sup> CR/PR at 1.18.

<sup>83</sup> CR/PR at 1.18.

and circles into the slab according to the design.<sup>84</sup> After the saw and waterjet cutting, the QSP goes through grinding and finishing operations on the edges and cutouts. The finished product is polished and detailed to ensure readiness for installation.<sup>85</sup>

According to Petitioners, producing slabs requires specialized knowledge not only of the complex equipment involved, but also the specific raw materials, chemistry, recipes, designs, and processes required to produce slabs with the desired physical characteristics and appearance, requiring \*\*\*.<sup>86</sup> Further, according to Petitioners, a quartz slab production factory is specific and specialized to make only quartz surface slabs; on the other hand, fabrication shops can fabricate and process all stone surface products of any origin, including but not limited to quarried stone such as marble, granite, and soapstone, along with a vast array of products such as porcelain, as well as QSP.<sup>87</sup> On the other hand, five responding fabricators indicated in their questionnaire responses that fabrication operations are complex to varying degrees.<sup>88</sup>

*Value Added to the Product in the United States.* Three responding fabricators reported an average value added by fabrication that ranged from 33.9 to 41.8 percent over the POI, while responding slab producers reported a higher average value added ranging from 46.0 to 52.7 percent.<sup>89</sup> On a per firm basis, the three responding fabricators reported a value added during 2020 to 2024 ranging from \*\*\* percent to \*\*\* percent, while

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<sup>84</sup> CR/PR at 1.18.

<sup>85</sup> CR/PR at 1.18.

<sup>86</sup> Petitioners' Prehearing Br. at 18-19; *see also* CR at Table I.7.

<sup>87</sup> Petitioners' Prehearing Br. at 20.

<sup>88</sup> CR/PR at Table I.7.

<sup>89</sup> CR/PR at Table I.1. Value added is calculated as the share of conversion costs (direct labor, other factory costs, and raw materials other than QSP for U.S. slab producers, direct labor and other factory costs for U.S. fabricators) out of cost of goods sold ("COGS"). *Id.* at note. Based on Cambria's experience, \*\*\*. Petitioners' Posthearing Br. at Exh. 1, p.16. According to Petitioners, QSP slab production facilities are very large and involve highly complex and interconnected machinery, engineering processes, and raw materials/inputs as well as highly sophisticated automation and process controls. QSP slab production facilities convert raw materials into slab form. The QSP slab production process imparts the finished QSP with its essential physical characteristics (*e.g.*, raw materials, color and design, hardness, strength, smoothness, and porosity), which do not change during the fabrication process. On the other hand, fabricators source QSP slab from domestic or foreign suppliers and convert them into custom shapes and sizes for specific projects in an end user's home or business. Fabricators require more generic machinery and equipment, such as saws and polishers, to cut and finish a QSP slab. As a result, according to Petitioners, the capital investment, type of technical expertise, and employees required to establish and operate a QSP slab production facility are significantly more than fabrication shops. Petitioners' Prehearing Brief at 16-19.



slab producers reported a value added ranging from \*\*\* percent to \*\*\* percent.<sup>90</sup>

*Employment Levels.* Twenty-five responding fabricators reported in the aggregate a range of 784 to 915 employees per year over the POI, while slab producers reported in the aggregate a range of 1,410 to 1,685 employees per year during the POI.<sup>91</sup> On a per firm basis, the three fabricators that submitted complete questionnaires reported employment levels during 2020 to 2024 ranging from \*\*\* employees to \*\*\* employees, while slab producers reported employee levels ranging from \*\*\* employees to \*\*\* employees.<sup>92</sup> Fabricators reported paying hourly wages ranging from \$24.89 to \$32.19 over the POI, while slab producers reported hourly wages of \$27.75 to \$33.27 during the POI.<sup>93</sup>

*Quantity and Type of Parts Sourced in the United States.* Responding fabricators reported that 44.2 percent of their production during 2024 used slab that was sourced domestically, while 55.8 percent of their production used slab that was imported.<sup>94</sup> Domestic slab producers, on the other hand, sourced 61.5 percent of their raw materials (a silica source, binding agents, pigments, and other additives) domestically in 2024, while 38.5 percent of their raw materials were imported.<sup>95</sup>

*Conclusion.* The record in this investigation indicates that independent fabricators do not engage in production-related activities sufficient to qualify as “producers” in the domestic industry. We start by noting that although a huge number of fabricators submitted letters opposing safeguard relief, a relatively small subset responded at all to our questionnaires, and only three provided information relevant to all factors in the sufficient production-related activities analysis. We have doubts that this subset of fabricators is representative of independent fabricators’ activities in general and therefore put less weight on those fabricators’ numerical reporting under the various factors.

Instead, we emphasize the nature of the production activities in which slab producers on the one hand and fabricators on the other hand are engaged. The QSP slab production process imparts the finished QSP with its essential physical characteristics (*e.g.*, raw materials, color and design, hardness, strength, smoothness, and porosity), which do not change during the fabrication process, while fabricators, despite the extent of the direct labor and other

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<sup>90</sup> CR/PR at Tables I.2 & I.3.

<sup>91</sup> CR/PR at Tables I.1, I.17, & 3.15.

<sup>92</sup> CR/PR at Tables I.2 & I.3.

<sup>93</sup> CR/PR at Tables I.1, I.17, & 3.15.

<sup>94</sup> CR/PR at Table I.10.

<sup>95</sup> CR/PR at Table I.1.

factory costs involved in fabricating the slabs (which drive the value added calculation), are not adding to or changing the essential characteristics of the slabs.

Further we emphasize that, unlike QSP slab facilities, fabrication facilities are not dedicated solely to the fabrication of domestically produced QSP, nor are they dedicated solely to fabrication of QSP; rather they fabricate both domestic and imported QSP and other surface products as well as QSP, such as granite, marble, and quartzite.<sup>96</sup> And, while responding fabricators reported sourcing 38.2 to 44.6 percent of their production during the POI using domestically produced slab, the evidence on the record indicates that their data are not representative of independent fabricators. Domestic slab producers accounted for only 11.7 to 19.4 percent of apparent U.S. consumption of QSP throughout the POI, with the remainder accounted for by imports of mostly unfabricated slab, and every QSP slab must be fabricated before it can be installed in its ultimate end use.<sup>97</sup> These data indicate that independent fabricators source significantly less QSP from domestic sources than reported by the responding independent fabricators, reflecting that far fewer of their inputs are sourced domestically compared to slab producers. We find that consideration of the source of inputs is particularly relevant in a safeguard investigation, where the Commission is charged with evaluating injury caused by imports to the productive resources of the article concerned. Here, independent fabricators directly and significantly benefit from the imports of QSP to the detriment of domestic QSP slab producers that as elaborated below have lost market share and sales as they face competition from low-price imported QSP slabs.<sup>98</sup>

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<sup>96</sup> In 2025, quartz was the most popular countertop material used in home kitchen renovations, accounting for 39 percent of the market. Granite (29 percent) and quartzite (11 percent) were the next most popular choices. CR/PR at 1.19. Respondents acknowledge that “{q}uartz now accounts for approximately 35 percent of U.S. kitchen countertop installations.” Arizona, Elite & MSI’s Prehearing Br. at 35.

<sup>97</sup> See Petitioners’ Posthearing Br. at Exh. 1, p. 17; CR/PR at Table C.1. We note that \*\*\*, the largest responding fabricator, initially mis-reported that 100 percent of its fabricated QSP was made using domestically produced slabs, when in fact it purchased most of its slabs from a U.S. importer of foreign-produced slab. Similarly, \*\*\* reported that \*\*\* percent of its fabricated QSP was made using domestically produced slabs, which is likely mis-reported considering domestic slab producers’ market shares during the POI. See Table I.1, note; CR/PR at Table C.1.

<sup>98</sup> In the CSPV safeguard investigation, the Commission included in the domestic industry independent module producers who relied only on imported CSPV cells because, among other reasons, the Commission reasoned that “exclusion of such independent module producers would arguably run counter to the legislative intent of considering serious injury to the productive resources in which the article is produced in the United States.” See CSPVs, USITC Pub. 4739 at 16-18. However, unlike in this investigation, there was no indication that independent module producers’ productive resources were (Continued...)

Furthermore, while fabrication requires at least moderate technical expertise, including specialized knowledge and training in order to operate specialized equipment required for fabrication, the QSP slab production process is more complex and requires more specialized equipment to transform raw materials into QSP and impart QSP with its essential physical characteristics which do not change in the fabrication process.<sup>99</sup> The nature of what producers of QSP slab are engaged in is significantly different than the nature of what independent fabricators are engaged in, even though we recognize both are necessary to produce fabricated QSP that is ready for installation.

Even considering the numerical responses of responding fabricators in terms of capital and greenfield investments, value added and employment, we do not find that these responses on their own, or in view of the aforementioned, support concluding that fabricators engage in sufficient production related activities. We review them as follows.

The total capital expenditures and investments of fabricators who responded to questionnaires in this proceeding are substantially less than those of slab producers. On a per firm basis, the high end of the range of capital expenditures reported by the three responding fabricators in 2020 was close to the low end of the range of capital expenditures reported by slab producers, while the range of greenfield investment estimates reported by fabricators was significantly lower than the greenfield investment estimates for responding QSP slab producers. Even assuming that the responding fabricators are representative of fabricators generally, this suggests that the capital expenditures and investments needed to start and maintain a fabrication facility are significantly less than those needed for QSP slab production.

With respect to value-added, the record in this proceeding indicates that the average value added to the finished product by fabrication is less than the average value reported by slab producers.<sup>100</sup> While the average value added reported by responding fabricators is

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dedicated to anything other than the like or directly competitive article. Whereas, in this investigation, fabrication facilities are not dedicated solely to the fabrication of QSP, rather they fabricate other surface products, such as granite, marble, and quartzite. See CR/PR at 1.19. Moreover, at the time of the safeguard investigation, there was minimal domestic cell production and the vast majority of U.S. imports of CSPV products were finished modules. See CSPVs, USITC Pub. 4739 at 29 and 92. Exclusion of the module producers would have resulted in the Commission failing to investigate a key productive resource that was being injured, whereas here inclusion of the independent fabricators would mean inclusion of entities that are themselves the beneficiaries of the imports.

<sup>99</sup> Petitioners' Posthearing Br. at Exh. 1, p. 16. Notably, Customs has found that imported slabs do not go through a substantial transformation when fabricated in a third-country before being imported into the United States. *Id.* at Exh. 1, p. 16-17 *citing* Petition at Exhs. 6, 7 & 8.

<sup>100</sup> CR/PR at Table I.1.

substantial, ranging from 33.9 to 41.8 percent, we find that these figures are not directly comparable to the value added percentages for domestically produced QSP slab because, as discussed more below, the pricing data in this investigation indicates that prices for imported QSP slab were below those for U.S.-produced QSP slab in all comparisons, with significant margins of underselling. As the record indicates that fabricators imported at least a majority of the slab that they fabricated, which undersold domestically produced slab, fabricators' conversion costs are likely higher as a percentage of COGS than if they had sourced QSP slab domestically.

With respect to employment, on a per firm basis, the majority of slab producers reported employment levels ranging to more than 100 PRWs, while \*\*\* of the three fabricators who provided these data reported similar levels.<sup>101</sup> Moreover, since fabrication facilities are not dedicated solely to the fabrication of domestically produced QSP, it is reasonable to assume that the employees at a fabrication facility also are not dedicated solely to the fabrication of domestically produced QSP slab and therefore it is unclear the extent to which reporting fabricators reported only the share of those workers' time dedicated to QSP fabrication.

On balance, for all the reasons discussed above, we conclude that independent fabricators are not engaged in sufficient production-related operations to be included in the domestic industry.<sup>102</sup>

### III. Increased Imports

The Commission next examines whether imports are entering in "increased quantities." Under section 202 of the Trade Act, the Commission is to consider whether imports have increased "either actual or relative to domestic production."<sup>103</sup> Consistent with its past

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<sup>101</sup> See CR/PR at Tables I.2 & I.3.

<sup>102</sup> In the antidumping and countervailing duty investigations conducted previously, the Commission concluded that fabricators were engaged in sufficient production-related activities to be included in the domestic industry definition. *Quartz Surface Products from China*, Inv. Nos. 701-TA-606 and 731-TA-1416 (Final), USITC Pub. 4913 (June 2019) at 13; *Quartz Surface Products from India and Turkey*, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451 (Final), USITC Pub. 5061 (June 2020) at 12. The Commission's domestic industry determinations in those antidumping and countervailing duty investigations are not, however, dispositive or binding on the determination of the domestic industry in this safeguard investigation. See, e.g., *Steel*, Inv. 201-TA-75, USITC Pub. 3479 at 27-32 (Dec. 2001); *Fresh Tomatoes and Bell Peppers*, Inv. No. 201-TA-66, USITC Pub. 2985 at I-7 (Aug. 1996).

<sup>103</sup> 19 U.S.C. § 2252(b)(1)(A) (requiring the Commission to determine whether an article is being imported into the United States in such increased quantities as to be a substantial cause of serious (Continued...))

practice,<sup>104</sup> the Commission in this safeguard investigation considered import trends over the most recent five-year period as the framework for its analysis. We note that the period of investigation (“POI”) in this safeguard investigation, January 2020 through September 2025, overlaps with the period of review in the first five-year expedited reviews of *Quartz Surface Products from China* and *Quartz Surface Products from India and Turkey*.<sup>105</sup>

We find that this statutory criterion is satisfied because imports increased during the POI, both in absolute terms and relative to domestic production.<sup>106</sup> In absolute terms, imports fluctuated but increased overall by 78.3 percent from 2020 to 2024. They were 0.4 percent lower in interim 2025 than in interim 2024.<sup>107</sup> Imports increased from 131.1 million square feet in 2020 to 196.5 million square feet in 2021 and 211.0 million square feet in 2022, but then decreased to 185.1 million square feet in 2023, and then increased again to 233.7 million square feet in 2024. They were 167.1 million square feet in interim 2024 and 166.3 million square feet in interim 2025.<sup>108</sup>

As a share relative to the domestic industry’s production, imports fluctuated but increased overall by 383.4 percentage points from 2020 to 2024. They were 1.6 percentage points higher in interim 2025 than in interim 2024.<sup>109</sup> The ratio of imports to domestic

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injury, or the threat thereof); *see also* 19 U.S.C. § 2252(c)(1)(C) (in turn requiring with respect to substantial cause, that the Commission take into account an increase in imports (either actual or relative to domestic production)).

<sup>104</sup> *See, e.g., Steel*, Inv. No. TA-201-73, USITC Pub. 3479 (Dec. 2001) at 32-33; *Extruded Rubber Thread*, Inv. No. TA-201-72, USITC Pub. 3375 (Dec. 2000) at I-8.

<sup>105</sup> *See* CR/PR at Table C-1; *First Reviews*, USITC Pubs. 5578 & 5691.

<sup>106</sup> Respondents argue that the Commission should place greater weight on imports during the period 2021 to 2024 because imports in 2020 were artificially low due to supply chain constraints, increased freight costs, and shipping disruptions caused by the COVID-19 pandemic, which would serve to inflate the increase over 2020 to 2024. *See* Cosentino’s Prehearing Br. at 3-9; Government of India’s Prehearing Br. at 7. We find this argument unpersuasive. Majorities of U.S. producers, importers, and purchasers did not report experiencing supply constraints since January 1, 2020. CR/PR at 6.8. Even if we were to disregard 2020, there was a significant increase in imports from 2021 to 2024, both in absolute terms and relative to production, with that increase leveling off in interim 2025, as compared to interim 2024. In absolute terms, imports fluctuated but increased overall by 19.0 percent from 2021 to 2024 and, as noted, the ratio of imports to domestic production increased from 451.3 percent in 2021 to 715.7 percent in 2024. CR/PR at Tables 2.1 & C.1. Moreover, based on information provided by Petitioners and confirmed by the records of the prior QSP AD/CVD investigations with similar scopes, the decline in imports from 2019 to 2020 was far smaller in magnitude than the increase in imports in 2021, meaning that measuring from 2021 to 2024 would serve to underestimate the surge in imports more than measuring from 2020 would overestimate it. *See* Petitioners’ Posthearing Br. at Exh. 1, p.42.

<sup>107</sup> CR/PR at Table C.1.

<sup>108</sup> CR/PR at Table C.1.

<sup>109</sup> *Derived from* CR/PR at Table 2.2.

production increased from 332.3 percent in 2020 to 451.3 percent in 2021 and 473.3 percent in 2023, but then decreased to 466.9 percent in 2023, before increasing to 715.7 percent in 2024. It was 676.0 percent in interim 2024 and 677.6 percent in interim 2025.<sup>110</sup> The ratio of imports to apparent U.S. consumption fluctuated but increased by 7.8 percentage points from 2020 to 2024 and was 0.6 percentage points higher in interim 2025 than in interim 2024. The ratio of imports to apparent U.S. consumption was 80.6 percent in 2020, 82.9 percent in 2021, 84.5 percent in 2022, 83.9 percent in 2023, and 88.3 percent in 2024. It was 87.6 percent in interim 2024 and 88.3 percent in interim 2025.<sup>111</sup>

#### **IV. Substantial Cause of Serious Injury or Threat of Serious Injury**

##### **A. Legal Standards and Statutory Requirements**

The second of the three statutory criteria concerns whether the domestic industry is seriously injured or threatened with serious injury. Section 202(c)(6)(C) of the Trade Act defines the term “serious injury” as “a significant overall impairment in the position of a domestic industry,” and section 202(c)(6)(D) defines the term “threat of serious injury” as “serious injury that is clearly imminent.”<sup>112</sup>

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<sup>110</sup> CR/PR at Table 2.2.

<sup>111</sup> CR/PR at Table C-1.

<sup>112</sup> 19 U.S.C. §§ 2252(c)(6)(C), 2252(c)(6)(D).

In determining whether serious injury or threat of serious injury exists, the Commission considers “all economic factors which it considers relevant, including (but not limited to) . . .”:

(A) with respect to serious injury –

- (i) the significant idling of productive facilities in the domestic industry,<sup>113</sup>
- (ii) the inability of a significant number of firms to carry out domestic production operations at a reasonable level of profit, and
- (iii) significant unemployment or underemployment within the domestic industry ...;<sup>114</sup>

(B) with respect to threat of serious injury –

- (i) a decline in sales or market share, a higher and growing inventory (whether maintained by domestic producers, importers, wholesalers, or retailers), and a downward trend in production, profits, wages, productivity, or employment (or increasing underemployment) in the domestic industry,
- (ii) the extent to which firms in the domestic industry are unable to generate adequate capital to finance the modernization of their domestic plants and equipment, or are unable to maintain existing levels of expenditures for research and development, and
- (iii) the extent to which the United States market is the focal point for the diversion of exports of the article concerned by reason of restraints on exports of such article to, or on imports of such article into, third country markets.<sup>115</sup>

The presence or absence of any of these factors is not “necessarily dispositive” of whether increased imports are a substantial cause of serious injury, or threat of serious injury, to the industry.<sup>116</sup> As part of its analysis, the Commission must “consider the condition of the domestic industry over the course of the relevant business cycle.”<sup>117</sup>

The third statutory criterion requires a finding that the article is being imported in such increased quantities as to be a “substantial cause” of serious injury or threat of serious injury. Section 202(b)(1)(B) defines “substantial cause” as “a cause which is important and not less than any other cause.”<sup>118</sup> Thus, the increased imports must be both an important cause of the serious injury or threat and a cause that is equal to or greater than any other cause.

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<sup>113</sup> The statute further provides that the term “significant idling of productive facilities” includes the closing of plants or the underutilization of production capacity. 19 U.S.C. § 2252(c)(6)(B).

<sup>114</sup> 19 U.S.C. § 2252(c)(1)(A).

<sup>115</sup> 19 U.S.C. § 2252(c)(1)(B).

<sup>116</sup> 19 U.S.C. § 2252(c)(3).

<sup>117</sup> 19 U.S.C. § 2252(c)(2)(A).

<sup>118</sup> 19 U.S.C. § 2252(b)(1)(B).

In determining whether increased imports are a substantial cause of serious injury or threat of serious injury, the statute directs the Commission to take into account all economic factors that it finds relevant, including but not limited to – “... an increase in imports (either actual or relative to domestic production) and a decline in the proportion of the domestic market supplied by domestic producers.”<sup>119</sup> The statute directs the Commission to consider “the condition of the domestic industry over the course of the relevant business cycle,” but it provides that the Commission “may not aggregate the causes of declining demand associated with a recession or economic downturn in the United States economy into a single cause of serious injury or threat of injury.”<sup>120</sup> The legislative history states that the provision is meant to clarify that import relief should be available during a recession or economic downturn.<sup>121</sup>

The statute also directs the Commission to “examine factors other than imports” that may be a cause of serious injury or threat to the domestic industry and include the results of its examination in its report.<sup>122</sup> Thus, the Commission is required to (1) examine factors other than increased imports and (2) make findings with respect to these other factors. The legislative history states that the purpose of this provision “is to assure that all factors injuring the domestic industry are identified.”<sup>123</sup>

## **B. Existing Antidumping and Countervailing Duty Orders**

Commerce imposed antidumping and countervailing duty orders on imports of QSP from China in July 2019 and QSP from India and Turkey in June 2020 and determined to continue these orders in January 2025 and in December 2025, respectively.<sup>124</sup>

Several past Commission global safeguard investigations likewise included articles covered by one or more antidumping or countervailing duty orders in the scope of the investigation, and the inclusion of such articles in the scope of existing orders, alone, did not

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<sup>119</sup> 19 U.S.C. § 2252(c)(1)(C).

<sup>120</sup> 19 U.S.C. § 2252(c)(2)(A).

<sup>121</sup> Senate Finance Committee, Omnibus Trade and Competitiveness Act of 1987: Report on S. 490, Rept. 100-71, 100<sup>th</sup> Cong., 1<sup>st</sup> Sess. at 50 (1987).

<sup>122</sup> 19 U.S.C. § 2252(c)(2)(B).

<sup>123</sup> Senate Finance Committee, Omnibus Trade and Competitiveness Act of 1987: Report on S. 490, Rept. 100-71, 100<sup>th</sup> Cong., 1<sup>st</sup> Sess. (1987) at 50. The legislative history of the Trade Act includes examples of other causes “such as changes in technology or consumer tastes, domestic competition from substitute products, plant obsolescence, or poor management,” which, if found to be more important causes of injury than increased imports, would require a negative determination. Senate Finance Committee, Trade Reform Act of 1974 Report on H.R. 10710, S. Rept. 1298, 93<sup>rd</sup> Cong., 2<sup>nd</sup> Sess. (1974) at 121.

<sup>124</sup> CR at 1.5-1.7.



dictate any particular outcome for the Commission's serious injury analysis. As we did in those past investigations, we have taken the antidumping and countervailing duty orders into account in our injury analysis and in fashioning our remedy proposals.<sup>125</sup>

### **C. Conditions of Competition and the Business Cycle**

The following conditions of competition inform our analysis of whether QSP is being imported into the United States in such increased quantities as to be a substantial cause of serious injury to the domestic industry producing an article like or directly competitive with the imported article.<sup>126</sup>

#### **1. Demand Conditions**

U.S. demand for quartz surface products is driven by remodeling and construction.<sup>127</sup> The remodeling market index ("RMI") rose sharply in 2020 and continued growing at a moderate rate in 2021 before seeing a slow but steady decline through 2024 with a slight increase in 2025.<sup>128</sup> All quarters other than the first quarter of 2020 were above an RMI index of 50 which indicates an increase in remodeling activity.<sup>129</sup> Monthly new privately owned housing starts decreased irregularly by 21.2 percent overall from 1.58 million in January 2020 to 1.25 million in October 2025.<sup>130</sup>

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<sup>125</sup> For example, the Commission's investigation in *LRWs* included various types of large residential washers subject to existing orders. The Commission took the orders into account in its injury analysis and in fashioning its remedy proposal, including the fact that some of these measures already provided some degree of protection to the domestic industry. *LRWs*, Inv. No. 2021-TA-76, USITC Pub. 4745 (Dec. 2017) at 22-23; *see also Steel*, Inv. No. TA-201-73, USITC Pub. 3479 (Dec. 2001) at 364 n.59 (noting that antidumping and countervailing duty orders were already in effect on several of the products subject to the investigation); *Carbon and Certain Steel Alloy Products*, Inv. No. TA-201-51, USITC Pub. 1553 (Jul. 1984) at a-24 (noting that antidumping and countervailing duty orders were already in effect on several of the products subject to the investigation and that other covered products were the subject of suspension agreements); *see also Nucor Corp. v. United States*, 318 F. Supp. 2d 1207, 1236 (Ct. Int'l Trade 2004), *aff'd*, 414 F.3d 1331 (Fed. Cir. 2005) and *Wheatland Tube Co. v. United States*, 495 F.3d 1355, 1363-67 (Fed. Cir. 2007) (recognizing in the context of antidumping and countervailing duty investigations that safeguard measures may be imposed on imports that are subject to antidumping or countervailing duty orders).

<sup>126</sup> We also take these conditions of competition into consideration in our analysis of imports from individual countries in section V below.

<sup>127</sup> CR/PR at 6.9.

<sup>128</sup> CR/PR at Fig. 6.1 & Table 6.8.

<sup>129</sup> CR/PR at 6.9.

<sup>130</sup> CR/PR at Fig. 6.2 & Table 6.9.

Most U.S. producers, importers, and purchasers reported that demand for QSP in the U.S. market steadily increased or fluctuated upward since January 1, 2020.<sup>131</sup> From 2020 through 2022, demand for QSP was reported to have risen as households invested in home renovation and new single-family home construction expanded. Beginning in 2023 and into 2024, the market cooled as the COVID-19 pandemic remodeling rise faded, and discretionary home-improvement spending normalized. This decline was not specific to any housing-related material, reflecting instead an overall contraction in housing and remodeling activity after an unsustainably high boom period. Firms reported that QSP has experienced an overall upward demand trend and QSP has continued to take market share from other natural stones such as granite.<sup>132</sup>

Apparent U.S. consumption of QSP increased irregularly during the POI, ending 62.6 percent higher in 2024 than in 2020 and 1.2 percent lower in interim 2025 than in interim 2024.<sup>133</sup> Apparent U.S. consumption increased from 162.7 million square feet in 2020 to 237.0 million square feet in 2021 and 249.7 million square feet in 2022, and then declined to 220.7 million square feet in 2023, before increasing to 264.6 million square feet in 2024.<sup>134</sup> Apparent U.S. consumption was 190.6 million square feet in interim 2024 and 188.4 million square feet in interim 2025.<sup>135</sup>

## **2. Supply Conditions**

Imports were, by far, the largest supplier to the U.S. market during the POI. Imports' market share by quantity fluctuated, but increased overall by 7.8 percentage points from 2020 to 2024, and was 0.6 percentage points higher in interim 2025 than in interim 2024: their market share was 80.6 percent in 2020, 82.9 percent in 2021, 84.5 percent in 2022, 83.9 percent in 2023, 88.3 percent in 2024, 87.6 percent in interim 2024, and 88.3 percent in interim 2025.<sup>136</sup>

The domestic industry's market share by quantity fluctuated, but declined overall by 7.8 percentage points from 2020 to 2024, and was 0.6 percentage points lower in interim 2025 than in interim 2024: it was 19.4 percent in 2020, 17.1 percent in 2021, 15.5 percent in 2022, 16.1 percent in 2023, 11.7 percent in 2024, 12.4 percent in interim 2024, and 11.7 percent in

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<sup>131</sup> CR/PR at Table 6.7.

<sup>132</sup> CR/PR at 6.13.

<sup>133</sup> CR/PR at Table C.1.

<sup>134</sup> CR/PR at Table C.1.

<sup>135</sup> CR/PR at Table C.1.

<sup>136</sup> CR/PR at Table C.1.

interim 2025.<sup>137</sup> During the POI, the domestic slab industry reported three expansions, three plant openings, and two planned plant openings. It also reported two plant closings, including Caesarstone's closure of its Richmond Hill, GA slab plant in January 2024 and USA Quartz's closure of its Jacksonville, FL plant in early 2022.<sup>138</sup> U.S. producers also reported prolonged shutdowns and production curtailments during the POI.<sup>139</sup>

As a result of the plant openings and closings, expansions, and prolonged shutdowns and production curtailments, the domestic industry's practical capacity declined irregularly by 9.0 percent from 2020 to 2024, declining from 50.2 million square feet in 2020 to 45.7 million square feet in 2024.<sup>140</sup> It was 11.2 percent higher in interim 2025, when it was 38.9 million square feet, than in interim 2024, when it was 35.0 million square feet.<sup>141</sup> The domestic industry's reported practical capacity utilization decreased irregularly by 7.1 percentage points from 2020 to 2024, declining from 78.6 percent in 2020 to 71.5 percent in 2024.<sup>142</sup> It was 7.5 percentage points lower in interim 2025, when it was 63.1 percent, than in interim 2024, when it was 70.6 percent.<sup>143</sup>

A majority of U.S. producers, importers, and purchasers did not report experiencing supply constraints since January 1, 2020. Constraints reported by importers in 2020 through 2022 include issues related to the COVID-19 pandemic, such as constrained supply related to logistics issues, port congestion, increased ocean freight costs, container shortages, factory shutdowns, limited availability of raw materials, and extended lead times. Constraints reported in 2023 and 2024 were issues experienced by individual firms or their suppliers such as experiencing an electricity supply shortage in their production facility or lack of local labor or raw materials in their local area. Four firms mentioned the U.S. tariffs implemented throughout 2025 as causing issues in their supply chains.<sup>144</sup>

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<sup>137</sup> CR/PR at Table C.1.

<sup>138</sup> CR/PR at Table 3.2.

<sup>139</sup> CR/PR at Table 3.3.

<sup>140</sup> CR/PR at Table C.1.

<sup>141</sup> CR/PR at Table C.1. The domestic industry's installed capacity increased from 76.6 million square feet in interim 2020 to 80.3 million square feet in 2024 and was higher in interim 2025, at 72.4 million square feet, than in interim 2024, at 60.2 million square feet. CR/PR at Table 3.4.

<sup>142</sup> CR/PR at Table C.1.

<sup>143</sup> CR/PR at Table C.1. The domestic industry's reported installed capacity utilization decreased irregularly by 10.7 percentage points from 2020 to 2024, declining from 51.5 percent in 2020 to 40.8 percent in 2024. It was 7.4 percentage points lower in interim 2025, at 33.9 percent, than in interim 2024, at 41.3 percent. CR/PR at Table 3.4.

<sup>144</sup> CR/PR at 6.8.

As discussed above, Commerce imposed antidumping and countervailing duty orders on imports of QSP from China in July 2019 and QSP from India and Turkey in June 2020, which remain in place following Commerce's continuation of the orders in January 2025 and in December 2025, respectively.<sup>145</sup>

### **3. Substitutability and Importance of Price in Purchasing Decisions**

Based on the record in this safeguard investigation, we find that there is a high degree of substitutability between domestically produced QSP and imports of QSP, although substitutability would be lower for certain styles that are only available from foreign sources.<sup>146</sup>

The record indicates that a majority of U.S. producers reported that QSP from domestic and imported sources is always or frequently interchangeable. A plurality of importers reported that QSP is frequently interchangeable and half of purchasers reported that QSP is frequently interchangeable.<sup>147</sup> A majority of purchasers reported that U.S.-produced QSP and QSP imported from foreign sources were comparable on all factors, except for price, product range, and U.S. transportation costs, for which a plurality of purchasers reported that domestic and imported QSP were comparable.<sup>148</sup>

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<sup>145</sup> CR at 1.5-1.7.

<sup>146</sup> CR/PR at 6.14. Petitioners argue that the record in this proceeding, consistent with the Commission's findings in the prior QSP proceedings, demonstrates that domestic and imported QSP are highly substitutable, and as a result, they primarily compete on price. Petitioners' Prehearing Br. at 32-34. Petitioners further contend that domestic and imported QSP compete head-to-head throughout the U.S. market and are not segmented by design, distribution channel, or caliber; as a result, imports do not occupy a distinct niche, but instead compete directly with domestic QSP across the full range of designs and market segments, and there is no evidence that imports possess unique or exclusive design characteristics unavailable from domestic producers. Petitioners' Prehearing Br. at 34-36.

Respondents argue that QSP (and other surface products) compete primarily on aesthetics, and the design-driven nature of competition is an economic condition directly affecting how products compete and explains why shifts in demand occur independently of price or import levels. Arizona, Elite & MSI's Prehearing Br. at 51-54. Respondents further contend that that QSP participates in a multi-material market in which several products compete for use in the same applications. Granite, marble, quartzite, laminate, solid surface, porcelain slab, ceramic slab, and other engineered stones are all used for kitchen countertops, bathroom vanities, backsplashes, commercial surfaces, and similar applications. Respondents assert that buyers readily migrate among material categories as design trends evolve, and that this market dynamic is particularly important to understand how lower-priced QSP imports have increased in volume by taking market share principally from imported granite as well as other surface products, while other surface products such as quartzite are becoming key competitors to QSP. Arizona, Elite & MSI's Prehearing Br. at 25-30; Indian Federation Prehearing Br. at 7-8.

<sup>147</sup> CR/PR at Table 6.17.

<sup>148</sup> CR/PR at Table 6.16.

The record also indicates that domestically produced QSP and imports overlapped in terms of caliber type and other attributes during the POI. Over the full POI, the majority of U.S. importers' and producers' U.S. shipments were of mass market brands, but both U.S. importers' and U.S. producers' shipments to the U.S. market increasingly gravitated to premium products as the POI progressed.<sup>149</sup> The share of U.S. producers' U.S. shipments of premium brands increased steadily through the POI, from 36 percent in 2020 to 52.7 percent in 2024; conversely, the share of shipments of mass market brands declined steadily, from 64 to 47.3 percent between 2020 and 2024.<sup>150</sup> Imports demonstrated a similar track. U.S. importers' U.S. shipments of premium brands increased steadily through the POI, from 36.5 percent in 2020 to 46.8 percent in 2024; conversely, the share of shipments of mass market brands declined steadily, from 63.5 to 53.2 percent.<sup>151</sup> The converging trends led to a near-even split between premium and mass market brands for both the domestic industry and imports by the last two years of the POI (2023 and 2024) and in the interim 2025 period. As in the prior QSP proceedings, we do not find that competition between the subject imports and the domestic product is attenuated because they serve different parts of the QSP market.<sup>152</sup> In addition, the record indicates that the majority of U.S. importers' and producers' U.S. shipments in 2024 were marble design with short or long veining and three centimeter thickness.<sup>153</sup>

We also find that price is an important factor in purchasing decisions for QSP, although non-price factors are also important. Responding purchasers most frequently cited price/cost (15 firms), quality (14 firms), and availability/supply and aesthetic/design (12 firms each) as the top three factors influencing their purchasing decisions.<sup>154</sup> Quality was the most frequently reported first-most important factor (8 firms), followed by price/cost and company

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<sup>149</sup> There is no established industry definition for "mass market" or "premium" brands. In this investigation, U.S. producers and U.S. importers were asked to report their U.S. shipments of QSP by caliber type, *i.e.*, premium brands versus mass market brands, as defined by the responding firms themselves. CR/PR at 3.22.

<sup>150</sup> CR/PR at Table 3.10.

<sup>151</sup> CR/PR at Table 2.5.

<sup>152</sup> See *QSP from China*, USITC Pub. 4913 at 34 (rejecting "respondents' argument that competition between the subject imports and the domestic product is attenuated because they serve different parts of the QSP market and that the domestic product, particularly that of Cambria, is sold as a luxury product and not extensively marketed to the broader market"); *QSP from India & Turkey*, USITC Pub. 5061 at 35-36 ("We are not persuaded by Respondents' argument that competition between the cumulated subject imports and the domestic product is attenuated because they serve different parts of the QSP market and that the domestic like product is a luxury product not sold to the broader market.").

<sup>153</sup> CR/PR at Tables 2.6 & 3.11, Figs. 2.2, 2.3, 3.2 & 3.3.

<sup>154</sup> CR/PR at Table 6.12.

relationships (6 firms). Availability/supply was the most frequently reported second-most important factor. Price/cost was the most frequently reported third-most important factor.<sup>155</sup> A majority of U.S. producers as well as a plurality of importers and purchasers reported that differences other than price were sometimes significant.<sup>156 157</sup>

#### **4. Other Conditions of Competition**

##### *a. Channels of Distribution*

U.S. producers and importers sold mainly to fabricators and retailers, with the second largest distribution channel for both being distributors. U.S. producers reported shipping 69.5 percent to 75.4 percent of their U.S. shipments to fabricators and retailers during the POI and 18.7 percent to 26.4 percent of their U.S. shipments to distributors, while U.S. importers reported shipping 56.4 percent to 68.0 percent of their U.S. shipments to fabricators and retailers during the POI and 23.0 percent to 36.1 percent of their U.S. shipments to distributors.<sup>158</sup>

Domestically produced QSP and imports of QSP are sold predominantly from inventories.<sup>159</sup> U.S. producers reported that 83.8 percent of their commercial shipments were from U.S. inventories, with lead times averaging four days, while the remaining 16.2 percent of their commercial shipments were produced to order, with lead times averaging 30 days.<sup>160</sup> Importers reported that 71.7 percent of their commercial shipments were from U.S. inventories, with lead times averaging 8 days, while 21.2 percent were produced-to-order, with lead times averaging 64 days, and the remaining 7.1 percent were from foreign inventories, with lead times averaging 48 days.<sup>161</sup>

##### *b. Costs, pricing, and sales terms*

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<sup>155</sup> CR/PR at Table 6.12.

<sup>156</sup> CR/PR at Table 6.12.

<sup>157</sup> As further discussed in section IV.F., below, to the degree that there was a shift from imported granite to imported QSP during the POI, as alleged by Respondents, this shift cannot explain why the domestic industry lost market share to imports within the QSP segment over the POI; additionally, to the degree that there was a shift from QSP to quartzite during the POI, there was nevertheless a substantial increase in demand for QSP over nearly the entire POI.

<sup>158</sup> CR/PR at Table 1.8.

<sup>159</sup> CR/PR at 6.18.

<sup>160</sup> CR/PR at 6.18.

<sup>161</sup> CR/PR at 6.18.

Most responding U.S. producers and importers reported setting prices using price lists or on a transaction-by-transaction basis.<sup>162</sup> The vast majority of U.S. producers and importers commercial U.S. shipments were sold on the spot market.<sup>163</sup>

QSP, as defined by the scope of this investigation, is a mixture of materials primarily composed of crushed quartz stone or other silica-based materials (*e.g.* quartz powder, cristobalite) and may also include additive materials such as pigments or cement. QSP also has a resin binder (*e.g.*, an unsaturated polyester).<sup>164</sup> Raw material costs, as a percentage of total U.S. producers' COGS, irregularly increased by 3.1 percentage points from 2020 to 2024, increasing from 47.3 percent of the domestic industry's COGS in 2020 to 52.8 percent in 2021 and 54.0 percent in 2022, and then declining to 50.6 percent in 2023 and 50.4 percent in 2024. Raw material costs were 51.1 percent of the domestic industry's COGS in interim 2024 and 49.6 percent in interim 2025.<sup>165</sup> On a per square foot basis, U.S. producers' raw material costs increased irregularly from \$6.05 per square foot in 2020 to \$7.43 per square foot in 2024 and were lower in interim 2025, at \$7.38 per square foot, than in interim 2024, at \$7.42 per square foot.<sup>166</sup>

Eleven of 26 responding purchasers reported that they require their suppliers to become certified or qualified to sell QSP to their firm.<sup>167</sup> Purchasers reported that the time needed to complete such processes ranged from five to 90 days.<sup>168</sup>

*c. Section 301, IEEPA, and Section 122 duties*

Effective September 24, 2018, QSP originating in China became subject to an additional 10 percent *ad valorem* duty under section 301 of the Trade Act of 1974, as amended ("section 301 tariffs"). Effective May 10, 2019, the section 301 tariffs on QSP from China was increased to 25 percent *ad valorem*.<sup>169</sup>

Beginning on February 4, 2025, imports of QSP into the United States were subject to varying levels of country-specific *ad valorem* duties pursuant to the International Emergency

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<sup>162</sup> CR/PR at Table 6.18.

<sup>163</sup> CR/PR at Table 6.19.

<sup>164</sup> CR/PR at 6.25.

<sup>165</sup> CR/PR at Table 4.1.

<sup>166</sup> CR/PR at Table 4.1.

<sup>167</sup> CR/PR at 6.19.

<sup>168</sup> CR/PR at 6.19.

<sup>169</sup> CR/PR at 1.24. As noted above, imports of QSP from China have also been subject to AD/CVD orders since 2019. Imports from China accounted for no more than 1.5 percent of total imports at any point over the POI in this safeguard proceeding. See CR/PR at Table 2.2.

Economic Powers Act (“IEEPA”).<sup>170</sup> It was announced on February 20, 2026, that tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.<sup>171</sup>

Effective February 24, 2026, QSP originating in all countries are subject to an additional 10 percent *ad valorem* duty under section 122 of the Trade Act of 1974. QSP originating in Canada or Mexico that enter with duty free treatment under the United States-Mexico-Canada Agreement (“USMCA”) are not subject to the additional *ad valorem* duty under section 122.<sup>172</sup>

#### **D. The Domestic Industry is Seriously Injured**

As detailed below, we find that there has been a significant idling of U.S. productive facilities, significant unemployment or underemployment in the domestic industry, and an inability of domestic producers to operate at reasonable levels of profitability. The data and trends for the domestic industry, as reviewed in this section, occurred during a period of substantial growth in domestic demand, and at or after a time when the domestic industry expanded its capacity in the reasonable expectation of increased sales after the completion of two antidumping/countervailing investigations which resulted in orders on imports from China, India and Turkey. But the surge of imports during the period of investigation defeated those expectations. Thus, what should have been a time of growth for the domestic industry turned into a period in which they sustained serious injury by reason of increased imports.

##### **1. Significant Idling of Productive Facilities**

In assessing whether the domestic industry is seriously injured, we first examine whether there has been a significant idling of U.S. productive facilities in terms of plant closures and/or underutilization of productive capacity to manufacture QSP products. Two U.S. producers — Caesarstone and USA Quartz — stopped producing QSP in the United States and \*\*\*.<sup>173</sup> As further discussed below in section IV.F, we find that the closure of these plants reflects the injury caused by the imports. Moreover, other U.S. producers reported prolonged shutdowns and production curtailments during the POI.<sup>174</sup>

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<sup>170</sup> CR/PR at 1.25-1.27.

<sup>171</sup> CR/PR at 1.25.

<sup>172</sup> CR/PR at 1.25.

<sup>173</sup> See CR/PR at Tables 3.2 & 4.14; Petitioners’ Prehearing Br. at 41-43; Petitioners’ Posthearing Br. at 5-7, Exh. 1, p. 43-45.

<sup>174</sup> See CR/PR at Table 3.3.



The domestic industry's installed capacity increased irregularly from 2020 to 2024 and was higher in interim 2025 than interim 2024. It increased from 76.6 million square feet in 2020 to 81.8 million square feet in 2021 and 2022 and 93.7 million in 2023, before declining to 80.3 million square feet in 2024. It was 60.2 million square feet in interim 2024 and 72.4 million square feet in interim 2025.<sup>175</sup> The domestic industry's practical capacity declined irregularly by 9.0 percent from 2020 to 2024 and was 11.2 percent higher in interim 2025 than in interim 2024.<sup>176</sup> It increased from 50.2 million square feet in 2020 to 53.0 million square feet in 2021, before declining to 52.3 million square feet in 2022, 51.6 million square feet in 2023, and 45.7 million square feet in in 2025. It was 35.0 million square feet in interim 2024 and 38.9 million square feet in interim 2025.<sup>177</sup>

During this period, the domestic industry's production declined by a higher percentage than practical capacity, declining irregularly by 17.2 percent from 2020 to 2024, and it was 0.7 percent lower in interim 2025 as compared with interim 2024.<sup>178</sup> Its production increased from 39.4 million square feet in 2020 to 43.5 million square feet in 2021 and 44.6 million square feet in 2022, but then declined to 39.6 million square feet in 2023 and 32.7 million square feet in 2024. It was 24.7 million square feet in interim 2024 and 24.5 million square feet in interim 2025.<sup>179</sup> Consequently, its practical capacity utilization decreased irregularly by 7.1 percentage points from 2020 to 2024, and was 7.5 percentage points lower in interim 2025 than in interim 2024.<sup>180</sup> It increased from 78.6 percent in 2020 to 82.1 percent in 2021 and 85.2 percent in 2022, before decreasing to 76.8 percent in 2023 and 71.5 percent in 2024. It was 70.6 percent in interim 2024 and 63.1 percent in interim 2025.<sup>181</sup> The industry's installed capacity utilization decreased irregularly by 10.7 percentage points from 2020 to 2024, and was 7.4 percentage points lower in interim 2025 than in interim 2024. It increased from 51.2 percent in 2020 to

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<sup>175</sup> CR/PR at Tables 3.4.

<sup>176</sup> CR/PR at Table C.1.

<sup>177</sup> CR/PR at Table 3.4. Petitioners claim that the difference between installed and practical capacity indicates the reduction in workforce and production shifts caused by imports. They contend, as well, that the divergence in trends indicates that the domestic industry expanded its production capacity to meet growing demand, which it ultimately had to idle because of the surge of imports. Petitioners' Prehearing Br. at 45-46; Petitioner's Posthearing Br. at Exh. 1, p. 47-49.

<sup>178</sup> CR/PR at Table C.1.

<sup>179</sup> CR/PR at Table C.1.

<sup>180</sup> CR/PR at Table C.1.

<sup>181</sup> CR/PR at Table C.1.

53.2 percent in 2021 and 54.5 percent in 2022, before decreasing to 42.3 percent in 2023 and 40.8 percent in 2024. It was 41.3 percent in interim 2024 and 33.9 percent in interim 2025.<sup>182</sup>

Petitioners claim that the difference between installed and practical capacity indicates the reduction in workforce and production shifts caused by imports. They contend, as well, that the divergence in trends indicates that the domestic industry expanded its production capacity to meet growing demand, which it ultimately had to idle because of the surge of imports.<sup>183</sup> As we observed above, the declines in the industry's capacity utilization rates occurred during a period of substantial growth in domestic demand, and at or after a time when the domestic industry expanded its capacity in the reasonable expectation of increased sales after the completion of successive successful petitions which resulted in orders on imports from China, India and Turkey, but these expectations were defeated by the surge in imports during the period.

Information on the record indicates that the domestic industry must operate at high levels of capacity utilization to remain profitable, but instead its practical capacity utilization rates never exceeded 85.2 percent during 2020-2024 and reached their lowest levels at the end of the POI at 71.6 percent in 2024 and 63.0 percent in interim 2025, during a time of growing apparent U.S. consumption.<sup>184</sup> While this practical capacity utilization rate was not abysmal, it reflects the market conditions influenced by competition with imports; installed capacity utilization was much lower, never reaching above 54.5 percent and dipping to as low as 33.9 percent in interim 2025.<sup>185</sup> Moreover, while the domestic industry added capacity during the POI, both installed and practical capacity utilization ended the POI lower than at the start of the POI, indicating that the domestic industry was not just underutilizing capacity that was newly installed during the POI, but was underutilizing its existing capacity as well.<sup>186</sup>

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<sup>182</sup> CR/PR at Table 3.4.

<sup>183</sup> Petitioners' Prehearing Br. at 45-46; Petitioner's Posthearing Br. at Exh. 1, p. 47-49.

<sup>184</sup> See CR/PR at Petitioners' Prehearing Br. at 46; CR/PR at Tables 3.4 & C.1.

<sup>185</sup> CR/PR at Table 3.4. The domestic industry's installed capacity utilization was 51.5 percent in 2020, 53.2 percent in 2021, 54.5 percent in 2022, 42.3 percent in 2023, 40.8 percent in 2024, and 33.9 percent in interim 2025. *Id.*

<sup>186</sup> See CR/PR at Table 3.4. Specifically, U.S. producer \*\*\*. U.S. producer \*\*\*. U.S. producer \*\*\*. U.S. producer \*\*\*

(Continued...)

We recognize that to a degree, the declines reviewed above are due to the exit of Caesarstone from the domestic industry in 2024. Respondents argue that the domestic industry’s declining condition reflects Caesarstone’s decision to shutter its domestic slab production for reasons unrelated to imports.<sup>187</sup> Respondents base this argument almost entirely on Caesarstone’s assertion in this proceeding that its decision to close its U.S. plant was unrelated to competition with imports. However, since Caesarstone has moved to a business model that focuses on importation of QSP, any acknowledgement that imports cause injury would be a statement against its commercial interests. We note that Caesarstone has made contradictory statements in the prior AD/CVD investigation of *Quartz Surface Productions from India and Turkey* and in public disclosures unrelated to proceedings before the Commission.<sup>188</sup> We further note that Caesarstone’s ratio of cost of goods sold to net sales was \*\*\* percent throughout the period of investigation, which led to a \*\*\* throughout the period of investigation (until \*\*\*).<sup>189</sup> On balance, we find more persuasive Caesarstone’s statements in prior proceedings, supported by public statements outside the context of trade remedy investigations, that the closure of its U.S. plant was at least in part due its deteriorating financial condition in a market increasingly dominated by imports, and reflects injury caused by imports.

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\*\*\*. *Id.* at Table 3.3.

<sup>187</sup> See Arizona, Elite & MSI’s Prehearing Br. at 51-54; Arizona, Elite & MSI’s Posthearing Br. at 10; Indian Federation’s Prehearing Br. at 23-24; Casablanca & Wilsonart’s Prehearing Br. at 11; Vietnamese Manufacturers’ Prehearing Br. at 10-11; Vietnamese Manufacturers’ Posthearing Br. at 3-4.

<sup>188</sup> See Petitioners’ Posthearing Br. at Ex. 1, 50-57 (for example, in the AD/CVD investigation on QSP from India and Turkey, \*\*\* and, in a Q1 2019 earnings call, Caesarstone stated it was suffering from “elevated inventory levels of quartz countertop in the U.S.” as a result of a “surge” of imports of Chinese quartz ahead of the implementation of the AD/CVD duties).

<sup>189</sup> CR/PR at Table 4.3.

In sum, two domestic producers closed their U.S. facilities and exited the U.S. market during the POI (one of which accounted for between \*\*\* and \*\*\* percent of domestic production during 2020-2023),<sup>190</sup> and a third producer \*\*\*, while several other producers reported prolonged shutdowns and production curtailments. Moreover, the domestic industry experienced large declines in its production and capacity utilization during the POI, while apparent U.S. consumption increased significantly from 2020-2024.<sup>191</sup> Based on this evidence, we find a significant idling of domestic productive facilities during the POI.

## **2. Significant Unemployment or Underemployment**

We next examine whether there has been significant unemployment or underemployment in the domestic industry. The facility closure by Caesarstone alone resulted in approximately 129 employees being laid off.<sup>192</sup> Moreover, as reviewed above, five firms — \*\*\* — all reported prolonged shutdowns or production curtailments during the POI, which also led to layoffs or underemployment.<sup>193</sup>

The domestic industry's number of production and related workers ("PRWs") and total hours worked fluctuated but declined by 9.2 percent and 4.8 percent, respectively, overall from 2020 to 2024, and were 3.2 percent and 1.4 percent higher in interim 2025 than in interim 2024.<sup>194</sup>

Total wages and hourly wages increased overall by 12.9 percent and 18.7 percent from 2020 to 2024 and were 2.6 percent and 1.2 percent higher in interim 2025 than in interim 2024.<sup>195</sup>

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<sup>190</sup> CR/PR at Table 3.6.

<sup>191</sup> See CR/PR at Table C.1. Apparent U.S. consumption was 1.2 percent lower in interim 2025 than in interim 2024. *Id.* at Table C.1.

<sup>192</sup> CR/PR at Table 3.2. As further discussed in section IV.F, below, we find that the closure of Caesarstone's plant reflects injury caused by imports.

<sup>193</sup> CR/PR at Table 3.3.

<sup>194</sup> CR/PR at Table C.1. The number of PRWs increased from 1,592 in 2020 to 1,685 in 2021, and then declined to 1,669 in 2022, 1,601 in 2023, and 1,446 in 2024. It was 1,410 in interim 2024 and 1,455 in interim 2025.<sup>194</sup> Total hours worked increased from 3.3 million hours in 2020 to 3.6 million hours in 2021 and 3.7 million hours in 2022, and then declined to 3.4 million hours in 2023 and 3.2 million hours in 2025. Total hours worked were 2.3 million hours in interim 2024 and 2.4 million hours in interim 2025. CR/PR at Table 3.15.

<sup>195</sup> CR/PR at Table C.1. Total wages increased from \$92.0 million in 2020 to \$105.8 million in 2021 and \$111.4 million in 2022, before declining to \$107.0 million in 2023 and \$103.8 million in 2024.

(Continued...)

Productivity fluctuated but decreased overall by 13.0 percent from 2020 to 2024 and was 2.1 percent lower in interim 2025 than in interim 2024.<sup>196</sup> Productivity increased from 11.9 square feet per hour in 2020 to 12.0 square feet per hour in 2021 and 12.2 square feet per hour in 2022, before declining to 11.5 square feet per hour in 2023, and 10.4 square feet per hour in 2024. Productivity was 10.6 square feet per hour in interim 2024 and 10.3 square feet per hour in interim 2025.<sup>197</sup>

These declines in PRW, hours worked, and productivity occurred at a time when demand increased following a period where the domestic industry expanded in anticipation of increasing production and sales that did not materialize as subject imports surged into the market despite successive successful AD/CVD investigations.<sup>198</sup> We find these failed efforts exacerbated the unemployment or underemployment stemming from the decrease in production and practical capacity utilization and plant closures. This together with the decrease in PRW, hours worked, and productivity from 2020 to 2024 supports our finding of significant unemployment or underemployment in the domestic industry during the POI.<sup>199</sup>

### **3. Inability of a Significant Number of Firms to Carry Out Domestic Production Operations at a Reasonable Level of Profit**

We next examined the ability of domestic producers to operate at reasonable levels of profitability. The domestic industry's gross profits increased irregularly by 14 percent from 2020 to 2024 and were 8.8 percent lower in interim 2025 than in interim 2024.<sup>200</sup> Gross profits increased from \$259.2 million in 2020 to \$321.5 million in 2021 and \$336.4 million in 2022,

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Total wages were \$77.0 million in interim 2024 and \$79.0 million in interim 2025.<sup>195</sup> Hourly wages increased from \$27.75 per hour in 2020 to \$29.11 per hour in 2021, \$30.51 per hour in 2022, \$31.13 per hour in 2023, and \$32.93 per hour in 2024. They were \$32.88 in interim 2024 and \$33.27 in interim 2025. CR/PR at Table 3.15.

<sup>196</sup> CR/PR at Table C.1.

<sup>197</sup> CR/PR at Table 3.15.

<sup>198</sup> See CR/PR at Table C.1. See also Petitioners' Posthearing Br. Ex. 1, p. 67 citing CSPVs, USITC Pub. 4739 at 33-34. ("The facts of CSPV are particularly illustrative. In that case, the Commission found an overall increase in employment for U.S. CSPV cell producers and only a 3.1% decline in employment for U.S. CSPV module operations. Nonetheless, these facts were sufficient to support a finding of 'unemployment and underemployment' in no small part due to the 'dramatic growth in apparent U.S. consumption of CSPV products.'").

<sup>199</sup> The number of PRWs was higher in interim 2025 compared to interim 2024, largely due to the entrance of a new U.S. producer, Hendrix, into the QSP market in 2025, which accounted for only \*\*\* percent of domestic production in interim 2025. CR/PR at 3.31 & Table 3.6.

<sup>200</sup> CR/PR at Table C.1.

before decreasing to \$318.4 million in 2023 and \$295.6 million in 2024. They were \$231.6 million in interim 2024 and \$211.2 million in interim 2025.<sup>201</sup>

Despite the overall increase in gross profits from 2020 to 2024, the domestic industry's operating income irregularly decreased by 20.7 percent from 2020 to 2024 and was 53.2 percent lower in interim 2025 than in interim 2024.<sup>202</sup> Operating income increased from \$63.7 million in 2020 to \$81.6 million in 2021, decreased to \$56.8 million in 2022, then increased slightly to \$57.4 million in 2023, and then decreased again to \$50.6 million in 2024. Operating income was \$46.7 million in interim 2024 and \$21.9 million in interim 2025.<sup>203</sup> Domestic producers' operating income margin, likewise, irregularly decreased by 2.5 percentage points from 2020 to 2024 and was 4.0 percentage points lower in interim 2025 than in interim 2024.<sup>204</sup> It decreased from 9.0 percent in 2020 to 8.9 percent in 2021, and 5.7 percent in 2022, increased to 6.3 percent in 2023, and then increased slightly to 6.5 percent in 2024. It was 7.9 percent in interim 2024 and 3.9 percent in interim 2025.<sup>205</sup>

Petitioners submitted information as to what a reasonable level of profit should be in this industry on an operating income level, asserting that \*\*\*.<sup>206</sup> No respondent submitted information regarding a reasonable level of profit in the QSP industry.

Of the five producers that operated throughout the POI (\*\*\*), four (\*\*\*) recorded declines in

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<sup>201</sup> CR/PR at Table 4.1.

<sup>202</sup> CR/PR at Table C.1.

<sup>203</sup> CR/PR at Table 4.1.

<sup>204</sup> CR/PR at Table C.1.

<sup>205</sup> CR/PR at Table 4.1.

<sup>206</sup> See Petitioners' Posthearing Br. at Exh. 1, p. 61.

their operating margin between 2020 and 2024.<sup>207</sup> One of these producers, \*\*\*, had negative operating margins throughout the POI, and only two producers reported an operating margin of 15 percent or greater at any point during the POI.<sup>208</sup> \*\*\*. \*\*\* operating margin in 2024, after it ceased production activities \*\*\*. By interim 2025, four of seven producers operating then posted operating losses and negative operating margins while the operating income of a fifth producer, \*\*\* and a sixth producer, \*\*\*, was barely profitable at the end of the POI, with operating margins of \*\*\* percent in 2024 and \*\*\* percent in interim 2025.<sup>209</sup> <sup>210</sup> Overall, the average operating margins of all U.S. producers ranged from 3.9 to 9.0 percent over the POI, with the high end of that range recorded at the beginning of the POI, *i.e.*, 2020, and the low end of that range recorded at the end of the POI, *i.e.*, interim 2025.<sup>211</sup>

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<sup>207</sup> \*\*\* was the only producer operating throughout the POI to record an improvement in its operating margin between 2020 and 2024, but its operating margin was lower in interim 2025 than in interim 2024. CR/PR at Table 4.3.

<sup>208</sup> CR/PR at Table 4.3. The range of operating margins reported by the five producers that operated throughout the POI were as follows: \*\*\*. *Id.*

<sup>209</sup> See CR/PR at Table 4.1. During 2020-2021, three of six operating domestic producers were posting operating losses and negative operating margins and, during 2023-2024, three of seven operating domestic producers were posting operating losses and negative operating margins. In 2022, two of six operating producers were posting operating losses and negative operating margins. See *id.*

<sup>210</sup> Respondents argue that the large and increasing SG&A expenses of the domestic industry were responsible for lower operating income for the domestic industry than would otherwise be the case, and therefore operating incomes show no evidence of serious injury. See, *e.g.*, Arizona Posthearing Br. Responses to Commission Questions, p. 54-56. We disagree. As Petitioners note, the domestic industry's SG&A expense ratio (*i.e.*, SG&A expenses-to-net sales-ratio) of 26.2 percent to 33.8 percent was in line with other consumer-facing industries with prior cases before the Commission, such as ceramic tile and mattresses. Petitioners' Posthearing Br. at Exh. 1, p. 82-87. Furthermore, there is wide variation among domestic producers, with SG&A expense ratios ranging from \*\*\* percent to \*\*\* percent and with little correlation between SG&A expense ratios and operating margins. For example, the producers with the highest operating margins in interim 2025 were \*\*\*, with one of the highest SG&A expense ratios in the industry, and \*\*\*, with the lowest SG&A expense ratio.

<sup>211</sup> CR/PR at Table 4.3.

Like operating income, the domestic industry's net income irregularly decreased from 2020 to 2024 and was lower in interim 2025 than in interim 2024. Domestic producers' net income was negative in 2023, 2024, and interim 2025.<sup>212</sup> Net income increased from \$30.9 million in 2020 to \$54.2 million in 2021, then decreased to \$12.1 million in 2022 and negative \$63.1 million in 2023, before increasing to negative \$2.4 million in 2024. It was \$9.0 million in interim 2024 and negative \$21.5 million in interim 2025.<sup>213</sup> In addition to the effect of declining operating income, net losses in 2023 were largely driven by \*\*\*.<sup>214</sup> Domestic producers' net income margin irregularly decreased by 4.7 percentage points from 2020 to 2024 and was 5.3 percentage points lower in interim 2025 than in interim 2024. Domestic producers' net income margin was negative in 2023, 2024, and interim 2025.<sup>215</sup> The domestic industry's net income margin increased from 4.4 percent in 2020 to 5.9 percent in 2021, decreased to 1.2 percent in 2022 and negative 6.9 percent in 2023, and then increased to negative 0.3 percent in 2024. The net income margin was 1.5 percent in interim 2024 and negative 3.8 percent in interim 2025.<sup>216</sup>

Of the five producers that operated throughout the POI, three recorded declines in their net income margin between 2020 and 2024 (\*\*\*).<sup>217</sup> \*\*\* had negative net margins in 2020, 2022, and 2023; it had a positive net margin in 2024, but that was the result of a nonrecurring all other income item of \*\*\*.<sup>218</sup> The two newer producers (\*\*) recorded \*\* net margins in the periods in which they operated. The remaining producer, \*\*, recorded \*\* net margin in 2024, after it ceased production activities \*\*

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<sup>212</sup> CR/PR at Table C.1.

<sup>213</sup> CR/PR at Table 4.1.

<sup>214</sup> CR/PR at 4.23 n. 21. As reviewed above and further discussed in section IV.F, below, we find that the closure of Caesarstone's plant reflects at least in part injury caused by imports.

<sup>215</sup> CR/PR at Table C.1.

<sup>216</sup> CR/PR at Table 4.1.

<sup>217</sup> \*\* operated throughout the POI and recorded an improvement in its net income margin between 2020 and 2024, but its operating margin was lower in interim 2025 than in interim 2024. CR/PR at Table 4.3.

<sup>218</sup> CR/PR at 4.23 n.22.



\*\*\*.<sup>219</sup> By interim 2025, five of seven operating producers posted net losses and negative net income margins.<sup>220</sup>

The domestic producers' ratio of cost of goods sold to net sales increased irregularly from 2020 to 2023 and was higher in interim 2025 than in interim 2024.<sup>221</sup> The COGS-to-net-sales ratio increased from 63.3 percent in 2020 to 64.9 percent in 2021 and 66.2 percent in 2022, and decreased to 65.2 percent in 2023 and 61.8 percent in 2024.<sup>222</sup> It was 60.9 percent in interim 2024 and 62.3 percent in interim 2025.<sup>223</sup>

In addition to the operating and net income declines and net losses during the POI, the domestic industry's poor and declining overall financial performance is further illustrated by the plant closures identified above. As noted above, this poor and declining financial performance of the domestic industry occurred as demand increased and in the wake of domestic industry capacity expansion in anticipation of growth following successive successful AD/CVD investigations. The POI should have been a period of growth for the domestic industry, with increased production and sales and improved profitability. Instead, the domestic industry experienced the opposite as imports surged during the period.

Based on this information, we find that a significant number of firms were unable to carry out domestic production operations at a reasonable level of profit during the POI.

#### **4. Other Factors Indicative of Serious Injury**

We have also examined various other factors in finding that the domestic industry is seriously injured. The declines in domestic industry performance reviewed below as noted

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<sup>219</sup> CR/PR at 4.23 n.22.

<sup>220</sup> See CR/PR at Table 4.1. During 2020 and 2022, three of six operating domestic producers were posting net losses and negative net income margins, during 2021, two of six operating domestic producers were posting net losses and negative net income margins, during 2023, four of seven operating domestic producers were posting net losses and negative net income margins and, during 2024, three of seven operating domestic producers were posting net losses and negative net income margins. See *id.* In interim 2025, the \*\*\* represented \*\*\* percent of domestic production. See CR/PR at Table 3.6.

<sup>221</sup> CR/PR at Table C.1.

<sup>222</sup> The COGS-to-net-sales ratio decreased in 2024 primarily because of \*\*\* data. \*\*\*. CR/PR at 4.18 n. 11.

<sup>223</sup> CR/PR at Table 4.1.

occurred at a time of increasing demand, where successive successful antidumping/countervailing duty investigations should have allowed the domestic industry to improve its performance. Instead, the domestic industry's shipments, net sales, market share, return on assets, and capital investments all declined.

The domestic industry's U.S. shipments declined irregularly by 2.4 percent from 2020 to 2024 and were 6.2 percent lower in interim 2025 than in interim 2024.<sup>224</sup> Domestic producers' U.S. shipments increased from 31.6 million square feet in 2020 to 40.5 million square feet in 2021, before decreasing to 38.7 million square feet in 2022, 35.6 million square feet in 2023, and 30.9 million square feet in 2024. They were 23.6 million square feet in interim 2024 and 22.1 million square feet in interim 2025.<sup>225</sup>

The domestic industry's net sales, by quantity, declined irregularly by 7.1 percent from 2020 to 2024 and were 5.4 percent lower in interim 2025 than in interim 2024.<sup>226</sup> Domestic producers' net sales increased from 34.9 million square feet in 2020 to 44.7 million square feet in 2021, before decreasing to 42.9 million square feet in 2022, 38.7 million square feet in 2023, and 32.5 million square feet in 2024. They were 24.9 million square feet in interim 2024 and 23.5 million square feet in interim 2025.<sup>227</sup>

The domestic industry's market share declined by 7.8 percentage points from 2020 to 2024 and was 0.6 percentage points lower in interim 2025 than in interim 2024.<sup>228</sup> Domestic producers' market share decreased from 19.4 percent in 2020 to 17.1 percent in 2021 and 15.5 percent in 2022, before increasing to 16.1 percent in 2023, and decreasing again to 11.7 percent in 2024. It was 12.4 percent in interim 2024 and 11.7 percent in interim 2025.<sup>229</sup>

The domestic industry's total assets increased irregularly by 3.8 percent from 2020 to 2024, while its return on assets decreased irregularly by 1.6 percentage points.<sup>230</sup> Domestic producers' assets increased from \$895.3 million in 2020 to \$973.7 million in 2021 and \$1.1 billion in 2022, before decreasing to \$950.5 million in 2023, and \$929.5 million in 2024.<sup>231</sup> Domestic producers' return on assets increased from 7.3 percent in 2020 to 8.6 percent in

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<sup>224</sup> CR/PR at Table C.1.

<sup>225</sup> CR/PR at Table 3.7.

<sup>226</sup> CR/PR at Table C.1.

<sup>227</sup> CR/PR at Table 4.1.

<sup>228</sup> CR/PR at Table C.1.

<sup>229</sup> CR/PR at Table C.1.

<sup>230</sup> CR/PR at Tables C.1, 4.10 & 4.11.

<sup>231</sup> CR/PR at Table 4.10.

2021, before decreasing to 5.6 percent in 2022, and fluctuating to 6.6 percent in 2023, and to 5.7 percent in 2024.<sup>232</sup>

We have also examined the domestic industry's capital expenditures and research and development ("R&D") expenses. Its capital expenditures declined irregularly by 37.0 percent from 2020 to 2024 and were 95.6 percent higher in interim 2025 than in interim 2024.<sup>233</sup> Its R&D expenses were low, compared to capital expenditures, but increased by 59.5 percent from 2020 to 2024, but were 0.5 percent higher in interim 2025 than in interim 2024.<sup>234</sup>

Furthermore, five U.S. producers reported that over the POI, i) imports had a negative effect on investments, including the cancellation, postponement, or rejection of expansion projects; ii) price pressure from imports led to the rejection of certain investment proposals; iii) import competition forced a reduction in the amounts of capital expenditures; and iv) the return on specific investments were negatively impacted by import competition.<sup>235</sup>

## **5. Conclusion**

The regressive performance of the domestic industry was coincident with a period of substantial growth in domestic demand, and at a time when the domestic industry expanded its capacity in the reasonable expectation of increased sales after the completion of two antidumping/countervailing investigations which resulted in orders on imports from China, India and Turkey. But the surge of imports during the period of investigation defeated those expectations. Thus, what should have been a time of growth for the domestic industry turned into a period in which they sustained serious injury by reason of increased imports.

In sum, two domestic producers closed their U.S. facilities and exited the U.S. market during the POI, one of which accounted for between \*\*\* and \*\*\* percent of domestic production during 2020-2023, another producer \*\*\*, while several other producers reported prolonged shutdowns and production curtailments. The domestic industry experienced large declines in its production, capacity utilization, U.S. shipments, net sales quantity, and market share during

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<sup>232</sup> CR/PR at Table 4.11.

<sup>233</sup> CR/PR at Table C.1. U.S. producers' capital expenditures increased from \$49.3 million in 2020 to \$89.6 million in 2021 and \$95.7 million in 2022, and decreased to \$80.5 million in 2023, and \$31.0 million in 2024. They were \$22.7 million in interim 2024 and \$44.4 million in interim 2025. CR/PR at Table 4.6.

<sup>234</sup> CR/PR at Table C.1. U.S. producers' R&D expenses increased from \$4.0 million in 2020 to \$5.2 million in 2021, \$5.6 million in 2022, \$5.9 million in 2023, and \$6.3 million in 2024. They were \$4.7 million in interim 2024 and interim 2025. CR/PR at Table 4.8.

<sup>235</sup> CR at Table 4.14.

the POI, while apparent U.S. consumption increased significantly from 2020 to 2024.<sup>236</sup> Its number of PRWs, hours worked, and productivity declined from 2020 to 2024. Further, the domestic industry experienced operating and net income declines during the POI, with \*\*\* by the end of the POI. In addition, the domestic industry experienced a declining return on assets over the POI.

Based on the above considerations, we find that there has been a significant overall impairment in the position of the domestic industry. Consequently, we find that the domestic industry is seriously injured.

#### **E. Increased Imports are a Substantial Cause of Serious Injury to the Domestic Industry**

In determining whether increased imports are a substantial cause of serious injury, we considered the impact of imports as well as the impact of other possible causes. As discussed above, the statute defines “substantial cause” as a cause “which is important and not less than any other cause.”<sup>237</sup>

We find that imports are a substantial cause of serious injury to the domestic industry. Imports of QSP increased significantly during the POI, in terms of volume and relative to U.S. production and consumption. In absolute terms, import volumes fluctuated but increased overall by 78.3 percent from 2020 to 2024. They were 0.4 percent lower in interim 2025 than in interim 2024.<sup>238</sup> As a share relative to the domestic industry’s production, imports fluctuated but increased overall by 383.4 percentage points from 2020 to 2024. They were 1.6 percentage points higher in interim 2025 than in interim 2024.<sup>239</sup> Imports increased irregularly as a share of apparent U.S. consumption from 80.6 percent in 2020 to 88.3 percent in 2024. Imports’ share of the U.S. market share increased between 2020 and 2022, followed by a slight decline in 2023, and increased again in 2024. Between the interim periods, imports’ market share was slightly higher in interim 2025 (88.3 percent) than in interim 2024 (87.6 percent), with 2024 and interim 2025 representing the peak level for imports’ market share over the period of investigation.<sup>240</sup>

The record indicates that imports that were highly substitutable with the domestic like product used aggressively low pricing to enter the U.S. market in significant and increasing

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<sup>236</sup> See CR/PR at Table C.1.

<sup>237</sup> 19 U.S.C. § 2252(b)(1)(B).

<sup>238</sup> CR/PR at Table C.1.

<sup>239</sup> Derived from CR/PR at Table 2.2.

<sup>240</sup> CR/PR at Table C.1.

volumes during the POI. The Commission collected and compared quarterly pricing data from domestic producers and importers for six specific quartz surface products.<sup>241</sup> From domestic producers, the Commission collected quarterly data for the total quantity and f.o.b. value of each of these six products shipped to unrelated U.S. customers during January 2020-September 2025.<sup>242</sup> From importers, the Commission collected quarterly data for the total quantity and landed duty-paid value of these six products imported from all sources during January 2020-September 2025.<sup>243</sup> Four U.S. producers and 62 importers provided usable pricing data for sales of the requested products, although not all firms reported data for all products for all quarters.<sup>244</sup> Data reported by the domestic producers accounted for 66.9 percent of domestic producers' U.S. shipments of QSP in 2024.<sup>245</sup> Data reported by importers accounted for 59.4 percent of U.S. shipments of imports from all sources in 2024.<sup>246</sup>

The record shows that the prices of imports were lower than the prices for the domestic like product in all 138 quarterly comparisons, with margins of underselling ranging from \*\*\* percent to \*\*\* percent and averaging \*\*\* percent.<sup>247</sup> The average differential between

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<sup>241</sup> The six pricing products are as follows:

**Product 1.**-- Plain white quartz surface products in slab form, with a nominal thickness of 2 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors;

**Product 2.**-- Plain white quartz surface products in slab form, with a nominal thickness of 3 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors;

**Product 3.**-- White quartz surface products with a "marble look" in slab form, a nominal thickness of 2 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors;

**Product 4.**-- White quartz surface products with a "marble look" in slab form, a nominal thickness of 3 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors;

**Product 5.**-- Neutral colored quartz surface products with a "natural stone look" in slab form, a nominal thickness of 2 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors; and

**Product 6.**-- Neutral colored quartz surface products with a "natural stone look" in slab form, a nominal thickness of 3 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

CR/PR at 6.28-6.29.

<sup>242</sup> CR/PR at 6.28.

<sup>243</sup> CR/PR at 6.28.

<sup>244</sup> CR/PR at 6.29.

<sup>245</sup> CR/PR at 6.29.

<sup>246</sup> CR/PR at 6.29

<sup>247</sup> See CR/PR at Tables 6.29 & 6.30.

import prices and prices for the domestic like product was \*\*\* percent.<sup>248</sup> On a volume basis, these comparisons covered \*\*\* square feet of imports.<sup>249</sup>

We have also considered purchasers' responses corroborating that imports were priced lower than the domestic product. Purchases by purchasers responding to the lost sales question accounted for approximately 30 percent of apparent U.S. consumption over the period of investigation.<sup>250</sup> Fifteen of 23 purchasers that responded to the Commission's lost sales/lost revenue survey reported that, since 2020, they had purchased imported QSP in lieu of purchasing the domestic like product.<sup>251</sup> Ten of these 15 purchasers reported that import prices were lower than prices for the domestically produced product, and eight of these purchasers confirmed that price was a primary reason for purchasing imports.<sup>252</sup> Only five of the eight purchasers estimated the quantity of QSP from foreign sources purchased instead of domestic product; quantities ranged from \*\*\* square feet to \*\*\* square feet, for a total volume of lost sales of \*\*\* square feet.<sup>253</sup> The total quantity of QSP purchases from foreign sources instead of domestic product due to the lower price of imports accounted for approximately \*\*\* percent of reported purchases of imports over the POI, and approximately \*\*\* percent of total imports over the POI.<sup>254</sup>

The evidence collected in this investigation thus demonstrates that imports were substantially lower priced than domestically produced QSP. As reviewed above, the price comparison data show that the prices of imports were lower than the prices for domestically produced QSP in 100 percent of available quarterly comparisons involving many hundreds of millions of square feet of product and there is evidence of lost sales and revenues due to low-priced imports.<sup>255</sup> In view of the high degree of substitutability of imported and domestic QSP

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<sup>248</sup> CR/PR at Tables 6.29 & 6.30.

<sup>249</sup> CR/PR at Tables 6.29 & 6.30.

<sup>250</sup> *Derived from* CR/PR at Tables C.1 & 6.31.

<sup>251</sup> CR/PR at 6.50 & Table 6.32.

<sup>252</sup> CR/PR at 6.50 & Table 6.32.

<sup>253</sup> CR/PR at 6.50 and Tables 6.32 & 6.33.

<sup>254</sup> *Derived from* CR/PR at Tables 6.31, 6.32 & C.1. Of 27 purchasers that responded to the Commission's lost sales/lost revenue survey, two reported that U.S. producers had reduced prices in order to compete with lower-priced imports. CR/PR at Table 6.34. The reported estimated price reduction ranged from 10 to 15 percent. In describing the price reductions, purchasers indicated they were customer specific discounts which were given because of price discussions. CR/PR at 6.50.

<sup>255</sup> Respondents argue that the pricing product data are unusable because the product definitions are too broad, subjective, unclear, and have captured vastly different products under the same pricing product umbrella. See *Arizona, Elite & MSI's Prehearing Br.* at 88-90. We find these arguments unpersuasive. Respondents had an opportunity to suggest modifications to the (Continued...)

the importance of price in purchasing decisions, and evidence that domestic producers lost a significant volume of sales to imports, we find that the aggressively low prices of imports caused them to enter the U.S. market in increasing and significant volumes, leading to a significant shift in market share from the domestic industry to imports from 2020 to 2024 and an additional market share shift in interim 2025.<sup>256</sup> These significant losses occurred even though apparent U.S. consumption increased significantly from 2020 to 2024.<sup>257</sup>

The losses in sales volume and market share led directly to large overall POI declines in the domestic industry's production, capacity utilization, U.S. shipments, net sales quantity, and market share. The decline in these statistics was accompanied by decreases in the number of PRWs, hours worked, and productivity from 2020 to 2024. The declines in the domestic industry's output indicators also negatively affected its financial performance, both in the form of lost revenue from sales and market share lost to competition from low-priced imports and in the form of higher fixed costs that otherwise would have been spread over a larger sales volume, further negatively impacting financial performance. Operating and net income and operating and net income margins declined overall from 2020 to 2024, and both were significantly lower in interim 2025 than in interim 2024. Moreover, \*\*\*

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Commission's questionnaires, but did not raise any concerns regarding the pricing product definitions, which were accordingly adopted by the Commission in the final questionnaires. See Letter from Jonathan T. Stoel, Hogan Lovells LLP, to The Honorable Lisa R. Barton, *Re: Quartz Surface Products: Draft Questionnaire Comments* (Sep. 22, 2025). Further, the Commission used the same product definitions in this investigation as it used in the AD/CVD investigations on quartz surface products. See *Quartz Surface Products from China*, USITC Pub. 4913 at n.184; *Quartz Surface Products from India and Turkey*, USITC Pub. 5061 at n. 167. As the Commission noted in the original investigations of *Quartz Surface Products for China*, the definitions incorporated many of respondents' suggestions in those investigations to better capture competition between subject imports and domestic QSP. These included adding fabricated QSP pricing products, adding a neutral colored pricing product, and better distinguishing between marble and granite patterns. See *Quartz Surface Products from China*, USITC Pub. 4913 at n.188.

<sup>256</sup> CR/PR at Table C.1. Due to competition from uniformly low-priced imports, the domestic industry was unable to take advantage of increasing demand during 2020 to 2024. Although apparent U.S. consumption increased by 62.6 percent during 2020-2024, the domestic industry's practical capacity utilization, production, and U.S. shipments decreased by 7.1 percentage points, 17.2 percent, and 2.4 percent, respectively, over the same period, thus significantly lagging the growth in apparent U.S. consumption. *Id.*

<sup>257</sup> See CR/PR at Table C.1. After Caesarstone exited the U.S. market as a producer in 2024, the domestic industry's market share fell by 4.4 percentage points, indicating that imports stepped in to fill that market void. See *id.* The inability of remaining domestic producers to gain market share after the departure of Caesarstone in 2024 further indicates that aggressively low priced imports captured sales from the domestic industry.

\*\*\* by the end of the POI. In addition, the domestic industry experienced a declining return on assets. Two domestic producers closed their U.S. facilities and exited the U.S. market during the POI, and another producer \*\*\*.

Accordingly, for the above reasons, we conclude that increased imports were an important cause of serious injury to the domestic industry.<sup>258</sup>

#### **F. Imports are an Important Cause Not Less Than Any Other Cause**

Respondents argue that five alternative causes of injury to the domestic industry are more important than imports. First, we consider Respondents' claim that declines in demand and broader economic conditions caused the observed decreases in U.S. producers' performance, particularly at the end of the POI.<sup>259</sup> As discussed above, apparent U.S. consumption increased overall from 2020 to 2024, while the domestic industry's practical capacity, production, capacity utilization, U.S. shipments, market share, employment, and operating and net income all declined.<sup>260</sup> We disagree with Respondents' assertion that

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<sup>258</sup> Respondents contend that there is a lack of correlation between import levels and the domestic industry's condition, indicating that imports were not a substantial cause of serious injury to the domestic industry. See *Arizona, Elite & MSI's Prehearing Br.* at 77-80; *Arizona, Elite & MSI's Posthearing Br.* at 12; *Casablanca & Wilsonart's Prehearing Br.* at 8-10; *Indian Federations' Prehearing Br.* at 19-20; *Indian Federations' Posthearing Br.* at 5-6; *Vietnamese Manufacturers' Posthearing Br.* at 11. We observe, however, that there is a strong overall correlation between import volumes and the domestic industry's condition, with import volumes increasing overall from 2020 to 2024 and the domestic industry's practical capacity, production, capacity utilization, U.S. shipments, market share, employment, and operating and net income all declining, despite an overall increase in apparent U.S. consumption during this period. See CR/PR at Table C.1. There is, however, one year-over-year comparison, from 2022 to 2023, in which imports declined, while the domestic industry's market share improved, and apparent U.S. consumption declined. See CR/PR at Table C.1. We acknowledge that the domestic industry posted significant net losses in 2023, even though its market share increased. We consider that these developments resulted from the closure of Caesarstone's plant, which, as discussed further below reflects the injury caused by imports. See CR/PR at 4.23 n. 21. Furthermore, while imports were slightly lower in interim 2025 compared to interim 2024, the domestic industry's market share was also lower, suggesting that aggressively low-priced imports continued to take market share from the domestic industry, negatively impacting its production, capacity utilization, U.S. shipments, and operating and net income during this period. See CR/PR at Table C.1. In any event, we consider that small, isolated improvements in a few indicia of industry performance do not detract our conclusion that the weight of the evidence indicates that a significant increase in imports caused serious injury to the domestic industry.

<sup>259</sup> See *Arizona, Elite & MSI's Prehearing Br.* at 95-96; *Casablanca & Wilsonart's Prehearing Br.* at 17; *Indian Federation's Prehearing Br.* at 38-39.

<sup>260</sup> See CR/PR at Table C.1.



demand decreased. To the contrary, apparent U.S. consumption increased overall during the five-year POI,<sup>261</sup> and most market participants characterized demand as increasing over the POI.<sup>262</sup> We consider that the massive increase over the period as a whole outweighs the relatively small decrease in apparent U.S. consumption in 2023, and that the minimal decrease in interim 2025 as compared to interim 2024 suggests that demand was essentially stable. Therefore, we determine that there was no decline in demand that caused serious injury to the domestic industry.

We are also unpersuaded by Respondents' argument that because QSP is part of a broader surface product market, the observed trends for the domestic industry are driven by consumers simply moving from imported granite to imported QSP over the POI and to quartzite at the expense of QSP late in the POI.<sup>263</sup> A shift from imported granite to imported QSP cannot explain why the domestic industry lost market share to imports within the QSP segment over the POI. Additionally, while there may have been a slight uptick in consumer interest in quartzite affecting QSP from all sources late in the POI, there was a substantial increase in demand for QSP over nearly the entire POI, so any shift to quartzite cannot explain impacts before that time.<sup>264</sup>

Respondents also contend that intra-industry competition has had a greater impact on U.S. industry performance than imports, pointing variously to some producers' increased shipments, lower AUVs, or better profit margins.<sup>265</sup> They focus in particular on \*\*\* increasing sales and improving financial condition over the POI, which in their view demonstrates that U.S. producers can succeed despite increased import volumes.<sup>266</sup> The statute, however, calls on the Commission to examine whether increased imports are a substantial cause of serious injury to the domestic industry, which it defines as "the producers as a whole."<sup>267</sup> In that analysis, it requires a consideration of "the inability of a significant

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<sup>261</sup> See CR/PR at Table C.1.

<sup>262</sup> CR/PR at 6.13.

<sup>263</sup> See Arizona, Elite & MSI's Prehearing Br. at 72-77; Arizona, Elite & MSI's Posthearing Br. at 11; Indian Federation's Posthearing Br. at 9.

<sup>264</sup> Furthermore, as previously observed, the record indicates that both domestically produced QSP and imports competed for sales of mass market QSP, which Respondents contend is more comparable to granite, with growing overlap in U.S. shipments of premium QSP. CR/PR at Tables 2.5 & 3.10.

<sup>265</sup> See Arizona, Elite & MSI's Prehearing Br. at 96-98; Indian Federation's Prehearing Br. at 39-40; Indian Federation's Posthearing Br. at 8-9.

<sup>266</sup> See Arizona, Elite & MSI's Prehearing Br. at 96-98; Arizona, Elite & MSI's Posthearing Br. at 14, Response to Commissioner Questions at 17-18.

<sup>267</sup> 19 U.S.C. § 2252(c)(6)(ii).

number of firms to carry out domestic production operations at a reasonable level of profit.”<sup>268</sup> These statutory provisions indicate that increased imports may be a substantial cause of serious injury despite the fact that some producers perform better than others.

In any event, the record evidence indicates that \*\*\* market share grew by \*\*\* percentage points from 2020 to 2024, and then stabilized.<sup>269</sup> During this time, the AUVs for its shipments increased more than 50 percent – from \$\*\*\* to \$\*\*\* per pound.<sup>270</sup> Therefore, we do not see \*\*\* relative success as responsible for the serious injury that we have attributed to imports’ gain of 7.8 percentage points of market share in a period when their average unit values decreased by 22.4 percent.<sup>271</sup> We also note Elite’s unique business model, in which SG&A expenses are covered by its distribution partner MSI.<sup>272</sup> This makes Elite less relevant as a benchmark for other producers in a consumer-facing industry with substantial fixed marketing expenses. Furthermore, the domestic industry as a whole lost market share to imports over the POI, and the remaining domestic producers were unable to gain market share after the departure of Caesarstone in 2024, which further indicates that imports, rather than intra-industry competition, were a more important cause of injury.

Respondents also argue that the domestic industry’s declining condition reflects Caesarstone’s decision to shutter its domestic slab production for reasons unrelated to imports.<sup>273</sup> As reviewed above in section IV.D.1., we find, on balance, that the closure of Caesarstone’s U.S. plant was at least in part due its deteriorating financial condition in a market increasingly dominated by imports, and reflects injury caused by imports. Therefore, we find that Caesarstone’s decision to close its U.S. slab production is not an “other cause” for purposes of section 201(b)(1)(B), 19 U.S.C. 2251(b)(1)(B).

Respondents further contend that the cost of defending fibrosis and silicosis mass tort lawsuits has become significant for U.S. producers in recent years and is, therefore, a more important cause of injury than imports.<sup>274</sup> However, \*\*\* were the only U.S. producers to report any notable amount of expenses related to silicosis litigation in their

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<sup>268</sup> 19 U.S.C. § 2252(c)(1)(A)(ii).

<sup>269</sup> *Calculated from* CR/PR at Table C.1 and Table 4.3 (Net sales quantity).

<sup>270</sup> CR/PR at Table 4.3 (unit net sales value).

<sup>271</sup> *Calculated from* CR/PR at Table C.1.

<sup>272</sup> Hearing Tr. at 267-268.

<sup>273</sup> *See* Arizona, Elite & MSI’s Prehearing Br. at 51-54; Arizona, Elite & MSI’s Posthearing Br. at 10; Indian Federation’s Prehearing Br. at 23-24; Casablanca & Wilsonart’s Prehearing Br. at 11; Vietnamese Manufacturers’ Prehearing Br. at 10-11; Vietnamese Manufacturers’ Posthearing Br. at 3-4.

<sup>274</sup> *See* Arizona, Elite & MSI’s Prehearing Br. at 99-100; Arizona, Elite & MSI’s Posthearing Br. at 14-15, Response to Commissioner Questions at 12-16; Indian Federation’s Posthearing Br. at 8.

financial results during the period for which data were collected. \*\*\*. \*\*\*.<sup>275</sup> These amounts are relatively low, however, when compared to the companies' net sales revenues.<sup>276</sup> Thus, we find that imports were a more important cause of serious injury than the cost to the domestic industry of defending fibrosis and silicosis mass tort lawsuits.

Finally, Respondents argue that rising raw material costs, largely driven by duties imposed under IEEPA, are a more important cause of injury to the domestic industry than imports.<sup>277</sup> As these increases occurred in 2025, they would explain serious injury to the domestic industry only in interim 2025. However, raw materials costs, as a percentage of total U.S. producers' COGS and on a per square foot basis were lower in interim 2025 than in interim 2024.<sup>278</sup> Therefore, rising raw material costs related to IEEPA tariffs were not a cause of serious injury to the domestic industry during the POI.

In sum, none of Respondents' alleged alternative causes of injury is more important than increased imports. We therefore conclude that increased imports are a substantial cause of serious injury to the domestic industry.

## **V. Findings Regarding Possible Exclusion of Certain Imports**

If the Commission makes an affirmative determination of serious injury or threat thereof (or is equally divided on the issue), our statutes require the Commission to make a number of additional findings. These requirements for the most part arise from the implementing statutes for various free trade agreements that the United States has negotiated in the last several decades or under statutory provisions related to certain preferential trade programs.<sup>279</sup>

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<sup>275</sup> CR/PR at 4.23 n.20.

<sup>276</sup> \*\*\* silicosis litigation related expenses amounted to between \*\*\* percent of its net sales during 2023, 2024, and the interim periods. CR/PR at 4.23 n.20. \*\*\* silicosis litigation related expenses amounted to \*\*\* percent of its net sales in 2024. *Derived from* CR/PR at Table 4.3.

<sup>277</sup> Arizona, Elite & MSI's Prehearing Br. at 100-101, Response to Commissioner Questions at 20.

<sup>278</sup> CR/PR at Table 4.1.

<sup>279</sup> Specifically, the Commission is required to make certain additional findings under the implementing statutes for USMCA (Canada and Mexico), CAFTA-DR (Costa Rica, El Salvador, Guatemala, Honduras, Nicaragua, and the Dominican Republic), the U.S.-Australia Free Trade Agreement, the U.S.-Korea Free Trade Agreement ("KORUS"), the U.S.-Colombia Trade Promotion Agreement, the

(Continued...)

## **A. Findings Regarding USMCA Imports**

Under section 301(a) of the USMCA Implementation Act, which implements article 10.2 of the USMCA, if the Commission makes an affirmative determination or is equally divided on the question of injury, the Commission also must find whether

- (i) imports of the article from Canada or Mexico, considered individually, account for a substantial share of total imports; and
- (ii) imports of the article from Canada or Mexico, considered individually or, in exceptional circumstances, imports from Canada or Mexico considered collectively, contribute importantly to the serious injury, or threat thereof, caused by imports.<sup>280</sup>

With respect to the first prong, the statute states that imports from a USMCA country “normally shall not be considered to account for a substantial share of total imports if that country is not among the top five suppliers of the article subject to the investigation, measured in terms of import share during the most recent three-year period.”<sup>281</sup>

With respect to the second prong (whether imports from USMCA countries individually or in exceptional circumstances, collectively, contribute importantly to the serious injury or threat of serious injury caused by imports), the statute defines “contribute importantly” as an important cause, but not necessarily the most important cause.<sup>282</sup> In determining whether imports have contributed importantly to the serious injury or threat thereof caused by imports, the Commission is directed to

consider such factors as the change in the import share of the USMCA country or countries, and the level and change in the level of imports from such country or countries. Imports from a USMCA country or countries normally shall not be

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Agreement between the United States of America and the Hashemite Kingdom of Jordan on the Establishment of a Free Trade Area, the U.S.-Panama Trade Promotion Agreement, the U.S.-Peru Free Trade Agreement, the U.S.-Singapore Free Trade Agreement, and the U.S.-Israel Free Trade Agreement or under statutory provisions related to preferential trade programs (CBERA and GSP). See 19 U.S.C. § 2112 note (Jordan, Israel); 19 U.S.C. § 2253(e)(6) (GSP); 19 U.S.C. § 2703(e) (CBERA); 19 U.S.C. § 4551 (USMCA); 19 U.S.C. § 3805 note (Australia, Colombia, KORUS, Panama, Peru, Singapore); 19 U.S.C. § 4101 (CAFTA-DR).

<sup>280</sup> As explained in the Statement of Administrative Action for the USMCA Act (USMCA SAA), sections 301 and 302 of the Act implement Article 10.2 of the USMCA by maintaining the treatment provided for in sections 311 and 312 of the NAFTA implementation Act, previously codified at 19 U.S.C. §§ 3371 and 3372 and transferred to 19 U.S.C. §§ 4551 and 4552. See USMCA SAA at 23-24. The USMCA SAA states that no changes in administrative regulations, practices, or procedures are required to implement the safeguard related provisions of Chapter 10 of the USMCA. USMCA SAA at 26.

<sup>281</sup> 19 U.S.C. § 4551(b)(1).

<sup>282</sup> 19 U.S.C. § 4551(c).

considered to contribute importantly to serious injury, or the threat thereof, if the growth rate of imports from such country or countries during the period in which an injurious increase in imports occurred is appreciably lower than the growth rate of total imports from all sources over the same period.<sup>283</sup>

Petitioners contend that neither Mexico nor Canada accounted for a substantial share of total imports or contributed importantly to serious injury.<sup>284</sup> The government of Canada and Hyundai Canada agree that imports from Canada did not account for a substantial share of total imports or contribute importantly to serious injury<sup>285</sup> and the government of Mexico agrees that imports from Mexico did not account for a substantial share of total imports or contribute importantly to serious injury.<sup>286</sup>

### **1. Findings Regarding Imports from Canada**

We find that imports of QSP from Canada do not account for a substantial share of total imports and do not contribute importantly to the serious injury caused by the imports.

Based on adjusted official Commerce statistics, the industry in Canada was not ranked among the top five import suppliers of QSP during the three most recent years,<sup>287</sup> and imports from Canada accounted for a small and declining share of total imports of QSP throughout the POI.<sup>288</sup> Specifically, as a share of total imports, imports from Canada were only 6.2 percent in 2020, 4.0 percent in 2021, 2.8 percent in 2022, 2.7 percent in 2023, and 2.0 percent in 2024. Imports from Canada accounted for 2.2 percent of total imports of QSP in interim 2024 and 1.6 percent in interim 2025.<sup>289</sup> Consequently, we find that imports of QSP from Canada, considered individually, do not account for a substantial share of total imports.

We also examined whether imports of QSP from Canada considered individually contribute importantly to the serious injury caused by imports.<sup>290</sup> Imports of QSP from Canada

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<sup>283</sup> 19 U.S.C. § 4551(b)(2).

<sup>284</sup> See Petitioners' Prehearing Br. at 76-77.

<sup>285</sup> See Government of Canada's Prehearing Br. at 6-13; Hyundai Canada's Prehearing Br. at 2-5; Hyundai Canada's Posthearing Br. at 3-7.

<sup>286</sup> See Government of Mexico's Posthearing Br. at 13-14.

<sup>287</sup> See CR/PR at Table 2.2.

<sup>288</sup> See CR/PR at Table 2.2.

<sup>289</sup> CR/PR at Table 2.2.

<sup>290</sup> The statute refers to "the serious injury, or threat thereof, caused by imports." 19 U.S.C. § 4551 (a)(2)). Having found under section 202 of the Trade Act (19 U.S.C. § 2252(b)) that QSP is being imported into the United States in such increased quantities as to be a substantial cause of serious injury to the domestic industry producing QSP, we limit our findings for USMCA countries to (Continued...)

declined from 2020 to 2024, while imports for all sources increased during this period.<sup>291</sup> Furthermore, the percentage by which imports from Canada were lower in interim 2025 than in interim 2024 was greater than the percentage by which imports from all sources were lower between interim periods.<sup>292</sup> Accordingly, we make a negative finding with respect to imports from Canada.

## **2. Findings Regarding Imports from Mexico**

We also find that imports of QSP from Mexico do not account for a substantial share of total imports and do not contribute importantly to the serious injury caused by the imports.

Imports of QSP from Mexico were very small in each year over the POI, and there is no known production of QSP in Mexico.<sup>293</sup> Based on adjusted official Commerce statistics, imports of QSP from Mexico to the United States were only 189,000 square feet in 2020, 35,000 square feet in 2021, 17,000 square feet in 2022, 36,000 square feet in 2023, and 54,000 square feet in 2024. They were 30,000 square feet in interim 2024 and 65,000 square feet in interim 2025.<sup>294</sup> The industry in Mexico was not ranked among the top five import suppliers of QSP during the three most recent years.<sup>295</sup>

Furthermore, imports of QSP from Mexico declined during 2020 to 2024, while imports from all sources increased during this period.<sup>296</sup> Although imports of QSP from Mexico were higher in interim 2025 than in interim 2024, while imports from all sources were lower, this a function of the very low level of imports from Mexico during the interim periods. Accordingly, we make a negative finding with respect to imports from Mexico.

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whether imports of the article from each USMCA country contribute importantly to the serious injury caused by imports consistent with the Commission's approach in prior safeguard investigations under NAFTA. *See, e.g., LRWs*, USITC Pub. 4745 at 52-53; *CSPVs*, USITC Pub. 4739 (Nov. 2017) at 68 n.390; *Circular Welded Carbon Quality Line Pipe*, USITC Pub. 3261 (Dec. 1999) at I-32 to I-33. We do not find exceptional circumstances that warrant considering whether imports from Canada and Mexico collectively contribute importantly to the serious injury caused by imports.

<sup>291</sup> See CR/PR at Table C.1.

<sup>292</sup> See CR/PR at Table C.1.

<sup>293</sup> See CR/PR at Table 5.5.

<sup>294</sup> CR/PR at Table 2.2.

<sup>295</sup> See CR/PR at Table 2.2. As a share of total imports, imports from Mexico accounted for only 0.1 percent of total imports in 2020 and 0.0 percent for the remainder of the POI. *Id.*

<sup>296</sup> See CR/PR at Table C.1.

**B. Findings Regarding to Imports from Australia, CAFTA-DR countries, Colombia, Jordan, South Korea, Panama, Peru, and Singapore**

Several of the United States' FTAs contain similar language providing the President with discretion to exclude imports from FTA partners from any global safeguard measure. Despite the permissive nature of the exclusions in the FTAs, the corresponding U.S. implementing statutes mandate that the Commission make a finding whether imports of the article from the FTA partner are a substantial cause of serious injury or threat thereof and report its finding to the President at the same time that it submits its report.<sup>297</sup> For imports from each of these countries, we thus consider whether QSP are being imported in increased quantities (either actual or relative to production); whether the domestic industry producing an article that is like or directly competitive with the imported article is seriously injured or threatened with serious injury; and whether the article is being imported in such increased quantities as to be a substantial cause of serious injury or threat of serious injury to the domestic industry.<sup>298</sup> South Korea is the only permissive FTA country that exported more than *de minimis* quantities of QSP to the United States during the POI.<sup>299</sup>

Petitioners argue that imports from South Korea do not contribute substantially to serious injury.<sup>300</sup> The government of South Korea agrees that imports of QSP from South Korea are not a substantial cause of serious injury.<sup>301</sup>

**1. Findings Regarding Imports from South Korea**

We find that imports of QSP from South Korea are not a substantial cause of serious injury or threat thereof.<sup>302</sup>

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<sup>297</sup> See, e.g., CAFTA-DR Article 8.6(2) (Costa Rica, El Salvador, Guatemala, Honduras, Nicaragua, and the Dominican Republic); the U.S.-Australia Free Trade Agreement Article 9.5; KORUS Article 10.5(1); the U.S.-Colombia Trade Promotion Agreement Article 8.6(2); U.S.-Jordan Agreement on the Establishment of a Free Trade Area Article 10.8; U.S.-Panama Trade Promotion Agreement Article 8.2(2); the U.S.-Peru Free Trade Agreement Article 8.6(2); and the U.S.-Singapore Free Trade Agreement Article 7.5. See 19 U.S.C. § 2112 note (Jordan); 19 U.S.C. §§ 4551 (USMCA); 19 U.S.C. § 3805 note (Australia, Colombia, KORUS, Panama, Peru, Singapore); 19 U.S.C. § 4101 (CAFTA-DR).

<sup>298</sup> See 19 U.S.C. § 2252(b)(1)(A).

<sup>299</sup> CR/PR at Table 2.3. Imports of QSP from South Korea accounted for 4.3 percent of total imports in 2020 and were *de minimis* for the remainder of the POI. *Id.*

<sup>300</sup> See Petitioners' Prehearing Br. at 77-78.

<sup>301</sup> Government of South Korea's Prehearing Br. at 9-14; Government of South Korea's Posthearing Br. at 5-7.

<sup>302</sup> The required analysis of imports from South Korea differs in important respects from the analysis with respect to imports from USMCA countries. For instance, the injury standards differ, with a (Continued...)

Based on official Commerce statistics, imports of QSP from South Korea were small throughout the POI and declined overall from 2020 to 2024, while steady between interim periods. They decreased from 5.6 million square feet in 2020 to 5.5 million square feet in 2021, 834,000 square feet in 2022, and 592,000 square feet in 2023, and then increased to 743,000 square feet in 2024. They were 486,000 square feet in interim 2024 and 489,000 square feet in interim 2025.<sup>303</sup> As a share of total imports, imports from South Korea, declined over the POI, declining from 4.3 percent in 2020 to 2.8 percent in 2021, 0.4 percent in 2022, and 0.3 percent in 2023, 2024, interim 2024, and interim 2025.<sup>304</sup> While imports from South Korea declined during 2020 to 2024, imports from all sources increased and imports from South Korea were only marginally higher between interim periods.<sup>305</sup>

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two-pronged test for imports from USMCA countries (imports “account for a substantial share of total imports” and “*contribute importantly to the serious injury, or threat thereof, caused by imports*”) and a single test for imports from South Korea (whether imports are “a *substantial cause of serious injury or threat*”).

Moreover, the context for our analysis differs. Our analysis of imports from USMCA countries is intertwined with our analysis of global imports. If we determine under section 201 of the Trade Act (19 U.S.C. § 2252(b)) that an article is being imported in such increased quantities as to be a substantial cause of *serious injury* to the domestic industry producing an article like or directly competitive with the imported article, then the statute limits our analysis of imports from USMCA countries to the basis for that determination (*i.e., serious injury*), as we have found in prior safeguard proceedings. *See, e.g., LRWs*, USITC Pub. 4745 at 55-59; *Circular Welded Carbon Quality Line Pipe*, Inv. No. TA-201-70, USITC Pub. 3261 at I-32 to I-33 (Dec. 1999). The operative language is the requirement that imports from the USMCA country “contribute importantly to *the serious injury, or threat thereof, caused by imports.*” 19 U.S.C. § 3371(a)(2) (emphasis added). Thus, the Commission analyzes imports from the USMCA country against the backdrop of its determination of serious injury caused by imports. No such language exists for purposes of analyzing imports from South Korea, so if, as here, the Commission based its determination with respect to global imports on *serious injury*, the statute *does not limit* the analysis of imports from South Korea to the *serious injury* context (as distinguished from the *threat of serious injury* context). 19 U.S.C. § 3805 note at section 341.

The Commission’s point of reference also changes. To analyze imports from the USMCA country, the Commission focuses on whether they “contribute importantly to *the serious injury, or threat thereof, caused by imports.*” 19 U.S.C. § 3371(a)(2) (emphasis added). That is, the statute contemplates that the Commission will analyze the imports from the USMCA country against the imports that the Commission determined caused the serious injury (or threat thereof) – global imports. For imports from South Korea, however, the statute does not direct the Commission to examine imports from South Korea with global imports that caused the serious injury (or threat thereof) as a reference point. The statute simply directs the Commission to find whether imports of the South Korean article “are a substantial cause of serious injury or threat thereof.” 19 U.S.C. § 3805 note at section 341(a).

<sup>303</sup> CR/PR at Table 2.3.

<sup>304</sup> CR/PR at Table 2.3.

<sup>305</sup> *See* CR/PR at Tables 2.3 & C.1.



In light of the above, imports from South Korea, considered alone, are not a substantial cause of threat of serious injury to the domestic industry.

## **2. Findings Regarding Imports from Australia, CAFTA-DR countries, Colombia, Jordan, Panama, Peru, and Singapore**

We find that imports of QSP from Australia, CAFTA-DR countries, Colombia, Jordan, Panama, Peru, and Singapore, individually, are not a substantial cause of serious injury or threat thereof.<sup>306</sup>

Official HTSUS import data show that there were zero imports of imports of QSP from Australia in 2020, 2021, 2022, and 2023, and only 16,000 square feet of imports in 2024, and 3,000 square feet of imports in interim 2025.<sup>307</sup> These data also show that there were zero imports of QSP from the Dominican Republic in 2020, 2022, 2023, and interim 2025, and only 8,000 square feet of imports in 2021, and 2,000 square feet of imports in 2024.<sup>308</sup> These data also show that there were zero imports of QSP from Columbia in 2020, 2024, and interim 2025, and only 6,000 square feet of imports in 2021 and 2022, and 1,000 square feet in 2023.<sup>309</sup> These data also show that there were zero imports of QSP from Panama in 2021, 2022, 2024, and interim 2025, and only 1,000 square feet of imports in 2020, and 3,000 square feet in 2024. Finally, these data show that there were zero imports of QSP from Singapore in 2023, 2024, and interim 2025, and only 2,000 square feet of imports in 2020, 35,000 square feet in 2021, and 5,000 square feet in 2022. As a share of total imports, the imports of QSP from Australia, the Dominican Republic, Columbia, Panama, and Singapore do not exceed 0.0 percent throughout

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<sup>306</sup> Petitioners argue that imports from Australia, CAFTA-DR countries, Columbia, Jordan, Panama, Peru, and Singapore do not contribute substantially to serious injury. *See* Petitioners' Prehearing Br. at 77-78. At the same time, Petitioners argue that the Commission should remain mindful of the risk that FTA countries could be used as transshipment points for QSP produced elsewhere, particularly considering the history of evasion in this industry. Petitioners' Prehearing Br. at n.311.

<sup>307</sup> CR/PR at Table 2.3.

<sup>308</sup> CR/PR at Table 2.3.

<sup>309</sup> CR/PR at Table 2.3.

the POI. There were no imports of QSP from Jordan, Peru, or other CAFTA-DR countries other than Dominican Republic.<sup>310</sup> There is no known production of QSP in any of these countries.<sup>311</sup>

Based on this information, we find that imports of QSP from Australia, CAFTA-DR countries, Colombia, Jordan, Panama, Peru, and Singapore, individually, are not a substantial cause of serious injury or threat thereof to the domestic industry.

### **3. Findings Regarding Other Imports**

In certain circumstances, the statute provides the President with discretion to suspend the reduction or elimination of duties on certain imports of articles subject to an affirmative safeguard action. The President, however, can only suspend the reduction or elimination of the duties if the Commission finds that the serious injury (or threat thereof) substantially caused by imports results from the reduction or elimination of any duty provided under that provision. Thus, these types of exclusion provisions involve two components: (1) serious injury or threat thereof by the imports and (2) a linkage between the serious injury or threat thereof and the reduction or elimination of any duty provided to those imports.

For imports from Israel, the implementing statute for the U.S.-Israel FTA permits the President to suspend the reduction or elimination of any duty provided under any trade agreement provision entered into with Israel under section 102(b)(1) of the Trade Act with respect to any article and permits the President to proclaim a duty rate for such article if such safeguard action is proclaimed,<sup>312</sup> but it precludes the President from suspending the reduction or elimination of any duty provided for under any trade agreement with Israel –

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<sup>310</sup> Although there were imports during the POI of QSP from FTA partner countries Oman and Morocco, FTAs with these countries do not include permissive exclusion provisions. See CR/PR at Table 2.3; *compare* Article 8.4, United States – Oman Free Trade Agreement (“This Agreement does not confer any additional rights or obligations on the Parties with regard to actions taken pursuant to Article XIX of the GATT 1994 and the Safeguards Agreement.”) *with, e.g.,* Article 8.6, United States – Peru Trade Promotion Agreement (“This Agreement does not confer any additional rights or obligations on the Parties with regard to actions taken pursuant to Article XIX of the GATT 1994 and the Safeguards Agreement *except that a Party taking a global safeguard measure may exclude imports of an originating good of another Party if such imports are not a substantial cause of serious injury or threat thereof.*”)(emphasis added). See also 19 U.S.C. § 3805 note.

<sup>311</sup> CR/PR at Table 5.5, note.

<sup>312</sup> The U.S.-Israel FTA provides the President with discretion to exclude imports from Israel from any global safeguard measure. Under the U.S.-Israel FTA, “When, in the view of the importing Party, the importation of a product from the other Party is not a substantial cause of the serious injury or threat thereof referred to in paragraph 1, the importing party may except the product of the other Party from any import relief that may be imposed with respect to imports of that product from third countries, (Continued...)

unless the Commission in addition to making an affirmative determination with respect to such article ... determines in the course of its investigation ... that the serious injury (or threat thereof) substantially caused by imports to the domestic industry producing a like or directly competitive article results from the reduction or elimination of any duty provided under any trade agreement provision entered into with Israel under section 102(b)(1) of the Trade Act of 1974 ... .<sup>313</sup>

To provide information necessary for the President to make this determination, the statute requires the Commission, in the event of an affirmative determination of serious injury or threat thereof (or an equally divided Commission), to state in its report to the President “whether and to what extent its findings and recommendations apply to such an article when imported from Israel.”<sup>314</sup>

Legislation authorizing certain U.S. preferential trade programs for developing countries also requires the Commission to address the extent to which its findings and recommendations apply to beneficiary countries under those programs. The CBERA provisions of the Caribbean Basin Initiative trade program<sup>315</sup> provide that “in any report by {the Commission} to the President under section 202(f) of the {the Trade Act} regarding any article for which duty-free treatment has been proclaimed by the President pursuant to this chapter, the Commission shall state whether and to what extent its findings and recommendations apply to such article when imported from beneficiary countries.”<sup>316</sup> To assist the President’s decision whether to suspend duty-free treatment for CBERA imports, in cases where the Commission makes an affirmative determination in a global safeguard investigation under section 202(b) of the Trade Act, the Commission determines whether “the serious injury (or threat thereof) substantially caused by

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taking into account the objective of achieving bilateral free trade as embodied in the Agreement, the domestic laws and international obligations of the Parties.” Agreement on the Establishment of a Free Trade Area between the Government of Israel and the Government of the United States of America, Article 5(3).

<sup>313</sup> 19 U.S.C. § 2112 note U.S.-Israel FTA Implementing Act § 403(d).

<sup>314</sup> 19 U.S.C. § 2112 note U.S.-Israel FTA Implementing Act § 403(b).

<sup>315</sup> The list of CBERA beneficiary countries has declined over time as some individual countries have entered into bilateral free trade agreements with the United States and are no longer eligible for CBERA benefits. Current beneficiaries include Antigua and Barbuda, Aruba, The Bahamas, Barbados, Belize, Curaçao, Dominica, Grenada, Guyana, Haiti, Jamaica, Montserrat, St. Kitts and Nevis, St. Lucia, St. Vincent and the Grenadines, Trinidad and Tobago, and the British Virgin Islands. 19 U.S.C. § 2702; <https://ustr.gov/issue-areas/trade-development/preference-programs/caribbean-basin-initiative-cbi>.

<sup>316</sup> 19 U.S.C. § 2703(e)(2).

imports to the domestic industry producing a like or directly competitive article results from the duty-free treatment provided by this chapter.”<sup>317</sup>

In this investigation, the evidence indicates that there has been a reduction or elimination of duties on eligible imports. QSP imports that are classifiable under subheading 7020.00.60 of the HTSUS, a basket category that could include imports of QSP and additional products that are not covered by this investigation, have a general tariff duty rate of 5.0 percent *ad valorem*, but are duty free under the U.S.-Israel FTA and the CBERA.<sup>318</sup>

Official Commerce import statistics show minimal imports of QSP from any CBERA beneficiary during the POI.<sup>319</sup> Moreover, no corresponding foreign producers submitted any data on production operations in these locations.<sup>320</sup> Imports of QSP from Israel declined over POI, decreasing from 9.4 million square feet in 2020, to 7.3 million square feet in 2021, 6.2 million square feet in 2022, 2.5 million square feet in 2023, and 1.5 million square feet in 2024. They were lower in interim 2025, at 542,000 square feet, than in interim 2024, at 1.2 million square feet.<sup>321</sup> As imports from Israel declined from 2020 to 2024, imports from all sources increased during this period.<sup>322</sup> The percentage by which imports from Israel were lower in interim 2025 than in interim 2024 was greater than the percentage by which imports from all sources were lower between interim periods.<sup>323</sup> Furthermore, the share accounted for by imports of QSP from Israel out of total imports declined over the POI, decreasing from 7.1

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<sup>317</sup> 19 U.S.C. § 2703(e)(4). The statute also requires the Commission to find whether, as a result of the designation of certain articles as eligible for duty-free treatment under the GSP program, the domestic industry is injured or threatened with serious injury as a result of increases in such imports. Section 203(e)(6)(B) of the Trade Act; 19 U.S.C. § 2253(e)(6)(B) (“No proclamation providing for a suspension {of duty-free treatment under the GSP program} may be made by the President, nor may any such suspension be recommended by the Commission under section 2252(e) of this title, unless the Commission, in addition to making an affirmative determination under section 2252(b)(1) of this title, determines in the course of its investigation under section 2252(b) of this title that the serious injury, or threat thereof, substantially caused by imports to the domestic industry producing a like or directly competitive article results from, as the case may be – (i) the application of subheading 9802.00.60 or subheading 9802.00.80 of the Harmonized Tariff Schedule of the United States; or (ii) the designation of the article as an eligible article for the purposes of subchapter V of this chapter.”).

<sup>318</sup> CR at 1.23. Imports of QSP that are provided for in HTSUS subheading 6810.99.00 are duty free under the general duty rate. *Id.*

<sup>319</sup> Official import statistics show 1,066 square feet of QSP imports from Barbados in 2023 and 5,802 square feet of QSP imports from Haiti in interim 2025. See Public Import Statistics, EDIS Doc. No. 876895.

<sup>320</sup> See CR/PR at Table 5.5, note.

<sup>321</sup> CR/PR at Table 2.2.

<sup>322</sup> See CR/PR at Table C.1.

<sup>323</sup> See CR/PR at Table C.1.

percent in 2020, to 3.7 percent in 2021, 3.0 percent in 2022, 1.3 percent in 2023, 0.6 percent in 2024, and 0.3 percent in interim 2025.<sup>324</sup> Consequently, we determine that the serious injury substantially caused by imports to the domestic industry producing a like or directly competitive article does not result from the reduction or elimination of any duty provided for under the U.S.-Israel Free Trade Agreement or from duty-free treatment provided for under the CBERA provisions of the Caribbean Basin Initiative Trade Program.<sup>325</sup>

## **VI. Conclusion**

For the foregoing reasons, we determine that QSP is being imported into the United States in such increased quantities as to be a substantial cause of serious injury to the domestic industry producing an article like or directly competitive with the imported article. We find that imports of QSP from neither Canada nor Mexico account for a substantial share of total imports or contribute importantly to the serious injury caused by imports. We also find that imports of QSP from Australia, CAFTA-DR countries, Colombia, Jordan, South Korea, Panama, Peru, and Singapore, individually, are not a substantial cause of serious injury or threat thereof, for purposes of the relevant FTA implementing legislation.<sup>326</sup>

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<sup>324</sup> CR/PR at Table 2.2.

<sup>325</sup> Legislative authority for the GSP program lapsed on December 31, 2020 and no countries received GSP treatment with respect to imports of QSP from 2021 through the present.

<sup>326</sup> We also determine that the serious injury substantially caused by imports to the domestic industry producing a like or directly competitive article does not result from the reduction or elimination of any duty provided for under the U.S.-Israel Free Trade Agreement, from duty-free treatment provided for under the CBERA provisions of the Caribbean Basin Initiative Trade Program, or from any reduction or elimination of any duty under the GSP program.



## Dissenting Views of Commissioner David S. Johanson

### I. Introduction

Based on the record in this investigation, I determine pursuant to section 202(b) of the Trade Act of 1974<sup>1</sup> that quartz surface products (QSP) are not being imported into the United States in such increased quantities as to be a substantial cause of serious injury, or threat thereof, to the domestic industry producing an article like or directly competitive with the imported article. I therefore dissent.

The product – QSP – is not novel to the Commission. Since 2018, the Commission has conducted four Title VII investigations involving QSP, the first involving imports from China in 2018 and the second involving imports from India and Turkey in 2019, both followed by five-year reviews concluded in January 2025 and December 2025, respectively.<sup>2</sup> What is novel is that this is brought as a global safeguard investigation, which implicates a different statutory scheme with different legal standards, heightened precisely because the safeguard law requires no showing that imports are unfairly traded. For example, safeguard relief is available only when increased imports cause or threaten to cause “serious injury,” defined in the statute as a “significant overall impairment” in the position of the domestic industry.<sup>3</sup> In AD/CVD investigations, in contrast, the injury analysis is whether an industry is “materially” injured or threatened with material injury by reason of subject imports, a lower standard defined as harm that is “not inconsequential, immaterial, or unimportant.”<sup>4</sup>

This distinction is critical. As discussed below, the domestic industry’s performance during the period of investigation (POI) does not meet the statutory indicators of distress that would warrant the extraordinary relief of a safeguard measure: the significant idling of productive facilities in the domestic industry; the inability of a significant number of firms to carry out domestic production operations at a reasonable level of profit; significant unemployment or underemployment. I explore these and other relevant economic criteria below, as well as the statutory serious injury threat factors, and find that this profitable and

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<sup>1</sup> 19 U.S.C. § 2252(b).

<sup>2</sup> *Quartz Surface Products from China*, Inv. Nos. 701-TA-606, and 731-TA-1416 (Final), USITC Pub. 4913 (June 2019); *Quartz Surface Products from India and Turkey*, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451 (Final), USITC Pub. 5061 (June 2020); *Quartz Surface Products from China*, Inv. Nos. 701-TA-606, and 731-TA-1416 (Review), USITC Pub. 5578 (Jan. 2025); *Quartz Surface Products from India and Turkey*, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451 (Review), USITC Pub. 5691 (Dec. 2025).

<sup>3</sup> 19 U.S.C. § 2252(c)(6)(C).

<sup>4</sup> 19 U.S.C. § 1677(7)(A).

growing industry, which increased prices throughout the POI, expanded and added new entrants during the POI, and is the subject of further significant investment post-POI does not fit the statutory requirements of serious injury or threat of serious injury in the clearly imminent future.

My dissent starts with my departure from the majority on the issue of defining the domestic industry. I conclude that the facts support defining the domestic industry under the safeguard statute as the Commission has to date consistently defined it in prior investigations, to include domestic slab producers and independent fabricators. I otherwise join the majority's background section (except that I augment the discussion of independent fabricator coverage as set forth immediately below),<sup>5</sup> as well as the majority's analysis and conclusion respecting the definition of the domestic like or directly competitive product (sections I-IIA of the Commission's Views on Injury).

## **II. Domestic Industry Producing a Product that is Like or Directly Competitive with the Imported Article**

In making determinations in global safeguard investigations, the Commission examines three statutory criteria. Specifically, to make an affirmative determination, the Commission must find –

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<sup>5</sup> The Commission issued U.S. fabricator questionnaires to approximately 500 independent fabricators. In total, 25 firms provided usable data on their domestic QSP fabricating operations. CR/PR at I.3. The Commission's prehearing report contained data on 17 independent fabricators. After the hearing, staff received an additional 34 questionnaires, of which eight presented usable data (bringing the total to 25) and 26 contained significant data and reconciliation issues. These 26 were not incorporated into the final staff report. Investigator Note to Appendix I, EDIS Doc. No. 875781. Respondents requested postponement of the vote on serious injury for the Commission to receive additional questionnaire responses from independent fabricators, but questionnaire responses were already overdue, the existing schedule would not accommodate such delay, and the request was denied. Letter from Hogan Lovells US LLP to the Commission, "Request That the Commission Extend the Injury Determination by 15 Additional Days and Allow for Final Comments," March 11, 2026 (EDIS Doc. No. 875253); Letter from the Commission to Hogan Lovells US LLP denying request in-part, March 17, 2026 (EDIS Doc. No. 875689). The coverage for independent fabricators is limited even with the additional questionnaires included in the final staff report but at 25 exceeds the participation in the previous Commission QSP cases (17 independent fabricator questionnaires responses in the China case and two in the India and Turkey case). Petitioners' arguments to give independent fabricator questionnaires little or no weight as untimely, biased, or otherwise unworthy of inclusion in the data are unpersuasive. I find no error or unfairness in their collection and reject the invitation to ignore them. *See, e.g.*, CR/PR at I.3; Investigator Note to Appendix I, EDIS Doc. No. 875781; Arizona, Elite & MSI's Final Comments at 13-15; \*\*\* U.S. Fabricator Questionnaire Response at 17.



- (1) an article is being imported into the United States in increased quantities;
- (2) the domestic industry producing an article that is like or directly competitive with the imported article is seriously injured or threatened with serious injury; and
- (3) the article is being imported in such increased quantities as to be a substantial cause of serious injury or threat of serious injury to the domestic industry.<sup>6</sup>

Before considering whether the three statutory criteria are satisfied, the Commission first defines the domestic industry. The Commission defines the domestic industry in terms of each like or directly competitive product and evaluates the impact of the pertinent imports on the facilities and workers producing each article.<sup>7</sup>

As noted above, I have joined the majority in defining a single domestic like or directly competitive article consisting of all QSP corresponding with the scope.

The term “domestic industry” is defined in section 202(c)(6)(A)(i) of the Trade Act to mean

with respect to an article, the domestic producers as whole of the like or directly competitive article or those producers whose collective production of the like or directly competitive article constitutes a major proportion of the total domestic production of such article.<sup>8</sup>

This definition was added by the Uruguay Round Agreements Act (“URAA”) and codified existing Commission practice.<sup>9</sup>

The Commission has broad discretion to determine what constitutes the domestic industry producing a like or directly competitive article in global safeguard investigations, generally adhering to the principal that “{t}he industry should be defined in a manner which allows for a meaningful analysis of the statutory criteria in light of the legislative history of section 201.”<sup>10</sup> The concept of industry employed in section 201 of the Trade Act is not the

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<sup>6</sup> See 19 U.S.C. § 2252(b)(1)(A).

<sup>7</sup> See, e.g., *Steel*, Inv. No. TA-201-073, USITC Pub. 3479 (Dec. 2001) at 29 n.25; *Extruded Rubber Thread*, Inv. No. TA-201-072, USITC Pub. 3375 (Dec. 2000) at I-8; *Crabmeat from Swimming Crabs*, Inv. No. TA-201-71, USITC Pub. 3349 (Aug. 2000) at I-8 to I-9 ; *Circular Welded Carbon Quality Pipe*, Inv. No. TA-201-070, USITC Pub. 3261 (Dec. 1999) at I-12 to I-13; *Certain Steel Wire Rod*, Inv. No. TA-201-069, USITC Pub. 3207 (Jul. 1997) at I-10, I-36.

<sup>8</sup> 19 U.S.C. § 2252(c)(6)(A)(i).

<sup>9</sup> Uruguay Round Agreements Act Statement of Administrative Action (“URAA SAA”), H. Doc. 103-316, vol. I (103<sup>rd</sup> Cong. 2<sup>nd</sup> Sess.) at 961.

<sup>10</sup> *Steel*, Inv. No. 201-TA-075, USITC Pub. 3479 (Dec. 2001) at 30 (quoting *Stainless Steel and Alloy Tool Steel*, 201-TA-048, USITC Pub. 1377 (May 1983) at 12).

same as that used in the antidumping and countervailing duty provisions of Title VII.<sup>11</sup> As the Commission has stated,

Title VII is narrowly aimed at remedying the specific advantages imports may be receiving from unfair trade practices. The purpose of section 201 either is to prevent or remedy serious injury to domestic productive resources from all imports. In light of the purpose of section 201 and in contrast to Title VII, the sharing of productive processes and facilities is a fundamental concern in defining the scope of the domestic industry under section 201.<sup>12</sup>

The legislative history of the Trade Act indicates that the concern in a safeguard investigation is “the question of serious injury to the productive resources (*e.g.*, employees, physical facilities, and capital) employed in the divisions or plants in which the article in question is produced.”<sup>13</sup>

In the Title VII context, the Commission generally considers six factors in analyzing whether a firm qualifies as a domestic producer, as it did in the previous Title VII QSP investigations it has conducted, including as recently as December 2025.<sup>14</sup> I agree with the

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<sup>11</sup> The statutory definitions of “domestic industry” are different. *Compare* 19 U.S.C. § 2252(c)(6)(A)(1) (defining the term for purposes of global safeguard investigations as “domestic producers as a whole of the like or directly competitive article ...”) *with* 19 U.S.C. §§ 1677(4)(A), 1677(10) (defining “domestic industry” in antidumping and countervailing duty investigations as “the producers as a whole of a domestic like product ...,” and in turn is defining “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses” with the imports subject to investigation).

<sup>12</sup> *Steel*, Inv. No. 201-TA-075, USITC Pub. 3479 at 30 (*quoting Stainless Steel and Alloy Tool Steel*, 201-TA-048, USITC Pub. 1377 at 16 n.21).

<sup>13</sup> H.R. Rep. 93-71 (1973) at 46; *see also* H.R. Rep. 100-576 (1988) at 661-62; S. Rep. 100-71 (1987) at 46-47; H.R. Rep. 100-40 (1987) at 86-96.

<sup>14</sup> *Quartz Surface Products from China*, Inv. Nos. 701-TA-606 and 731-TA-1416 (Final), USITC Pub. 4913 (June 2019); *Quartz Surface Products from India and Turkey*, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451 (Final), USITC Pub. 5061 (June 2020); *Quartz Surface Products from China*, Inv. Nos. 701-TA-606 and 731-TA-1416 (Review), USITC Pub. 5578 (Jan. 2025); *Quartz Surface Products from India and Turkey*, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451 (Review), USITC Pub. 5691 (Dec. 2025). As stated in the China case, factors the Commission considers in Title VII investigations include “(1) source and extent of the firm’s capital investment; (2) technical expertise involved in U.S. production activities; (3) value added to the product in the United States; (4) employment levels; (5) quantity and type of parts sourced in the United States; and (6) any other costs and activities in the United States directly leading to production of the like product. No single factor is determinative and the Commission may consider any other factors it deems relevant in light of the specific facts of any investigation.” *Quartz Surface Products from China*, Inv. Nos. 701-TA-606 and 731-TA-1416 (Final), USITC Pub. 4913 (June 2019).

majority in this safeguard investigation that these factors are informative in determining whether an entity satisfies the ordinary meaning of “producers” in the “domestic industry,” provided such analysis is applied with appropriate breadth and flexibility consistent with the safeguard statute’s purpose to prevent or remedy serious injury to the domestic productive resources used to produce the article in question.<sup>15</sup> On this record, as discussed in connection with the finding of a single domestic like or directly competitive product, the article in question includes raw material slab and fabricated slab.

The record contains full questionnaire responses from only a limited number of fabricators. The records of the five-year reviews of *QSP from China* and *QSP from India and Turkey* provide additional information with respect to periods overlapping the POI. In addition, the original AD/CVD investigations contain relevant pre-POI information on fabricators’ operations. Together, these sources represent the best information available with respect to the operations of independent fabricators. Cambria, a member of the QMAA, also provided information about \*\*\*.

*Source and Extent of the Firm’s Capital Investment.* The capital investment necessary for fabricating is substantial, although it is lower than the investment needed to produce slabs. In the final phase investigations in *QSP from China*, in which the Commission received questionnaire responses from 17 independent fabricators, total capital investment that the responding fabricators reported was \$\*\*\* during the POI, whereas capital investment reported for slab producers was \$\*\*\*; fabricators reported annual capital

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<sup>15</sup> See H.R. Rep. 93-71 (1973) at 46; see also H.R. Rep. 100-576 (1988) at 661-62; S. Rep. 100-71 (1987) at 46-47; H.R. Rep. 100-40 (1987) at 86-96; *Crystalline Silicon Photovoltaic Cells (Whether or not Partially or Fully Assembled into Other Products)*, Inv. No. TA-201-75 Volume I: Determination and Views of Commissioners, USITC Pub. 4739 (Nov. 2017) at 14. Prior cases addressing the sufficiency of production activities for inclusion in the domestic industry include, for example: *Steel*, Inv. No. TA-201-73, USITC Pub. 3479 (Dec. 2001) at 195-96 n.1210 (Commission found that service centers and processors are part of the domestic industry producing CTL plate because, despite limited information on the record regarding the nature of the production activities, service centers and processors cut coiled plate to length causing the product to come within the scope of the investigation). In the *CSPV* safeguard investigation, rather than analyze the traditional six factors in determining whether independent module producers were producers in the domestic industry, the Commission found that exclusion of such independent module producers would arguably run counter to the legislative intent of considering serious injury to the productive resources in which the article is produced in the United States. Consequently, the Commission included the module producers in the domestic industry. *CSPV*, USITC Pub. 4739 at 18 (Nov. 2017).

expenditures ranging from \$\*\*\* to \$\*\*\*, whereas slab producers reported annual capital expenditures ranging from \$\*\*\* to \$\*\*\*.<sup>16</sup>

In final phase investigations in *QSP from India and Turkey*, during which the Commission received questionnaire responses from only two independent fabricators, fabricators reported annual capital expenditures of \$\*\*\* in 2017, \$\*\*\* in 2018, and \$\*\*\* in 2019.<sup>17</sup> Slab producers in the final phase investigations in *QSP from India and Turkey* reported annual capital expenditures of \$\*\*\* in 2017, \$\*\*\* in 2018, and \$\*\*\* in 2019.<sup>18</sup>

In this investigation, the Commission received usable questionnaire responses from 25 independent fabricators, three of which answered the sufficient production-related activities questions.<sup>19</sup> These three independent fabricators reported annual capital expenditures of \$\*\*\* in 2020, \$\*\*\* in 2021, \$\*\*\* in 2022, \$\*\*\* in 2023, and \$\*\*\* in 2024. Capital expenditures were \$\*\*\* in interim 2024 and \$\*\*\* in interim 2025.<sup>20</sup> Because only a limited number of independent fabricators responded to the Commission's questionnaire, the aggregate capital expenditures of all fabricators are likely substantially higher. Slab producers reported capital expenditures of \$49.3 million in 2020, \$89.6 million in 2021, \$95.7 million in 2022, \$80.5 million in 2023, and \$31.0 million in 2024. Capital expenditures were \$22.7 million in interim 2024 and \$44.4 million in 2025.<sup>21</sup>

The three responding fabricators estimated the total amount of capital investments that would be required today on a greenfield basis to replicate their firms' current quartz surface operations as \$\*\*\*, whereas slab producers estimated the total amount of capital investments as \$1.7 billion.<sup>22</sup> Petitioners assert that substantially less investment is required to establish a fabrication facility than a slab production facility.<sup>23</sup>

*Technical Expertise Involved in U.S. Production Activities.* The production of slabs is a multi-step manufacturing process involving mixing, combining, dispensing and molding,

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<sup>16</sup> Final Staff Report in *QSP from China* at Tables III-6 & VI-8 (INV-RR-048) (May 31, 2019) (EDIS Doc. No. 873811).

<sup>17</sup> Final Staff Report in *QSP from India and Turkey* at Table VI-10 (INV-SS-058) (May 18, 2020) (EDIS Doc. No. 873814).

<sup>18</sup> *Id.*

<sup>19</sup> CR/PR at I.3.

<sup>20</sup> CR/PR at Tables J.11 & I.1.

<sup>21</sup> CR/PR at Tables 4.6 & I.1.

<sup>22</sup> CR/PR at Table I.1.

<sup>23</sup> Petitioners' Prehearing Br. at 17-18.

pressing, curing, cooling, polishing, and inspection.<sup>24</sup> Fabrication is a somewhat simpler physical process insofar as fabrication gives the product a new shape but does not alter its chemistry or physical properties.<sup>25</sup> A technician with the fabricator creates a design file and adjusts the design for features like the type of edge, desired configuration, various cutouts and openings, and the backsplash of the surface.<sup>26</sup> The technician then sends the design file to a production facility where workers program machines so that a diamond blade saw will cut straight lines and waterjets will cut arcs and circles into the slab.<sup>27</sup> Computer networked control (CNC) routers are programmed to cut edges and cutouts for sinks and faucets.<sup>28</sup> After the saw and waterjet cutting, the CNC router machining begins by utilizing a crane, lasers, and vacuum cups to position the section for grinding and finishing operations on the edges and cutouts. The finished product is polished and detailed to ensure readiness for installation.<sup>29</sup>

According to Petitioners, producing slabs requires specialized knowledge not only of the complex equipment involved, but also the specific raw materials, chemistry, recipes, and processes required to produce slabs with the desired physical characteristics, designs, and appearance, requiring \*\*\*.<sup>30</sup> On the other hand, five responding fabricators indicated in their questionnaire responses that fabrication operations are complex to varying degrees.<sup>31</sup>

*Value Added to the Product in the United States.* In the final phase investigations in *QSP from China*, fabricators that responded to the Commission's questionnaire reported a value added by fabrication, excluding SG&A expenses, ranging from \*\*\* percent during the POI, and a value added, including SG&A expenses, ranging from \*\*\* percent.<sup>32</sup> In the final phase investigations in *QSP from India and Turkey*, fabricators reported a value added by fabrication, excluding SG&A expenses, ranging from \*\*\* percent during the POI, and a value added, including SG&A expenses, ranging from \*\*\* percent.<sup>33</sup> In this

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<sup>24</sup> CR/PR at 1.17.

<sup>25</sup> CR/PR at 1.18.

<sup>26</sup> CR/PR at 1.18.

<sup>27</sup> CR/PR at 1.18.

<sup>28</sup> CR/PR at 1.18.

<sup>29</sup> CR/PR at 1.18.

<sup>30</sup> Petitioners' Prehearing Br. at 18-19; see also CR/PR at Table I.6.

<sup>31</sup> CR/PR at Table I.6.

<sup>32</sup> Final Staff Report in *QSP from China* at Tables III-6 & VI-3 (INV-RR-048) (May 31, 2019) (EDIS Doc. No. 873811).

<sup>33</sup> Final Staff Report in *QSP from India and Turkey* derived from Tables III-6 & VI-3 (INV-SS-058) (May 18, 2020) (EDIS Doc. No. 873814).

investigation, the three responding fabricators reported a value added by fabrication, the aggregate average of which ranged from 33.9 to 41.8 percent over the POI, while responding slab producers reported a slightly higher value added average ranging from 46.0 to 52.7 percent.<sup>34</sup>

*Employment Levels.* In the final phase investigations in *QSP from China*, the fabricators that responded to the Commission's questionnaires reported \*\*\* employees whereas slab producers reported \*\*\* employees.<sup>35</sup> In the final phase investigations in *QSP from India and Turkey*, fabricators that responded to the Commission's questionnaire reported \*\*\* employees. Slab producers reported 1,490 to 1,559 employees.<sup>36</sup> In this investigation, twenty-five responding fabricators reported a range of 784 to 915 employees per year over the POI, while slab producers reported a range of 1,446 to 1,685 employees per year during the POI.<sup>37</sup> Fabricators reported paying hourly wages ranging from \$24.89 to \$32.19 over the POI, while slab producers reported hourly wages of \$27.85 to \$33.27 during the POI.<sup>38</sup> Because only a limited number of independent fabricators responded to the Commission's questionnaire, the actual total employment level by fabricators is likely substantially higher.

*Quantity and Type of Parts Sourced in the United States.* In the final phase investigations in *QSP from China*, the record indicated that U.S. fabricators sourced slabs from both domestic and subject sources and that the majority of independent fabricators' slabs were purchased from domestic sources.<sup>39</sup> In the final phase investigations in *QSP from India and Turkey*, both responding independent fabricators reported purchasing slabs from foreign sources during the period of investigation.<sup>40</sup> In this investigation, responding fabricators reported that 38.2 to 44.6 percent of their production during the POI used slab that was sourced domestically, while 55.4 to 61.8 percent of their production used slab that was imported.<sup>41</sup> Domestic slab producers, on the other hand, sourced 61.5 percent of their raw materials domestically in 2024, while 38.5 percent of their raw materials were imported.<sup>42</sup>

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<sup>34</sup> CR/PR at Table I.1.

<sup>35</sup> Final Staff Report in *QSP from China* at Table III-6 (INV-RR-048) (May 31, 2019) (EDIS Doc. No. 873811).

<sup>36</sup> Final Staff Report in *QSP from China* at Tables III-6 & III-14 (INV-SS-058) (May 18, 2020) (EDIS Doc. No. 873814).

<sup>37</sup> CR/PR at Tables I.1, I.17, & 3.15.

<sup>38</sup> CR/PR at Tables I.1, I.17, & 3.15.

<sup>39</sup> USITC Pub. 4913 at 12.

<sup>40</sup> USITC Pub. 5061 at 11.

<sup>41</sup> CR/PR at Table I.10.

<sup>42</sup> CR/PR at Table I.1.

*Conclusion.* The record in this investigation indicates that independent fabricators should be included in the domestic industry. The aggregated capital investments of fabricators who responded to questionnaires in this proceeding and in the AD/CVD investigations are lower than those of slab producers, but their capital expenditures associated with fabrication and capital investments required to establish a fabrication facility are not insubstantial. As they represent a subset of domestic fabricators, totals for all fabricators are likely much larger. Fabrication also requires at least moderate technical expertise, including specialized knowledge and training in order to create the design file and operate CNC routers and other specialized equipment required for fabrication. Workers producing slabs are not paid substantially higher wages than workers engaged in fabrication. Further, it is apparent that fabricators employ a significant number of personnel in their U.S. operations. Moreover, the record in this proceeding indicates that the aggregate average value added to the finished product by fabrication is substantial, ranging from 33.9 to 41.8 percent.<sup>43</sup>

While fabricators source a greater amount of imported slab than domestic slab, their situation is indistinguishable from *Crystalline Silicon Photovoltaic Cells*, where module producers sourced the majority of their cells from imports, as domestic cell producers did not have enough capacity to supply all of domestic module producers' needs,<sup>44</sup> and the Commission found that "exclusion of such independent module producers would arguably run counter to the legislative intent of considering serious injury to the productive resources in which the article is produced in the United States."<sup>45</sup>

Based on this record, I conclude that independent fabricators are engaged in sufficient production-related operations to be included in the domestic industry. They are integral domestic producers whose substantial production activity directly results in the production of the finished QSP that is purchased and used in the U.S. market and is in-scope. Nothing has changed about the structure or sophistication of domestic fabrication operations since the original QSP Title VII investigations, and the evidence is no less substantial than in the four Title VII cases the Commission has previously considered, in which the Commission determined that independent fabricators were included in the domestic industry. Independent fabricators are

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<sup>43</sup> CR/PR at Table I.1.

<sup>44</sup> Full year apparent U.S. consumption during the POI of this investigation, based on quantity, was never lower than 162.7 million square feet; domestic QSP slab producers' full year installed overall production capacity was no higher than 93.7 million square feet and its practical overall production capacity was no higher than 52.3 million square feet. CR/PR at Tables 3.4 & 5.1.

<sup>45</sup> *Crystalline Silicon Photovoltaic Cells (Whether or not Partially or Fully Assembled into Other Products)*, Inv. No. TA-201-75, USITC Pub. 4739 (Nov. 2017) at 16-18.

engaged in technical and complicated work that requires substantial capital investment, employment, and resources, including domestic inputs, and add substantial value to the article in question in this investigation. Although QSP domestic industry definitions previously adopted in Title VII investigations are not dispositive or binding in this proceeding, and every Commission investigation is necessarily *sui generis*, I find the record to include fabricators in the domestic industry more compelling, not less so, given the safeguard statute's emphasis on domestic productive resources used in the manufacture of the domestic like or directly competitive product. Accordingly, and consistent with the like or directly competitive product definition adopted here – a single like or directly competitive product of QSP corresponding to the scope, I find that independent fabricators are part of the domestic industry.

### III. Increased Imports

After defining the domestic industry that manufactures a product that is like or directly competitive with the imported article, the Commission next examines whether imports are entering in “increased quantities.” Under section 202 of the Trade Act, imports have increased when the increase is “either actual or relative to domestic production.”<sup>46</sup> Consistent with its usual past practice in safeguard investigations,<sup>47</sup> the Commission considers import trends over the most recent five-year period as the framework for its analysis.<sup>48</sup>

Based on the data in the record, I find that the statutory criterion of increased imports is met. Imports of QSP, by quantity, increased irregularly during the POI, increasing from 2020 to 2022, before decreasing in 2023 and then increasing in 2024, for an overall increase of 78.3 percent.<sup>49</sup> By value, imports of QSP also increased irregularly during the POI, peaking in 2022 before decreasing in 2023 and then increasing in 2024, for an overall increase of 40.4 percent.<sup>50</sup>

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<sup>46</sup> 19 U.S.C. § 2252(b)(1)(A) (requiring the Commission to determine whether an article is being imported into the United States in such increased quantities as to be a substantial cause of serious injury, or the threat thereof); *see also* 19 U.S.C. § 2252(c)(1)(C) (in turn requiring with respect to substantial cause, that the Commission take into account an increase in imports (either actual or relative to domestic production)).

<sup>47</sup> *See, e.g., Steel*, Inv. No. 201-TA-73, USITC Pub. 3479 at 32-33 (Dec. 2001); *Extruded Rubber Thread*, Inv. No. 201-TA-72, USITC Pub. 3375 at I-8 (Dec. 2000).

<sup>48</sup> The POI in the instant global safeguard investigation covered the full five years for January 2020 through December 2024, as well as the first three quarters (January through September) of 2025.

<sup>49</sup> CR/PR at 2.3, C.8 & Table 2.1. QSP imports by quantity increased from 131.1 million square feet in 2020 to 211.0 million square feet in 2022, declined to 185.1 million square feet in 2023, and were 233.7 million square feet in 2024. *Id.*

<sup>50</sup> CR/PR at 2.3, C.7-C.8 & Table 2.1. QSP imports by value increased from \$1.2 billion in 2020 to \$2.0 billion in 2022, declined to \$1.5 billion in 2023, and were \$1.7 billion in 2024. *Id.*



In interim 2025 compared to interim 2024, imports by quantity and value were both slightly lower, 0.4 and 3.5 percent, respectively.<sup>51</sup>

The statutory requirement for increased imports is met on this record.

#### **IV. Substantial Cause of Injury or Threat of Serious Injury**

##### **A. Legal Standards and Statutory Requirements**

The second of the three statutory criteria concerns whether the domestic industry is seriously injured or threatened with serious injury. Section 202(c)(6)(C) of the Trade Act defines the term “serious injury” as “a significant overall impairment in the position of a domestic industry,” and section 202(c)(6)(D) defines the term “threat of serious injury” as “serious injury that is clearly imminent.”<sup>52</sup>

In determining whether serious injury or threat of serious injury exists, the Commission considers “all economic factors which it considers relevant, including (but not limited to) . . .”:

(A) with respect to serious injury –

(i) the significant idling of productive facilities in the domestic industry,<sup>53</sup>

(ii) the inability of a significant number of firms to carry out domestic production operations at a reasonable level of profit, and

(iii) significant unemployment or underemployment within the domestic industry ...;<sup>54</sup>

(B) with respect to threat of serious injury –

(i) a decline in sales or market share, a higher and growing inventory (whether maintained by domestic producers, importers, wholesalers, or retailers), and a downward trend in production, profits, wages, productivity, or employment (or increasing underemployment) in the domestic industry,

(ii) the extent to which firms in the domestic industry are unable to generate adequate capital to finance the modernization of their domestic plants and equipment, or are unable to maintain existing levels of expenditures for research and development, and

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<sup>51</sup> CR/PR at C.7-C.8 & Table 2.1. By quantity, QSP imports were 166.3 million square feet in interim 2025 compared to 167.1 million feet in interim 2024. By value, they were \$1.2 billion in interim 2025 compared to \$1.3 billion in interim 2024. *Id.*

<sup>52</sup> 19 U.S.C. §§ 2252(c)(6)(C), 2252(c)(6)(D). The legislative history of the Trade Act describes a “threat” of serious injury to exist “when serious injury, although not yet existing, is clearly imminent if imports {sic} trends continued unabated.” Senate Finance Committee, Trade Reform Act of 1974 Report on H.R. 10710, S. Rept. 1298, 93rd Cong., 2nd Sess. (1974) at 121.

<sup>53</sup> The statute further provides that the term “significant idling of productive facilities” includes the closing of plants or the underutilization of production capacity. 19 U.S.C. § 2252(c)(6)(B).

<sup>54</sup> 19 U.S.C. § 2252(c)(1)(A).

(iii) the extent to which the United States market is the focal point for the diversion of exports of the article concerned by reason of restraints on exports of such article to, or on imports of such article into, third country markets.<sup>55</sup>

The presence or absence of any of these factors is not “necessarily dispositive” of whether increased imports are a substantial cause of serious injury, or threat of serious injury, to the industry.<sup>56</sup> As part of its analysis, the Commission must “consider the condition of the domestic industry over the course of the relevant business cycle.”<sup>57</sup>

The third statutory criterion requires a finding that the article is being imported in such increased quantities as to be a “substantial cause” of serious injury or threat of serious injury. Section 202(b)(1)(B) defines “substantial cause” as “a cause which is important and not less than any other cause.”<sup>58</sup> Thus, the increased imports must be both an important cause of the serious injury or threat and a cause that is equal to or greater than any other cause.

In determining whether increased imports are a substantial cause of serious injury or threat of serious injury, the statute directs the Commission to take into account all economic factors that it finds relevant, including but not limited to – “... an increase in imports (either actual or relative to domestic production) and a decline in the proportion of the domestic market supplied by domestic producers.”<sup>59</sup> The statute directs the Commission to consider “the condition of the domestic industry over the course of the relevant business cycle,” but it provides that the Commission “may not aggregate the causes of declining demand associated with a recession or economic downturn in the United States economy into a single cause of serious injury or threat of injury.”<sup>60</sup> The legislative history states that the provision is meant to clarify that import relief should be available during a recession or economic downturn.<sup>61</sup>

The statute also directs the Commission to “examine factors other than imports” that may be a cause of serious injury or threat to the domestic industry and include the results of its examination in its report.<sup>62</sup> Thus, the Commission is required to (1) examine factors other than increased imports and (2) make findings with respect to these other factors. The legislative

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<sup>55</sup> 19 U.S.C. § 2252(c)(1)(B).

<sup>56</sup> 19 U.S.C. § 2252(c)(3).

<sup>57</sup> 19 U.S.C. § 2252(c)(2)(A).

<sup>58</sup> 19 U.S.C. § 2252(b)(1)(B).

<sup>59</sup> 19 U.S.C. § 2252(c)(1)(C).

<sup>60</sup> 19 U.S.C. § 2252(c)(2)(A).

<sup>61</sup> Senate Finance Committee, Omnibus Trade and Competitiveness Act of 1987: Report on S. 490, Rept. 100-71, 100<sup>th</sup> Cong., 1<sup>st</sup> Sess. (1987) at 50.

<sup>62</sup> 19 U.S.C. § 2252(c)(2)(B).

history states that the purpose of this provision “is to assure that all factors injuring the domestic industry are identified.”<sup>63</sup>

## **B. Conditions of Competition**

The following conditions of competition inform my analysis of whether QSP is being imported into the United States in such increased quantities as to be a substantial cause of serious injury or threat of serious injury to the domestic industry producing an article like or directly competitive with the imported article.<sup>64</sup>

### **1. Demand Conditions**

U.S. demand for quartz surface products is driven by remodeling and construction.<sup>65</sup> The remodeling market index (“RMI”) rose sharply in 2020 and continued growing at a moderate rate in 2021 before seeing a slow but steady decline through 2024 with a slight increase in 2025.<sup>66</sup> Overall, the RMI started at a low of 47 in the first quarter of 2020 and peaked at 87 in the fourth quarter of 2021 before declining to 64 at the end of 2025.<sup>67</sup> An RMI index above 50 indicates a higher share of remodelers view conditions as good rather than poor

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<sup>63</sup> Senate Finance Committee, Omnibus Trade and Competitiveness Act of 1987: Report on S. 490, Rept. 100-71, 100<sup>th</sup> Cong., 1<sup>st</sup> Sess. (1987) at 50. The legislative history of the Trade Act includes examples of other causes “such as changes in technology or consumer tastes, domestic competition from substitute products, plant obsolescence, or poor management,” which, if found to be more important causes of injury than increased imports, would require a negative determination. Senate Finance Committee, Trade Reform Act of 1974 Report on H.R. 10710, S. Rept. 1298, 93rd Cong., 2nd Sess. (1974) at 121.

<sup>64</sup> The definition of the domestic industry necessarily impacts the data relied upon to assess serious injury and threat under the statute because the industry includes independent fabricators. Specifically, reported operations and financial data for independent fabricators (see CR/PR at Appendices I and J) are appropriately combined with slab producers’ data because the industry includes the productive resources of all U.S. producers. Hence, Table C.2 in the final staff report is the relevant summary table (U.S. producers and independent fabricators). Moreover, shipments by independent fabricators are not included in the apparent U.S. consumption quantity data in order to avoid double counting the slabs. CR/PR at Table I.19 Note and Table C.2 n.3. Accordingly, and consistent with ordinary Commission practice in such circumstances when the information is available, reliance primarily upon value data for assessment of apparent U.S. consumption and market shares is appropriate as the best information available to capture the domestic industry of slab producers and independent fabricators. See CR/PR at Table I.20 Note and Table C.2 n.3; *Quartz Surface Products from China*, Inv. Nos. 701-TA-606, and 731-TA-1416 (Final), USITC Pub. 4913 (June 2019) at 23 n.145.

<sup>65</sup> CR/PR at 6.9.

<sup>66</sup> CR/PR at Fig. 6.1 & Table 6.8.

<sup>67</sup> CR/PR at 6.10.

for remodeling.<sup>68</sup> Monthly new privately owned housing starts decreased irregularly by 21.2 percent overall from 1.58 million in January 2020 to 1.25 million in October 2025.<sup>69</sup>

Most U.S. producers, importers, and purchasers reported that demand for QSP in the U.S. market steadily increased or fluctuated upward since January 1, 2020.<sup>70</sup> From 2020 through 2022, demand for QSP was reported to have risen as households invested in home renovation and new single-family home construction expanded. Beginning in 2023 and into 2024, the market cooled as the COVID-19 pandemic remodeling rise faded, and discretionary home-improvement spending normalized. This decline was not specific to any housing-related material, reflecting instead an overall contraction in housing and remodeling activity after an unsustainably high boom period. Firms reported that QSP has experienced an overall upward demand trend and QSP has continued to take market share in the broader surface products market from other natural stones such as granite.<sup>71</sup> Several firms reported that demand is down a bit in 2025, due to broader economy-wide factors.<sup>72</sup> In the United States, QSP is now the most popular countertop material, with predictions that this will remain the case at least through 2029.<sup>73</sup>

Apparent U.S. consumption of QSP by value increased irregularly during the POI, ending 31.9 percent higher in 2024 than in 2020 and 3.7 percent lower in interim 2025 than in interim 2024.<sup>74</sup> Apparent U.S. consumption by value increased from \$2.0 billion in 2020 to \$2.9 billion in 2021 and \$3.1 billion in 2022, and then declined to \$2.6 billion in 2023, before increasing to \$2.7 billion in 2024.<sup>75</sup> Apparent U.S. consumption by value was \$2.0 billion in interim 2024 and \$1.9 billion in interim 2025.<sup>76</sup>

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<sup>68</sup> CR/PR at Fig. 6.1 Note.

<sup>69</sup> CR/PR at Fig. 6.2 & Table 6.9.

<sup>70</sup> CR/PR at Table 6.7.

<sup>71</sup> CR/PR at 6.13; *see also* CR/PR at 6.14 (discussing substitute products, including granite and quartzite).

<sup>72</sup> CR/PR at 6.13.

<sup>73</sup> CR/PR at 6.14.

<sup>74</sup> CR/PR at Table C.2. Apparent U.S. consumption by quantity was 162.7 million square feet in 2020, 237.0 million square feet in 2021, 249.7 million square feet in 2022, 220.7 million square feet in 2023, 264.6 million square feet in 2024, 190.6 million square feet in interim 2024, and 188.4 million square feet in interim 2025. CR/PR at Table C.2. As discussed above, shipments by fabricators are not included in the apparent U.S. consumption by quantity in order to avoid double counting the slabs, and I have accordingly relied primarily upon value data for apparent U.S. consumption and market shares. *See, e.g., Quartz Surface Products from China*, USITC Pub. 4913 at 23 n.145.

<sup>75</sup> CR/PR at Table C.2.

<sup>76</sup> CR/PR at Table C.2.

## 2. Supply Conditions

Imports were the largest supplier to the U.S. market during the POI. Imports' market share by value fluctuated, but increased overall by 3.9 percentage points from 2020 to 2024, and was 0.2 percentage points lower in interim 2025 than in interim 2024: their market share was 60.8 percent in 2020, 64.2 percent in 2021, 63.4 percent in 2022, 59.1 percent in 2023, 64.8 percent in 2024, 63.8 percent in interim 2024, and 63.6 percent in interim 2025.<sup>77</sup>

The domestic industry's market share by value fluctuated, but declined overall by 3.9 percentage points from 2020 to 2024, and was 0.2 percentage points higher in interim 2025 than in interim 2024: it was 39.2 percent in 2020, 35.8 percent in 2021, 36.6 percent in 2022, 40.9 percent in 2023, 35.2 percent in 2024, 36.2 percent in interim 2024, and 36.4 percent in interim 2025.<sup>78</sup>

Domestic slab producers' practical capacity declined irregularly by 9.0 percent from 2020 to 2024, declining from 50.2 million square feet in 2020 to 45.7 million square feet in 2024.<sup>79</sup> It was 11.2 percent higher in interim 2025, when it was 38.9 million square feet, than in interim 2024, when it was 35.0 million square feet.<sup>80</sup> Domestic slab producers' reported practical capacity utilization decreased irregularly by 7.1 percentage points from 2020 to 2024, declining from 78.6 percent in 2020 to 71.5 percent in 2024.<sup>81</sup> It was 7.5 percentage points lower in interim 2025, when it was 63.1 percent, than in interim 2024, when it was 70.6 percent.<sup>82</sup> Fabricators' practical capacity increased throughout the POI, by 39.6 percent from 2020 to 2024 and by 9.1 percent between the interim periods.<sup>83</sup> Fabricators' capacity utilization increased irregularly by 0.4 percent overall from 2020 to 2024, and was 4.9 percent lower in interim 2025 than in interim 2024.<sup>84</sup>

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<sup>77</sup> CR/PR at Table C.2.

<sup>78</sup> CR/PR at Table C.2.

<sup>79</sup> CR/PR at Table C.2.

<sup>80</sup> CR/PR at Table C.2.

<sup>81</sup> CR/PR at Table C.2.

<sup>82</sup> CR/PR at Table C.2.

<sup>83</sup> Reported fabricator practical capacity was 6.2 million square feet in 2020, 7.2 million square feet in 2021, 8.3 million square feet in 2022, 8.8 million square feet in 2023, 8.7 million square feet in 2024, 6.6 million square feet in interim 2024, and 7.2 million square feet in interim 2025. CR/PR at Table C.2.

<sup>84</sup> Reported fabricator capacity utilization was 80.3 percent in 2020, 87.8 percent in 2021, 87.7 percent in 2022, 75.2 percent in 2023, 80.7 percent in 2024, 76.6 percent in interim 2024, and 71.7 percent in interim 2025. CR/PR at Table C.2.

There is a significant deficit in domestic slab supply, illustrated by comparing domestic slab producers' practical capacity compared to consumption in any part of the POI.<sup>85</sup> This deficit ranged from 69 percent in 2020 to 83 percent in 2024.<sup>86</sup> Imports are an integral part of the market, necessary to satisfy U.S. demand for QSP.

A majority of U.S. producers, importers, and purchasers did not report experiencing supply constraints since January 1, 2020. Constraints reported by importers in 2020 through 2022 include issues related to the COVID-19 pandemic, such as constrained supply related to logistics issues, port congestion, increased ocean freight costs, container shortages, factory shutdowns, limited availability of raw materials, and extended lead times. Constraints reported in 2023 and 2024 were issues experienced by individual firms or their suppliers such as experiencing an electricity supply shortage in their production facility or lack of local labor or raw materials in their local area. Four firms mentioned the U.S. tariffs implemented throughout 2025 as causing issues in their supply chains.<sup>87</sup>

Commerce imposed antidumping and countervailing duty orders on imports of QSP from China in July 2019 and QSP from India and Turkey in June 2020, which remain in place following Commerce's continuation of the orders in January 2025 and in December 2025, respectively.<sup>88</sup>

### **3. Substitutability and Other Conditions**

In the Title VII QSP cases, the Commission generally found a high degree of substitutability between subject imports and domestic QSP and rejected arguments that the two compete in different parts of a segmented market.<sup>89</sup> The evidence developed on this record does not lead me to conclude differently. I find that there is generally a high degree of substitutability between domestically produced QSP and imported QSP, although substitutability would be lower for certain styles that are only available from foreign sources.<sup>90</sup> According to the questionnaire responses, for example, a majority of U.S. slab producers

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<sup>85</sup> See CR/PR at Tables 3.4 and C.2; *see also* U.S. Producers' Questionnaire at II-3a (capacity definitions).

<sup>86</sup> *Derived from* CR/PR at Table C.2.

<sup>87</sup> CR/PR at 6.8.

<sup>88</sup> CR/PR at 1.5-1.7. Additional tariffs were also in place during the POI, as discussed further below.

<sup>89</sup> *Quartz Surface Products from China*, USITC Pub. 4913 at 24; *Quartz Surface Products from India and Turkey*, USITC Pub. 5061 at 24-26; *Quartz Surface Products from China*, USITC Pub. 5578 at 16; *Quartz Surface Products from India and Turkey*, USITC Pub. 5691 at 25-26.

<sup>90</sup> CR/PR at 6.14.

reported that QSP from domestic and imported sources is always or frequently interchangeable. A plurality of importers reported that QSP is frequently interchangeable and half of purchasers reported that QSP is frequently interchangeable.<sup>91</sup> A majority of purchasers reported that U.S.-produced QSP and QSP imported from foreign sources were comparable on all factors, except for price, product range, and U.S. transportation costs, for which a plurality of purchasers reported that domestic and imported QSP were comparable.<sup>92</sup>

The record also indicates that domestically produced QSP and imports overlapped in terms of caliber type and other attributes during the POI. Over the full POI, a substantial share of U.S. importers' and the domestic industry's U.S. shipments were of mass market brands. U.S. importers' and slab producers' shipments to the U.S. market increasingly gravitated to premium products as the POI progressed:<sup>93</sup> for U.S. importers, the share of their total U.S. shipments that were of premium brands increased from 36.5 percent in 2020 to 46.8 percent in 2024, and was higher (47.7 percent in interim 2024 compared to 50.3 percent in interim 2025) between the interim periods;<sup>94</sup> for U.S. slab producers, their share of total U.S. shipments that were of premium brands increased from 36.0 percent in 2020 to 52.7 percent in 2024, but was slightly lower (51.8 in interim 2024 compared to 47.8 percent in interim 2025) between the interim periods.<sup>95</sup> For medium-to-large sized fabricators, most of their total U.S. shipments were of premium brands, with substantial shipments of mass market brands.<sup>96</sup> The data also show substantial overlap in terms of U.S. importers' and the domestic industry's U.S. shipments in 2024 with respect to design attributes and thickness.<sup>97</sup>

Price is an important factor in purchasing decisions for QSP, and non-price factors are also important in this market, which is influenced by consumer taste and preference as well as availability. Responding purchasers most frequently cited price/cost (15 firms), quality (14 firms), and availability/supply and aesthetic/design (12 firms each) as the top three factors

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<sup>91</sup> CR/PR at Table 6.17.

<sup>92</sup> CR/PR at Table 6.16.

<sup>93</sup> There is no established industry definition for "mass market" or "premium" brands. In this investigation, U.S. producers and U.S. importers were asked to report their U.S. shipments of QSP by caliber type, *i.e.*, premium brands versus mass market brands, as defined by the responding firms themselves. CR/PR at 3.22.

<sup>94</sup> CR/PR at Table 2.5.

<sup>95</sup> CR/PR at Table 3.10.

<sup>96</sup> CR/PR at Table I.13 (premium brands ranged from approximately \*\*\* of their shipments by quantity earlier in the POI to \*\*\* later in the POI; mass market brands ranged from about \*\*\* of their shipments by quantity earlier in the POI to \*\*\* later in the POI).

<sup>97</sup> CR/PR at Tables 2.6, 3.11 and I.14, Figs. 2.2, 2.3, 3.2, 3.3, I.2 & I.3.

influencing their purchasing decisions.<sup>98</sup> Quality was the most frequently reported first-most important factor (8 firms), followed by price/cost and company relationships (6 firms). Availability/supply was the most frequently reported second-most important factor. Price/cost was the most frequently reported third-most important factor.<sup>99</sup> A majority of U.S. producers as well as a plurality of importers and purchasers reported that differences other than price were sometimes significant.<sup>100</sup>

The record shows overlap between domestic QSP and imports in terms of channels of distribution. U.S. importers reported shipping 56.4 percent to 68.0 percent of their U.S. shipments to fabricators and retailers during the POI and 23.0 percent to 36.1 percent of their U.S. shipments to distributors.<sup>101</sup> U.S. slab producers also sold mainly to fabricators and retailers, with the next largest distribution channel being distributors: they reported shipping 69.5 percent to 75.4 percent of their U.S. shipments to fabricators and retailers during the POI and 18.7 percent to 26.4 percent of their U.S. shipments to distributors.<sup>102</sup> Fabricators sold substantial volumes to three of the four channels during the POI – fabricators and retailers, contractors and builders, and other end users, with \*\*\* sold to contractors and builders and other end users \*\*\*.<sup>103</sup>

QSP, as defined by the scope of this investigation, is a mixture of materials primarily composed of crushed quartz stone or other silica-based materials (*e.g.*, quartz powder, cristobalite) and may also include additive materials such as pigments or cement. QSP also has a resin binder (*e.g.*, an unsaturated polyester).<sup>104</sup> Raw material costs, as a share of slab producers' COGS, irregularly increased by 3.1 percentage points from 2020 to 2024, increasing from 47.3 percent of the domestic industry's COGS in 2020 to 52.8 percent in 2021 and 54.0 percent in 2022, and then declining to 50.6 percent in 2023 and 50.4 percent in 2024. Raw material costs were 51.1 percent of slab producers' COGS in interim 2024 and 49.6 percent in interim 2025.<sup>105</sup> Raw material costs, as a share of medium-to-large sized fabricators' COGS, irregularly declined by \*\*\* percentage points from 2020 to 2024; they were \*\*\* percent in 2020, \*\*\* percent in 2021, \*\*\* percent in 2022, \*\*\* percent in 2023, and \*\*\* percent

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<sup>98</sup> CR/PR at Table 6.12.

<sup>99</sup> CR/PR at Table 6.12.

<sup>100</sup> CR/PR at Table 6.12.

<sup>101</sup> CR/PR at Table 1.8.

<sup>102</sup> CR/PR at Table 1.8.

<sup>103</sup> CR/PR at Table I.12.

<sup>104</sup> CR/PR at 6.25.

<sup>105</sup> CR/PR at Table 4.1.



in 2024.<sup>106</sup> Raw material costs were \*\*\* percent of medium-to-large sized fabricators' COGS in interim 2024 and \*\*\* percent in interim 2025.<sup>107</sup>

I noted above the existing AD/CVD orders on imports of QSP from China, India, and Turkey. Section 301, Emergency Economic Powers Act (IEEPA), and Section 122 duties have also applied to QSP imports into the United States during the POI. Specifically, since May 10, 2019, the section 301 tariffs of 25 percent *ad valorem* have applied to QSP from China.<sup>108</sup> In addition, beginning on February 4, 2025, imports of QSP into the United States were subject to varying levels of country-specific *ad valorem* duties pursuant to IEEPA.<sup>109</sup> Effective February 20, 2026, however, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.<sup>110</sup>

Effective February 24, 2026, QSP originating in all countries have been subject to an additional 10 percent *ad valorem* duty under section 122 of the Trade Act of 1974. QSP originating in Canada or Mexico that enter with duty free treatment under the United States-Mexico-Canada Agreement (USMCA) are not subject to the additional *ad valorem* duty under section 122.<sup>111</sup>

### **C. The Domestic Industry Is Not Seriously Injured by QSP Imports**

In determining whether the domestic industry is seriously injured by QSP imports, I have considered the three statutorily enumerated factors as well as other relevant economic factors. As discussed below, the record does not demonstrate significant idling of productive facilities, significant unemployment, or the inability of a significant number of firms to operate at a reasonable level of profit; nor do other economic factors, including pricing data and trends and other information show a significant overall impairment in the domestic industry's condition. In short, the record falls short of meeting the statute's heightened injury requirement. As the Commission has previously cautioned, this standard requires "demonstration of not merely injury, but *serious* injury, and not merely impairment, but a *significant* overall impairment of the position of the domestic industry."<sup>112</sup>

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<sup>106</sup> CR/PR at Table J.1.

<sup>107</sup> CR/PR at Table J.1.

<sup>108</sup> CR/PR at 1.24.

<sup>109</sup> CR/PR at 1.25-1.27.

<sup>110</sup> CR/PR at 1.25.

<sup>111</sup> CR/PR at 1.25.

<sup>112</sup> *Crabmeat from Swimming Crabs*, Inv. No. TA-201-77 (Determination and Views of the Commission), USITC Pub. No. 3349 (Aug. 2000) at n.67 (emphasis in original).

## 1. No Significant Idling of Productive Facilities

In assessing serious injury, I first consider whether there has been significant idling of domestic productive facilities in terms of plant closures or underutilization of productive capacity to manufacture QSP products. The evidence with respect to specific firms and the industry as a whole does not lend support to finding significant idling.

Six of the eight domestic slab producers that responded to the Commission's questionnaire reported plant openings and expansions; three firms are new entrants to the industry during the POI; and more expansions and growth have been announced. For example, in 2022, Cambria completed a \*\*\* expansion at its manufacturing facility in Le Sueur, Minnesota. The expansion added manufacturing \*\*\*, and the capacity to add \*\*\* more employees.<sup>113</sup> Cambria \*\*\*.<sup>114</sup> In August 2025, the company announced plans to build a new \$80 million quartz processing plant and rail center in Randolph, Minnesota. Cambria is planning to reshore some of its Canadian quartz processing operations to the United States when the plant is completed, as the company reported that it is "positioning for growth."<sup>115</sup>

LX Hausys and Dal-Tile also announced expansions to their existing capacity during the POI.<sup>116</sup> Also, Dal-Tile's parent company, Mohawk, recently announced: "We are also increasing our participation in the countertop business," explaining that its new production line "remains on schedule and will deliver higher value products through an advanced veining technology that creates unique visuals."<sup>117</sup>

Elite Quartz, Guidoni, and Hendrix, all new entrants in the domestic QSP industry, announced plant openings during the POI. In September 2020, Elite Quartz completed construction of a new 360,000 square foot QSP facility in Latta, South Carolina, and hired 150 new employees upon opening the facility.<sup>118</sup> In 2020, Guidoni completed construction of a new QSP factory in McRae-Helena, Georgia, investing \$96 million and hiring 455 new employees.<sup>119</sup>

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<sup>113</sup> CR/PR at Table 3.2; Cambria U.S. Producers' Questionnaire at II-2a.

<sup>114</sup> *Id.* at III-15.

<sup>115</sup> CR/PR at 3.2; Arizona, Elite & MSI's Prehearing Br. at Exh. 6-B, Cambria Shifts Quartz Processing from Canada to Dakota, The Minnesota Star Tribune.

<sup>116</sup> *See, e.g.*, CR/PR at Table 3.2; Alliance Respondent Prehearing Br. at Exh. 2; Dal-Tile U.S. Producers' Questionnaire at I-2c.

<sup>117</sup> Arizona, Elite & MSI's Prehearing Br. at Exh. 6-J, Mohawk MHK Q4 2025 Earnings Call Transcript.

<sup>118</sup> CR/PR at Table 3.2; *see also* Elite Quartz Producers' Questionnaire at II-2a.

<sup>119</sup> CR/PR at Table 3.2.

In 2022, Guidoni \*\*\*.<sup>120</sup> In 2024, Hendrix began developing QSP at its new plant in Sealy, Texas. The plant has the capacity to produce up to 12 million square feet of QSP per year. The plant began producing QSP in 2025.<sup>121</sup>

The staff report at table 3.2 lists other plans for expansion and growth in the domestic QSP industry after the POI, discussed further below in connection with threat of serious injury, including for Cosentino's plant in Florida and OK Stone's in Texas.<sup>122</sup> New entrants during the POI, reports of growth during the POI, and reports of further development going forward run counter to finding significant idling by the domestic industry. In fact, only one closure was reported by a domestic slab producer that responded to the Commission's questionnaire, and this closure was not caused by import competition.

Specifically, Caesarstone closed its Richmond Hill, Georgia, slab plant in January 2024, which was part of a global decision to shift away from global manufacturing of QSP slabs. The evidence shows that Caesarstone's actions were undertaken in connection with a restructuring plan across its global operations, not as a response to an increase in volume of U.S. QSP imports. Shortly after the petition was filed, Caesarstone submitted a letter stating that it was not "forced" to close its Georgia facility due to import competition but instead the decision was based on a careful assessment of industry developments, challenges in supply chain and availability of raw materials, and the inability to achieve sufficient manufacturing efficiencies.<sup>123</sup> Caesarstone's global Chief Executive Officer, Yos Shiran, submitted a sworn declaration stating in response to the allegation that the firm shut down U.S. operations due to import competition, "This is false. Our decision to restructure and refocus our operations was not due to 'injury' caused by U.S. imports of QSP."<sup>124</sup> Mr. Shiran also testified in person, under oath, "I want to state clearly Caesarstone did not close its U.S. manufacturing operations because of import competition."<sup>125</sup>

Mr. Shiran explained that Caesarstone began a multi-year, substantial reorganization in 2023, which began with its closure of the Sdot-Yam plant in Israel, followed closely by closure of the Richmond Hill facility, and finally the closure of its Bar-Lev manufacturing facility in Israel in

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<sup>120</sup> Guidoni U.S. Producers' Questionnaire at II-2a.

<sup>121</sup> CR/PR at Table 3.2; *see also* Hendrix Producers' Questionnaire at II-2a.

<sup>122</sup> CR/PR at Table 3.2.

<sup>123</sup> Caesarstone Objection to Petition (Sept. 22, 2025) at 1.

<sup>124</sup> Arizona, Elite & MSI's Prehearing Br. at Exh. 1-D, Caesarstone Declaration para. 5.

<sup>125</sup> Injury Hearing Transcript (Tr.) at 230 (Mr. Shiran).

2025, which represented the shutdown of its final QSP production lines.<sup>126</sup> According to Mr. Shiran:

Our decision to restructure and refocus our operations was not due to ‘injury’ caused by U.S. imports of QSP. Rather, we decided to cease both our global and U.S. production operations for many other reasons, including: (A) reducing the need to invest in capital expenditures to maintain and upgrade production technologies; (B) alleviating ourselves from functions such as maintaining engineering teams dedicated to design and oversee production, maintenance, and equipment procurement; and (C) procuring raw materials, their transportation, storage and testing. These challenges (and more) made little sense considering our scale. We hope that this substantial transformation will enable Caesarstone to focus our capital on the innovation of specific unique processes and designs, as well as improving our marketing and agility.<sup>127</sup>

Mr. Shiran further stated that additional causes unique to Richmond Hill were internal operational considerations, not imports:

For example, each model Caesarstone designs is tied to and requires specific raw materials to ensure manufacturing consistency and product quality across all of our production lines. We relied on specific quartz inputs sourced from outside the United States, and maintaining that level of uniformity in those inputs made U.S. manufacturing less efficient.<sup>128</sup>

The record thus ties Caesarstone’s manufacturing exits to a multi-year strategic transformation and cost-optimization effort, not an inability to compete with U.S. QSP imports. Mr. Shiran supported his testimony with substantial evidence and explanation, including the fact that Caesarstone closed not only its U.S. facility but manufacturing in Israel around the same time.<sup>129</sup> This business decision is consistently described throughout Caesarstone’s

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<sup>126</sup> Caesarstone Declaration at para. 4.

<sup>127</sup> *Id.* at para. 5.

<sup>128</sup> *Id.* at para 6.

<sup>129</sup> Tr. at 231 (Mr. Shiran). Mr. Shiran also noted mass tort litigation arising out of silicosis-related claims as a major risk factor weighed at the corporate level, in addition to geopolitical factors. *See, e.g.*, Tr. at 244-45. The company’s 20-F forms flag mass tort and related insurance issues and demonstrate this was a growing issue well before the civil court judgment in California in August 2024 or Australia’s ban on engineered stone containing crystalline silica in July 2024. *See, e.g.*, Arizona, Elite & MSI’s Posthearing Br. at Responses to Commission Questions, pp. 27-32; CR/PR at Tables 3.2 and 5.7. I do not second-guess the company’s global business decisions.

quarterly reports and SEC filings, all of which emphasize that the firm's evaluation and restructuring were global in scope and not U.S.-specific.<sup>130</sup>

Caesarstone has fully participated in this proceeding and its position is credible and well supported. U.S. imports do not explain the closure of the Richmond Hill facility, just as they do not explain the closure of the Sdot-Yam plant or Bar-Lev facilities in Israel. Given the sworn testimony of its CEO and supporting business documentation, Caesarstone has amply demonstrated that the closure of its Richmond Hill facility was strategic and operational, including respecting the operation of its manufacturing operations, firm-specific challenges in securing critical raw materials, and deliberate reallocation of capital and management attention toward design, innovation, brand, and go-to-market capabilities.

Petitioners would also ascribe the closure of another producer, USA Quartz, apparently in early 2022, to QSP imports, but the record does not support this claim either. USA Quartz did not submit a questionnaire response or testify in this proceeding. In the first five-year review of the AD/CVD orders on China, the Commission did not link the firm's closure to imports, simply stating, "In January 2019, USA Quartz began production operations at its new quartz slab facility in Jacksonville, Florida. However, available information suggests that the facility subsequently closed."<sup>131</sup> It is not apparent that the firm ever launched production at scale. Also, no sooner had it started production operations than it began to accumulate citations for safety violations by the U.S. Department of Labor's Occupational Safety and Health Administration (OSHA). These continued in 2019 and several were classified by OSHA as serious and resulted in fines and penalties.<sup>132</sup>

The firm also closed under apparently unusual circumstances. Litigation following its closure alleged that the manager sold all of the company's assets without consulting other members of USA Quartz.<sup>133</sup> There were also claims of mismanagement of the company and the misappropriation of company funds and profits.<sup>134</sup>

On this record, I am not persuaded that USA Quartz's closure was driven by imports, particularly given the myriad other issues USA Quartz apparently faced, and, in any event, do not find this closure to support finding significant idling by the domestic industry.

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<sup>130</sup> See, e.g., Caesarstone Declaration at Att. A.

<sup>131</sup> *Quartz Surface Products from China*, Inv. Nos. 701-TA-606 and 731-TA-1416 (Review), USITC Pub. 5578 (Jan. 2025) at I-16.

<sup>132</sup> Indian Federation's Posthearing Br. at Exh. 1 (copies of OSHA documents).

<sup>133</sup> Indian Federation's Posthearing Br. at Exh. 2 (copies of litigation documents).

<sup>134</sup> *Id.*

Data respecting domestic slab and fab capacity and production during the POI similarly fail to support finding significant idling of domestic productive resources. Fabrication capacity increased overall from 2020 to 2024 and was higher in interim 2025 than interim 2024.<sup>135</sup> Fabrication production also increased overall from 2020 to 2024 and was higher in interim 2025 than interim 2024.<sup>136</sup> Fabrication utilization increased slightly overall from 2020 to 2024 and was lower in interim 2025 than interim 2024.<sup>137</sup> Petitioners do not allege, and the record does not support finding that the U.S. fabricators' data demonstrate significant idling.

The practical capacity of domestic slab producers increased overall from 2020 to 2023, reached a period low in 2024, and was higher in interim 2025 than in interim 2024.<sup>138</sup> The production of domestic slab producers increased overall from 2020 to 2023 and reached a period low in 2024, and was slightly lower in comparing interim 2025 to interim 2024.<sup>139</sup> In taking into consideration the industry as a whole, the changes in slab practical capacity and production figures do not demonstrate significant idling. Moreover, the overall declines in slab capacity and production from 2020 to 2024 were driven primarily by Caesarstone's closure, which as described above and testified to by Caesarstone's global CEO, was due to factors other than U.S. QSP imports.<sup>140</sup> I also do not find that the slab producers' capacity utilization figures,

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<sup>135</sup> CR/PR at Table C.2 (fabricators' practical capacity was 6.2 million square feet in 2020, 7.2 million square feet in 2021, 8.3 million square feet in 2023, 8.8 million square feet in 2024, and 8.7 million square feet in 2025; it was 6.6 million square feet in interim 2024 and 7.2 million square feet in interim 2025).

<sup>136</sup> CR/PR at Table C.2 (fabricators' production was 5.0 million square feet in 2020, 6.3 million square feet in 2021, 7.3 million square feet in 2023, 6.6 million square feet in 2024, and 7.0 million square feet in 2025; it was 5.1 million square feet in interim 2024 and 5.2 million square feet in interim 2025).

<sup>137</sup> CR/PR at Table C.2 (fabricators' capacity utilization was 80.3 percent in 2020, 87.8 percent in 2021, 87.7 percent in 2022, 75.2 percent in 2023, 80.7 percent in 2024, 76.6 percent in interim 2024, and 71.7 percent in interim 2025).

<sup>138</sup> CR/PR at Table C.2 (slab producers' practical capacity was 50.2 million square feet in 2020, 53.0 million square feet in 2021, 52.3 million square feet in 2022, 51.6 million square feet in 2023, 45.7 million square feet in 2024; it was 35.0 million square feet in interim 2024 and 38.9 million square feet in interim 2025).

<sup>139</sup> CR/PR at Table C.2 (slab producers' production was 39.4 million square feet in 2020, 43.5 million square feet in 2021, 44.6 million square feet in 2022, 39.6 million square feet in 2023, and 32.7 million square feet in 2024; it was 24.7 million square feet in interim 2024, and 24.5 million square feet in interim 2025).

<sup>140</sup> See, e.g., CR/PR at Tables 3.6 (breakouts by individual firms), C.2; Tr. at 245 (Caesarstone's closure did "not stem{} from imports, not at all" (Mr. Shiran); Arizona, Elite & MSI's Prehearing Br. at 55-56; Vietnamese Manufacturers' Final Comments at 3-4.

which declined later in the POI,<sup>141</sup> demonstrate significant idling, particularly as new producers entered the market.<sup>142</sup> The capacity added by new producers is a sign of growth, not serious injury.

Accordingly, based on the record and taking into account the evidence with respect to specific firms and the industry as a whole, I do not find significant idling of domestic productive resources during the POI.

## **2. No Significant Unemployment or Underemployment**

I next examine whether there has been significant unemployment or underemployment in the domestic industry during the POI. The number of production and related workers (PRWs) increased from 2020 to 2021, from 2,421 to 2,600, before it began to decrease from 2022 to 2024, to 2,230, reflecting the general reported trendlines in demand during the height of the COVID-19 pandemic before beginning to return to normal.<sup>143</sup> The number of PRWs was higher in interim 2025 (2,186) than in interim 2024 (2,147).<sup>144</sup> Hiring was strong earlier in the POI when demand was heightened and declined some later in the POI, though certain firms continued to increase employment throughout the POI.<sup>145</sup> The total number of hours worked followed a similar trend over the full years, though the increase continued into 2022, and the total number of hours worked was slightly higher in interim 2025 than in interim 2024.<sup>146</sup>

The total wages paid increased by 16.9 percent overall from 2020 to 2024 and were higher in interim 2025 than in interim 2024.<sup>147</sup> The hourly wages increased by 22.2 percent overall from 2020 to 2024 and were also higher in interim 2025 than in interim 2024.<sup>148</sup> The slab producers' productivity decreased overall from 2020 to 2024 and was slightly lower in

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<sup>141</sup> CR/PR at Table C.2 (slab producers' capacity utilization was 78.6 percent in 2020, 82.1 percent in 2021, 85.2 percent in 2022, 76.8 percent in 2023, and 71.5 percent in 2024; it was 70.6 percent in interim 2024 and 63.1 percent in interim 2025).

<sup>142</sup> See, e.g., CR/PR at 3.14 and Table 3.6; Arizona, Elite & MSI's Prehearing Br. at 56.

<sup>143</sup> CR/PR at Table C.2; see also *id.* at 3.31.

<sup>144</sup> CR/PR at Table C.2.

<sup>145</sup> CR/PR at 3.31.

<sup>146</sup> CR/PR at Table C.2 (total hours worked were 5.1 million in 2020, 5.7 million in 2021, 5.8 million in 2022, 5.3 million in 2023, and 4.9 million in 2024; total hours worked were 3.6 million in interim 2024 and 3.7 million in interim 2025).

<sup>147</sup> CR/PR at Table C.2 (total wages were \$137.1 million in 2020, \$159.2 million in 2021, \$170 million in 2022, \$161.3 million in 2023, and \$160.2 million in 2024; total wages were \$118.0 million in interim 2024 and \$119.3 million in interim 2025).

<sup>148</sup> CR/PR at Table C.2 (hourly wages were \$26.74 in 2020, \$27.70 in 2021, \$29.29 in 2022, \$30.61 in 2023, and \$32.67 in 2024; hourly wages were \$32.47 in interim 2024 and \$32.66 in interim 2025).

interim 2025 than in interim 2024, while fabricators' productivity increased from 2020 to 2024 and was higher in interim 2025 than in interim 2024.<sup>149</sup>

I also observe that labor availability was cited as a concern by domestic producers, which reported, for example, that \*\*\* and that \*\*\*.<sup>150</sup> Employment levels likely would have been higher with the availability of additional workers. Moreover, as noted in my analysis of the domestic industry issue, total employment levels are likely understated given the limited coverage of fabricators.

Based on the record and considering the industry as a whole, I find that the employment-related data do not demonstrate significant unemployment or underemployment in the QSP industry during the POI.

### **3. No Inability of a Significant Number of Firms to Carry Out Domestic Production Operations at a Reasonable Level of Profit**

I next examine the domestic industry's profitability. Respondents make the point that as the fabricator questionnaires received represent only a small portion of total U.S. fabricators and continue to be outweighed by slab producer responses, the combined data collected by the Commission does not fully convey the profitability of the domestic industry.<sup>151</sup> The observation that increased fabricator coverage on this record shows improved domestic industry profitability is not unreasonable;<sup>152</sup> however, I rely upon the collected data as the best available information to assess the industry's actual performance during the POI. The collected data show an industry that is consistently and clearly profitable. Gross profits increased 23.4 percent overall during the full years of the POI, from \$337.2 million in 2020 to \$416.0 million in 2024.<sup>153</sup> While gross profit was 6.2 percent lower in comparing interim 2025 to interim 2024, the industry still earned over \$300 million in both interim periods in gross profit.<sup>154</sup>

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<sup>149</sup> CR/PR at Table C.2 (slab producers' productivity per hour was 11.9 square feet in 2020, 12.0 square feet in 2021, 12.2 square feet in 2022, 11.5 square feet in 2023, 10.4 square feet in 2024, 10.6 square feet in interim 2024, and 10.3 square feet in interim 2025; fabricators' productivity per hour was 2.8 square feet in 2020, 3.0 square feet in 2021, 3.4 square feet in 2022, 3.6 square feet in 2023, 4.0 square feet in 2024; 3.9 square feet in interim 2024, and 4.0 square feet in interim 2025).

<sup>150</sup> CR/PR at Table 3.5; \*\*\* U.S. Producers' Questionnaire at I-7.

<sup>151</sup> See, e.g., Arizona, Elite & MSI's Final Comments at 6-7.

<sup>152</sup> See, e.g., Prehearing Report at Tables C.1, C.2, and J.5; CR/PR at Tables C.1, C.2, and J.5.

<sup>153</sup> CR/PR at Table C.2 (the domestic industry's gross profits were \$337.2 million in 2020, \$421.1 million in 2021, \$447.4 million in 2022, \$433.4 million in 2023, and \$416.0 million in 2024).

<sup>154</sup> CR/PR at Table C.2 (\$301.9 million in interim 2025 and \$321.7 million in interim 2024).



The domestic industry's operating profits were also healthy throughout the POI. The industry's operating income fluctuated in the full years but increased 1.3 percent overall from \$85.5 million in 2020 to \$86.6 million in 2024.<sup>155</sup> The industry's operating income was 34.8 percent lower in comparing interim 2025 (\$47.7 million) to interim 2024 (\$73.1 million).<sup>156</sup> The industry's operating margin was 9.4 percent in 2020, 9.1 percent in 2021, 6.7 percent in 2022, 7.1 percent in 2023, and 8.1 percent in 2024.<sup>157</sup> The industry's operating margin was 6.1 percent in interim 2025 and 9.0 percent in interim 2024.<sup>158</sup> The operating margin in interim 2025 is not far off the operating margin in 2022, a year in which Dal-Tile indicated it "achieved reasonable profits."<sup>159</sup> Even with declines at the end of the period, which coincided with a slowdown in demand,<sup>160</sup> the industry's performance at the operating level was reasonably profitable, rather than reflective of "serious" injury or "significant" impairment.

Petitioners reach to net income figures to show actual loss for slab producers during the POI, and 2023 in particular stands out, when slab producers reported a net loss of \$63.1 million.<sup>161</sup> A closer examination of net income data reveals, however, nonrecurring expenses incurred by individual producers for reasons unrelated to import competition. In 2023, for example, \*\*\* reported a \*\*\*.<sup>162</sup> As discussed above, Caesarstone has made clear that its plant closure was a global restructuring strategy – it did not close its Georgia plant due to competition from QSP imports in the United States.<sup>163</sup>

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<sup>155</sup> CR/PR at Table C.2 (the domestic industry's operating income was \$85.5 million in 2020, \$106.3 million in 2021, \$87.3 million in 2022, \$86.0 million in 2023, \$86.6 million in 2024; it was \$73.1 million in interim 2024 and \$47.7 million in interim 2025).

<sup>156</sup> CR/PR at Table C.2.

<sup>157</sup> CR/PR at Table C.2.

<sup>158</sup> CR/PR at Table C.2

<sup>159</sup> Tr. at 81 (Mr. Viana).

<sup>160</sup> See CR/PR at 6.13 and Table C.2

<sup>161</sup> CR/PR at Table C.1 (slab producers' net income was \$30.9 million in 2020, \$54.2 million in 2021, \$12.1 million in 2022, negative \$63.1 million in 2023, and negative \$2.4 million in 2024; it was \$9 million in interim 2024 and negative \$21.5 million in interim 2025). Medium-to-large sized fabricators also reported net income/loss data. They show no losses during the POI. To the contrary, net income increased overall from 2020-2024 and finished the POI higher than at the start. CR/PR at Table J.1 (medium-to-large sized fabricators' net income was \$\*\*\* in 2020, \$\*\*\* in 2021, \$\*\*\* in 2022, \$\*\*\* in 2023, and \$\*\*\* in 2024; it was \$\*\*\* in interim 2024 and \$\*\*\* in interim 2025).

<sup>162</sup> CR/PR at 4.23 n.21; \*\*\* U.S. Producers' Questionnaire at 43.

<sup>163</sup> See, e.g., Tr. at 230, 231 (Mr. Shiran) ("I want to state clearly Caesarstone did not close its U.S. manufacturing operations because of import competition.")

(Continued...)

Similarly, in the same year, \*\*\* reported a \*\*\*.<sup>164</sup> Additionally, according to \*\*\* own account, it \*\*\*. Staff queried \*\*\* regarding the \*\*\*.<sup>165</sup> Regarding sales trends over the same period, \*\*\*.<sup>166</sup> The underlying factors identified by \*\*\*, are not related to import competition. Consistent with this, in response to question II-8(a) in the U.S. producers' questionnaire -- Have your firm's QSP operations been injured by imports of quartz surface products since January 1, 2020? -- \*\*\* responded \*\*\*.<sup>167</sup>

More fundamentally, on this record, as between operating and net income, I find operating income the better measure of domestic industry profitability, as it isolates the profitability generated from a company's regular operations, excluding the effects of financing decisions, interest rates, taxes, and one-time items that net income necessarily includes. Operating income, on this record, better captures the core business at issue, providing a cleaner view of how well the underlying business is truly performing. Those data show a

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Our evaluation was global in scope. We closed our Sdot-Yam facility in Israel in 2023, followed by our Richmond Hill, Georgia, facility later that year, and, ultimately, our Bar-Lev facility in Israel in 2025. This was not a U.S.-specific response. It was a global restructuring designed to reposition Caesarstone for long-term competitiveness. Instead of allocating capital to plant utilization, we redirected investment toward research and development, new materials, designs platform, and brand development. That shift has enhanced our agility and strengthened our ability to respond to evolving market trends.

<sup>164</sup> See CR/PR at 4.23 n.21; \*\*\* U.S. Producers' Questionnaire at 42; EDIS Doc. No. 870487 (January 28, 2026 Email with \*\*\* Questionnaire Revisions).

<sup>165</sup> EDIS Doc. No. 870487 (January 28, 2026 Email with \*\*\* Questionnaire Revisions).

<sup>166</sup> *Id.*

<sup>167</sup> \*\*\* U.S. Producers' Questionnaire at 17.

consistently profitable domestic industry, notwithstanding increased imports during the POI, as discussed above.

With respect to the financial performance of individual firms in the context of the industry as a whole, the data show that the number of firms reporting operating losses was 4 of 28 in 2020 (14.3 percent), 5 of 29 in 2021 (17.2 percent), 3 of 29 in 2022 (10.3 percent), 6 of 30 in 2023 (20.0 percent), 4 of 30 in 2024 (13.3 percent), and 4 of 28 in interim 2025 (14.3 percent).<sup>168</sup> Moreover, two of the slab producers reporting losses at the end of the POI are new entrants to the QSP market.<sup>169</sup> I do not view these data as supportive of finding an unprofitable domestic QSP industry.

Accordingly, based on profitability metrics inclusive of industry-wide and individual firm performance, I do not find that a significant number of firms in the industry were unable to carry out domestic production operations at a reasonable level of profit. To the contrary, the industry as a whole was operating at a reasonable level of profit during the POI.

#### **4. No Indication of Serious Injury Based on Other Economic Factors**

I have also considered other economic factors in evaluating whether the record supports finding serious injury in this investigation. Such factors are not statutorily enumerated but contribute to the completeness of the evaluation on any given record. My considerations on this record included, as set forth below, pricing-related data, shipment and market share data, capital expenditures, research and development expenses, and total assets of the domestic industry during the POI.

*Pricing-related data.* The Commission collected pricing data on six QSP slab products from U.S. producers and importers.<sup>170</sup> Four U.S. producers and 62 importers provided usable

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<sup>168</sup> CR/PR at Table J.7.

<sup>169</sup> CR/PR at Table 4.3.

<sup>170</sup> The six pricing products are as follows:

**Product 1.**-- Plain white quartz surface products in slab form, with a nominal thickness of 2 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors;

**Product 2.**-- Plain white quartz surface products in slab form, with a nominal thickness of 3 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors;

**Product 3.**-- White quartz surface products with a “marble look” in slab form, a nominal thickness of 2 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors;

(Continued...)

pricing data for sales of the requested products, although not all firms reported data for all products for all quarters.<sup>171</sup> The record shows that the prices of slab imports were uniformly lower than the prices for the domestic slab, with margins of underselling ranging from \*\*\* percent to \*\*\* percent.<sup>172</sup> Domestic slab producers' sales and shipments data show increased prices over the POI. Specifically, domestic prices for all pricing products increased, with domestic price increases ranging from \*\*\* to \*\*\* percent during January 2020 to September 2025.<sup>173</sup> Domestic slab producers' U.S. shipment average unit values (AUVs) increased steadily, from \$20.94 per square foot in 2020 to \$24.23 per square foot in 2024, an increase of 15.7 percent.<sup>174</sup> Domestic slab producers' U.S. shipment AUVs also increased in comparing interim 2024 to interim 2025, from \$24.29 per square foot to \$24.63 per square foot, respectively, an increase of 1.4 percent.<sup>175</sup> Domestic slab producers' net sales AUVs showed a similar trend, increasing by 18 percent between 2020 and 2024 and also increased between the interim periods.<sup>176</sup> For the industry as a whole, aggregated shipment and net sales AUVs showed similar trends, with prices increasing during the POI.<sup>177</sup>

Thus, notwithstanding the underselling observed on this record, domestic QSP prices increased during the POI. Moreover, the domestic industry's cost of goods sold (COGS) to net sales ratio declined overall during the POI, from 62.8 percent in 2020 to 60.9 percent in 2024.<sup>178</sup> The COGS to net sales ratio increased slightly between interim 2024 and interim 2025, from

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**Product 4.--** White quartz surface products with a "marble look" in slab form, a nominal thickness of 3 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors;

**Product 5.--** Neutral colored quartz surface products with a "natural stone look" in slab form, a nominal thickness of 2 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors; and

**Product 6.--** Neutral colored quartz surface products with a "natural stone look" in slab form, a nominal thickness of 3 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

CR/PR at 6.28-6.29.

<sup>171</sup> CR/PR at 6.29.

<sup>172</sup> CR/PR at Tables 6.29 & 6.30.

<sup>173</sup> CR/PR at 6.42 & Table 6.26.

<sup>174</sup> CR/PR at Table C.1.

<sup>175</sup> CR/PR at Table C.1.

<sup>176</sup> CR/PR at Table C.1 (slab producers' net sales AUVs were \$20.21 in 2020, \$20.46 in 2021, \$23.21 in 2022, \$23.62 in 2023, \$23.84 in 2024; they were \$23.84 in interim 2024 and \$23.85 in interim 2025).

<sup>177</sup> CR/PR at Table C.2.

<sup>178</sup> CR/PR at Table C.2.

60.3 percent to 61.5 percent, but remained lower than in 2020.<sup>179</sup> The low and declining COGS to net sales ratio shows that the industry was not experiencing a cost-price squeeze during the POI. On this record, therefore, and particularly in light of the industry's ability to raise prices and its favorable ratio of costs to net sales, I do not find that the industry experienced adverse price conditions.<sup>180</sup>

*Shipments and market share.* The domestic industry's U.S. shipments by value increased overall from 2020 to 2024, from \$798.3 million to \$946.9 million, an increase of 18.6 percent.<sup>181</sup> Domestic industry shipments by value were 3.3 percent lower in interim 2025 (\$696.5 million) than in interim 2024 (\$720.1 million).<sup>182</sup> The domestic industry's market share, as measured by value, declined overall from 2020 to 2024 by 3.9 percentage points, from 39.2 percent to 35.2 percent, respectively.<sup>183</sup> The industry's market share increased slightly in comparing the interim periods, from 36.2 percent in interim 2024 to 36.4 percent in interim 2025.<sup>184</sup> I do not find that the domestic industry's market share loss demonstrates serious injury, particularly given the modest decline, the fact that Caesarstone's closure in 2024, which as discussed above was unrelated to import competition, contributed to it, and the fact that the domestic industry's shipments by value increased in the same period.<sup>185</sup>

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<sup>179</sup> CR/PR at Table C.2.

<sup>180</sup> I note further that there are minimal confirmed lost sales or revenue allegations on this record. Of the 27 responding purchasers, two reported that U.S. producers had reduced prices in order to compete with imports. CR/PR at 6.50. With respect to the lost sales allegations, the total quantity of confirmed lost sales (\*\* square feet) accounts for approximately \*\* percent of the responding purchasers' total reported purchases and imports, \*\* percent of total imports over the POI, and \*\* percent of apparent U.S. consumption over the POI. *Derived from* CR/PR at Tables 2.2, 6.31-6.32, and C.2.

<sup>181</sup> CR/PR at Table C.2. In assessing trends in shipments and market share, as noted above, value data are the best metric to capture the domestic industry as whole, inclusive of slab producers and independent fabricators. Quantity data do not include the production of fabricators.

<sup>182</sup> I am mindful that this overall increase in shipments by value from 2020-2024 lagged the overall increase in apparent U.S. consumption by value from 2020-2024, which increased 31.9 percent (CR/PR at Table C.2); however, the issue in a safeguard investigation is not suboptimal performance but whether the industry's performance crosses the statutory line into the dire circumstances of serious injury.

<sup>183</sup> CR/PR at Table C.2.

<sup>184</sup> CR/PR at Table C.2.

<sup>185</sup> CR/PR at Table C.2.

<sup>186</sup> CR/PR at Table C.2; U.S. Producers' and Fabricators' Questionnaire Responses (EDIS Doc. No. 876880). I note that given the evidence on this record, I would reach the same conclusion that the domestic industry's market share loss does not constitute serious injury even if measured on a quantity basis, which fails to account for the domestic industry as a whole.

*Capital expenditures, research and development expenses, total assets.* Capital expenditures for the domestic industry increased from 2020 to 2022 and then decreased from 2022 to 2024, for an overall decrease during the full years of the period; capital expenditures were higher in interim 2025 than in interim 2024.<sup>187</sup> Overall, domestic slab producers expended hundreds of millions of dollars in capital expenditures during the POI.<sup>188</sup> Research and development (R&D) expenses increased from 2020 to 2024 and were higher in interim 2025 than in interim 2024.<sup>189</sup> Overall, domestic slab producers spent more than \$31 million on R&D expenses during the POI.<sup>190</sup> The domestic industry's total assets, which were reported for 2020-2024, also increased overall during the period.<sup>191</sup> Rather than show serious injury, the favorable data respecting these measures of the industry's condition demonstrate substantial investment during the POI, and this on a record in which, due to limited coverage with respect to fabricators, total investments were likely higher.

Finally, according to the questionnaire responses, among the slab producers, \*\*\* oppose the petition, \*\*\* support the petition, and \*\*\* takes no position.<sup>192</sup> Among the fabricators, \*\*\* oppose the petition, \*\*\* support the petition, and \*\*\* take no position.<sup>193</sup> Support for the petition, on this record, is mixed, and that is not taking into account the over one thousand declarations from fabricators expressing their opposition to the petition that the Commission received.<sup>194</sup> While those expressions of opposition within the domestic industry do not displace actual data on the record, they tend to confirm my view of the relevant

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<sup>187</sup> CR/PR at J.15 and Table J.13 (capital expenditures for the slab producers and medium-to-large sized fabricators were \$\*\*\* in 2020, \$\*\*\* in 2021, \$\*\*\* in 2022, \$\*\*\* in 2023, \$\*\*\* in 2024; they were \$\*\*\* in interim 2024 and \$\*\*\* in interim 2025).

<sup>188</sup> CR/PR at Table C.1.

<sup>189</sup> CR/PR at J.15 and Table J.13 (R&D expenses for the slab producers and medium-to-large sized fabricators were \$\*\*\* in 2020, \$\*\*\* in 2021, \$\*\*\* in 2022, \$\*\*\* in 2023, \$\*\*\* in 2024; they were \$\*\*\* in interim 2024 and \$\*\*\* in interim 2025).

<sup>190</sup> CR/PR at Table C.1.

<sup>191</sup> CR/PR at J.15 and Table J.13 (total assets for slab producers and medium-to-large sized fabricators were \$\*\*\* in 2020, \$\*\*\* in 2021, \$\*\*\* in 2022, \$\*\*\* in 2023, and \$\*\*\* in 2024).

<sup>192</sup> CR/PR at Table 1.12.

<sup>193</sup> U.S. Fabricators' Questionnaire Responses at I-3.

<sup>194</sup> See Letters from Hogan Lovells to USITC dated September 19, 2025, September 22, 2025, September 25, 2025, November 17, 2025; Letter from Rockheads Group to USITC dated November 17, 2025. See also, Arizona, Elite & MSI's Prehearing Br. at 2 and Exh. 1-A.

economic data as discussed above, which demonstrate the lack of serious injury on this record.<sup>195</sup>

For all of these reasons, the evidence does not show significant overall impairment in the position of the domestic industry. As a result, and consistent with the overall record, I do not find that the domestic industry is seriously injured.

**D. The Domestic Industry is Not Threatened With Serious Injury**

In considering whether the industry is threatened with serious injury, I have considered all relevant economic factors, including the statutory threat factors:

(i) a decline in sales or market share, a higher and growing inventory (whether maintained by domestic producers, importers, wholesalers, or retailers), and a downward trend in production, profits, wages, productivity, or employment (or increasing underemployment) in the domestic industry,

(ii) the extent to which firms in the domestic industry are unable to generate adequate capital to finance the modernization of their domestic plants and equipment, or are unable to maintain existing levels of expenditures for research and development,

(iii) the extent to which the United States market is the focal point for the diversion of exports of the article concerned by reason of restraints on exports of such article to, or on imports of such article into, third country markets.<sup>196</sup>

**1. Decline in Sales or Market Share, Higher and Growing Inventories, Downward Trends in Production, Profits, Wages, Productivity, or Employment in the Industry**

I have taken into account each of the performance indicators identified in this statutory threat factor and find that they do not demonstrate a threat of material injury to the domestic industry in the imminent future.

I do not find a discernible downward trend in sales to support a finding of threat of material injury. The domestic industry's U.S. shipments by value, the data that capture domestic sales for both slab producers and fabricators while avoiding double-counting issues, increased 18.6 percent overall from 2020 to 2024.<sup>197</sup> Domestic industry U.S. shipments by

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<sup>195</sup> They also tend to confirm my view of the record evidence, as discussed below, that serious injury in the imminent future is also not demonstrated.

<sup>196</sup> 19 U.S.C. § 2252(c)(1)(B).

<sup>197</sup> CR/PR at Table C.2 (U.S. shipments by value were \$798.3 million in 2020 and \$946.9 million in 2024).

value were 3.3 percent lower in interim 2025 compared to interim 2024.<sup>198</sup> Given the modest decline between the interim periods, and the fact that interim (Jan.-Sept.) 2025 shipments by value (\$696.5 million) are only approximately \$100 million lower than the domestic industry's shipments by value for the entire first year of the POI (\$798.3 million), I do not find this indicative of threat of serious injury.<sup>199</sup>

I also find no trend in market share sufficient to support finding threat of serious injury. The domestic industry's market share, as measured by value, declined 3.9 percentage points from 2020 to 2024, but was slightly higher (0.2 percentage points) in comparing interim 2025 to interim 2024.<sup>200</sup> Domestic producers' market share decreased from 39.2 percent in 2020 to 35.8 percent in 2021, before increasing to 36.6 percent in 2022 and 40.9 percent in 2023, and decreasing again to 35.2 percent in 2024. It was 36.2 percent in interim 2024 and 36.4 percent in interim 2025.<sup>201</sup> The slight increase at the end of the POI coupled with the modest, irregular decline over the full years are not indicative of threat of serious injury. In fact, U.S. shipments by value increased overall from 2020 to 2024, as noted above.<sup>202</sup>

I do not find an indication of threat of serious injury in the imminent future based on trends in the other statutory factors. In terms of profits, for example, the domestic industry performed well during the POI. Gross profits increased 23.4 percent overall during the full years of the POI.<sup>203</sup> Gross profit was 6.2 percent lower in comparing interim 2025 to interim 2024, but the industry still earned over \$300 million in gross profits in each period.<sup>204</sup> At the operating level, the domestic industry demonstrated consistent profitability, showing an overall increase between 2020 and 2024 of 1.3 percent.<sup>205</sup> The industry's operating income was 34.8 percent lower in comparing interim 2025 to interim 2024 and the industry still earned \$47.7 million in operating profit.<sup>206</sup> The domestic industry's operating margin ranged from 6.7 percent to 9.4 percent during the full years of the POI, and was 6.1 percent in interim 2025

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<sup>198</sup> CR/PR at Table C.2 (U.S. shipments by value were \$720.1 million in interim 2024 and \$696.5 million in interim 2025).

<sup>199</sup> CR/PR at C.2. I note that the data for the domestic industry's total sales revenue follow the same trend of increasing during the full years followed by a modest decrease in comparing the interim periods. CR/PR at Table C.2.

<sup>200</sup> CR/PR at Table C.2.

<sup>201</sup> CR/PR at Table C.2.

<sup>202</sup> CR/PR at Table C.2.

<sup>203</sup> CR/PR at Table C.2 (from \$337.2 million in 2020 to \$416.0 million in 2024).

<sup>204</sup> CR/PR at Table C.2 (\$301.9 million in interim 2025 and \$321.7 million in interim 2024).

<sup>205</sup> CR/PR at Table C.2 (\$85.5 million in 2020 to \$86.6 million in 2024).

<sup>206</sup> CR/PR at Table C.2.



compared to 9.0 percent in interim 2024,<sup>207</sup> demonstrating lower but not unreasonable profitability or significant overall impairment at the end of the POI. The industry was able to increase prices throughout the POI and experienced no cost-price squeeze,<sup>208</sup> and its profits actually increased during the full years of the POI, despite increased imports.<sup>209</sup> The industry's profitability is not indicative of an industry threatened with serious injury.

Fabrication production increased throughout the POI,<sup>210</sup> while slab production experienced a low in 2024,<sup>211</sup> which was driven primarily by Caesarstone's closure, which as discussed above did not involve imports.<sup>212</sup> New domestic producers entered the market during the POI adding capacity, including in interim 2025 (when Hendrix's production began), none of which demonstrates threatened serious injury, as discussed further below. Slab producer inventories increased during the POI,<sup>213</sup> as did fabricator inventories<sup>214</sup> and U.S. importer inventories,<sup>215</sup> but these were in a market that experienced a significant increase in

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<sup>207</sup> CR/PR at Table C.2 (the domestic industry's operating margin was 9.4 percent in 2020, 9.1 percent in 2021, 6.7 percent in 2022, 7.1 percent in 2023, and 8.1 percent in 2024; it was 9.0 percent in interim 2024 and 6.1 percent in interim 2025).

<sup>208</sup> See, e.g., CR/PR at 6.42 & Tables 6.26 and C.2.

<sup>209</sup> CR/PR at Tables 2.2 and C.2.

<sup>210</sup> CR/PR at Table C.2. Domestic fabricators' production increased by 40.3 percent from 2020 to 2024 and was 2.0 percent higher in interim 2025 as compared with interim 2025. Domestic fabricators' production increased from 5.0 million square feet in 2020 to 6.3 million square feet in 2021, and 7.3 million square feet in 2022, before decreasing to 6.6 million square feet in 2023, and increasing again to 7.0 million square feet in 2024. It was 5.1 million square feet in interim 2024 and 5.2 million square feet in interim 2025. CR/PR at Table C.2.

<sup>211</sup> CR/PR at Table C.2. Domestic slab producers' production increased from 39.4 million square feet in 2020 to 43.5 million square feet in 2021 and 44.6 million square feet in 2022 and then declined to 39.6 million square feet in 2023 and 32.7 million square feet in 2024. It was 24.7 million square feet in interim 2024 and 24.5 million square feet in interim 2025. CR/PR at Table C.2.

<sup>212</sup> See, e.g., CR/PR at Tables 3.6 (breakouts by individual firms), C.2; Tr. at 245 (Caesarstone's closure did "not stem{} from imports, not at all" (Mr. Shiran); Arizona, Elite & MSI's Prehearing Br. at 55-56; Vietnamese Manufacturers' Final Comments at 3-4.

<sup>213</sup> CR/PR at Table C.2 (slab producers' inventories decreased from 19.0 million square feet in 2020 to 17.8 million square feet in 2021, before increasing to 19.4 million square feet in 2022, 20.3 million square feet in 2023, and 20.4 million square feet in 2024. They were 20.1 million square feet in interim 2024 and 21.4 million square feet in interim 2025).

<sup>214</sup> CR/PR at Table C.2 (fabricator inventories increased from 1.9 million square feet in 2020 to 2.3 million square feet in 2021 and 2.6 million square feet in 2022, before decreasing to 1.9 million square feet in 2023, and increasing again to 2.1 million square feet in 2024. They were 1.94 million square feet in interim 2024 and 1.90 million square feet in interim 2025).

<sup>215</sup> CR/PR at Table 2.8 (U.S. importers' inventories irregularly increased from 2020 to 2024. U.S. importers' inventories increased from 39.9 million square feet in 2020 to 45.4 million square feet in interim 2025). (Continued...)

apparent U.S. consumption during the POI, and the trend and size do not support a finding of threat of serious injury on this record.<sup>216</sup>

Finally, the employment indicators for the industry as a whole remained healthy overall, and the number of PRWs increased between the interim periods.<sup>217</sup> The total number of hours worked also increased between the interim periods, and total wages and hourly wages showed increases throughout the POI.<sup>218</sup> Productivity data were mixed between slab producers and fabricators and do not alter my conclusion that the employment trends on this record portend no imminent serious injury.<sup>219</sup>

Reviewing the domestic industry's performance trends during the POI based on the statutory factors, I therefore find that the record does not support finding a threat of imminent serious injury. To the contrary, the record reveals an industry, in a market in which imports increased, that experienced, *inter alia*, price increases, capacity increases, investment increases, and, notwithstanding concerns over mass tort litigation (which cannot be blamed on imports), healthy employment and profitability levels with positive demand conditions going

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2021 and 54.9 million square feet in 2022, before decreasing to 45.8 million square feet in 2023 and then increasing again to 58.7 million square feet in 2024, a level higher than in 2020. Importers' inventories were higher in interim 2025, at 66.5 million square feet, compared with interim 2024, at 52.3 million square feet).

<sup>216</sup> See, e.g., CR/PR at Tables 2.8 and C.2.

<sup>217</sup> CR/PR at Table C.2 (the domestic industry's number of PRWs was 2,421 in 2020, 2,600 in 2021, 2,565 in 2022, 2,401 in 2023, and 2,230 in 2024; it was 2,147 in interim 2024 and 2,186 in interim 2025).

<sup>218</sup> CR/PR at Table C.2. Total wages and hourly wages increased overall by 16.9 percent and 22.2 percent from 2020 to 2024 and were 1.1 percent and 0.6 percent higher in interim 2025 than in interim 2024. Total wages increased from \$137.1 million in 2020 to \$159.2 million in 2021 and \$170.0 million in 2022, before declining to \$161.3 million in 2023 and \$160.2 million in 2024. Total wages were \$118.0 million in interim 2024 and \$119.3 million in interim 2025. Hourly wages increased from \$26.74 per hour in 2020 to \$27.70 per hour in 2021, \$29.29 per hour in 2022, \$30.61 per hour in 2023, and \$32.67 per hour in 2024. They were \$32.47 in interim 2024 and \$32.66 in interim 2025. CR/PR at Table C.2.

<sup>219</sup> CR/PR at Table C.2. Domestic slab producers' productivity fluctuated but decreased overall by 13.0 percent from 2020 to 2024 and was 2.1 percent lower in interim 2025 than in interim 2024. Domestic slab producers' productivity increased from 11.9 square feet per hour in 2020 to 12.0 square feet per hour in 2021 and 12.2 square feet per hour in 2022, before declining to 11.5 square feet per hour in 2023, and 10.4 square feet per hour in 2024. Productivity was 10.6 square feet per hour in interim 2024 and 10.3 square feet per hour in interim 2025. CR/PR at Table C.2. Domestic fabricators' productivity increased overall by 45.3 percent from 2020 to 2024 and was 3.3 percent higher in interim 2025 than in interim 2024. Domestic fabricators' productivity increased from 2.8 square feet per hour in 2020 to 3.0 square feet per hour in 2021, 3.4 square feet per hour in 2022, 3.6 square feet per hour in 2023, and 4.0 square feet per hour in 2024. Productivity was 3.9 square feet per hour in interim 2024 and 4.0 square feet per hour in interim 2025. CR/PR at Table C.2.

forward. There has been no change in the nature of imports that suggests competitive changes such that, having not caused serious injury during the POI, imports would suddenly cause serious injury in the imminent future.

**2. Inability of Domestic Producers to Generate Adequate Capital to Finance the Modernization of Their Domestic Plants and Equipment or Inability to Maintain Existing Levels of Expenditures for Research and Development**

As discussed in connection with my serious injury analysis, the domestic industry has made substantial investments in capital expenditures and R&D during the POI.<sup>220</sup> During the POI, domestic slab producers spent nearly \$400 million on capital expenditures and more than \$31 million on research and development.<sup>221</sup> The domestic industry continued to invest in the most recent period. Domestic producers \*\*\* their capital expenditures between interim 2024 and interim 2025, increasing capital expenditures from \$\*\*\* in interim 2024 to \$\*\*\* in interim 2025.<sup>222</sup> R&D expenses also increased between the interim periods.<sup>223</sup>

Moreover, in 2025, Cosentino, a leading global QSP producer from Spain, purchased land in Jacksonville, Florida, on which to build a new production facility, with plans to open the plant by 2030.<sup>224</sup> The initial investment in the plant is \$270 million, and Cosentino expects to hire 180 employees. Total investment in the project could increase to \$440 million in the future. As of February 2026, progress towards completing the facility was ongoing.<sup>225</sup> Cosentino confirmed at the hearing that it is finalizing engineering plans for the facility and that it will be “fully operational by 2030 at an initial cost of at least \$270 million.”<sup>226 227</sup>

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<sup>220</sup> CR/PR at J.15 and Table J.13.

<sup>221</sup> CR/PR at Table C.1.

<sup>222</sup> CR/PR at Table J.13.

<sup>223</sup> CR/PR at J.15 and Table J.13 (\$\*\*\* in interim 2024; \$\*\*\* in interim 2025).

<sup>224</sup> Cosentino identified this as a QSP plant when originally announced. CR/PR at Table 3.2. In letters to Cosentino from October and November 2025, Petitioners Cambria and Guidoni commended Cosentino for its announced \$270 million investment in “slab manufacturing.” Cosentino Prehearing Br. Exhs. 1-2. Posthearing, Cosentino referred to the plant as “a new QSP production facility.” Cosentino Posthearing Br. at 1. To the extent that Cosentino decides to make other surface products at this plant as well, this does not detract from its investment in the domestic industry.

<sup>225</sup> CR/PR at Table 3.2.

<sup>226</sup> Tr. at 199-200 (Mr. Calvo); *see also* CR/PR at Table 3.2.

<sup>227</sup> In their letters to Cosentino from October and November 2025, both Cambria and Guidoni expressed support for an exclusion from safeguard relief for imports from Spain. Cosentino Prehearing

(Continued...)

OK Stone announced plans to build a new QSP factory in Dallas, Texas, projected to open in 2026, that will use Breton manufacturing technology to produce QSP.<sup>228</sup> OK Stone did not testify, but publicly available information indicates that the firm, using the trade name Radical Surfaces, is already operational.<sup>229</sup>

As noted above, in August 2025, Cambria announced plans to build a new \$80 million quartz processing plant and rail center in Randolph, Minnesota.<sup>230</sup> Cambria plans to move some of its Canadian quartz processing operations to the United States when the plant is completed, and reported that the new plant will “optimize our cost to the tune of several million a year and improve reliability.”<sup>231</sup> Cambria’s CEO stated: “We are positioning for growth ... The building product industry has a lot of pent-up demand.”<sup>232</sup>

Another domestic QSP producer, \*\*\*, which has expanded to \*\*\*, indicated it \*\*\* in 2026.<sup>233</sup>

In the 2025 five-year review of *Quartz Surface Products from India and Turkey*, domestic producers reported that the subject orders “helped spur” a significant increase in investment and production capacity in the domestic QSP industry since 2020, including citing substantial investments since 2020 by Cambria, Dal-Tile, Guidoni, LX Hausys, and Elite, and the Cosentino and OK Stone examples referenced above.<sup>234</sup>

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Br. Exhs. 1-2. However, U.S. imports of QSP from Spain were the second largest source of imports through 2022 and third largest throughout the rest of the POI. CR/PR at Table 2.2. Imports from Spain undersold the domestic like product in 138 of 138 comparisons, by margins ranging from \*\*\* percent to \*\*\* percent. CR/PR at Table K.7. Imports from Spain are a major part of U.S. imports during the POI, and the apparent concession by two members of the Petitioner coalition, including the largest U.S. QSP producer, that they have no issue with Spanish imports during the POI or after, tends to support my findings that the heightened statutory standard for serious injury and imminent threat is unmet on this record. This parsing by petitioning firms of imports under a statute that is global in reach and covers fairly traded imports also illustrates a separate issue. Petitioners have a wide range of other tools at their disposal to seek protection from imports; the safeguard statute, as discussed above and below, is not an appropriate tool under the circumstances of this record.

<sup>228</sup> CR/PR at Table 3.2.

<sup>229</sup> See, e.g., Arizona, Elite & MSI’s Posthearing Br. at Exhs. 3-A-3-D; Indian Federation’s Posthearing Br. at Exhs. 5-6.

<sup>230</sup> CR/PR at Table 3.2.

<sup>231</sup> CR/PR at Table 3.2.

<sup>232</sup> Arizona, Elite & MSI’s Posthearing Br. Exh. 6-B.

<sup>233</sup> \*\*\* U.S. Producers’ Questionnaire at II-2a.

<sup>234</sup> Indian Federation’s Prehearing Br. Exh. 25 at 10-11 (Domestic Interested Party Response to Notice of Institution, June 2, 2025).

I recognize that some firms have reported actual and anticipated negative effects of imports on investment and growth and development;<sup>235</sup> however, in light of the evidence respecting the domestic industry's substantial investments during the POI and growth and expansion during the POI and continuing, as well as the industry's profitability throughout the POI, I find that the record does not show that the industry as a whole is unable to generate adequate capital to finance the modernization of their domestic facilities and equipment, nor is it unable to maintain existing levels of expenditures for R&D.

### **3. Extent to Which the U.S. Market is a Focal Point for Diversion of Exports**

There is no indication on this record that imports will likely be a focal point for the diversion of QSP exports in the imminent future. As an initial matter, there are no trade restraints on QSP in third-country markets.<sup>236</sup> Moreover, U.S. imports of slab, which account for the vast majority of QSP import volume, are projected to be lower in the coming years than the peak in 2024. Imports declined between interim 2024 and interim 2025,<sup>237</sup> and projections of exports to the United States from all foreign producers and resellers were 156.9 million square feet for 2025 and 169.9 million square feet for 2026, both lower than the volume of 195.5 million square feet exported in 2024, the last full year of the POI.<sup>238</sup> This shows the opposite of an unabated increase in imports.

Additionally, as a share of total shipments, exports to the United States were projected to be 59.0 percent in 2025 and 58.2 percent in 2026, also lower than the percentage in 2024 of 63.7 percent.<sup>239</sup> With a reduced focus on the United States, there is no indication that the U.S. market would be a focal point for diverted exports.

Accordingly, while the record indicates that the United States has been and will continue to be an important export market, there is no indication that additional exports will be diverted to the United States in the imminent future. I note further that, as of March 2026, all imports of QSP were subject to a 10 percent tariff under Section 122, with rates for imports from India, Turkey, and China being higher due to the existing AD/CVD orders (and for China, Section 301 duties).<sup>240</sup> There was also testimony that uncertainty of the future imposition of

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<sup>235</sup> CR/PR at Table 4.13.

<sup>236</sup> CR/PR at 1.38.

<sup>237</sup> CR/PR at Table C.8 and Table 2.1 (on a quantity and value basis, imports were lower in interim 2025 compared to interim 2024, by 0.4 percent and 3.5 percent, respectively).

<sup>238</sup> CR/PR at Table 5.19.

<sup>239</sup> CR/PR at Table 5.15.

<sup>240</sup> CR/PR at Table 1.9.

additional tariffs limits QSP imports into the United States.<sup>241</sup> Finally, even if the United States were likely to continue to be a focus for exports from some exporting countries, the level of imports would likely be consistent with levels that occurred during the POI, which did not result in serious injury to the domestic industry. I therefore do not find that any continued focus on the U.S. market threatens the domestic industry with serious injury in the imminent future.

In sum, based on the record in this investigation, I do not find that the domestic industry is threatened with serious injury from imports of QSP.<sup>242</sup>

## **V. Conclusion**

For all of these reasons, I have determined that quartz surface products are not being imported into the United States in such increased quantities as to be a substantial cause of serious injury, or threat thereof, to the domestic industry producing an article like or directly competitive with the imported article. It follows from this disposition that, in my view, import relief under the safeguard statute is not appropriate in this investigation.

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<sup>241</sup> Tr. at 354-55 (Mr. Thomas); *see also* Indian Federation Posthearing Br. at Responses to Commission Questions, pp. 16-17.

<sup>242</sup> Because I have found that the domestic industry is not seriously injured or threatened with serious injury, I do not make any findings as to whether imports would be a substantial cause of such injury or threat thereof. *See, e.g., Fresh, Chilled, or Frozen Blueberries*, Inv. No. TA-201-77, USITC Pub. 5164 (Mar. 2021) at 65 n.255.

## Views of the Commission on Remedy

### I. Findings and Recommendations

For the reasons set forth below, we recommend the following actions,<sup>1</sup> which we find will address the serious injury to the domestic industry producing quartz surface products (“QSP”) and be most effective in facilitating the efforts of the domestic industry to make a positive adjustment to import competition:

1. That the President impose a tariff-rate quota (“TRQ”) for a duration of four years on U.S. imports of QSP, including slab and fabricated QSP.
  - That the President impose an out-of-quota tariff of 40 percent *ad valorem* on U.S. imports of QSP during the first year of the four-year period of relief that would decrease by one percent for each subsequent year of relief.
  - That the President impose an in-quota tariff of 25 percent *ad valorem* on U.S. imports of QSP during the first year of the four-year period of relief that would decrease by one percent for each subsequent year of relief.
  - That the President set the in-quota volume level at 140,000,000 square feet during the first year of the four-year period of relief, 159,000,000 square feet during the second year, 164,000,000 square feet during the third year, and 169,000,000 during the fourth year.
  - That the President allocate the annual in-quota volume on a quarterly basis, with each quarter allowing for 25 percent of the in-quota annual volume, and further allow for any unused portion of a quarterly allocation to be added to the allocation in the following quarter.

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<sup>1</sup> The Commission’s remedy recommendations reflect the views of Chair Amy A. Karpel and Commissioner Jason E. Kearns. Commissioner David S. Johanson made a negative determination on serious injury and threat thereof and was not eligible to vote on the Commission’s remedy recommendations. See 19 U.S.C. § 2552(e)(6).

2. Having made negative findings with respect to imports of QSP from Canada and Mexico under section 301(a) of the United States-Mexico-Canada Implementation Act,<sup>2</sup> that the President exclude imports from Canada and Mexico from the TRQ action described above;
3. Having made negative findings with respect to imports of QSP from the countries with which the United States has free trade agreements that provide for exclusion from global safeguard measures (Australia, Colombia, Costa Rica, the Dominican Republic, El Salvador, Guatemala, Honduras, Israel, Jordan, Nicaragua, Panama, Peru, Singapore, and South Korea) and imports of QSP from the beneficiary countries under the Caribbean Basin Economic Recovery Act (“CBERA”) or the Generalized System of Preferences (“GSP”) program, that the President exclude imports from those countries from the TRQ action described above;
4. That the President consider policy proposals suggested by Petitioners or another robust mechanism to mitigate potential circumvention of the TRQ action described above.
5. In addition, Commissioner Kearns makes the following recommendations:
  - That the President “de-stack” the in-quota and out-of-quota tariffs imposed by the TRQ action described above with any other tariffs to prevent multiple additional duties on U.S. imports of QSP, in consideration of the potential impact of the TRQ action on domestic manufacturers of downstream products. This does not apply to antidumping/countervailing duty (“AD/CVD”) tariffs because they serve a different purpose of remedying unfair trade.
  - That the President submit to Congress, pursuant to his authority under section 203(a)(3)(H) of the Trade Act of 1974, a legislative proposal to distribute tariff revenue generated by the TRQ action to mitigate the potential impact of the remedy on fabricators of slab QSP.
  - That the President, pursuant to his authority under section 203(a)(3)(G) of the Trade Act of 1974, continue international negotiations to reduce overcapacity and global imbalances that drive U.S. imports of QSP and other products to levels that injure domestic producers.
  - That the President authorize the establishment of an exclusion process to allow for importation of U.S. imports of QSP without application of the TRQ action described above in the case of a demonstrated lack of production in

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<sup>2</sup> 19 U.S.C. §§ 4551(a).



the United States for a particularized QSP or in the case of a critical short supply of a particularized QSP from domestic sources.

The following table summarizes the Commissioners' TRQ recommendation:

| <b>Summary of Commissioners' Recommended TRQ on QSP</b> |        |        |        |        |
|---------------------------------------------------------|--------|--------|--------|--------|
|                                                         | Year 1 | Year 2 | Year 3 | Year 4 |
| <b>In-Quota Volume Level (millions of square feet)</b>  | 140    | 159    | 164    | 169    |
| <b>In-Quota Tariff Rate (<i>ad valorem</i>)</b>         | 25%    | 24%    | 23%    | 22%    |
| <b>Out-of-Quota Tariff Rate (<i>ad valorem</i>)</b>     | 40%    | 39%    | 38%    | 37%    |

## **II. Introduction**

Having found that increased imports of QSP<sup>3</sup> are a substantial cause of serious injury to the domestic industry, we must now recommend to the President action that will address the serious injury and be most effective in facilitating the efforts of the domestic industry to make a positive adjustment to import competition. In deciding what relief to recommend, we have taken into account the considerations set forth in section 202(e)(5)(B) of the Trade Act of 1974 (the "Trade Act"),<sup>4</sup> including the form and amount of action that will, in our view, remedy the serious injury we have found to exist; commitments submitted by firms in the domestic industry during the course of the investigation; information available to the Commission concerning the conditions of competition in domestic and world markets; and likely developments affecting such conditions during the period for which action is being requested.

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<sup>3</sup> See the scope definition, CR/PR at 1.12.

<sup>4</sup> 19 U.S.C. § 2252(e)(5)(B).

### III. Conditions of Competition

We have taken into account the conditions of competition in domestic and world markets and likely developments affecting such conditions during the next four years. We found the following conditions of competition particularly relevant to our consideration of the appropriate actions to recommend in this investigation.

#### A. Demand Conditions

We have taken into account the conditions of competition affecting demand set out in our determination of serious injury, in particular demand indicator trends, market participant responses regarding demand trends, and the 62.6 percent increase in apparent U.S. consumption from 2020 to 2024, when it reached 264.6 million square feet.<sup>5</sup> These conditions of competition and other record evidence lead us to project an exogenous 3 percent annual increase in apparent U.S. consumption during the remedy period. We view this as a conservative estimate taking into account the year-over-year apparent U.S. consumption growth trends during the POI, market participant responses regarding POI demand trends, and information regarding the possibility of increased regulation of QSP fabrication.<sup>6</sup> We have also assumed a demand elasticity of -0.5.<sup>7</sup> Although QSP does compete to some degree with granite, quartzite, and other surface products, the aesthetic and performance characteristics of QSP as compared to these other products lead us to conclude that demand for QSP is moderately inelastic and that increases in the price of QSP will only lead to limited substitution with other surface products.<sup>8</sup>

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<sup>5</sup> CR/PR at Table C.1.

<sup>6</sup> See, e.g., Letter from Georges C. Benjamin, MD, David Michaels, PhD, PH, and Robert Harrison, MD, MPH, American Public Health Association, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products – Petition for Safeguard Relief Pursuant to Sections 201 and 202 of the Trade Act of 1974* (April 7, 2026) at 7 (noting that, on May 19, 2016, the California Occupational Safety and Health Standards Board will vote on a petition to prohibit all fabrication and installation tasks on engineered stone that contain more than one percent crystalline silica, which would severely limit the fabrication of non-glass QSP in California).

<sup>7</sup> We recognize that this is outside the range of the -0.75 to -1.25 demand elasticity estimate in our report. CR/PR at 6.24. Sensitivity analysis conducted using a total demand elasticity of -1.0 (at the midpoint of the staff report range) shows that the expected outcomes of the remedy are substantially similar (i.e. only slightly lower in terms of the domestic industry's resulting capacity utilization and operating margins). See Staff Worksheet, EDIS Doc. #882423.

<sup>8</sup> See Letter from Luke A. Meisner, Schagrin Associates, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products – Petitioner's Submission of Remedy Post-Hearing Brief* (April 21, 2026) ("Petitioners' Posthearing Remedy Br.") at Ex. 1, p. 16-18.

## **B. Supply Conditions**

We have taken into account the conditions of competition affecting supply set out in our determination of serious injury, and in particular the fact that U.S. producers' installed capacity utilization decreased over the POI, and was at a level lower at the end of the POI than it was at the beginning of the POI.<sup>9</sup> The domestic industry's installed capacity increased irregularly from 2020 to 2024 and was higher in interim 2025 than interim 2024. It increased from 76.6 million square feet in 2020 to 81.8 million square feet in 2021 and 2022 and 93.7 million in 2023, before declining to 80.3 million square feet in 2024. It was 60.2 million square feet in interim 2024 and 72.4 million square feet in interim 2025.<sup>10</sup> The domestic industry's production, however, declined over the POI, by 17.2 percent between 2020 and 2024 and by 0.7 percent over the interim periods. The decline in the domestic industry's production coupled with the increase in installed capacity prompted in anticipation of growth in domestic industry sales following successive antidumping and countervailing duty investigations, led to a decline in the domestic industry's installed capacity utilization. The industry's installed capacity utilization decreased irregularly by 10.7 percentage points from 2020 to 2024, and was 7.4 percentage points lower in interim 2025 than in interim 2024. It increased from 51.5 percent in 2020 to 53.2 percent in 2021 and 54.5 percent in 2022, before decreasing to 42.3 percent in 2023 and 40.8 percent in 2024. It was 41.3 percent in interim 2024 and 33.9 percent in interim 2025.<sup>11</sup> We focus on installed capacity in the context of this investigation rather than practical capacity in view of the significant idling of productive facilities and underemployment in the domestic industry, even despite the significant growth in demand over the POI and the anticipated but unrealized growth in domestic industry sales and market share following the earlier trade actions.

## **C. Substitutability and Other Conditions**

As discussed in section IV.C.3 of our views on injury, we have found that there is a high degree of substitutability between domestically produced QSP and imports of QSP, although substitutability would be lower for certain styles that are only available from foreign sources.<sup>12</sup> We have also found that price is an important factor in purchasing decisions for QSP although

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<sup>9</sup> See CR/PR at Tables 3.4.

<sup>10</sup> CR/PR at Tables 3.4.

<sup>11</sup> CR/PR at Table 3.4.

<sup>12</sup> CR/PR at 6.14.

non-price factors are also important. These findings lead us to conclude that a substitution elasticity is 5, at the high end of the range estimated in our staff report.<sup>13</sup>

#### **IV. Commitments Submitted By Firms in the Domestic Industry**

Petitioners filed a document that they characterized as an “adjustment plan” with the Commission on April 7, 2026.<sup>14</sup> Section 202(a)(4) of the Trade Act provides that a petitioner may submit a “plan to facilitate positive adjustment to import competition” to the Commission and to the U.S. Trade Representative (“USTR”) with the petition, or at any time within 120 days of the filing of the petition, which in this case was March 17, 2026. Petitioners argue that their adjustment plan was timely submitted pursuant Section 202(a)(6)(B)(i), which permits any firm in the domestic industry to submit to the Commission at any time after the serious injury determination, “commitments regarding actions such persons and entities intend to take to facilitate positive adjustment to import competition.”<sup>15</sup> We accordingly treat Petitioners’ submission as a timely-filed collection of individual domestic firm “commitments” for purposes of section 202(a)(6)(B)(i).

Pursuant to section 202(e)(5)(B) of the Trade Act, in making our remedy recommendations, we have carefully examined and taken these commitments into account. We have also carefully examined the responses of individual U.S. producers to the Commission’s questionnaire in which those firms addressed their efforts to compete and the specific adjustment actions that they intended to take during any period of relief that would permit them to compete more effectively with imports. U.S. producers Cambria, Dal-Tile, Estone, Guidoni, Hendrix, and LX Hausys provided such questionnaire responses.<sup>16</sup>

In their commitments, Petitioners state that the domestic industry is willing and able to invest in production capacity and innovation when warranted by market conditions. They contend that the domestic industry invested in new production facilities, the expansion of

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<sup>13</sup> The Staff Report indicates that, based on available information, the elasticity of substitution between U.S.-produced QSP and imported QSP is likely to be in the range of 3 to 5. CR/PR at 6.24. Staff has corroborated a level of substitutability of 5 using 2025 U.S. import data for QSP and the “trade cost” method of estimation that Commission staff often use in fact finding and technical assistance modeling.

<sup>14</sup> See Letter from Luke A. Meisner, Schagrin Associates, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products – Petitioner’s Submission of Adjustment Plan* (April 7, 2026)(“Petitioners’ Commitments”). See also Petitioners’ Posthearing Remedy Br. at Exs. 4-8.

<sup>15</sup> Petitioners’ Commitments at 5.

<sup>16</sup> See CR/PR at Tables E.1 & E.3. U.S. producer Caesarstone only addressed its efforts to compete during the POI. *Id.*

facilities, and new designs in the wake of the AD/CVD orders on *Quartz Surface Products from China, India, and Turkey*, but that these investments did not live up to their full potential when global imports surged into the U.S. market. They argue that safeguard relief will enable the domestic industry to activate its unused installed capacity and make new investments, and that higher production levels will lead to higher employment, leading to a meaningful and sustained adjustment to import competition.<sup>17</sup>

*Cambria*. According to Petitioners, if an appropriate safeguard remedy is imposed, Cambria plans to\*\*\*.<sup>18</sup>

*Dal-Tile*. Petitioners maintain that, if granted safeguard relief, Dal-Tile would\*\*\*. They also state that Dal-Tile would evaluate expanding its production mix to produce domestically more designs and potentially larger quantities in the low-end market,\*\*\*, and reconsider projects related to expanding distribution and sales infrastructure. Finally, Dal-Tile commits to\*\*\*.<sup>19</sup>

*Guidoni*. Petitioners maintain that, if granted safeguard relief, Guidoni would expand production on existing lines to a multi-shift operating model,\*\*\*, recruit and train additional workers, invest in color development, product differentiation, and marketing, increase procurement of raw materials while reducing costs through scale efficiencies, make additional investments in new equipment technology, and expand into additional regions.<sup>20</sup>

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<sup>17</sup> Petitioners' Commitments at 5-6.

<sup>18</sup> Petitioners' Commitments at 6-7; Petitioners' Posthearing Remedy Br. at Ex. 4.

<sup>19</sup> Petitioners' Commitments at 7-8; Petitioners' Posthearing Remedy Br. at Ex. 5.

<sup>20</sup> Petitioners' Commitments at 8-9; Petitioners' Posthearing Remedy Br. at Ex. 6.

*Hendrix*. Petitioners maintain that, if granted safeguard relief, Hendrix would increase production by running shifts consistently and adding shifts to existing capacity, negotiate better pricing and terms with raw material suppliers, and install an additional production line.<sup>21</sup>

*LX Hausys*. Petitioners maintain that, if granted safeguard relief, LX Hausys would\*\*\*, open new warehouses and expand sales personnel from\*\*\* to\*\*\* employees by 2028, potentially invest\*\*\* to develop\*\*\*, as well as invest in marketing, including\*\*\*.<sup>22</sup>

## **V. Recommended Relief**

### **A. Parties' Arguments**

Petitioners urge the Commission to recommend a tariff of 50 percent on all imports of QSP and an annual quantitative restriction ("QR") on such imports of 155 million square feet.<sup>23</sup> They argue that a 50 percent tariff is needed to ensure that imports are priced at levels that do not significantly undersell the domestic industry.<sup>24</sup> They contend that a QR is also needed because the maximum margin of underselling\*\*\* later in the POI, such that exporters would likely absorb a tariff of 50 percent, rendering it inadequate to remedy serious injury. They also argue that imports remained highly elevated in interim 2025 and U.S. shipments declined despite the application of significant tariffs under IEEPA authority throughout 2025.<sup>25</sup> According to their economic modeling, a 50 percent tariff would increase domestic production, capacity utilization, employment, and profitability, enabling the domestic industry to execute its adjustment commitments.<sup>26</sup>

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<sup>21</sup> Petitioners' Commitments at 9-10 Petitioners' Posthearing Remedy Br. at Ex. 7.

<sup>22</sup> Petitioners' Commitments at 10; Petitioners' Posthearing Remedy Br. at Ex. 8.

<sup>23</sup> See Letter from Luke A. Meisner, Schagrin Associates, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products – Petitioner's Submission of Remedy Pre-Hearing Brief* (April 7, 2026) ("Petitioners' Prehearing Remedy Br.") at 1, 6; Petitioners' Posthearing Remedy Br. at 1, 3, 4.

<sup>24</sup> See Petitioners' Prehearing Remedy Br. at 7-8.

<sup>25</sup> See Petitioners' Prehearing Remedy Br. at 8-9.

<sup>26</sup> See Petitioners' Prehearing Remedy Br. at 2-3, 22-23; Petitioners' Posthearing Remedy Br. at 7. Petitioners and respondents Elite, Arizona, MSI, and Caesarstone used a COMPAS model for their economic modeling of proposed remedy recommendations. The Commission has ceased using the COMPAS model, and used an alternative model in modeling its own remedy recommendations. Therefore, while the Commission considered parties' arguments regarding the assumptions underlying the inputs into their modeling exercise, it did not consider the outputs pertinent to its analysis. Hence,

(Continued...)

By contrast, some respondents urge the Commission to recommend trade adjustment assistance and increased enforcement measures against duty evasion for existing AD/CVD orders but not impose a quota or tariff remedy.<sup>27</sup> Some respondents urge the Commission to recommend a TRQ, with a zero tariff for in-quota imports, a low tariff on above-quota imports, and an in-quota volume based on import volumes over the most recent three-year period.<sup>28</sup> Other respondents urge the Commission to recommend allocation of in-quota TRQ volumes on a country-specific, or country-group, basis.<sup>29</sup> Some respondents also urge the Commission to

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the Commission found that it was not appropriate to grant Elite, Arizona, MSI, and Caesarstone's April 28, 2026, request for leave to file, after the date for the final submissions envisaged in the Commission's schedule for this proceeding, a rebuttal of certain aspects of Petitioners' economic modeling using the COMPAS model. See Letter from Jonathan T. Stoel, Hogan Lovells US LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products Global Safeguard Investigation: Request for Leave to File Out of Time to Correct the Commission Record on Petitioner's COMPAS Model* (April 28, 2026) (EDIS Doc. # 881088).; Letter from Lisa R. Barton, Secretary, to Jonathan T. Stoel, Hogan Lovells US LLP, *Re: Request to File an Additional Submission; Quartz Surface Products; Inv. No. TA-201-79 (Remedy)* (May 6, 2026) (EDIS Doc. # 881472).

<sup>27</sup> See Letter from Jonathan T. Stoel, Hogan Lovells US LLP, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products Global Safeguard Investigation: Remedy Phase Prehearing Brief of Elite Quartz Manufacturing, Arizona Tile LLC, and M S International, Inc.* (April 7, 2026) ("Elite, Arizona, and MSI's Prehearing Remedy Br.") at 4, 15-17; Letter from Jonathan T. Stoel, Hogan Lovells US LLP, to The Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products Global Safeguard Investigation: Remedy Phase Posthearing Brief of Elite Quartz Manufacturing, Arizona Tile LLC, M S International, Inc., and Caesarstone USA, Inc.* (April 21, 2026) ("Elite, Arizona, MSI, and Caesarstone's Posthearing Remedy Br.") at 7; Letter from Eric C. Emerson, Steptoe & Johnson LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products; Inv. No. TA-201-79 (Remedy): Alliance of Vietnamese Quartz Surface Products Manufacturers Prehearing Brief* (April 7, 2026) ("Vietnamese Manufacturers' Prehearing Remedy Br.") at 8-10; Letter from Eric C. Emerson, Steptoe & Johnson LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products; Inv. No. TA-201-79 (Remedy): Alliance of Vietnamese Quartz Surface Products Manufacturers Posthearing Brief* (April 21, 2026) ("Vietnamese Manufacturers' Posthearing Remedy Br.") at 2-4.

<sup>28</sup> See Elite, Arizona, and MSI's Prehearing Remedy Br. at 3-4, 11-14; Elite, Arizona, MSI, and Caesarstone's Posthearing Remedy Br. at 4; Vietnamese Manufacturers' Prehearing Remedy Br. at 8-10; Vietnamese Manufacturers' Posthearing Remedy Br. at 2-4; Letter from Matthew J. McConkey, Mayer Brown LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products: Prehearing Remedy Brief of Royal House Manufacture and Investment Joint Stock Company* (April 7, 2026) ("Royal House Prehearing Remedy Br.") at 2-3; Letter from Matthew J. McConkey, Mayer Brown LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products: Post-Hearing Brief of Royal House Manufacture and Investment Joint Stock Company* (April 21, 2026) ("Royal House Posthearing Remedy Br.") at 4.

<sup>29</sup> See Letter from Lizbeth R. Levinson, Fox Rothschild LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products, Inv. TA-201-79 (Remedy): Submission of the Pre-Hearing Brief* (April 7, 2026) ("Casablanca's Prehearing Remedy Br.") at 1; Letter from Michael E. Murphy, Sidley Austin LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products: Prehearing Brief of* (Continued...)

recommend not “stacking” tariffs.<sup>30</sup> Certain respondents also request that imports of in-scope low-silica products, such as crushed glass QSP, be excluded from the remedy.<sup>31</sup> Finally, certain

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*C&C North America, Inc., Cosentino Industrial S.A.U., and Stone Suppliers, Inc.* (April 7, 2026) (“C&C North America, Cosentino, and Stone Suppliers’ Prehearing Remedy Br.”) at 2, 5-12; Letter from Michael E. Murphy, Sidley Austin LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products: {Post}hearing Brief of C&C North America, Inc., Cosentino Industrial S.A.U., and Stone Suppliers, Inc.* (April 21, 2026) (“C&C North America, Cosentino, and Stone Suppliers’ Posthearing Remedy Br.”) at 8-9; Letter from Brittany R. Powell, Fox Rothschild, LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products, Inv. No. TA-201-79: Submission of the Pre-Hearing Brief* (April 7, 2026) (“Wilsonart and Technistone’s Prehearing Remedy Br.”) at 3-5; Letter from Brittany R. Powell, Fox Rothschild, LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products, Inv. No. TA-201-79: Submission of the Post-Conference Brief* (April 21, 2026) (“Wilsonart and Technistone’s Posthearing Remedy Br.”) at 3-4.

<sup>30</sup> See Casablanca’s Prehearing Remedy Br. at 1; Royal House Prehearing Remedy Br. at 3-4; Royal House Posthearing Remedy Br. 4-6; Letter from R. Will Planert, Taft Stettinius & Hollister LLP, to Lisa R. Barton, Secretary, *Re Quartz Surface Products, Inv. 201-79 (Remedy): Posthearing Brief of the Federation of the Indian Quartz Surface Industry* (April 21, 2026) (“Indian Federation’s Posthearing Br.”) at 6-8.

<sup>31</sup> See Elite, Arizona, and MSI’s Prehearing Remedy Br. at 4; Elite, Arizona, MSI, and Caesarstone’s Posthearing Remedy Br. at 7; Letter from Jessica R. DiPietro, ArentFox Schiff LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products; Inv. No. TA-201-79 (Remedy): EOS Surfaces, LLC’s Prehearing Remedy Brief* (April 7, 2026) (“EOS’ Prehearing Remedy Br.”) at 3-4; Letter from Jessica R. DiPietro, ArentFox Schiff LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products; Inv. No. TA-201-79 (Remedy): EOS Surfaces, LLC’s Posthearing Remedy Brief* (April 21, 2026) (“EOS’ Posthearing Remedy Br.”) at 2.



respondent parties and interested nonparties,<sup>32</sup> as well as certain foreign governments,<sup>33</sup> request that the Commission exclude imports from their respective countries from its remedy recommendations.

## **B. Nature and Duration of Remedies**

The statute authorizes the Commission to recommend several forms of action, including tariffs, tariff-rate quotas, quantitative restrictions, and appropriate adjustment measures, as well as a combination of those remedies. In determining which of these forms would address

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<sup>32</sup> Letter from R. Will Planert, Taft Stettinius & Hollister LLP, to Lisa R. Barton, Secretary, *Re Quartz Surface Products, Inv. 201-79 (Remedy): Prehearing Brief of the Federation of the Indian Quartz Surface Industry* (April 7, 2026) (“Indian Federation’s Prehearing Remedy Br.”) at 1-5; Indian Federation’s Posthearing Remedy Br. at 2-4; Letter from Robert L. LaFrankie, Crowell & Moring, LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Global Safeguard Investigation of Quartz Surface Products: Prehearing Brief on behalf of Respondents from Oman and United Arab Emirates (Remedy)* (April 7, 2026) (“Global and Madhav’s Prehearing Remedy Br.”) at 2-6; Letter from Robert L. LaFrankie, Crowell & Moring, LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Global Safeguard Investigation of Quartz Surface Products: Post-hearing Brief on behalf of Respondents from Oman and United Arab Emirates (Remedy)* (April 21, 2026) (“Global and Madhav’s Posthearing Remedy Br.”) at 3-12; Letter from J. Scott Maberry, Sheppard, Mullin, Richter & Hampton LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products; Inv. No. TA-201-79 (Remedy): Lotte Chemical California, Inc. Prehearing Brief on Remedy* (April 7, 2026) (“LCCA’s Prehearing Remedy Br.”) at 3; Wilsonart and Technistone’s Prehearing Remedy Br. at 2-3; Wilsonart and Technistone’s Posthearing Remedy Br. at 1-2; Letter from Geoffrey M. Goodale, Duane Morris LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products: Post-Hearing Comments of Hyundai L&C Canada, Inc.* (April 21, 2026) (“Hyundai Canada’s Posthearing Remedy Br.”) at 1; Letter from Diana Dimitriuc Quaia, ArentFox Schiff LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products; Inv. No. TA-201-79 (Remedy); MXM Post-Hearing Remedy Brief* (April 21, 2026) (“MXM’s Posthearing Remedy Br.”) at 2; Letter from Andrew T. Schutz, Grunfeld, Desiderio, Lebowitz, Silverman & Klestadt LLP, to the Honorable Lisa R. Barton, Secretary, *Re: Opalus Post-Hearing Written Statement, Quartz Surface Products; Inv. No. TA-201-79 Remedy* (April 21, 2026) (“Opalus Posthearing Remedy Br.”) at 1-2.

<sup>33</sup> Letter from Mayank Singhal, Dua Associates, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products: Government of India’s Pre-Hearing Brief on Remedy* (April 7, 2026); Letter from Mayank Singhal, Dua Associates, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products: Government of India’s Post Hearing Brief on Remedy* (April 21, 2026); Letter from Dongwon Jung, Yoon & Yang LLC, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products, Inv. TA-201-79: Pre-Hearing Brief on Remedy* (April 7, 2026); Letter from Dongwon Jung, Yoon & Yang LLC, to the Honorable Lisa R. Barton, Secretary, *Re: Quartz Surface Products, Inv. TA-201-79: Post-Hearing Brief* (April 21, 2026); Letter from María Pilar de Carlos, Embassy of Spain, to the Honorable Lisa R. Barton, Secretary, *Re: Global Safeguard Investigation of Quartz Surface Products (Inv. Nos. 201-79): Prehearing Brief on Remedy of the Government of Spain* (April 7, 2026); <sup>33</sup> Letter from Wang Jianfeng, Ministry of Commerce of the People’s Republic of China, to the Honorable Lisa R. Barton, Secretary, *Re: Global Safeguard Investigation of Quartz Surface Products, No. TA-201-79: the Government of People’s Republic of China’s Post-hearing Brief on Remedy* (April 21, 2026).

the serious injury and would be most effective in facilitating a positive adjustment to import competition, we have considered the impact of each on the domestic industry, and in particular the extent to which it would remedy the serious injury we have found and facilitate the domestic industry's positive adjustment to import competition. We have determined that a TRQ on U.S. imports of QSP, including slabs and fabricated QSP, with both in-quota and above-quota tariff rates is necessary to address the serious injury that the Commission has found, as discussed above. The scope of our TRQ remedy covers both slab and fabricated QSP. Although we have excluded independent QSP fabricators from the definition of the domestic industry for purposes of our serious injury analysis, we include fabricated QSP in our remedy because excluding fabricated QSP would create a high risk that importers would seek to circumvent the remedy by fabricating QSP slabs prior to entry. In addition, as further discussed below, several fabricators testified to the threat posed by an increasing volume of lower-priced fabricated imports.

## **1. Duration**

Given the severity and nature of the serious injury to the domestic industry that we have found, and that it will take time for the capital-intensive domestic industry to expand capacity, we recommend the imposition of safeguard measures for four years to afford the industry sufficient time to make a positive adjustment to import competition. We recognize that relief of more than three years in duration will require the Commission to conduct a mid-course review under 19 U.S.C. § 2254(a)(2). Such an investigation would provide the Commission with an opportunity to review formally, among other matters, the progress of firms in the domestic industry in implementing the commitments they submitted to the Commission. It would also provide the President, after receiving the Commission's report, with the opportunity to reduce or terminate relief if the industry has not made adequate efforts to make a positive adjustment to import competition.

## **2. Tariff-Rate Quota**

We recommend that the President impose a TRQ on U.S. imports of in-scope QSP, including slabs and fabricated QSP, with an in-quota volume level to be set at 140 million square feet during the first year of the four-year period of relief, 159 million square feet during the second year, 164 million square feet during the third year, and 169 million during the fourth year. In considering the in-quota volume, we endeavored to find a level that together with the recommended in- and out-of-quota rates would reduce imports relative to projected levels in the absence of a remedy and allow the domestic industry to achieve an acceptable level of

capacity utilization and a reasonable level of profit. To calculate the in-quota volume, we considered two approaches as described below.

The first approach began with an import level equal to the average of pre-POI imports from 2018 and 2019, before the COVID-19 pandemic in 2020 and import surges during the POI. It then subtracted the average volume of U.S. imports from excluded countries during the full years of the POI and adjusted the resulting volume to account for the increase in consumption during the POI between 2021 to 2024. The calculations derive a base quota level of 145.2 million square feet. The second approach began with interim 2025 apparent U.S. consumption, increased by 33.3 percent to estimate annual consumption, and then subtracted 85 percent of the domestic industry's annualized interim 2025 installed production capacity, and the average of U.S. imports from excluded countries during the full years of the POI and annualized interim 2025, deriving a base quota level of 163.5 million square feet. We used an average of these figures to produce a base quota level of 154.3 million square feet.<sup>34</sup> Thus, the base quota level takes into account the pre-surge level of imports, the growth in consumption, and a level of capacity utilization that is necessary to restore the health of the domestic industry and enable it to adjust and compete against imports in the future.

We also considered that U.S. importers' inventories of imported QSP were markedly higher, by 27.2 percent, in interim 2025 as compared to interim 2024, reaching a POI-high level of 66.5 million square feet by the end of the interim 2025 period.<sup>35</sup> We considered that shipments from this build up in inventories would lessen the remedial effect of the recommended TRQ, at least in the first year of the relief period. We have, therefore, deducted the estimated volume of additional inventories held by U.S. importers of QSP from covered countries from the quota level for the first year of the relief period to arrive at a first year quota level of 140 million square feet. To estimate the additional volume of imports held in importers' inventories due to this build up and thus the additional volume available to be sold in the U.S. market at the beginning of the relief period, we calculated the difference between the inventory-to-U.S.-shipments ratio in interim 2025 and the average of that ratio over 2020 to 2024, and multiplied the result by total interim 2025 shipments of covered imports.<sup>36</sup> We note

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<sup>34</sup> The quota level in each year increases three percentage points in line with a conservative estimate of the growth in apparent consumption, described below in the discussion of model results. The second-year quota level of 159 million square feet reflects that increase over the base quota level of 154.3 million square feet.

<sup>35</sup> *Derived from CR/PR at Table 2.8.*

<sup>36</sup> *See CR/PR at Tables 2.8 & 3.7, with adjustments made to remove excluded, or non-covered, imports.*

that his amount does not further adjust for imports that are available to be sold in the U.S. market or have been stockpiled since the end of the Commission's data collection period.

We further recommend that the annual in-quota volume be allocated on a quarterly basis, with 25 percent of the in-quota annual volume allocated to each quarter of the year. We view such allocation as necessary to ensure that the in-quota volume of covered imports is spread over the course of an entire year, thus ensuring that covered imports do not surge at the opening of each annual TRQ, which we believe would focus the effects of imports at the beginning of each TRQ period in ways that would cause additional injury to the domestic industry. We also recommend that any unused portion of a quarterly allocation be added to the allocation in the following quarter, so as best ensure that the annual in-quota volume is fully utilized.

We find that a tariff on all imports, both in-quota and out-of-quota, is appropriate to sufficiently address the serious injury to the domestic industry producing QSP. As discussed in our views on injury, we found that the aggressively low prices of imports caused them to enter the U.S. market in increasing and significant volumes, leading to a significant shift in market share from the domestic industry to imports from 2020 to 2024 and an additional market share shift in interim 2025. These significant losses occurred even though apparent U.S. consumption increased significantly from 2020 to 2024. The losses in sales volume and market share led directly to large overall POI declines in the domestic industry's production, capacity utilization, employees, hours worked, productivity, and operating and net income margins. In light of this serious injury, and the importance of price to purchasers in this market, we find that an additional 25 percent *ad valorem* tariff on the in-quota volume of imports is appropriate as it will likely increase the price of imports, reduce underselling, and temper the volume of imports, which will allow the domestic industry to increase its sales, production, and prices thereby allowing it to maintain a healthier level of capacity utilization and profitability that, in turn, allows the domestic industry to execute on its adjustment commitments. We also note that this level of in-quota tariff will likely lead to additional tariff revenue.

We recognize that apparent domestic consumption may increase by more than we have estimated, or that domestic producers may not be able to increase production as much as anticipated and, were a quota imposed as requested by Petitioners, that could leave the market without adequate supply of QSP. To ensure that the remedy provides flexibility for purchasers of QSP to address such possibilities without undermining the remedial effect of the measure, we recommend a TRQ instead of a quota and that the President impose an out-of-quota tariff of 40 percent *ad valorem* on imports of QSP in the first year of relief. We consider this tariff

level appropriate given the average margin of underselling during the POI,<sup>37</sup> and consideration of importers' ability to absorb a lower tariff.

We also recognize that section 203(e)(5) of the Trade Act requires that a TRQ be "phased down at regular intervals" if it is in effect for more than one year. Although the statute does not dictate the level at which a TRQ must be phased down at each interval, the Commission has previously considered the severity and nature of the injury to the domestic industry in setting the phased reductions.<sup>38</sup> Given the severity and nature of the serious injury to the domestic industry that we have found, and that it will take time for the capital-intensive domestic industry to increase its production and spread its investment costs over production to realize the benefits of its investments, we recommend that the out-of-quota tariff be reduced by one percent during each subsequent year of the remedy period, or to 39 percent in the second year of the remedy period, 38 percent in the third year of the remedy period, and 37 percent in the fourth year of the remedy period. Likewise, we recommend that the in-quota tariff be reduced by one percent during each subsequent year of the remedy period, or to 24 percent in the second year of the remedy period, 23 percent in the third year, and 22 percent in the fourth year.<sup>39</sup>

Section 203(e)(2) of the Trade Act provides that the President may impose a TRQ "only to the extent the cumulative impact of such action does not exceed the amount necessary to prevent or remedy the serious injury." As described above, the TRQ remedy that we have recommended is designed to address the various aspects of serious injury that we have found from imports of QSP and does not exceed the amount necessary to prevent or remedy the serious injury.

We find additional support for our recommendation in economic modeling, which indicates that our recommended TRQ would address the serious injury suffered by the domestic industry without exceeding the cumulative impact necessary to prevent or remedy serious injury. We used an industry-specific partial equilibrium model to estimate changes in

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<sup>37</sup> See CR/PR at Table 6.30 (The average margin of underselling was\*\*\* percent for the full POI). The average margin of underselling increased over the POI, and exceeded\*\*\* percent in 2023, 2024 and interim 2025. *Id.* The maximum margin of underselling exceeded\*\*\* percent in 2022 and exceeded\*\*\* percent in 2023, 2024 and interim 2025. *Id.*

<sup>38</sup> See, e.g., 19 U.S.C. § 2252(e)(5)(B)(i); see, e.g., *Wheat Gluten*, USITC Pub. 3088 at I-30-31.

<sup>39</sup> Commissioner Kearns further recommends that the in-quota and out-of-quota tariffs not be "stacked" with any other tariffs to prevent multiple additional duties on U.S. imports of QSP, in consideration of the potential impact of the TRQ action on domestic manufacturers of downstream products. This does not apply to AD/CVD tariffs since they serve a different purpose of remedying unfair trade.

prices and quantities of imports and domestic industry shipments in the U.S. market for QSP and changes in the revenues and operating income of U.S. producers that would result from the recommended TRQ. The model assumes a conservative three percent annual growth rate in apparent consumption over the remedy period.<sup>40</sup>

The economic model estimates that the net volume of covered imports would decline significantly during the remedy period, negating the import volume increases over the POI, and a corresponding increase in the domestic industry's U.S. shipments.<sup>41</sup> The model estimates that this shift would occasion an increase in the domestic industry's capacity utilization rate from current depressed levels of 63.1 percent of practical capacity and 33.9 percent of installed capacity in interim 2025, to reach levels more in line with the beginning of the POI, before imports surged into the U.S. market at increasing levels.<sup>42</sup> The model also estimates an increase in overall market prices for both domestically produced and imported QSP during the

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<sup>40</sup> As noted in section IV.C.1, apparent consumption increased over the 2020-24 period. In addition, parties agreed that demand for QSP is likely to grow in the coming years. For example, respondents cite to a third-party forecast that the global quartz countertop market is expected to grow from \$9.5 billion to \$15.7 billion from 2025 to 2032, reflecting compound annual growth of 7.3 percent. They offer two reasons for this growth: continued increasing popularity of QSP and pent-up demand in the housing sector. See *Elite, Arizona, MSI, and Caesarstone's Posthearing Remedy Br.* Appendix, at 34-36. Similarly, Petitioners anticipate future growth in the market. See, e.g., *Remedy Tr.* at 162 (Mr. Meisner) ("Yes, we do anticipate growing demand in the market.").

<sup>41</sup> See *Remedy Modeling Attachment Table 1*.

<sup>42</sup> The model estimates the recommended remedy would increase the domestic industry's installed capacity utilization to 49.7 percent in Year 1 of the relief period and to over 50 percent in Years 2 through 4 of the relief period. See *CR/PR* at Tables 3.4, C.1, & *Remedy Modeling Attachment Table 1*. Above we note that one consideration in setting the quota level was to reserve for the domestic industry a portion of the market equivalent to what they considered a healthy capacity utilization of 85 percent. See *Remedy hearing transcript* at 148-149. The model predicts an increase in domestic shipments that, while sizable in percentage terms, is not sufficient in terms of square feet to reach 85 percent capacity utilization. See *Remedy Modeling Attachment Table 1*. We judged it unnecessary to strengthen the remedy to the point that the model shows 85 percent capacity utilization under the remedy. First, the increase in domestic shipments and capacity utilization under the remedy is limited by the reasonable assumption that domestic producers will continue to price their product at or above marginal cost as they did at the end of the POI, rather than price below that point to reach a higher level of capacity utilization. At the same time, the assumption of constant marginal costs, while standard in trade models, does not account for efficiency gains or decreasing raw materials costs that may occur as production expands. In this context, we note that even as they observed the importance of reaching 85 percent capacity utilization, the modeling provided by the Petitioner on their more stringent proposed remedy resulted in a 54.5 percent capacity utilization rate. *Petitioners' Posthearing Remedy Br.* at 7 and *Exh. 1* at p. 3. Finally, if demand is not as sensitive to prices as predicted or increases due to other economic factors beyond our conservative estimate of three percent annual growth, the domestic industry may be able to increase capacity utilization beyond what the model shows.

remedy period.<sup>43</sup> The estimated increase in the overall market price results from the tariff applied to in-quota imports. Given that we have found that aggressively low-priced import prices resulted in decreased sales volume and market share losses for the domestic industry, leading to decreased sales revenue and profitability, we find that an in-quota tariff is necessary to reverse these downward trends, which will facilitate the industry's adjustment to import competition. The in-quota rate should also allow domestic QSP to be more price competitive with imports. The out-of-quota rate could serve to temper import volume and therefore increase prices if import demand reaches the quota level.

While Petitioners argue that a 50 percent tariff rate is needed given underselling margins that range as high or higher than 50 percent, average underselling margins for the pricing products ranged from\*\*\* percent, with the average margin of underselling at\*\*\*.<sup>44</sup>

The model estimates that the recommended TRQ would result in increased capacity utilization, sales, and prices for the domestic industry, and would significantly increase its revenues and operating income during the remedy period, as compared to if the remedy were not imposed.<sup>45</sup> The projected operating income margin (\*\*\* percent in Year 1 of the relief period, increasing to\*\*\* percent in Years 2 and 3, and to\*\*\* percent in Year 4) is generally consistent with the levels indicated in financial benchmarking studies submitted by Petitioners,<sup>46</sup> as well as the domestic industry's operating income margin\*\*\*.<sup>47</sup>

Given these considerations, we find that our recommended TRQ action would address the serious injury suffered by the domestic industry without exceeding the amount of relief

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<sup>43</sup> See Remedy Modeling Attachment Table 1.

<sup>44</sup> CR/PR at Table 6.29.

<sup>45</sup> See Remedy Modeling Attachment Table 1.

<sup>46</sup> As noted in section IV.D.3. of our views on serious injury, Petitioners submitted information as to what a reasonable level of profit should be in this industry on an operating income level, asserting that\*\*\*. Petitioners' Posthearing Remedy Br. at Exh. 1.

<sup>47</sup> See Remedy Modeling Attachment Table 1; Confidential Version of Staff Report, *Quartz Surface Products from China*, Inv. Nos. 701-TA-606 and 731-TA-1416, INV-RR-048 (May 31, 2019), EDIS Doc. #873811 at Table C-1.

needed to prevent or remedy the serious injury and facilitate efforts by the domestic industry to make a positive adjustment to import competition.

### **C. Country Exclusions**

Having made negative findings with respect to imports of QSP from Canada and Mexico under section 301(a) of the United States-Mexico-Canada Implementation Act<sup>48</sup> for the reasons set out in the Commission's views on injury, we recommend that the President not include imports from Canada and Mexico in any recommended TRQ. Further, we recommend that the President not impose the recommended TRQ on imports from the following countries with which the United States has free trade agreements that provide for exclusion from global safeguard measures in certain circumstances: Australia, Colombia, Costa Rica, the Dominican Republic, El Salvador, Guatemala, Honduras, Israel, Jordan, Nicaragua, Panama, Peru, Singapore, and South Korea. We also recommend that the President not impose the TRQ on imports from the beneficiary countries under the CBERA or the GSP Program.<sup>49</sup>

### **D. Requests for Product Exclusions**

During the remedy phase of this investigation, the Commission was presented with a request to exclude from the remedy low-silica products, such as crushed glass QSP, covered by our affirmative determination in the injury phase of the proceedings. The parties making these requests generally contended that the products for which they were requesting exclusions were niche or specialty products either not produced by the domestic industry or produced in insufficient quantities to satisfy U.S. demand.<sup>50</sup> Petitioners argue that low-silica products covered by this exclusion request compete directly with products produced by the domestic industry, and that to exclude them would undermine any safeguard remedy.<sup>51</sup>

We decline to recommend the exclusion of such products from our TRQ remedy. While respondents argue that demand for crushed glass QSP cannot be met by domestically produced

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<sup>48</sup> 19 U.S.C. §§ 4551(a).

<sup>49</sup> As indicated above, certain respondent parties and foreign governments request that the Commission exclude imports from their respective countries from its remedy recommendations. As identified in our injury views, U.S. law provides for exclusion of certain countries under certain conditions. To the extent that U.S. law does not provide for exclusion of those countries, we decline to exclude them from our remedy recommendation.

<sup>50</sup> See Elite, Arizona, and MSI's Prehearing Remedy Br. at 4; Elite, Arizona, MSI, and Caesarstone's Posthearing Remedy Br. at 7; EOS' Prehearing Remedy Br. at 3-4; EOS' Posthearing Remedy Br. at 2.

<sup>51</sup> See Petitioners Posthearing Remedy Br. at 12-13, Ex. 1, p. 21-26.



QSP, the domestic industry currently produces, or has the ability to produce, a product similar to or competitive with the imported QSP made from crushed glass for which an exclusion has been requested.<sup>52</sup> Moreover, excluding this product from the scope of the remedy would disincentivize domestic investment in increasing the production of such products. Furthermore, we have taken note of Petitioners' argument that the scope exclusion for crushed glass products for the AD/CVD orders on QSP from China has led to circumvention of the orders, which has continued despite Commerce modifying the scope of the orders to address the potential for evasion.<sup>53</sup> Thus, in our view, excluding crushed glass QSP would create a loophole that would undermine the remedial effect of the recommended TRQ.

Nevertheless, in light of his concerns regarding the supply of raw materials to domestically produce crushed glass QSP and possibility of a spike in demand for low-silica products, Commissioner Kearns recommends that the President authorize the establishment of an exclusion process in the case of a demonstrated lack of production in the United States for a particularized types of QSP or in the case of a critical short supply of a particularized type of QSP from domestic sources.

## **E. Additional Remedy Recommendations**

### **1. Additional Remedy Recommendation of the Commission**

Chair Karpel and Commissioner Kearns both recommend that the President consider policy proposals suggested by Petitioners to mitigate potential circumvention of the TRQ action described above. In Commissioner Kearns' view, such a mechanism could build off the strengthened anti-circumvention enforcement of the AD/CVD orders on QSP from China, India, and Turkey.

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<sup>52</sup> See Petitioners Posthearing Remedy Br. at 12-13, Ex. 1, p. 23.

<sup>53</sup> See Petitioners Posthearing Remedy Br. at 12-13, Ex. 1, p. 24-25.

## **2. Additional Remedy Recommendations of Commissioner Kearns**

Commissioner Kearns recommends that the President submit to Congress, pursuant to his authority under section 203(a)(3)(H) of the Trade Act of 1974, a legislative proposal to distribute TRQ revenue generated by this action to downstream users of the article, to the extent necessary to mitigate the potential impact of the remedy on domestic manufacturers of downstream products, such as fabricators.

Furthermore, Commissioner Kearns recommends that the President, pursuant to his authority under section 203(a)(3)(G) of the Trade Act of 1974, continue international negotiations to reduce overcapacity and global imbalances that drive U.S. imports of QSP and other products to levels that injure domestic producers.

## **VI. Short- and Long-Term Effects of Recommended Remedies**

The tariff-rate quota and other measures that we are recommending will address the serious injury to the QSP industry that we have found to exist and will be most effective in facilitating the efforts of the domestic industry to make a positive adjustment to import competition.

The domestic industry's trade and financial performance would benefit significantly from the remedies we are recommending, which would lead to increasing sales, higher prices, and increased cash flow and working capital for the domestic industry. With imports subject to restraint, import volumes should decline and prices increase, leading to an increase in the domestic industry's production, capacity utilization, sales, market share, prices, revenues, and profitability. Moreover, the domestic industry's employment indicators should improve, particularly as a result of resumption of production on existing production lines and investment in new production lines. Based on our economic modeling, we estimate that in the first year of the remedy period, the domestic industry's U.S. shipments, compared to if the recommended actions were not taken, would be 50 percent more than their 2024 level, and the U.S. producers' resulting operating income would be almost triple existing operating income in 2024.<sup>54</sup>

Moreover, the significant improvements in the domestic industry's financial condition as a result of these remedies would permit the industry to undertake substantial capital investments to increase its capacity and improve its competitiveness, as well as fully implement past capital investments by domestic producers. As previously discussed, domestic producers'

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<sup>54</sup> Compare CR/PR at Table C.1 with Remedy Modeling Attachment Table 1.

adjustment commitments and their individual questionnaire responses indicate a number of investments that domestic producers intend to make to adjust to import competition if an appropriate safeguard remedy is implemented.<sup>55</sup>

Furthermore, some firms have already made substantial investments from which they have been unable to benefit due to import competition. For example, in 2020, LX Hausys completed an expansion of its QSP facility to add a third production line, increasing its capacity by 50 percent, but as of February 2026 the company had reduced operating shifts for all three of its QSP production lines and reduced QSP production by 40 percent from 2021 to 2025.<sup>56</sup> Guidoni completed construction of a new QSP facility in 2020 at a cost of \$96 million. As of February 2026, Guidoni had reduced its workforce and the plant was operating a single 8-hour shift, two days per week.<sup>57</sup> Cambria completed a factory expansion in 2022 valued at \$130 million adding a sixth production line, but, as of February 2026, Cambria had reduced production shifts at its QSP plant from seven days per week to four to five days per week and was operating at 60 percent capacity utilization.<sup>58</sup>

In addition, some domestic producers have indicated that they will increase their investments in technology and R&D, as well as increase their marketing and distribution efforts in order to develop and sell new products.<sup>59</sup> For example, Cambria plans to increase its investment in innovation and technology to create new aesthetically appealing designs, as well as to expand its distribution network\*\*\*.<sup>60</sup> LX Hausys would open new warehouses and expand sales personnel from\*\*\* to\*\*\* employees

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<sup>55</sup> Cambria plans to\*\*\*. Petitioners' Commitments at 6-7; Petitioners' Posthearing Remedy Br. at Ex. 4. Dal-Tile commits to\*\*\*. Petitioners' Commitments at 7-8; Petitioners' Posthearing Remedy Br. at Ex. 5. Guidoni plans to\*\*\*. Petitioners' Adjustment Plan at 8-9; Petitioners' Posthearing Remedy Br. at Ex. 6. *See also* CR/PR at Table E.3.

<sup>56</sup> CR/PR at Table 3.2.

<sup>57</sup> CR/PR at Table 3.2.

<sup>58</sup> CR/PR at Table 3.2.

<sup>59</sup> *See* CR/PR at Table E.3.

<sup>60</sup> Petitioners' Commitments at 6-7; Petitioners' Posthearing Remedy Br. at Ex. 4.

by 2028, potentially invest\*\*\* to develop\*\*\*, as well as invest in marketing, including\*\*\*.<sup>61</sup>

The remedies we have recommended should enable the domestic industry to implement these projects outlined in their commitments. These investments would make the industry better positioned to compete with imports by the expiration of the remedy period by improving efficiency, increasing capacity, and developing new products.

The remedies we are recommending are the minimum necessary to prevent or remedy the serious injury to the domestic industry that we have found.<sup>62</sup> In reaching our recommendation, we have been mindful of the need to consider the impact on downstream U.S. industries that consume QSP, such as independent fabricators.<sup>63</sup> Our recommended remedies attempt to strike a balance between remedying the serious injury to the domestic industry, as defined as U.S. slab producers and integrated producers, while not undercutting the downstream industries' competitiveness. The scope of our TRQ remedy includes both slab and fabricated QSP, as the domestic industry produces a small amount of fabricated QSP, and excluding fabricated QSP would create a high risk of circumvention. We expect, therefore, that the measure will not incentivize increased imports of fabricated QSP that might have negative

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<sup>61</sup> Petitioners' Commitments at 10; Petitioners' Posthearing Remedy Br. at Ex. 8.

<sup>62</sup> In making the remedy recommendations as set forth earlier, we are mindful that the relief provided under section 201 in recent cases has proven to be less than intended, expected, or needed. For example, relief has been less than intended and expected because importers and purchasers have increased and stockpiled imports before import restrictions could be implemented; those increases occurred after the close of the data collection period for the safeguard investigation and so were not reflected in the baseline for the safeguard modeling used by the Commission and the President. See *Large Residential Washers (Extension): Prehearing Brief on Behalf of Whirlpool Corporation*, October 26, 2020, pp. 34-37. See also *Additional Comments of Commissioner Jason E. Kearns, Large Residential Washers: Monitoring Developments in the Domestic Industry*, Inv. No. TA-204-013 (Aug. 2019). And importers have used exclusions in ways almost certainly beyond what was intended, to dramatically increase imports in ways that undermined the remedial effect of the safeguard. See *Crystalline Silicon Photovoltaic Cells, Whether or Not Partially or Fully Assembled: Monitoring Developments in the Domestic Industry*, Pre-hearing Report, Inv. No. TA-201-075 (Second Monitoring), p. III-25, n. 27 (Four U.S. solar module producers import bifacial cells (excluded at that time from the relief) for use in the production of non-bifacial modules). The relief we recommend, takes that history into account.

<sup>63</sup> As noted above, Commissioner Kearns recommends that the President propose legislation to assist the downstream users of QSP. He recommends that the President submit to Congress a legislative proposal to distribute TRQ revenue generated by this action to downstream users of the article, to the extent necessary to mitigate the effect of the remedy on domestic manufacturers of downstream products. That fund would address the burden U.S. independent fabricators and purchasers face as a consequence of the safeguard tariffs.

effects on downstream users of QSP.<sup>64</sup> Finally, while we recognize that our recommended relief will raise the price of U.S. imports of QSP and is intended to increase sales of higher priced domestically produced QSP, which could potentially negatively impact the downstream fabrication industry, the point of our recommended relief is to grow production and sales of domestically produced QSP and improve the price competitiveness of domestically produced QSP vis-à-vis U.S. imports of QSP, thereby allowing the domestic QSP industry to increase its shipments and prices and generate the revenue and profitability needed to make the investments that will enable it to make a positive adjustment to import competition.<sup>65</sup>

Given the precarious position of the domestic industry as a result of the serious injury caused by increased imports, it is essential that the industry receive strong import relief in the short term and commence its adjustment efforts quickly to facilitate its recovery. In the short term, the remedies we have recommended will give the domestic industry some protection from imports, tempering import volume and disciplining import pricing. Accordingly, U.S. producers' cash flow and operating income will increase, giving them funds necessary for investments in increased capacity and improved efficiency as well as in R&D and innovation.<sup>66</sup>

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<sup>64</sup> See Remedy Tr. at 48 (Mr. Maxwell) ("The incredibly low cost of importing finished product displaces both domestic slab producers along with countertop manufacturing companies, bypassing our value-added manufacturing process entirely."), 52 (Mr. Dominguez) ("I compete regularly against companies that manufacture exclusively overseas and undercut my prices because they've eliminated the American fabricator from the equation entirely."), 57 (Mr. Chahin) ("As an American and a U.S. manufacturer and an entrepreneur, I do find common grounds with the petitioners regarding cut to size products."), 67 (Mr. Millar) ("In a single transaction, {prefabricated product} eliminates the demand for domestic slab producers product and eliminates the skilled manufacturing work the American countertop manufacturers would otherwise perform. It enters the US market at a very low cost undercutting both industries simultaneously while supporting no American jobs whatsoever.").

<sup>65</sup> We also do not credit numerous respondents claims that imposing a tariff on U.S. imports of QSP will contribute to "housing affordability" concerns in the United States. As laid out by Petitioners, the cost of imported QSP is roughly 0.07 percent of the average cost of a new home. Thus, any tariff imposed on U.S. imports of QSP is likely to only minimally contribute to the cost of building a new home. See Petitioner's Prehearing Remedy Br. at 29-30.

<sup>66</sup> Cosentino has posited that imposing a remedy on imports from Spain would inhibit its investments in a new production facility in Jacksonville, FL. See Cosentino's Prehearing Br. at Ex. 1. As noted above, U.S. law does not provide for exclusion of imports from Spain. Moreover, we note that imports from Spain recorded one of the largest volume increases over the full years of the POI among major foreign suppliers of QSP to the U.S. market (plus 36.5 percent) while the average unit value of imports from Spain declined significantly over the full years of the POI (minus 37 percent) and was well below the average unit value of total imports in 2024 and interim 2025. See CR/PR at Table C.1. It is clear that U.S. imports of QSP from Spain contributed to the increase of imports of the POI that seriously injured the domestic industry. Thus, excluding U.S. imports from Spain from our recommended TRQ would undermine the remedial effect of the TRQ.

In the longer term, by the end date of our recommended remedies, the increased capacity and capacity utilization of domestic producers, their strengthened financial and working capital position, and their improved efficiency and product offerings should give them the ability to better compete with imports. For all these reasons, we believe that our recommended remedies will enable the domestic industry to make a positive adjustment to import competition during the remedy period and emerge in a greatly strengthened competitive position over the long term.

## **VII. Short- and Long-Term Effects of Not Taking the Recommended Action**

In the absence of relief, the increase in imports would likely continue, and the domestic industry would likely continue to suffer the injurious consequences of those imports in both the short term and the long term.

The continued loss of sales and market share by the domestic industry to low-priced imports will likely cause more shutdowns of domestic production facilities, affecting employment as workers lose their jobs, and causing short-term and long-term negative effects for those workers and their communities.

The domestic industry, which suffered declining operating and net income over the POI and between interim periods,<sup>67</sup> would likely see its financial condition continue to worsen as it continued to lose sales and market share in the absence of relief. Without a strong improvement in the industry's financial condition, U.S. producers would be unable to make the necessary investments detailed in their commitments to increase capacity, improve efficiencies, and conduct R&D and innovation efforts necessary to develop the new products necessary for the industry's long-term survival.

Indeed, the domestic industry's limited ability to fund R&D expenditures and innovation efforts in the absence of a remedy would have long-term effects on the domestic industry's ability to compete with imports. Innovation is important in the U.S. market, in which purchasers increasingly demand new and evolving styles and performance characteristics. While U.S. producers are working to ramp up their efforts to meet this demand, the absence of a remedy would likely result in the domestic industry lacking the financial resources to continue funding these R&D and innovation efforts necessary for its long-term competitiveness and viability.

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<sup>67</sup> CR/PR at Table C.1.

## **Remedy Modeling Attachment**

### **1. Introduction**

This attachment reports estimates of the economic effects of the safeguard remedy recommended in Investigation No. TA-201-79, Quartz Surface Products. These estimates are the output of a customized economic model that Commission staff developed for evaluating the effects of safeguard remedies in the quartz surface products (QSP) industry.

### **2. Economic Model**

Commission staff built a customized partial equilibrium model that estimates the effects of the recommended tariff rate quota (TRQ) remedy on (1) the quantity of QSP imports, (2) the quantity of U.S.-produced products that compete with QSP imports, (3) the revenues and operating income of U.S. producers from their domestic shipments, (4) U.S. tariff revenues from the remedy, (5) prices in the U.S. market, and (6) capacity utilization of U.S. producers. Model simulations isolate the effects of the TRQ while holding other supply and demand fundamentals constant.

The model includes several assumptions that are standard in PE models:

- Consumers view imports and domestic products as imperfect substitutes. The model represents the level of substitutability with a substitution elasticity and constant elasticity of substitution (CES) demand.
- The model treats aggregate expenditure levels and prices in other sectors of the economy as exogenous variables. In the model, they do not change in response to the remedy.
- The model treats foreign producers' prices as exogenous variables. They reflect the foreign producers' excess capacity and the ability of foreign producers to divert product from other national markets to the United States.

The customized model adds several features to fit the conditions of competition specific to the QSP industry in the United States:

- The model has oligopolistic competition among domestic producers (specifically, Bertrand competition in prices). The use of oligopolistic competition reflects the fact that there are few domestic producers in the QSP industry.
- The model incorporates the capacity constraints on domestic producers. It assumes that domestic producers have constant marginal costs up to 85 percent of their installed capacity, and their production cannot exceed that limit.
- The model provides estimates of changes in the operating income of domestic producers.
- The model incorporates the unusually high inventory levels at the beginning of the remedy period.
- The model uses firm-level confidential business information (“CBI”) on prices, quantities, production capacity, and inventories from the domestic producers as model inputs.

The economic effects of each potential remedy in each year are calculated as the difference between the modeled quantities under the remedy and the baseline quantities absent the remedy.<sup>1</sup> The model estimates the effect on consumer prices as the percent changes in a CES industry price index that combines imported and domestic products. It estimates the effect on the operating income of U.S. producers based on the calibrated marginal costs of the individual domestic producers.

### **3. Data and Elasticity Estimates**

The model incorporates data on quantities and values in Interim 2025 from the staff report in the injury phase of the investigation, as well as more detailed firm-level CBI on production capacity, operating income, and inventories from the responses to the Commission’s questionnaires.

The total demand elasticity for QSP measures the sensitivity of the overall quantity demanded in the United States to a change in market prices. This estimate depends on the existence, availability, and commercial viability of substitute products as well as the component share of the product in the manufacture of downstream products. The model uses a value of -0.5 for the

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<sup>1</sup> In the baseline, there are approximately 216 million square feet of covered imports, and they account for 86.2 percent of consumption in the U.S. market.



total demand elasticity, which is outside of the range recommended in the staff report. Sensitivity analysis conducted using a total demand elasticity of -1.0 (at the midpoint of the staff report range) shows that the expected outcomes of the remedy are substantially similar (i.e. only slightly lower in terms of the domestic industry's resulting capacity utilization and operating margins).<sup>2</sup>

The elasticity of substitution reflects the extent of product differentiation between the domestic and imported products. Product differentiation depends on such factors as quality (e.g., appearance and efficiency) and conditions of sale (e.g., availability, sales terms, discounts, and warranties). The model uses a value of 5 for the substitution elasticity. This value is an estimate based on 2025 data for U.S. imports of QSP and the econometric methodology in Riker (2020) and U.S. International Trade Commission (2023).<sup>3</sup>

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<sup>2</sup> See Staff Worksheet, EDIS Doc. #882423.

<sup>3</sup> Riker, David (2020): A Trade Cost Approach to Estimating the Elasticity of Substitution. U.S. International Trade Commission, Economics Working Paper 2020-07-D. [https://www.usitc.gov/publications/332/working\\_papers/ecwp\\_2017-07-d.pdf](https://www.usitc.gov/publications/332/working_papers/ecwp_2017-07-d.pdf); and U.S. International Trade Commission (2023): Economic Impact of Section 232 and 301 Tariffs on U.S. Industries, Investigation 332-591, Publication No. 5405, Appendix F. <https://www.usitc.gov/publications/332/pub5405.pdf?source=govdelivery>.

#### 4. Economic Effects of the Recommended TRQ Remedy

The model simulation reported in Attachment Table 1 quantifies the effects of the recommended TRQ remedy on the volumes of imports and domestic shipments, the values of industry revenue and operating income, and the installed capacity utilization rate under the remedy.

**Attachment Table 1. Effects on Imports and Domestic Shipments**

| <b>Estimated Effects</b>                                         | <b>Year 1</b> | <b>Year 2</b> | <b>Year 3</b> | <b>Year 4</b> |
|------------------------------------------------------------------|---------------|---------------|---------------|---------------|
| Baseline covered imports<br>(million square feet)                | ***           | ***           | ***           | ***           |
| Covered imports under the<br>remedy<br>(million square feet)     | 123.5         | 144.9         | 152.3         | 160.2         |
| Baseline non-covered imports<br>(million square feet)            | ***           | ***           | ***           | ***           |
| Non-covered imports under the<br>remedy<br>(million square feet) | 8.1           | 9.5           | 9.6           | 9.7           |
| Baseline domestic shipments<br>(million square feet)             | ***           | ***           | ***           | ***           |
| Domestic shipments under the<br>remedy<br>(million square feet)  | 49.8          | 50.5          | 51.1          | 51.7          |
| Baseline industry revenue<br>(million dollars)                   | ***           | ***           | ***           | ***           |
| Industry revenue under the<br>remedy<br>(million dollars)        | 1,243.7       | 1,261.0       | 1,278.0       | 1,294.7       |
| Baseline operating income<br>(million dollars)                   | ***           | ***           | ***           | ***           |
| Operating income under the<br>remedy<br>(million dollars)        | 175.4         | 179.0         | 182.5         | 185.9         |
| Installed capacity utilization<br>under the remedy (%)           | 49.7          | 54.2          | 54.9          | 55.5          |
| Operating income over sales<br>under the remedy (%)              | ***           | ***           | ***           | ***           |

Source: USITC remedy model results.

The model simulation reported in Attachment Table 2 quantifies the effects of the recommended TRQ remedy on average prices in the U.S. market and tariff revenues generated.

**Attachment Table 2. Additional Economic Effects**

| <b>Estimated Effects</b>                         | <b>Year 1</b> | <b>Year 2</b> | <b>Year 3</b> | <b>Year 4</b> |
|--------------------------------------------------|---------------|---------------|---------------|---------------|
| Change in U.S. Price Index (%)                   | 15.1          | 14.6          | 14.1          | 13.6          |
| Tariff Revenue from the Remedy (million dollars) | 223.5         | 251.6         | 253.6         | 255.0         |

Source: USITC remedy model results.

## **5. Comments on Parties' Remedy Models**

The Petitioners and Respondents both testified regarding remedy modeling analysis that they performed using the COMPAS model.<sup>4</sup> The COMPAS model was developed by former Commission staff economists many years ago and was included in past Commission staff analysis in Title VII investigations and some safeguard investigations. However, the COMPAS model is no longer used by Commission staff in Title VII or safeguard investigations.

Instead, Commission staff build a model for the remedy phase of each safeguard investigation that is customized to fit the conditions of competition in the specific industry under investigation, including in this case product differentiation, concentration of domestic production, capacity constraints on domestic QSP producers, and initial inventory levels, as described in this memorandum. The customized model more fully utilizes the confidential business information collected in responses to the Commission's questionnaires. It also includes calculations of the changes in operating income that are consistent with the theory of the underlying model, unlike the basic perfect competition COMPAS model. The parties' remedy models analyze tariff remedies, while the Commission's remedy model is flexibly designed to estimate the economic effects of TRQs as well as tariffs.

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<sup>4</sup> Transcript of Commission's April 14, 2026, Hearing on Remedy Issues, p. 129 (Kahn), p. 267 (Pope).

# Part 1: Introduction

## Background

This safeguard investigation results from a petition properly filed on November 17, 2025, under section 202(a) of the Trade Act of 1974 (“The Act”),<sup>1</sup> by the Quartz Manufacturing Alliance of America (“QMAA” or “Petitioner”).<sup>2 3</sup> The petition alleges that quartz surface products (“QSP”)<sup>4</sup> are being imported into the United States in such increased quantities as to be a substantial cause of serious injury, or the threat thereof, to the domestic industry producing an article like or directly competitive with the imported article. The Commission has determined that this investigation is “extraordinarily complicated” within the meaning of section 202(b)(2)(B) of the Act.<sup>5</sup> Table 1.1 presents information relating to the background and scheduling of this proceeding.<sup>6 7</sup>

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<sup>1</sup> 19 U.S.C. § 2552(a).

<sup>2</sup> The QMAA is composed of U.S. firms Cambria Company, LLC (“Cambria”), Le Sueur, Minnesota; Dal-Tile LLC (“Dal-Tile”), Dallas, Texas; Guidoni USA (“Guidoni”), McRae-Helena, Georgia; and Hyundai L&C USA (“Hyundai”), Norcross, Georgia. At the time the petition was filed, the QMAA was composed of Cambria, Dal-Tile, Guidoni, and Architectural Surfaces, Inc. (“Architectural Surfaces”); however, Architectural Surfaces subsequently withdrew its participation in the QMAA, while Hyundai became a member of the QMAA.

<sup>3</sup> QMAA initially submitted a petition on September 15, 2025. Shortly thereafter, the Commission received a series of submissions containing statements from a current producer of QSP slab, Elite Quartz Manufacturing LLC (“Elite”), and more than 700 entities stating that they were independent fabricators of QSP that opposed the petition. On September 23, 2025, and November 17, 2025, QMAA supplemented the petition with signed statements on behalf of E-Stone USA Corporation (“Estone”), LX Hausys America, Inc. (“LX Hausys”), and Hendrix Industries, Inc. (“Hendrix”) supporting the petition. The Commission determined that the petition, as supplemented, was supported by entities representative of a domestic industry producing QSP, including an industry producing QSP slabs, and an industry producing both QSP slabs and fabricated slabs. Therefore, the Commission determined that the petition, as supplemented, was properly filed as of November 17, 2025. 90 FR 55165, December 1, 2025.

<sup>4</sup> See the section entitled “The imported articles described in this investigation” in Part 1 of this report for a complete description of the merchandise subject in this proceeding.

<sup>5</sup> 19 U.S.C. § 2552(b)(2)(B).

<sup>6</sup> Pertinent Federal Register notices are referenced in appendix A and may be found at the Commission’s website ([www.usitc.gov](http://www.usitc.gov)).

<sup>7</sup> Appendix B presents a list of witnesses which appeared at the Commission’s injury hearing.

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

| Effective date    | Actions                                                                                                                                          |
|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| November 17, 2025 | Petition properly filed with the Commission; institution and scheduling of safeguard Investigation No. TA-201-79 (90 FR 55165, December 1, 2025) |
| February 24, 2026 | Commission's hearing on injury                                                                                                                   |
| April 1, 2026     | Commission's vote on injury                                                                                                                      |
| April 14, 2026    | Commission's hearing on remedy                                                                                                                   |
| May 4, 2026       | Commission's vote on remedy                                                                                                                      |
| May 18, 2026      | Commission's findings and recommendations due to the President                                                                                   |

## Statutory criteria and organization of the report

Under the statute, the Commission considers whether “an article is being imported into the United States in such increased quantities as to be a substantial cause of serious injury, or the threat thereof, to the domestic industry producing an article like or directly competitive with the imported article.”<sup>8</sup> Under section 202 of the Trade Act, imports have increased when the increase is “either actual or relative to domestic production.”<sup>9</sup> This information is addressed in Part 2 of this report.

Section 202(c)(1)(A) of the Act provides that in making its determination with respect to serious injury the Commission shall take into account all economic factors which it considers relevant, including (but not limited to) “(i) the significant idling of productive facilities in the domestic industry, (ii) the inability of a significant number of firms to carry out domestic production operations at a reasonable level of profit, and (iii) significant unemployment or underemployment with the domestic industry.”<sup>10</sup> Section 202(c)(1)(B) of the Act provides that in making its determination with respect to threat of serious injury the Commission shall take into account all economic factors which it considers relevant, including (but not limited to) “(i) a decline in sales or market share, a higher and growing inventory (whether maintained by domestic producers, importers, wholesalers, or retailers), and a downward trend in production, profits, wages, productivity, or employment (or increasing underemployment) in the domestic industry, (ii) the extent to which firms in the domestic industry are unable to generate adequate capital to finance the modernization of their domestic plants and equipment, or are

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<sup>8</sup> Section 202(b)(1)(A) of the Trade Act; 19 U.S.C. § 2252(b)(1)(A).

<sup>9</sup> 19 U.S.C. § 2252(c)(1)(C).

<sup>10</sup> 19 U.S.C. § 2252(c)(1)(A).

unable to maintain existing levels of expenditures for research and development, {and} (iii) the extent to which the United States market is the focal point for the diversion of exports of the article concerned by reason of restraints on exports of such article to, or on imports of such article into, third country markets.”<sup>11</sup> These factors are addressed in Parts 3 and 4 of this report, except for restraints on imports in third-country markets, which are addressed in Part 1 of the report and information on market share declines, if any, which are addressed in Part 5 of the report.

With respect to substantial cause, the Commission shall consider an increase in imports (either actual or relative to domestic production) and a decline in the proportion of the domestic market supplied by domestic producers.<sup>12</sup> The presence or absence of any factor that the Commission is required to consider is “not necessarily dispositive.”<sup>13</sup> The statute also directs the Commission to consider “the condition of the domestic industry over the course of the relevant business cycle ... ” and to examine “factors other than imports which may be a cause of serious injury, or threat of serious injury, to the domestic industry.”<sup>14</sup> Part 5 of this report provides information on apparent U.S. consumption and respective market shares and available information on foreign industries and their participation, if any, in the U.S. market during January 2020 to September 2025 (“period of investigation”). Information on other competitive dynamics in the U.S. market, including information on any relevant business cycle, is provided in Part 6 of this report.

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<sup>11</sup> 19 U.S.C. § 2252(c)(1)(B).

<sup>12</sup> Section 202(c)(1)(C); 19 U.S.C. § 2252(c)(1)(C).

<sup>13</sup> Section 202(c)(3); 19 U.S.C. § 2252(c)(3).

<sup>14</sup> Section 202(c)(2); 19 U.S.C. § 2252(c)(2).

## Summary data

Information obtained during the course of this safeguard investigation that relates to the applicable statutory criteria is presented throughout this report. The Commission's questionnaires collected data for the years 2020 to 2024 and interim periods January through September of 2024 ("interim 2024") and January through September of 2025 ("interim 2025"). Except as noted, U.S. industry data are based on the questionnaire responses of eight domestic producers of QSP slab and fabricated QSP slab ("U.S. producers" or "integrated producers") and, in certain circumstances, 25 independent domestic fabricators of QSP ("independent U.S. fabricators").<sup>15</sup> U.S. imports are based on the U.S. Department of Commerce's ("Commerce") official U.S. import statistics and the questionnaire responses of 94 firms. Data on U.S. purchasers are based on the questionnaire responses of 27 firms. Foreign industry data are based on the foreign producer/exporter questionnaire responses of 71 firms.

A summary of data collected in this safeguard investigation is presented in appendix C. Responses by firms to a series of questions comparing the semi-finished product (slab versus fabricated slab) are presented in appendix D. Responses by firms to a series of questions concerning competitive efforts and proposed adjustments are presented in appendix E. Responses by firms to a series of questions concerning the effects of imports on U.S. producers' existing development and production efforts, growth, investment, and research and development are presented in appendix F. Responses by firms to a series of questions concerning the significance of existing antidumping and countervailing duty orders on QSP are presented in appendix G. Responses by firms concerning the impact of the COVID-19 pandemic on their operations is presented in appendix H. Information on independent U.S. fabricators' QSP operations and financial experience are presented in appendix I and appendix J, respectively. Information on import price data by select sources is presented in appendix K.

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<sup>15</sup> An "integrated producer" is a firm which produces both QSP slabs and fabricated QSP slabs. \*\*\*. An "independent U.S. fabricator" is a firm which purchases QSP slabs to produce fabricated QSP slabs.



## Previous and related investigations

QSP has been the subject of a number of prior antidumping and countervailing duty investigations in the United States. Table 1.2 presents a summary of the previous and related investigations and a discussion follows.

**Table 1.2 QSP: Previous and related Commission proceedings and status of orders**

| Date | Investigation number | Country | ITC original determination | Current status                               |
|------|----------------------|---------|----------------------------|----------------------------------------------|
| 2018 | 701-TA-606           | China   | Affirmative                | Order continued after 1st review, 01/24/2025 |
| 2018 | 731-TA-1416          | China   | Affirmative                | Order continued after 1st review, 01/24/2025 |
| 2019 | 701-TA-624           | India   | Affirmative                | Order continued after 1st review, 12/18/2025 |
| 2019 | 701-TA-625           | Turkey  | Affirmative                | Order continued after 1st review, 12/18/2025 |
| 2019 | 731-TA-1450          | India   | Affirmative                | Order continued after 1st review, 12/18/2025 |
| 2019 | 731-TA-1451          | Turkey  | Affirmative                | Order continued after 1st review, 12/18/2025 |

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.

## Quartz surface products from China

These investigations resulted from petitions filed on April 17, 2018 with Commerce and the Commission by Cambria.<sup>16</sup> On May 23, 2019, Commerce determined that imports of quartz surface products from China were being sold at less than fair value (“LTFV”) and subsidized by the Government of China.<sup>17</sup> The Commission determined on June 28, 2019 that the domestic industry was materially injured by reason of LTFV and subsidized imports of quartz surface products from China.<sup>18</sup> On July 11, 2019, Commerce issued its antidumping and countervailing duty orders with final weighted-average dumping margins ranging from 265.81 to 336.69 percent and net subsidy rates ranging from 45.32 to 190.99 percent.<sup>19</sup>

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<sup>16</sup> Quartz Surface Products from China, Inv. Nos. 701-TA-606 and 731-TA-1416 (Final), USITC Publication 4913, June 2019, p. 1.

<sup>17</sup> 84 FR 23760 and 23767, May 23, 2019.

<sup>18</sup> 84 FR 32216, July 5, 2019. The Commission also found that imports subject to Commerce’s affirmative critical circumstances determination were not likely to undermine seriously the remedial effect of the order on China.

<sup>19</sup> 84 FR 33053, July 11, 2019.

On June 3, 2024, the Commission instituted five-year reviews to determine whether revocation of the countervailing and antidumping duty orders on quartz surface products from China would be likely to lead to continuation or recurrence of material injury.<sup>20</sup> On September 6, 2024, the Commission determined that it would conduct expedited reviews.<sup>21</sup> On October 4, 2024 and October 9, 2024, Commerce determined that revocation of the antidumping and countervailing duty orders on quartz surface products from China would be likely to lead to continuation or recurrence of dumping and subsidization, respectively.<sup>22</sup> On January 17, 2025, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.<sup>23</sup> Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective January 24, 2025, Commerce issued a continuation of the antidumping and countervailing duty orders on imports of quartz surface products from China.<sup>24 25</sup>

## **Quartz surface products from India and Turkey**

These investigations resulted from petitions filed on May 8, 2019 with Commerce and the Commission by Cambria.<sup>26</sup> On May 1, 2020, Commerce determined that imports of quartz surface products from India and Turkey were being sold at LTFV and subsidized by the Governments of India and Turkey.<sup>27</sup> The Commission determined on June 15, 2020 that the domestic industry was materially injured by reason of LTFV and subsidized imports of quartz surface products from India and Turkey.<sup>28</sup> On June 22, 2020, Commerce issued its antidumping and countervailing duty orders with final weighted-average dumping margins ranging from 2.67 to 5.15 percent for India and 5.17 percent for Turkey-wide; and net subsidy rates ranging from 1.57 to 2.34 percent for India and 2.43 percent for Turkey-wide.<sup>29</sup>

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<sup>20</sup> 89 FR 47614, June 3, 2024.

<sup>21</sup> 89 FR 97653, December 9, 2024.

<sup>22</sup> 89 FR 80885, October 4, 2024; and 89 FR 81887, October 9, 2024.

<sup>23</sup> 90 FR 8140, January 24, 2025.

<sup>24</sup> 90 FR 8521, January 30, 2025.

<sup>25</sup> In the first five-year review, Commerce issued its antidumping and countervailing duty orders with a weighted-average dumping margin of 326.15 percent for China-wide and net subsidy rates ranging from 45.32 to 190.99 percent. 89 FR 80885, October 4, 2024; and 89 FR 81887, October 9, 2024.

<sup>26</sup> Quartz Surface Products from India and Turkey, Inv. Nos. 701-TA-624–625 and 731-TA-1450–1451 (Final), USITC Publication 5061, June 2020, p. 1.

<sup>27</sup> 85 FR 25389, 25391, 25398, and 25400, May 1, 2020.

<sup>28</sup> 85 FR 37108, June 19, 2020. The Commission also found that imports subject to Commerce's affirmative critical circumstances determination were not likely to undermine seriously the remedial effect of the order on India and Turkey.

<sup>29</sup> 85 FR 37422 and 37431, June 22, 2020.

On May 1, 2025, the Commission instituted five-year reviews to determine whether revocation of the countervailing and the antidumping duty orders on quartz surface products from India and Turkey would be likely to lead to continuation or recurrence of material injury.<sup>30</sup> On August 4, 2025, the Commission determined that it would conduct expedited reviews.<sup>31</sup> On August 19, 2025, Commerce determined that revocation of the countervailing duty orders on quartz surface products from India and Turkey would be likely to lead to continuation or recurrence of subsidization.<sup>32</sup> On August 28, 2025 and September 2, 2025, Commerce determined that revocation of the antidumping duty orders on quartz surface products from India and Turkey, respectively, would be likely to lead to continuation or recurrence of dumping.<sup>33</sup> On December 16, 2025, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.<sup>34</sup> Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective December 18, 2025, Commerce issued a continuation of the antidumping and countervailing duty orders on imports of quartz surface products from India and Turkey.<sup>35 36</sup>

## **Commerce's reviews on quartz surface products from China, India, and Turkey**

### **Sunset five-year reviews**

As discussed in detail above, Commerce has conducted one sunset review on the antidumping and countervailing duty orders on quartz surface products from China and one sunset review on the antidumping and countervailing duty orders on quartz surface products from India and Turkey.

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<sup>30</sup> 90 FR 18697, May 1, 2025.

<sup>31</sup> 90 FR 45245, September 19, 2025.

<sup>32</sup> 90 FR 40340, August 19, 2025.

<sup>33</sup> 90 FR 41993, August 28, 2025; and 90 FR 42384, September 2, 2025.

<sup>34</sup> 90 FR 59202, December 18, 2025.

<sup>35</sup> 91 FR 1751, January 15, 2026.

<sup>36</sup> In the first five-year review, Commerce issued its antidumping and countervailing duty orders with a weighted-average dumping margin of 5.15 percent for India-wide and 5.17 percent for Turkey-wide; and net subsidy rates ranging from 1.57 to 2.34 percent for India and 2.43 percent for Turkey-wide. 90 FR 40340, August 19, 2025; 90 FR 41993, August 28, 2025; and 90 FR 42384, September 2, 2025.

## Administrative reviews<sup>37</sup>

### China

Commerce has completed one administrative review of the countervailing duty order on quartz surface products from China (table 1.3) and two administrative reviews of the antidumping duty order on quartz surface products from China (table 1.4).

**Table 1.3 QSP: Administrative reviews of the countervailing duty order for China**

| Date results published          | Period of review        | Producer or exporter                  | Margin (percent) |
|---------------------------------|-------------------------|---------------------------------------|------------------|
| November 22, 2024 (89 FR 92622) | 11/04/2021 – 12/31/2022 | Bada Industries                       | 371.47           |
| November 22, 2024 (89 FR 92622) | 11/04/2021 – 12/31/2022 | Karina Stone                          | 371.47           |
| November 22, 2024 (89 FR 92622) | 11/04/2021 – 12/31/2022 | Unique Stone Sdn. Bhd. (Unique Stone) | 371.47           |
| November 22, 2024 (89 FR 92622) | 11/04/2021 – 12/31/2022 | Universal Quartz                      | 371.47           |

Source: Cited Federal Register notices.

Note: Commerce determined that Bada Industries, Karina Stone, Unique Stone Sdn. Bhd. (Unique Stone), and Universal Quartz are Malaysian exporters of quartz surface products. Commerce also found that these Malaysian exporters did not demonstrate that the quartz slab used to produce their exports to the United States was sourced from a country other than China. 89 FR 92622, November 22, 2024.

**Table 1.4 QSP: Administrative reviews of the antidumping duty order for China**

| Date results published          | Period of review        | Producer or exporter                  | Margin (percent) |
|---------------------------------|-------------------------|---------------------------------------|------------------|
| August 9, 2021 (86 FR 43520)    | 11/20/2018 – 06/30/2020 | China-wide entity                     | 326.15           |
| November 22, 2024 (89 FR 92622) | 11/04/2021 – 06/30/2023 | Bada Industries                       | 326.15           |
| November 22, 2024 (89 FR 92622) | 11/04/2021 – 06/30/2023 | Karina Stone                          | 326.15           |
| November 22, 2024 (89 FR 92622) | 11/04/2021 – 06/30/2023 | Unique Stone Sdn. Bhd. (Unique Stone) | 326.15           |
| November 22, 2024 (89 FR 92622) | 11/04/2021 – 06/30/2023 | Universal Quartz                      | 326.15           |

Source: Cited Federal Register notices.

Note: The China-wide entity includes the following companies: Dava Industry Co., Ltd.; Deyuan Panmin International Limited; Guangzhou Hercules Quartz Stone Co., Ltd.; Heshan City Nande Stone Co., Ltd.; and Xiamen Deyuan Panmin Trading Co., Ltd. 86 FR 43520, August 9, 2021.

Note: Commerce determined that Bada Industries, Karina Stone, Unique Stone Sdn. Bhd. (Unique Stone), and Universal Quartz are Malaysian exporters of quartz surface products. Commerce also found that these Malaysian exporters did not demonstrate that the quartz slab used to produce their exports to the United States was sourced from a country other than China. 89 FR 92622, November 22, 2024.

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<sup>37</sup> Commerce has not conducted any administrative reviews on quartz surface products from Turkey.

## India

Commerce has completed one administrative review of the countervailing duty order on quartz surface products from India (table 1.5) and three administrative reviews of the antidumping duty order on quartz surface products from India (table 1.6).

**Table 1.5 QSP: Administrative reviews of the countervailing duty order for India**

| Date results published            | Period of review        | Producer or exporter      | Margin (percent) |
|-----------------------------------|-------------------------|---------------------------|------------------|
| October 18, 2022<br>(87 FR 63033) | 10/11/2019 – 12/31/2020 | Divyashakti Granites Ltd. | 1.18             |

Source: Cited Federal Register notices.

**Table 1.6 QSP: Administrative reviews of the antidumping duty order for India**

| Date results published             | Period of review        | Producer or exporter                                                           | Margin (percent) |
|------------------------------------|-------------------------|--------------------------------------------------------------------------------|------------------|
| January 9, 2023<br>(88 FR 1188)    | 12/13/2019 – 05/31/2021 | Pokarna Engineered Stone Limited                                               | 0.00             |
| January 9, 2023<br>(88 FR 1188)    | 12/13/2019 – 05/31/2021 | Antique Group                                                                  | 3.58             |
| January 9, 2023<br>(88 FR 1188)    | 12/13/2019 – 05/31/2021 | Non-Selected Companies                                                         | 1.02             |
| November 20, 2023<br>(88 FR 80689) | 06/01/2021 – 05/31/2022 | Pokarna Engineered Stone Limited                                               | 0.00             |
| November 20, 2023<br>(88 FR 80689) | 06/01/2021 – 05/31/2022 | Marudhar Rocks International Pvt. Ltd./Marudhar Quartz Surface Private Limited | 0.00             |
| November 20, 2023<br>(88 FR 80689) | 06/01/2021 – 05/31/2022 | Non-Selected Companies                                                         | 0.00             |
| November 5, 2024<br>(89 FR 87850)  | 06/01/2022 – 05/31/2023 | Pokarna Engineered Stone Limited                                               | 0.00             |
| November 5, 2024<br>(89 FR 87850)  | 06/01/2022 – 05/31/2023 | Marudhar Rocks International Pvt. Ltd./Marudhar Quartz Surface Private Limited | 0.00             |
| November 5, 2024<br>(89 FR 87850)  | 06/01/2022 – 05/31/2023 | Non-Individually Examined Companies                                            | 0.00             |

Source: Cited Federal Register notices.

Note: In the administrative review for the period December 13, 2019 through May 31, 2021, the non-selected companies included 51 exporters. See appendix II of Certain Quartz Surface Products From India: Final Results of Antidumping Duty Administrative Review; 2019-2021 (88 FR 1188, January 9, 2023); as amended in Certain Quartz Surface Products From India: Notice of Amended Final Results of Antidumping Duty Administrative Review Pursuant to Settlement (89 FR 84529, October 23, 2024).

Note: In the administrative review for the period June 1, 2021 through May 31, 2022, the non-selected companies included 36 exporters. See appendix II of Certain Quartz Surface Products From India: Final Results of Antidumping Duty Administrative Review, and Final Determination of No Shipments; 2021-2022 (88 FR 80689, November 20, 2023).

Note: In the administrative review for the period June 1, 2022 through May 31, 2023, the non-selected companies included 44 exporters. See appendix II of Certain Quartz Surface Products From India: Final Results of Antidumping Duty Administrative Review; 2022-2023 (89 FR 87850, November 5, 2024).

## Changed circumstances reviews

Commerce has initiated two changed circumstances reviews on the antidumping and countervailing duty orders on quartz surface products from China. However, both reviews were rescinded.<sup>38</sup> Commerce has not conducted any changed circumstances reviews on quartz surface products from India and Turkey.

## Scope rulings<sup>39</sup>

### *China*

Commerce has made four scope rulings with respect to quartz surface products from China, as presented below.

- (1) Commerce determined that Panmin's three "ZZ" series glass products for which it requested an exclusion (i.e., ZZ3003, ZZ7119, and ZZ7027) are within the scope of the antidumping and countervailing orders on quartz surface products from China.<sup>40</sup>
- (2) Commerce determined that SMA Surfaces' crushed glass products are covered by the scope of the antidumping and countervailing duty orders on quartz surface products from China because they do not meet the language of the crushed glass scope exclusion.<sup>41</sup>
- (3) Commerce determined that certain crushed glass surface products are excluded from the antidumping and countervailing duty orders.<sup>42</sup>
- (4) Commerce determined that Fritech, a waste mineral-based surface product, is predominantly made of silica and, therefore, within the scope of the antidumping and countervailing duty orders on quartz surface products from China.<sup>43</sup>

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<sup>38</sup> 88 FR 72993, October 24, 2023; and 88 FR 72994, October 24, 2023.

<sup>39</sup> Commerce has made no scope rulings with respect to quartz surface products from Turkey.

<sup>40</sup> 85 FR 35261, June 9, 2020.

<sup>41</sup> 86 FR 69619, December 8, 2021.

<sup>42</sup> Certain crushed glass surface products are excluded from the antidumping and countervailing orders if they meet four criteria: (1) the crushed glass content is greater than any other single material, by actual weight; (2) there are pieces of crushed glass visible across the surface of the product; (3) at least some of the individual pieces of crushed glass that are visible across the surface are larger than one centimeter wide as measured at their widest cross-section (glass pieces); and (4) the distance between any single glass piece and the closest separate glass piece does not exceed three inches. Golden Spectrum's crushed glass surface products met these criteria and are, thus, excluded from the scope of the AD/CVD orders. 88 FR 60434, September 1, 2023.

<sup>43</sup> 89 FR 63407, August 5, 2024.

## **India**

Commerce has made one scope ruling with respect to quartz surface products from India, as presented below.

- (1) Commerce determined that certain merchandise produced and exported by Pokarna are and are not covered by the scope of the antidumping and countervailing duty orders on quartz surface products from India.<sup>44</sup>

## **Circumvention inquiry<sup>45</sup>**

Commerce determined that imports of quartz slab manufactured in China and processed in Malaysia are covered by the scope of the antidumping and countervailing duty orders on certain quartz surface products from China.<sup>46</sup>

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<sup>44</sup> Certain sinks and basins produced and exported by Pokarna are not covered by the scope of the orders based on the plain language that excludes these products from the scope. Certain shower trays produced and exported by Pokarna are covered by the scope of the orders as they correspond to products listed in the plain language of the scope. Certain integrated vanity tops are covered by the scope of the orders because the totality of evidence establishes that the integrated vanity tops have similar physical characteristics, expectations of the ultimate purchaser, ultimate use, and channels of trade to in-scope quartz surface products. 88 FR 60434, September 1, 2023.

<sup>45</sup> Commerce has made no circumvention inquiries with respect to quartz surface products from India and Turkey.

<sup>46</sup> 87 FR 64009, October 21, 2022.

## The product

### The imported articles described in this investigation

The imported article covered by this safeguard investigation is described as follows:<sup>47</sup>

QSP consists of slabs and other surfaces created from a mixture of materials that includes predominately silica (e.g., quartz, quartz powder, cristobalite, glass powder) as well as a resin binder (e.g., an unsaturated polyester). The incorporation of other materials, including, but not limited to, pigments, cement, or other additives does not remove the merchandise from the scope. However, the scope only includes products where the silica content is greater than any other single material, by actual weight. QSP is typically sold as rectangular slabs with a total surface area of approximately 45 to 60 square feet and a nominal thickness of one, two, or three centimeters. However, the scope includes surface products of all other sizes, thicknesses, and shapes. In addition to slabs, the scope includes, but is not limited to, other surfaces such as countertops, backsplashes, vanity tops, bar tops, work tops, tabletops, flooring, wall facing, shower surrounds, fireplace surrounds, mantels, and tiles. QSP may be polished or unpolished, cut or uncut, fabricated or not fabricated, cured or uncured, edged or not edged, finished or unfinished, thermoformed or not thermoformed, packaged or unpackaged, and may have any type of surface finish. In addition, QSP is covered by the scope whether or not it is imported attached to, or in conjunction with, nonsubject merchandise such as sinks, sink bowls, vanities, cabinets, and furniture. If QSP is imported attached to, or in conjunction with, such nonsubject merchandise, only the QSP is covered by the scope.

The country of origin of QSP is the country in which the slab is manufactured.<sup>48</sup> Subject merchandise includes material matching the above description that has been finished, packaged, or otherwise fabricated in a third country, including by cutting, polishing, curing, edging, thermoforming, attaching to, or packaging with another product, or any other finishing, packaging, or fabrication that would not otherwise remove the merchandise from the scope if performed in the country of manufacture of the QSP slab. The scope does not cover quarried stone surface products, such as granite, marble, soapstone, or quartzite.

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<sup>47</sup> 90 FR 55165, December 1, 2025.

<sup>48</sup> See Customs Classification Ruling H303280 Re: Country of origin of quartz countertops; Section 301 trade remedy; 9903.88.03, HTSUS (Apr. 25, 2019); Customs Classification Ruling N299117 Re: Country of origin determination of agglomerated quartz slabs (July 31, 2018); Customs Classification Ruling N101559 Re: Country of origin marking of imported articles of agglomerated stone (May 10, 2010).



## Physical properties<sup>49</sup>

QSP is a compacted stone composite building material primarily composed of crushed quartz stone<sup>50</sup> or other silica-based materials (e.g., quartz powder, cristobalite, or glass powder); a resin binder; and materials such as pigments, cement, or other additives.<sup>51</sup> The silica content is greater than any other material, by weight, in subject products.<sup>52</sup> QSP is sold in the form of unfabricated slabs (typically rectangular in standard sizes with a total surface area of 45 to 60 square feet and a nominal thickness of one, two, or three centimeters) or fabricated products (sometimes referred to as “fabs” or “fabricated slabs”) in final shapes and sizes that are ready for installation.<sup>53</sup> QSP without any pigments is typically white in appearance with fine particulates.<sup>54</sup> Producers have also developed collections and designs beyond basic white (figure 1.1). Manufacturing techniques have enabled producers to make QSP that replicates characteristics found in natural stone (e.g., the veining that is commonly found in marble) or distinctive patterns.<sup>55</sup> QSP are used in countertops and other surfaces for their aesthetics, durability, crack, stain, and scratch resistance, heat tolerance, and anti-microbial properties.<sup>56</sup>

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<sup>49</sup> Unless otherwise noted, this information is based on the Petition, pp. 18 to 19; Quartz Surface Products from India and Turkey, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451 (Final), USITC Publication 5061, June 2020, pp. 1.13 to 1.14; and Quartz Surface Products from China, Inv. Nos. 701-TA-606 and 731-TA-1416 (Final), USITC Publication 4913, June 2019, p. 1.11 to 1.12.

<sup>50</sup> Quartz is a common mineral, a compound of silicon and oxygen (silicon dioxide), that accounts for about 12 percent of the crust of the earth. MSI Surfaces, “The Science Behind Quartz Countertops: From Raw Material To Finished Product,” <https://www.msisurfaces.com/blogs/post/2016/12/01/tips-from-the-trade-what-is-quartz-and-how-is-it-made.aspx>, December 1, 2016.

<sup>51</sup> A non-exhaustive list of silica sources includes quartz, quartz powder, cristobalite, glass powder, feldspar, mica, nepheline syenite, basalt, andesite, rhyolite, and dacite. Petition, p. 16.

<sup>52</sup> The composition is typically 80 to 90 percent quartz and 10 to 20 percent resin. Le Surfaces, “Understanding the Quartz Manufacturing Process: A Behind-the-Scenes Look at LE Surfaces’ Factory,” <https://lesurfaces.com/understanding-the-quartz-manufacturing-process-a-behind-the-scenes-look-at-le-surfaces-factory/>, retrieved January 14, 2026.

<sup>53</sup> Petition, p., 18.

<sup>54</sup> Petition, p. 19.

<sup>55</sup> Veins are long, curvy lines that run through marble or natural stone and form distinctive patterns. They form naturally from mineral deposits that crystallized inside of the stone as it is formed. Veins can appear in different shapes, colors, and densities. True Blue Surfaces, “In the Veins: What Is Marble Veining, and How Would It Affect Your Kitchen’s Decor?” March 30, 2023, <https://truebluesurfaces.com/marble-veining-and-how-it-affects-kitchens/> and “Understanding the Beauty of Marble Veining Patterns,” <https://truebluesurfaces.com/understanding-the-beauty-of-marble-veining-patterns/>, October 31, 2025; Petition, pp. 13 and 19.

<sup>56</sup> Caesarstone, “Quartz Countertops vs. Granite: The Big Debate,” <https://www.caesarstoneus.com/blog/quartz-countertops-vs-granite-the-big-debate/>, retrieved January 26, 2026.

**Figure: 1.1 QSP: Samples of surface patterns**



Source: QSP from India and Turkey, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451 (Final), USITC Publication 5061, June 2020, p. 1.14.

Products made from crushed glass (glass slabs) are included in the scope of this safeguard investigation. Certain products made from crushed glass are excluded from the AD/CVD orders on QSP from China, India, and Turkey.<sup>57</sup> Glass slabs consist of 75 percent recycled glass and a mixture of Portland cement and pigment (figure 1.2).<sup>58</sup> Glass slabs have similar physical characteristics to quartz slabs but are more susceptible to chipping, cracking, or staining.<sup>59</sup>

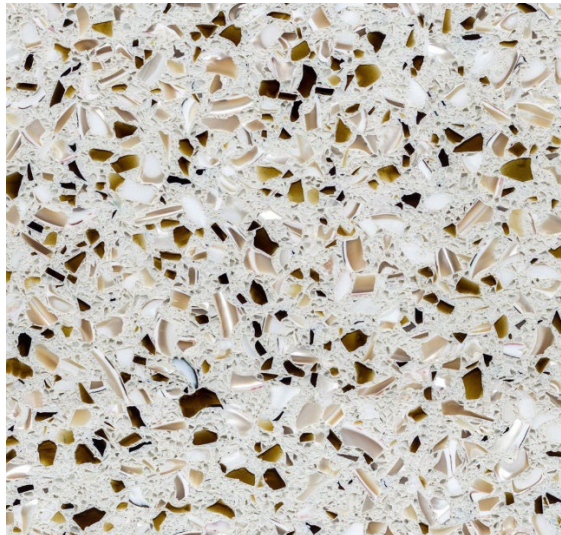
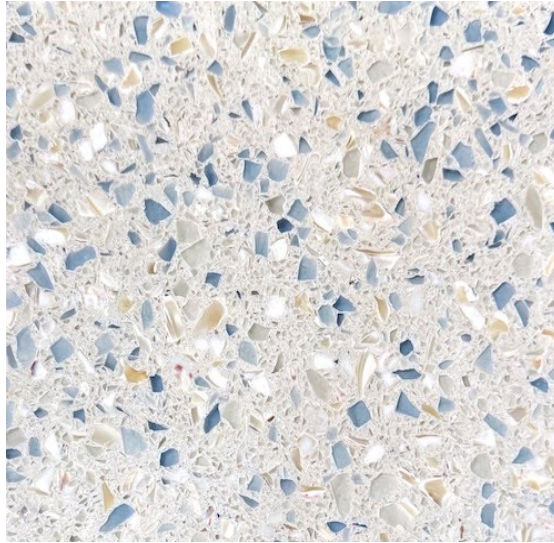
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<sup>57</sup> The petitioners claim that “Chinese producers exploited the exclusion as a loophole that allowed them to avoid AD/CVD liability by exporting glass-based surface products that were virtually indistinguishable from other types of QSP.” Petition, p. 16, n. 46; Quartz Surface Products from India and Turkey, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451 (Final), USITC Publication 5061, June 2020, pp. 1.11 to 1.12; Quartz Surface Products from China, Inv. Nos. 701-TA-606 and 731-TA-1416 (Final), USITC Publication 4913, June 2019, p. 1.8 to 1.10.

<sup>58</sup> IceStone USA, “IceStone for your business,” [IceStone Countertops & Surfaces for your Business | IceStone](https://www.icestone.com/), retrieved January 13, 2026.

<sup>59</sup> Consumer Reports, “Countertop Buying Guide,” <https://www.consumerreports.org/home-garden/countertops/buying-guide/?msocid=344739cca6196d351e612f80a7346cf7>, retrieved January 13, 2026.

**Figure: 1.2 QSP: Samples of glass slabs**



Source: IceStone, "IceStone for your home," <https://icestoneusa.com/icestone-for-your-home/>, retrieved January 14, 2026.

## Manufacturing facilities and processes<sup>60</sup>

QSP is composed from a combination of the following raw materials: a silica source (e.g., quartz) that has been crushed into small pieces, binding agents, pigments, and any other additives. The quartz and other silica sources come from natural stone that is extracted from quarries or from man-made materials, such as glass or ceramic materials. The binding agent used in QSP is a polymer resin. Additives can include other stone materials for pigmentation or larger particles of glass or metal flecks for visual effects. QSP slabs are manufactured in a multi-step process by a handful of domestic producers. The slabs are then transformed into fabricated QSP through the fabrication process. Slab producers either sell their QSP slabs to independent fabricators or complete the fabrication process themselves (integrated producers).<sup>61</sup>

According to the petitioners, domestic and foreign QSP producers use essentially the same overall production processes. However, the level of automation used in QSP production can differ. Some domestically produced QSP is made using a patented production process with machinery developed by Breton S.p.A. of Italy (“Breton”).<sup>62</sup> There is mixed usage of Breton and non-Breton slab production techniques in other producing countries, such as Canada, China, Turkey, South Korea, and India. Chinese and other manufacturers that do not use Breton technology rely more on manual labor to produce quartz slabs with natural stone-like appearances.<sup>63</sup> In contrast, Breton manufacturing is more automated, using robotic arms with attached sprays to create the intended aesthetic effects. The following section describes the QSP production process.

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<sup>60</sup> Unless otherwise noted, this information is based on the Petition, pp. 24-25; Quartz Surface Products from India and Turkey, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451(Final); and USITC Publication 5061, June 2020, pp. 1.15 to 1.18; Quartzcraft, “Quartz Stone Manufacturing Process,” <https://quartzcrafts.com/quartz-stone-manufacturing-process-complete-guide/>, October 5, 2025.

<sup>61</sup> Petition, p. 25.

<sup>62</sup> The Breton process uses specialized patented equipment and a “vibro-compression under vacuum” process to blend and compact the raw material inputs used to produce QSP. Breton claims that QSP made with its process requires less resin binder than other technologies and can produce a broader range of designs. Breton, “BretonStone,” <https://breton.it/products/plants/bretonstone-compound-stone--slab-production-plant>, retrieved January 14, 2026.

<sup>63</sup> A Malaysian firm is an example of a producer that uses a less automated production process to make QSP. Mquartz, “Factory tour,” <https://mquartz.com/page-4969.html>, retrieved January 21, 2026.



## Slab production

Slab production typically involves seven stages: (1) mixing; (2) combining; (3) dispensing and molding; (4) pressing; (5) curing; (6) cooling; and (7) polishing. First, raw materials, including quartz (or other sources of silica), resin binder, pigments, and additives are mixed in the specific proportions required to produce the colors and patterns desired in the final product. Materials from the mixing stage are blended further in the combining stage. In the dispensing and molding stage, the material is poured into a rubber mold and distributed to produce the desired appearance and thickness needed before getting pressed into the final shape. At this point, a high-pressure spray can be used to create the appearance of veins in the slab. Next, in the pressing stage, the material in the mold may be placed under a vacuum inside a press chamber and the physical force of the press compacts the material into slabs of varying sizes and thicknesses. This pressing process might also involve the use of vibration to remove gases from the mixture, increasing the strength of the final slab. After pressing, the slabs are heated (cured) in a kiln at 194 degrees Fahrenheit for 45 minutes, a process that hardens the slabs and forms a solid surface while instilling desirable physical qualities like stain resistance.<sup>64</sup> The slabs are then cooled for 24 hours and then the slab is measured, calibrated, and worked (as needed) to make sure it meets the desired dimensions before polishing.<sup>65</sup> The slab is then polished to produce the desired surface finish, such as smooth or matte appearance.<sup>66</sup> Finally, the slabs are inspected to ensure that they are free from any defects and damage before shipment.

According to the petitioners, production of crushed glass surface product slabs is similar to that of other QSP. Silica-based glass is crushed to a glass powder, mixed with resin and pigments, and subjected to vibro-compression under vacuum. Regardless of whether the QSP is made from crushed quartz or another silica-based material such as crushed glass, the slabs are cured, polished, and cut into standard or customized sizes.

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<sup>64</sup> LE Surfaces, “Understanding the Quartz Manufacturing Process: A Behind-the-Scenes Look at LE Surfaces’ Factory,” <https://lesurfaces.com/understanding-the-quartz-manufacturing-process-a-behind-the-scenes-look-at-le-surfaces-factory/>, retrieved January 14, 2026.

<sup>65</sup> LE Surfaces, “Understanding the Quartz Manufacturing Process: A Behind-the-Scenes Look at LE Surfaces’ Factory,” <https://lesurfaces.com/understanding-the-quartz-manufacturing-process-a-behind-the-scenes-look-at-le-surfaces-factory/>, retrieved January 14, 2026.

<sup>66</sup> LE Surfaces, “Understanding the Quartz Manufacturing Process: A Behind-the-Scenes Look at LE Surfaces’ Factory,” <https://lesurfaces.com/understanding-the-quartz-manufacturing-process-a-behind-the-scenes-look-at-le-surfaces-factory/>, retrieved January 14, 2026; Quartzcrafts, “Quartz Stone Manufacturing Process,” <https://quartzcrafts.com/quartz-stone-manufacturing-process-complete-guide/>, October 5, 2025.

## **Fabrication**

The fabrication process is performed by independent or integrated fabricators. According to parties in the original investigations of QSP from India and Turkey, there were reportedly 10,000 independent fabricators operating in the United States that transform slabs of quartz surface products into products ready for installation. This process typically starts with a field technician visiting the install site to gather the dimensional measurements needed to create the design. Design technicians then adjust the design to meet customer specifications regarding features like the type of edge, desired configuration, various cutouts and openings, and the backsplash of the surface. The design is then sent to the production facility where it is used to fabricate the slab into pieces that match the desired end products.

Next, machines are programmed so that the tools are assigned paths for diamond-edged saw and water jet cutting. Computer numerical control (“CNC”) routers are programmed to cut edges and cutouts for sinks and faucets. Quartz slabs are pulled from inventory and moved to the cutting operation. The diamond blade saw cuts straight lines and waterjets cut arcs and circles into the slab. Cut parts are removed. After the saw and waterjet cutting, the CNC router machining begins by utilizing a crane, lasers, and vacuum cups to position the section for grinding and finishing operations on the edges and cutouts. The finished product is polished and detailed to ensure readiness for installation. The fabricated product is then ready for transportation.

## Uses<sup>67</sup>

QSP are commonly used for countertop surfaces or aesthetic accents in residential, commercial, and industrial properties. QSP are also used as backsplashes, bathroom vanity tops, furniture surfaces, bar tops, work tops, tabletops, flooring, wall facing, shower surrounds, fireplace surrounds, mantels, and tiles.<sup>68</sup>

QSP competes with quarried natural stone products, such as granite, marble, and quartzite.<sup>69</sup> Demand for QSP has grown due to improvements in its aesthetics and its physical properties that make it more durable and easier to maintain than granite or other natural stone products.<sup>70</sup> The appearance of QSP has evolved from a monochromatic surface to one that imitates natural stone patterns or other designs. In 2025, quartz was the most popular countertop material used in home kitchen renovations, accounting for 39 percent of the market.<sup>71</sup> Granite (29 percent) and quartzite (11 percent) were the next most popular choices.<sup>72</sup> According to hearing testimony, quartzite is valued for its “visual uniqueness and durability” and has increased in popularity during the past few years.<sup>73</sup> Respondent witnesses at the hearing mentioned that quartzite has become a popular choice among “luxury consumers” and in premium installations.<sup>74</sup>

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<sup>67</sup> Unless otherwise noted, this information is based on the Petition, pp. 17 to 18, 23; USITC Publication 5061, June 2020, pp. I.13 to I.14; and Quartz Surface Products from China, Inv. Nos. 701-TA-606 and 731-TA-1416 (Final), USITC Publication 4913, June 2019, pp 1.11 to 1.23; and Quartz Surface Products from India and Turkey, Inv. Nos. 701-TA-624-625 and 731-TA-1450-1451 (Final), USITC Publication 5061, June 2020, pp. 1.13 to 1.14.

<sup>68</sup> Petition, pp. 17 to 18.

<sup>69</sup> Quartzite, not to be confused with quartz, is a naturally occurring stone (containing more than 90 percent quartzite) that is used in countertops whereas quartz is an engineered product containing quartz and other materials. While prices are similar, quartzite is a porous stone that requires annual sealing to prevent staining. Quartz countertops are nonporous and do not require sealant. Caesarstone, “Quartzite Countertops vs. Quartz Countertops,” <https://www.caesarstoneus.com/blog/quartzite-countertops-vs-quartz-countertops/>, retrieved January 13, 2026.

<sup>70</sup> Caesarstone, “Countertop Trends in 2024,” <https://www.caesarstoneus.com/blog/countertop-trends/>, retrieved January 26, 2026.

<sup>71</sup> Houzz Research, 2025 Houzz U.S. Kitchen Trends Study, [https://st.hzcdn.com/static/econ/2025\\_Houzz\\_US\\_Kitchen\\_Trends\\_Study.pdf](https://st.hzcdn.com/static/econ/2025_Houzz_US_Kitchen_Trends_Study.pdf), p. 28.

<sup>72</sup> Houzz Research, 2025 Houzz U.S. Kitchen Trends Study, [https://st.hzcdn.com/static/econ/2025\\_Houzz\\_US\\_Kitchen\\_Trends\\_Study.pdf](https://st.hzcdn.com/static/econ/2025_Houzz_US_Kitchen_Trends_Study.pdf), p. 28.

<sup>73</sup> Hearing testimony, pp. 228 (Shah), 252 (Omohundro), 254 (Tuberville); Arizona Tile, Elite, and MSI’s joint prehearing brief, February 17, 2026, pp. 29 to 30 and 76 to 77.

<sup>74</sup> Hearing testimony, pp. 228 (Shah), 252 (Omohundro), 254 (Tuberville).

## Intermediate product analysis

As discussed above, upstream QSP slabs are used in the production of downstream fabricated QSP slabs. U.S. producers, fabricators, importers, and purchasers were asked to assess any differences between slabs and fabricated slabs, based on factors the Commission typically considers in a semi-finished products analysis, including: (1) whether the upstream article is dedicated to the production of the downstream article or has independent uses; (2) whether there are perceived to be separate markets for the upstream and downstream articles; (3) differences in the physical characteristics and functions of the upstream and downstream articles; (4) differences in the costs or value of the vertically differentiated articles; and (5) the significance and extent of the processes used to transform the upstream into the downstream articles. Responses provided by firms are summarized in table 1.7 (where a “no” response generally corresponds to indicating no differences or distinctions between a slab and a fabricated slab).

**Table 1.7 QSP: Count of firms’ responses regarding the domestic like product factors comparing slabs to fabricated slabs**

| Firm type        | Factor                         | No | Yes |
|------------------|--------------------------------|----|-----|
| U.S. producers   | Other uses                     | 7  | 1   |
| U.S. producers   | Separate market                | 7  | 1   |
| U.S. producers   | Differences in characteristics | 5  | 3   |
| U.S. producers   | Differences in costs           | 5  | 3   |
| U.S. producers   | Transformation intensive       | 5  | 3   |
| U.S. fabricators | Other uses                     | 6  | 0   |
| U.S. fabricators | Separate market                | 3  | 3   |
| U.S. fabricators | Differences in characteristics | 3  | 3   |
| U.S. fabricators | Differences in costs           | 2  | 4   |
| U.S. fabricators | Transformation intensive       | 2  | 4   |
| Importers        | Other uses                     | 78 | 5   |
| Importers        | Separate market                | 45 | 38  |
| Importers        | Differences in characteristics | 54 | 29  |
| Importers        | Differences in costs           | 22 | 60  |
| Importers        | Transformation intensive       | 26 | 57  |
| Purchasers       | Other uses                     | 20 | 3   |
| Purchasers       | Separate market                | 8  | 14  |
| Purchasers       | Differences in characteristics | 11 | 12  |
| Purchasers       | Differences in costs           | 6  | 15  |
| Purchasers       | Transformation intensive       | 5  | 18  |

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

Note: See appendix D for firms’ narrative responses regarding the semi-finished product analysis.



## Like or directly competitive articles

To determine whether an article is being imported into the United States in such increased quantities as to be a substantial cause of serious injury or the threat thereof to the domestic industry, the Commission first defines “the domestic industry producing an article that is like or directly competitive with the imported article.”<sup>75</sup> In assessing what constitutes the product(s) that is/are like or directly competitive with the imported article(s), the Commission takes into account such factors as (1) the physical properties of the article, (2) its customs treatment, (3) its manufacturing process (i.e., where and how it is made), (4) its uses, and (5) the marketing channels through which the product is sold. Information relating to these factors was presented above, except for marketing channels through which the product is sold, which is presented in the next section.

In the current safeguard investigation, Petitioner notes that in previous antidumping and countervailing duty investigations on QSP the Commission has found that slabs and fabricated slabs were not separate domestic like products and defined a single domestic like product coextensive with the scope. Accordingly, the petitioner argues that in this investigation the Commission should define the domestic like product as inclusive of all QSP corresponding to the definition of the imported article within the scope of the investigation.<sup>76 77</sup> No party requested that the Commission collect data concerning other possible alternative domestic like products in their comments on the Commission’s draft questionnaires in the current safeguard investigation.<sup>78</sup>

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<sup>75</sup> 19 U.S.C. § 2252(b)(1)(A).

<sup>76</sup> Petition, pp. 20 to 27; and Petitioner’s prehearing brief, February 17, 2026, pp. 5 to 14.

<sup>77</sup> Petitioner further argues that the Commission should define the domestic industry as all domestic QSP slab producers. Petitioner’s prehearing brief, February 17, 2026, pp. 14 to 22; and Petitioner’s posthearing brief, March 3, 2026, pp. 10 to 23.

However, respondents Arizona Tile, Elite, and MSI, as well as the Federation of the Indian Quartz Surface Industry (“Indian Federation”), argue that the Commission should define the domestic industry to include both QSP slab producers and independent QSP fabricators as it has done in previous antidumping and countervailing duty investigations on quartz surface products. Arizona Tile, Elite, and MSI’s joint prehearing brief, February 17, 2026, pp. 12 to 18; Arizona Tile, Elite, and MSI’s joint posthearing brief, March 3, 2026, pp. 8 to 9 and Response to Commission Questions, pp. 68 to 81; and the Indian Federation’s posthearing brief, March 3, 2026, pp. 1 to 4.

<sup>78</sup> See generally Petitioner’s comments on draft questionnaires, September 22, 2025; and Arizona Tile, Bedrosians, Elite, and MSI’s joint comments on draft questionnaires, September 22, 2025.

## Marketing channels

U.S. producers and importers sold mainly to fabricators and retailers with the second largest distribution channel for both being distributors, as shown in table 1.8.

**Table 1.8 QSP: Share of U.S. shipments by source, channel of distribution, and period**

Share in percent

| Source             | Channel                   | 2020 | 2021 | 2022 | 2023 | 2024 |
|--------------------|---------------------------|------|------|------|------|------|
| United States      | Distributors              | 26.4 | 25.8 | 24.6 | 26.2 | 23.9 |
| United States      | Fabricators and retailers | 69.5 | 70.3 | 71.0 | 69.8 | 72.3 |
| United States      | Contractors and builders  | 2.9  | 2.7  | 3.0  | 2.8  | 2.8  |
| United States      | Other end users           | 1.3  | 1.3  | 1.5  | 1.2  | 0.9  |
| All import sources | Distributors              | 23.0 | 32.8 | 31.4 | 31.5 | 36.1 |
| All import sources | Fabricators and retailers | 68.0 | 59.8 | 61.5 | 61.1 | 56.4 |
| All import sources | Contractors and builders  | 6.6  | 5.8  | 5.3  | 6.0  | 6.3  |
| All import sources | Other end users           | 2.4  | 1.7  | 1.7  | 1.5  | 1.3  |

Table continued.

**Table 1.8 (Continued) QSP: Share of U.S. shipments by source, channel of distribution, and period**

Share in percent; Interim period is January through September

| Source             | Channel                   | Interim 2024 | Interim 2025 |
|--------------------|---------------------------|--------------|--------------|
| United States      | Distributors              | 23.1         | 18.7         |
| United States      | Fabricators and retailers | 73.3         | 75.4         |
| United States      | Contractors and builders  | 2.7          | 4.8          |
| United States      | Other end users           | 0.9          | 1.1          |
| All import sources | Distributors              | 34.8         | 27.9         |
| All import sources | Fabricators and retailers | 57.3         | 63.1         |
| All import sources | Contractors and builders  | 6.6          | 7.6          |
| All import sources | Other end users           | 1.2          | 1.5          |

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

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

## Tariff treatment

QSP is currently imported under Harmonized Tariff Schedule of the United States (“HTS”) statistical reporting numbers 6810.99.0020, 6810.99.0040, and 7020.00.6000.<sup>79</sup> The general rate of duty is “free” for HTS subheading 6810.99.00 and 5 percent ad valorem for HTS subheading 7020.00.60.<sup>80</sup> Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Table 1.9 summarizes certain countries subject to additional tariffs as of March 3, 2026.

**Table 1.9 QSP: Additional tariffs on imports originating in Canada, China, Mexico, Brazil, India and other countries as of March 3, 2026**

Duty rates in percent ad valorem

| Additional tariff                | Canada                         | China | Mexico                         | Brazil | India | Others |
|----------------------------------|--------------------------------|-------|--------------------------------|--------|-------|--------|
| Section 232                      | NA                             | NA    | NA                             | NA     | NA    | NA     |
| Section 301                      | NA                             | 25    | NA                             | NA     | NA    | NA     |
| Section 122                      | 10 (unless enters under USMCA) | 10    | 10 (unless enters under USMCA) | 10     | 10    | 10     |
| Total additional ad valorem rate | 10                             | 35    | 10                             | 10     | 10    | 10     |

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 above for historical changes to the additional tariffs.

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<sup>79</sup> HTS statistical reporting numbers 6810.99.0020 and 6810.99.0040 are believed to only contain QSP that are produced from agglomerated quartz slabs used for countertops. HTS statistical reporting number 7020.00.600 (“Other articles of glass”) is a basket category that could include imports of QSP and additional products that are not covered by this investigation. Petition, pp. 19 to 20.

<sup>80</sup> USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 68.7 and 70.41.

## Column 2 duty rates

Imports of QSP from Belarus, Cuba, North Korea, and Russia are subject to column 2 rates of duty.<sup>81</sup> The column 2 rate of duty is 30 percent ad valorem for QSP imported under HTS subheading 6810.99.00 and 55 percent ad valorem for QSP imported under HTS subheading 7020.00.60.<sup>82</sup> Throughout the period of investigation, Cuba and North Korea were subject to the column 2 rates of duty. However, imports of QSP from Belarus and Russia became subject to duty rates set forth in column 2 of the HTS effective April 9, 2022.<sup>83</sup> Effective July 27, 2022, the column 2 rate of duty was raised to 35 percent ad valorem for QSP originating in Russia imported under HTS subheading 6810.99.00.<sup>84</sup>

## Section 301 tariffs

Effective September 24, 2018, QSP 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 QSP was increased to 25 percent.<sup>85</sup>

The Office of the U.S. Trade Representative (“USTR”) announced it initiated an investigation effective July 15, 2025, into Brazil’s acts, policies, and practices related to digital trade and electronic payment services; unfair, preferential tariffs; anti-corruption enforcement; intellectual property protection; ethanol market access; and illegal deforestation under section 301 of the Trade Act of 1974. USTR held a public hearing for this investigation on September 3, 2025.<sup>86</sup>

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<sup>81</sup> 19 U.S.C. § 2434, Statutory Notes and Related Subsidiaries; USITC, HTS (2026) Revision 4, Publication 5711, February 2026, General Note 3(b), p. 4.

<sup>82</sup> USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 68.7 and 70.41.

<sup>83</sup> 19 U.S.C. § 2434, Statutory Notes and Related Subsidiaries.

<sup>84</sup> 19 U.S.C. § 2434, Statutory Notes and Related Subsidiaries. 87 FR 38875, June 30, 2025. See also HTS heading 9903.90.08 and U.S. note 30 to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.333 to 99.3.340 and 99.3.476.

<sup>85</sup> 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 III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.99 to 99.3.124, and 99.3.463.

<sup>86</sup> 90 FR 34069, July 18, 2025.

## **Section 122 tariffs**

Effective February 24, 2026, QSP originating in all countries are subject to an additional 10 percent ad valorem duty under section 122 of the Trade Act of 1974.<sup>87</sup> QSP originating in Canada or Mexico that enter with duty free treatment under the United States-Mexico-Canada Agreement (“USMCA”) are not subject to the additional ad valorem duty under section 122.<sup>88</sup>

## **Tariffs initiated under the International Emergency Economic Powers Act (“IEEPA”)<sup>89</sup>**

Effective February 20, 2026, all tariffs initiated under IEEPA were terminated. Below is a history of the IEEPA tariffs relevant to QSP originating in countries that were in effect until February 20, 2026.<sup>90</sup>

### ***Country specific IEEPA tariffs***

Effective February 4, 2025, QSP originating in China, Hong Kong, and Macau was subject to an additional 10 percent ad valorem duty under IEEPA, and on March 4, 2025, that additional duty increased to 20 percent ad valorem. However, effective November 10, 2025, that

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<sup>87</sup> 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 4, Publication 5711, February 2026, pp. 99.3.49 to 99.3.59 and 99.3.410.

<sup>88</sup> 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 headings 9903.03.07 and 9903.03.08, and U.S. notes 2(aa)(vi) and 2(aa)(vii) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.49 to 99.3.59 and 99.3.411.

<sup>89</sup> 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.

<sup>90</sup> 91 FR 9437, February 25, 2026.

additional duty was reduced back to 10 percent.<sup>91</sup> Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.<sup>92</sup>

Effective March 4, 2025, QSP originating in Canada was subject to an additional 25 percent ad valorem duty under IEEPA. Effective August 1, 2025, the duty rate increased to 35 percent. Effective March 7, 2025, products originating in Canada that enter with duty free treatment under the United States-Mexico-Canada Agreement (“USMCA”) were not subject to the additional 35 percent ad valorem duty under IEEPA.<sup>93</sup> Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.<sup>94</sup>

Effective March 4, 2025, QSP originating in Mexico was subject to an additional 25 percent ad valorem duty under IEEPA. Effective March 7, 2025, products originating in Mexico that enter with duty free treatment under the United States-Mexico-Canada Agreement (“USMCA”) were not subject to the additional 25 percent ad valorem duty under IEEPA.<sup>95</sup> Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.<sup>96</sup>

Effective August 6, 2025, QSP originating in Brazil was subject to an additional 40 percent ad valorem duty under IEEPA.<sup>97</sup> Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.<sup>98</sup>

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<sup>91</sup> 90 FR 9121, February 7, 2025; 90 FR 11426, March 6, 2025; 90 FR 11463, March 7, 2025; 90 FR 50725, November 7, 2025. See also HTS heading 9903.01.20 and U.S. note 2(s) and HTS heading 9903.01.24 and U.S. note 2(u) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.3 to 99.3.4 and 99.3.374 to 99.3.375.

<sup>92</sup> 91 FR 9437, February 25, 2026.

<sup>93</sup> 90 FR 9113, February 7, 2025; 90 FR 9183, February 10, 2025; 90 FR 11785, March 11, 2025; 90 FR 37957, August 6, 2025. See also HTS headings 9903.01.10, 9903.01.14, and 9903.01.15 and U.S. notes 2(j) and 2(l) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.2 to 99.3.3 and 99.3.373 to 99.3.374.

<sup>94</sup> 91 FR 9437, February 25, 2026.

<sup>95</sup> 90 FR 9117, February 7, 2025; 90 FR 9185, February 10, 2025; 90 FR 11787, March 11, 2025. See also HTS headings 9903.01.01, 9903.01.04, and 9903.01.05 and U.S. notes 2(a) and 2(c) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.1 to 99.3.2 and 99.3.373.

<sup>96</sup> 91 FR 9437, February 25, 2026.

<sup>97</sup> 90 FR 37739, August 5, 2025. See also HTS headings 9903.01.77, 9903.01.80, 9903.01.81, 9903.01.82, and 9903.01.83 and U.S. note 2(x) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.41 to 99.3.48 and 99.3.386.

<sup>98</sup> 91 FR 9437, February 25, 2026.

Effective August 27, 2025, QSP originating in India was subject to an additional 25 percent ad valorem duty under IEEPA. Effective February 7, 2026, the additional tariff specific to India was terminated.<sup>99</sup>

### ***Tariffs initiated in April 2025 under IEEPA***

QSP originating in Canada, Mexico, Belarus, Cuba, North Korea, and Russia were not subject to tariffs initiated in April 2025 under IEEPA.<sup>100</sup>

Effective April 5, 2025, QSP originating in China, Hong Kong, and Macau 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, Hong Kong, and Macau was reduced to 10 percent.<sup>101</sup> Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.<sup>102</sup>

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<sup>99</sup> 90 FR 38701, August 11, 2025; 91 FR 6501, February 11, 2026. See also HTS headings 9903.01.84, 9903.01.85, 9903.01.86, 9903.01.87, 9903.01.88, and 9903.01.89 and U.S. note 2(z) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.48 to 99.3.49 and 99.3.387.

<sup>100</sup> Imports originating in Canada, Mexico, Belarus, Cuba, North Korea, and Russia were exempt from tariffs initiated in April 2025 under IEEPA. 90 FR 15041, April 7, 2025. See also HTS headings 9903.01.25 to 9903.01.27 and 9903.01.29 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.4 to 99.3.41 and 99.3.375 to 99.3.376.

<sup>101</sup> 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. See also HTS headings 9903.01.25 and 9903.01.63 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.4 to 99.3.41, 99.3.375, and 99.3.382.

<sup>102</sup> 91 FR 9437, February 25, 2026.

Effective April 5, 2025, QSP originating in all countries (except for Canada, Mexico, Belarus, Cuba, North Korea, and Russia) was subject to an additional 10 percent ad valorem duty as part of tariffs initiated in April 2025 under IEEPA.<sup>103</sup> <sup>104</sup> Effective April 9, 2025, certain countries were assigned individualized country duties (see table 1.10 for country duty rates). However, effective April 10, 2025, the individualized country duties were suspended and the additional duty rates as part of tariffs initiated in April 2025 under IEEPA for QSP were returned to 10 percent.<sup>105</sup> Effective August 7, 2025, certain countries were assigned individualized country duties under IEEPA (see table 1.10 for duty rates).<sup>106</sup> In some cases, the duty rates assigned under IEEPA in August 2025 were different from those assigned in April 2025.<sup>107</sup> Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.<sup>108</sup>

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<sup>103</sup> Imports originating in Canada, Mexico, Belarus, Cuba, North Korea, or Russia were exempt from tariffs initiated in April 2025 under IEEPA. 90 FR 15041, April 7, 2025. See also HTS headings 9903.01.25 to 9903.01.27 and 9903.01.29 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.4 to 99.3.41 and 99.3.375 to 99.3.376.

<sup>104</sup> 90 FR 15041, April 7, 2025; 90 FR 37963, August 6, 2025. See also HTS heading 9903.01.25 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.4 to 99.3.41 and 99.3.375.

<sup>105</sup> Individualized country duties as part of tariffs initiated in April 2025 under IEEPA for all countries other than China were suspended April 10, 2025, until August 7, 2025. 90 FR 15041, April 7, 2025; 90 FR 15625, April 15, 2025; 90 FR 30823, July 10, 2025; 90 FR 37963, August 6, 2025. See also HTS headings 9903.01.25 and 9903.01.43 to 9903.01.76 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.4 to 99.3.41 and 99.3.375 to 99.3.385.

<sup>106</sup> 90 FR 37963, August 6, 2025. See also HTS headings 9903.01.25 and 9903.01.43 to 9903.01.76 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.4 to 99.3.41 and 99.3.375 to 99.3.385.

<sup>107</sup> On January 29, 2026, and January 30, 2026, the United States entered into agreements on reciprocal trade with El Salvador and Guatemala. Pursuant to those agreements, eligible products from El Salvador and Guatemala that entered into the United States under the rules of origin of the Dominican Republic-Central America - United States Free Trade Agreement (CAFTA-DR) were not subject to the additional duties under IEEPA. Office of the United States Trade Representative, "Joint Statement on Framework for United States–El Salvador Agreement on Reciprocal Trade," January 29, 2026, p. 1.1, Annex 1, no. 4,

<https://ustr.gov/sites/default/files/files/Press/Releases/2026/El%20Salvador%20Agreement%201.29%20FINAL.pdf>, Office of the United States Trade Representative, "Joint Statement on Framework for United States–Guatemala Agreement on Reciprocal Trade," January 30, 2026, p. 1.1, Annex 1, no. 4, <https://ustr.gov/sites/default/files/files/Press/Releases/2026/Guatemala%20ART%201.30%20for%20posting%20CLEAN.pdf>.

<sup>108</sup> 91 FR 9437, February 25, 2026.



Effective August 7, 2025, QSP originating in the EU or Japan was subject to an additional rate of 15 percent for QSP imported under 6810.99.0020 and 6810.99.0040, and 10 percent for QSP imported under 7020.00.6000.<sup>109 110</sup> Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.<sup>111</sup>

Effective August 7, 2025, South Korea was assigned an individualized country additional rate of duty of 15 percent. However, effective November 14, 2025, the additional individualized country duty for South Korea was changed to 15 percent for QSP imported under 6810.99.0020 and 6810.99.0040, and 10 percent for QSP imported under 7020.00.6000.<sup>112</sup> Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.<sup>113</sup>

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<sup>109</sup> For a product originating in an EU member country with a Column 1 duty rate that is less than 15 percent, the additional duty was designed so that the sum of the product's Column 1 duty rate and the additional ad valorem rate of duty for this tariff equaled 15 percent. Therefore, the additional rate of duty for QSP imported under 6810.99.0020 and 6810.99.0040 was 15 and the additional rate of duty for QSP imported under 7020.00.6000 was 10 percent ad valorem. 90 FR 37963, August 6, 2025. See also HTS headings 9903.01.25 and 9903.02.20, and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.4 to 99.3.41, 99.3.375, and 99.3.393.

<sup>110</sup> For a product originating in Japan with a Column 1 duty rate that is less than 15 percent, the additional duty was designed so that the sum of the product's Column 1 duty rate and the additional ad valorem rate of duty for this tariff equaled 15 percent. Therefore, the additional rate of duty for QSP imported under 6810.99.0020 and 6810.99.0040 was 15 and the additional rate of duty for QSP imported under 7020.00.6000 was 10 percent ad valorem. 90 FR 43535, September 9, 2025. See also HTS headings 9903.01.72 and 9903.02.73, and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.4 to 99.3.41 and 99.3.384 to 99.3.385.

<sup>111</sup> 91 FR 9437, February 25, 2026.

<sup>112</sup> For a product originating in South Korea with a Column 1 duty rate that is less than 15 percent, the additional duty was designed so that the sum of the product's Column 1 duty rate and the additional ad valorem rate of duty for this tariff equaled 15 percent. Therefore, the additional rate of duty for QSP imported under 6810.99.0020 and 6810.99.0040 was 15 and the additional rate of duty for QSP imported under 7020.00.6000 was 10 percent ad valorem. 90 FR 37963, August 6, 2025; 90 FR 55964, December 4, 2025. See also HTS headings 9903.02.56, 9903.02.79 and 9903.02.80, and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.4 to 99.3.41, 99.3.402, and 99.3.408.

<sup>113</sup> 91 FR 9437, February 25, 2026.

Effective August 7, 2025, Switzerland was assigned an individualized country duty of 39 percent and Liechtenstein was assigned an individualized country duty of 15 percent. However, effective November 14, 2025, the individualized country duty for Switzerland and Liechtenstein was changed to 15 percent for QSP imported under 6810.99.0020 and 6810.99.0040, and 10 percent for QSP imported under 7020.00.6000.<sup>114</sup> Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.<sup>115</sup>

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<sup>114</sup> For a product originating in Switzerland or Liechtenstein with a Column 1 duty rate that is less than 15 percent, the additional duty was designed so that the sum of the product's Column 1 duty rate and the additional ad valorem rate of duty for this tariff equaled 15 percent. Therefore, the additional rate of duty for QSP imported under 6810.99.0020 and 6810.99.0040 was 15 and the additional rate of duty for QSP imported under 7020.00.6000 was 10 percent ad valorem. 90 FR 37963, August 6, 2025; 90 FR 59281, December 18, 2025. See also HTS headings 9903.02.58, 9903.02.82, and 9903.02.83 for Switzerland and 9903.02.36, 9903.02.87, and 9903.02.88 for Liechtenstein, and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.4 to 99.3.41, 99.3.397 and 99.3.403 to 99.3.410.

<sup>115</sup> 91 FR 9437, February 25, 2026.

**Table 1.10 QSP: Tariffs initiated in April 2025 under IEEPA**

Duty rates in percent ad valorem

| Country                               | Effective:<br>April 9 to 10, 2025                                                                             | Effective:<br>August 7, 2025, to<br>February 20, 2026                                                               |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|
| Afghanistan                           | 10                                                                                                            | 15                                                                                                                  |
| Algeria                               | 30                                                                                                            | 30                                                                                                                  |
| Angola                                | 32                                                                                                            | 15                                                                                                                  |
| Bangladesh                            | 37                                                                                                            | 20                                                                                                                  |
| Bolivia                               | 10                                                                                                            | 15                                                                                                                  |
| Bosnia and Herzegovina                | 35                                                                                                            | 30                                                                                                                  |
| Botswana                              | 37                                                                                                            | 15                                                                                                                  |
| Brazil                                | 10                                                                                                            | 10                                                                                                                  |
| Brunei                                | 24                                                                                                            | 25                                                                                                                  |
| Cambodia                              | 49                                                                                                            | 19                                                                                                                  |
| Cameroon                              | 11                                                                                                            | 15                                                                                                                  |
| Chad                                  | 13                                                                                                            | 15                                                                                                                  |
| Costa Rica                            | 10                                                                                                            | 15                                                                                                                  |
| China (including Hong Kong and Macau) | 84 from April 9 to 10, 2025; 125 from April 10 to May 14, 2025; 10 percent May 14, 2025, to February 20, 2026 |                                                                                                                     |
| Cote d'Ivoire                         | 21                                                                                                            | 15                                                                                                                  |
| Democratic Republic of the Congo      | 11                                                                                                            | 15                                                                                                                  |
| Ecuador                               | 10                                                                                                            | 15                                                                                                                  |
| Equatorial Guinea                     | 13                                                                                                            | 15                                                                                                                  |
| European Union                        | 20                                                                                                            | 15 percent for QSP imported under 6810.99.0020 and 6810.99.0040, and 10 percent for QSP imported under 7020.00.6000 |
| Falkland Islands                      | 41                                                                                                            | 10                                                                                                                  |
| Fiji                                  | 32                                                                                                            | 15                                                                                                                  |
| Ghana                                 | 10                                                                                                            | 15                                                                                                                  |
| Guyana                                | 38                                                                                                            | 15                                                                                                                  |
| Iceland                               | 10                                                                                                            | 15                                                                                                                  |
| India                                 | 26                                                                                                            | 25                                                                                                                  |
| Indonesia                             | 32                                                                                                            | 19                                                                                                                  |
| Iraq                                  | 39                                                                                                            | 35                                                                                                                  |
| Israel                                | 17                                                                                                            | 15                                                                                                                  |

| Country          | Effective:<br>April 9 to 10, 2025 | Effective:<br>August 7, 2025, to<br>February 20, 2026                                                                                                                                 |
|------------------|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Japan            | 24                                | 15 percent for QSP imported under 6810.99.0020 and 6810.99.0040, and 10 percent for QSP imported under 7020.00.6000                                                                   |
| Jordan           | 20                                | 15                                                                                                                                                                                    |
| Kazakhstan       | 27                                | 25                                                                                                                                                                                    |
| Laos             | 48                                | 40                                                                                                                                                                                    |
| Lesotho          | 50                                | 15                                                                                                                                                                                    |
| Libya            | 31                                | 30                                                                                                                                                                                    |
| Liechtenstein    | 37                                | 15 percent effective August 7, 2025; effective November 14, 2025, 15 percent for QSP imported under 6810.99.0020 and 6810.99.0040, and 10 percent for QSP imported under 7020.00.6000 |
| Madagascar       | 47                                | 15                                                                                                                                                                                    |
| Malawi           | 17                                | 15                                                                                                                                                                                    |
| Malaysia         | 24                                | 19                                                                                                                                                                                    |
| Mauritius        | 40                                | 15                                                                                                                                                                                    |
| Moldova          | 31                                | 25                                                                                                                                                                                    |
| Mozambique       | 16                                | 15                                                                                                                                                                                    |
| Myanmar (Burma)  | 44                                | 40                                                                                                                                                                                    |
| Namibia          | 21                                | 15                                                                                                                                                                                    |
| Nauru            | 30                                | 15                                                                                                                                                                                    |
| New Zealand      | 10                                | 15                                                                                                                                                                                    |
| Nicaragua        | 18                                | 18                                                                                                                                                                                    |
| Nigeria          | 14                                | 15                                                                                                                                                                                    |
| North Macedonia  | 33                                | 15                                                                                                                                                                                    |
| Norway           | 15                                | 15                                                                                                                                                                                    |
| Pakistan         | 29                                | 19                                                                                                                                                                                    |
| Papua New Guinea | 10                                | 15                                                                                                                                                                                    |
| Philippines      | 17                                | 19                                                                                                                                                                                    |
| Serbia           | 37                                | 35                                                                                                                                                                                    |
| South Africa     | 30                                | 30                                                                                                                                                                                    |

| Country             | Effective:<br>April 9 to 10, 2025 | Effective:<br>August 7, 2025, to<br>February 20, 2026                                                                                                                                 |
|---------------------|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| South Korea         | 25                                | 15 percent effective August 7, 2025; effective November 14, 2025, 15 percent for QSP imported under 6810.99.0020 and 6810.99.0040, and 10 percent for QSP imported under 7020.00.6000 |
| Sri Lanka           | 44                                | 20                                                                                                                                                                                    |
| Switzerland         | 31                                | 39 percent effective August 7, 2025; effective November 14, 2025, 15 percent for QSP imported under 6810.99.0020 and 6810.99.0040, and 10 percent for QSP imported under 7020.00.6000 |
| Syria               | 41                                | 41                                                                                                                                                                                    |
| Taiwan              | 32                                | 20                                                                                                                                                                                    |
| Thailand            | 36                                | 19                                                                                                                                                                                    |
| Trinidad and Tobago | 10                                | 15                                                                                                                                                                                    |
| Tunisia             | 28                                | 25                                                                                                                                                                                    |
| Turkey              | 10                                | 15                                                                                                                                                                                    |
| Uganda              | 10                                | 15                                                                                                                                                                                    |
| United Kingdom      | 10                                | 10                                                                                                                                                                                    |
| Vanuatu             | 22                                | 15                                                                                                                                                                                    |
| Venezuela           | 15                                | 15                                                                                                                                                                                    |
| Vietnam             | 46                                | 20                                                                                                                                                                                    |
| Zambia              | 17                                | 15                                                                                                                                                                                    |
| Zimbabwe            | 18                                | 15                                                                                                                                                                                    |
| Others              | 10                                | 10                                                                                                                                                                                    |

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

Note: Afghanistan, Bolivia, Brazil, Costa Rica, Ecuador, Ghana, Iceland, New Zealand, Papua New Guinea, Trinidad and Tobago, Turkey, Uganda, and the UK were not assigned individualized country duty rates in April 2025 and remained subject to the 10 percent duty rate for tariffs initiated in April 2025 under the IEEPA until August 2025.

Table 1.11 summarizes certain countries subject to additional tariffs as of January 26, 2026.

**Table 1.11 QSP: Additional tariffs on imports originating in Canada, China, Mexico, Brazil, India and other countries as of January 26, 2026**

Duty rates in percent ad valorem

| <b>Additional tariff</b>                               | <b>Canada</b> | <b>China</b> | <b>Mexico</b> | <b>Brazil</b> | <b>India</b> | <b>Others</b>                 |
|--------------------------------------------------------|---------------|--------------|---------------|---------------|--------------|-------------------------------|
| Section 232                                            | NA            | NA           | NA            | NA            | NA           | NA                            |
| Section 301                                            | NA            | 25           | NA            | NA            | NA           | NA                            |
| IEEPA – Canada specific                                | 35            | NA           | NA            | NA            | NA           | NA                            |
| IEEPA – China specific                                 | NA            | 10           | NA            | NA            | NA           | NA                            |
| IEEPA – Mexico specific                                | NA            | NA           | 25            | NA            | NA           | NA                            |
| IEEPA – Brazil specific                                | NA            | NA           | NA            | 40            | NA           | NA                            |
| IEEPA – India specific                                 | NA            | NA           | NA            | NA            | 25           | NA                            |
| Tariffs initiated in April and August 2025 under IEEPA | NA            | 10           | NA            | 10            | 25           | See table 1.10 for duty rates |
| Total additional ad valorem rate                       | 35            | 45           | 25            | 50            | 50           | Various                       |

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 above for historical changes to the additional tariffs.

Note: Effective March 7, 2025, products originating in Canada and Mexico that enter with duty free treatment under the United States-Mexico-Canada Agreement (“USMCA”) are not subject to the country specific additional ad valorem duties under IEEPA of 35 percent for Canada and 25 percent for Mexico.

## The U.S. market

### U.S. producers

The Commission issued a U.S. producers' questionnaire to nine known producers of QSP based on information contained in the petition and through industry research, and eight producers, representing the vast majority of QSP slab production in 2024, provided usable data on their operations.<sup>116 117</sup> Table 1.12 lists the U.S. producers of QSP, their production locations, positions on the petition, and shares of total QSP production in 2024.

**Table 1.12 QSP: U.S. producers, their position on the petition, location of production, and share of reported production, 2024**

Shares in percent

| Firm        | Petitioner status | Position on petition | Production location(s)                                         | Share of slab production |
|-------------|-------------------|----------------------|----------------------------------------------------------------|--------------------------|
| Caesarstone | —                 | ***                  | Richmond Hill, GA                                              | ***                      |
| Cambria     | Petitioner        | ***                  | Le Sueur, MN<br>Belle Plaine, MN<br>Greenfield, IN<br>Kent, OH | ***                      |
| Dal-Tile    | Petitioner        | ***                  | Dickson, TN                                                    | ***                      |
| Elite       | —                 | ***                  | Latta, SC                                                      | ***                      |
| Estone      | —                 | ***                  | Sebring, FL                                                    | ***                      |
| Guidoni     | Petitioner        | ***                  | McRae-Helena, GA                                               | ***                      |
| Hendrix     | —                 | ***                  | Sealy, TX                                                      | ***                      |
| LX Hausys   | —                 | ***                  | Adairsville, GA<br>Adairsville, GA<br>Adairsville, GA          | ***                      |
| All firms   | Various           | Various              | Various                                                        | 100.0                    |

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

Note: Cambria, Dal-Tile, and Guidoni are members of the petitioning party QMAA. \*\*\* is an integrated producer. The firm's production of fabricated slab is included in its share of slab production calculation. Using U.S. shipments as a proxy for production, \*\*\*'s production of fabricated QSP slab accounted for approximately \*\*\* percent of its total QSP production in 2024.

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

<sup>116</sup> The Commission also issued a questionnaire to USA Quartz LLC but did not receive a response. For additional information on integrated U.S. producers' operations and financial experience, see Part 3 and Part 4 of this report, respectively.

<sup>117</sup> The Commission also issued a U.S. fabricators' questionnaire to approximately 500 independent U.S. fabricators of QSP based on industry research and information provided to the Commission by U.S. producer Elite. Twenty-five firms provided usable data on their domestic fabricating operations. For more information on independent U.S. fabricators' operations and financial experience, see appendix I and appendix J of this report, respectively.

## U.S. importers

The Commission issued importer questionnaires to approximately one thousand firms believed to be importers of QSP, as well as to all known U.S. producers of QSP.<sup>118</sup> Usable questionnaire responses were received from 94 firms. The Commission also received a questionnaire response from 15 firms that certified that they had not imported QSP from any source at any time since January 1, 2020.

Based on adjusted official Commerce statistics for imports of QSP,<sup>119</sup> responding firms accounted for 65.6 percent of U.S. imports of QSP from all sources during 2024.<sup>120</sup> Table 1.13 lists the top 20 U.S. importers of QSP, their headquarters, and their share of imports from all import sources during 2024.

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<sup>118</sup> The Commission issued questionnaires to those firms identified in the petition (many of which appear to be logistics firms); staff research; and proprietary, Census-edited Customs' import records.

<sup>119</sup> U.S. imports as presented are based on official U.S. import statistics from the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, adjusted to remove out-of-scope imports under the primary HTS numbers and add in-scope imports under other HTS numbers according to data submitted in the Commission questionnaires.

<sup>120</sup> See Part 2 of this report for additional information on U.S. imports and import coverage calculations.



**Table 1.13 QSP: U.S. importers, their headquarters, and share of total imports within a given source by firm, 2024**

Shares in percent

| <b>Firm</b>            | <b>Headquarters</b>     | <b>Share of imports from all import sources</b> |
|------------------------|-------------------------|-------------------------------------------------|
| Cosentino              | Coral Gables, FL        | ***                                             |
| PNS                    | Orange, CA              | ***                                             |
| Arizona Tile           | Tempe, AZ               | ***                                             |
| Architectural Surfaces | Austin, TX              | ***                                             |
| Caesarstone            | Charlotte, NC           | ***                                             |
| Dal-Tile               | Dallas, TX              | ***                                             |
| Construction Resources | Decatur, GA             | ***                                             |
| Hyundai                | Norcross, GA            | ***                                             |
| Wilsonart              | Austin, TX              | ***                                             |
| Modern Surfaces        | Westbury, NY            | ***                                             |
| Kapotah                | Burlington, MA          | ***                                             |
| DuPont Specialty       | Wilmington, DE          | ***                                             |
| MXM                    | Houston, TX             | ***                                             |
| Pacific Surfaces       | Elk Grove Village, IL   | ***                                             |
| Classic Marble         | Mumbai, India           | ***                                             |
| Haique                 | Dover, DE               | ***                                             |
| LX Hausys              | Alpharetta, GA          | ***                                             |
| Bow Trade              | Lakewood, CO            | ***                                             |
| Venkata                | Maddipadu Mandal, India | ***                                             |
| Surface Warehouse      | Austin, TX              | ***                                             |
| All other firms        | Various                 | ***                                             |
| All firms              | Various                 | 100.0                                           |

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

Note: The table shows the share of imports from the top twenty U.S. importers followed by the share of imports from all other firms. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

## **U.S. purchasers**

The Commission sent U.S. purchasers' questionnaires to 91 firms identified as possible U.S. purchasers of QSP and received 27 usable questionnaire responses from firms that purchased QSP during January 2020 through September 2025. Responding U.S. purchasers of QSP are mostly distributors (16 firms) and retailers (9 firms) with one firm classified as a house builder and one as a U.S. producer; leading purchasers include \*\*\*.

## **Third-country market import restraints**

There are no known import restraints on QSP in third-country markets.<sup>121</sup>

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<sup>121</sup> Based upon the petition and publicly available information from the World Trade Organization's ("WTO") trade remedies data portal.

## Part 2: Information relating to increased imports

### U.S. imports

U.S. import data and related information presented in this part of the report are based on adjusted official Commerce statistics<sup>1</sup> and the questionnaire responses of 94 companies, which accounted for 65.6 percent of U.S. imports of QSP from all sources during 2024. Table 2.1 presents questionnaire coverage calculations for select sources, as well as for all import sources combined, during 2024.

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<sup>1</sup> U.S. imports as presented are based on official U.S. import statistics from the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, adjusted to remove out-of-scope imports under the primary HTS numbers and add in-scope imports under other HTS numbers according to data submitted in the questionnaires.

**Table 2.1 QSP: U.S. imports questionnaire data coverage in 2024**

Coverage ratio in percent

| Source             | Coverage |
|--------------------|----------|
| Canada             | 90.9     |
| China              | 1.6      |
| Czechia            | 89.1     |
| India              | 52.8     |
| Israel             | 147.4    |
| Italy              | 74.7     |
| Malaysia           | 73.0     |
| Mexico             | 0.0      |
| Spain              | 99.8     |
| Taiwan             | 42.3     |
| Thailand           | 73.7     |
| Turkey             | 88.1     |
| Vietnam            | 56.3     |
| Other FTA sources  | 102.4    |
| All other sources  | 44.9     |
| All import sources | 65.6     |

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics from the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, accessed on December 15, 2025. Imports are based on the imports for consumption data series. Official U.S. import statistics were adjusted to remove out-of-scope imports under the primary HTS numbers and add in-scope imports under other HTS numbers according to data submitted in the questionnaires.

Note: The coverage ratio calculations are derived by taking the quantity of imports as reported in U.S. importers' questionnaire responses and dividing those figures by quantity imports as reported in adjusted official U.S. import statistics of the U.S. Department of Commerce Census Bureau (table 2.2).

Note: "Other free trade agreement ('FTA') sources" were defined in the questionnaires to include the following countries: Australia, Bahrain, Chile, Colombia, Costa Rica, Dominican Republic, El Salvador, Guatemala, Honduras, Jordan, Morocco, Nicaragua, Oman, Panama, Peru, Singapore, and South Korea. Two firms reported importing QSP from Oman and South Korea.

Note: Firms which reported importing QSP from "all other sources" listed the following countries as their source: Bangladesh, Belgium, Brazil, Cambodia, Germany, Indonesia, the Philippines, Pakistan, Portugal, Sri Lanka, and the United Arab Emirates.

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

Table 2.2 and figure 2.1 present data for U.S. imports of QSP from all sources over the period of the investigation. The largest sources of U.S. imports of QSP during the period were India, Spain, and Vietnam, which accounted for approximately two-thirds of QSP imports during 2024.

U.S. imports from all sources, by quantity, increased irregularly during the period of the investigation, increasing from 2020 to 2022, before decreasing in 2023 and then increasing in 2024 to a level higher than in any other period examined. Imports by value also increased irregularly during the period of investigation, peaking in 2022 before decreasing in 2023 and then increasing in 2024 to a level higher than in 2020. Imports by quantity and value were both relatively steady in interim 2025 compared with interim 2024.

The average unit value for imports from all sources aggregated ranged between approximately \$7.30 and \$9.50 per square foot. Canada and Mexico, on average, had the highest unit values during the period of the investigation, while China and India had, on average, the lowest unit values.

In any period examined, the quantity of U.S. imports of QSP were three to seven times larger than U.S. producers' production of QSP. The ratio of these imports to U.S. producers' production increased from 2020 to 2024 and was higher in interim 2025 compared with interim 2024. Imports from India, Spain, and Vietnam as a ratio of U.S. producers' production were among the highest in each period. In 2024, imports from these three countries, individually, were higher than U.S. producers' production of QSP.

**Table 2.2 QSP: U.S. imports, by source and period**

Quantity in 1,000 square feet; Value in 1,000 dollars

| Source             | Measure  | 2020      | 2021      | 2022      | 2023      | 2024      |
|--------------------|----------|-----------|-----------|-----------|-----------|-----------|
| Canada             | Quantity | 8,142     | 7,760     | 5,896     | 4,945     | 4,714     |
| China              | Quantity | 976       | 1,024     | 2,654     | 2,017     | 3,151     |
| Czechia            | Quantity | 2,514     | 3,448     | 3,879     | 2,533     | 2,911     |
| India              | Quantity | 26,924    | 54,381    | 68,521    | 56,508    | 84,547    |
| Israel             | Quantity | 9,360     | 7,274     | 6,227     | 2,491     | 1,501     |
| Italy              | Quantity | 4,077     | 5,153     | 3,221     | 1,671     | 1,121     |
| Malaysia           | Quantity | 12,385    | 16,127    | 5,836     | 4,981     | 9,990     |
| Mexico             | Quantity | 189       | 35        | 17        | 36        | 54        |
| Spain              | Quantity | 24,948    | 36,304    | 44,067    | 31,348    | 34,052    |
| Taiwan             | Quantity | 4,175     | 5,245     | 4,169     | 4,197     | 3,112     |
| Thailand           | Quantity | 1,382     | 4,053     | 13,994    | 20,518    | 27,931    |
| Turkey             | Quantity | 5,242     | 10,388    | 9,460     | 6,589     | 6,055     |
| Vietnam            | Quantity | 19,437    | 33,103    | 34,587    | 38,664    | 43,562    |
| Other FTA sources  | Quantity | 5,658     | 5,512     | 1,875     | 1,464     | 1,284     |
| All other sources  | Quantity | 5,660     | 6,660     | 6,595     | 7,096     | 9,729     |
| All import sources | Quantity | 131,069   | 196,467   | 210,999   | 185,058   | 233,715   |
| Canada             | Value    | 92,989    | 92,961    | 80,854    | 65,264    | 58,647    |
| China              | Value    | 8,306     | 11,386    | 15,318    | 8,365     | 10,306    |
| Czechia            | Value    | 18,712    | 28,403    | 35,683    | 20,722    | 22,292    |
| India              | Value    | 178,190   | 374,932   | 559,355   | 368,604   | 513,591   |
| Israel             | Value    | 101,463   | 76,669    | 66,271    | 25,361    | 13,702    |
| Italy              | Value    | 38,758    | 48,559    | 30,905    | 13,709    | 5,147     |
| Malaysia           | Value    | 103,227   | 149,671   | 56,968    | 36,140    | 69,901    |
| Mexico             | Value    | 1,532     | 502       | 108       | 455       | 713       |
| Spain              | Value    | 270,658   | 398,494   | 374,201   | 262,527   | 232,591   |
| Taiwan             | Value    | 45,683    | 59,424    | 49,580    | 39,505    | 29,560    |
| Thailand           | Value    | 10,181    | 38,787    | 150,860   | 206,175   | 275,905   |
| Turkey             | Value    | 43,647    | 87,717    | 83,647    | 55,489    | 46,774    |
| Vietnam            | Value    | 202,315   | 349,342   | 360,581   | 339,561   | 370,790   |
| Other FTA sources  | Value    | 61,788    | 60,898    | 19,155    | 15,819    | 12,878    |
| All other sources  | Value    | 61,615    | 80,448    | 73,804    | 64,221    | 77,138    |
| All import sources | Value    | 1,239,063 | 1,858,193 | 1,957,290 | 1,521,918 | 1,739,935 |

Table continued.

**Table 2.2 (Continued) QSP: U.S. imports, by source and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Interim period is January through September

| Source             | Measure  | Interim 2024 | Interim 2025 |
|--------------------|----------|--------------|--------------|
| Canada             | Quantity | 3,688        | 2,584        |
| China              | Quantity | 2,570        | 405          |
| Czechia            | Quantity | 2,046        | 1,864        |
| India              | Quantity | 58,648       | 64,947       |
| Israel             | Quantity | 1,187        | 542          |
| Italy              | Quantity | 911          | 296          |
| Malaysia           | Quantity | 6,431        | 8,622        |
| Mexico             | Quantity | 30           | 65           |
| Spain              | Quantity | 24,579       | 23,414       |
| Taiwan             | Quantity | 2,402        | 1,517        |
| Thailand           | Quantity | 18,982       | 19,727       |
| Turkey             | Quantity | 4,744        | 3,709        |
| Vietnam            | Quantity | 32,629       | 29,766       |
| Other FTA sources  | Quantity | 975          | 747          |
| All other sources  | Quantity | 7,235        | 8,101        |
| All import sources | Quantity | 167,057      | 166,305      |
| Canada             | Value    | 45,706       | 31,742       |
| China              | Value    | 8,063        | 1,330        |
| Czechia            | Value    | 15,438       | 15,249       |
| India              | Value    | 356,641      | 407,631      |
| Israel             | Value    | 10,997       | 4,878        |
| Italy              | Value    | 5,015        | 3,517        |
| Malaysia           | Value    | 44,959       | 66,590       |
| Mexico             | Value    | 455          | 1,009        |
| Spain              | Value    | 184,255      | 147,580      |
| Taiwan             | Value    | 23,072       | 14,469       |
| Thailand           | Value    | 190,681      | 175,318      |
| Turkey             | Value    | 36,428       | 30,355       |
| Vietnam            | Value    | 278,177      | 258,052      |
| Other FTA sources  | Value    | 10,217       | 6,601        |
| All other sources  | Value    | 59,543       | 54,950       |
| All import sources | Value    | 1,269,648    | 1,219,270    |

Table continued.

**Table 2.2 (Continued) QSP: U.S. imports, by source and period**

Unit values in dollars per square foot; Share in percent

| Source             | Measure           | 2020  | 2021  | 2022  | 2023  | 2024  |
|--------------------|-------------------|-------|-------|-------|-------|-------|
| Canada             | Unit value        | 11.42 | 11.98 | 13.71 | 13.20 | 12.44 |
| China              | Unit value        | 8.51  | 11.12 | 5.77  | 4.15  | 3.27  |
| Czechia            | Unit value        | 7.44  | 8.24  | 9.20  | 8.18  | 7.66  |
| India              | Unit value        | 6.62  | 6.89  | 8.16  | 6.52  | 6.07  |
| Israel             | Unit value        | 10.84 | 10.54 | 10.64 | 10.18 | 9.13  |
| Italy              | Unit value        | 9.51  | 9.42  | 9.59  | 8.20  | 4.59  |
| Malaysia           | Unit value        | 8.33  | 9.28  | 9.76  | 7.26  | 7.00  |
| Mexico             | Unit value        | 8.11  | 14.47 | 6.28  | 12.65 | 13.20 |
| Spain              | Unit value        | 10.85 | 10.98 | 8.49  | 8.37  | 6.83  |
| Taiwan             | Unit value        | 10.94 | 11.33 | 11.89 | 9.41  | 9.50  |
| Thailand           | Unit value        | 7.37  | 9.57  | 10.78 | 10.05 | 9.88  |
| Turkey             | Unit value        | 8.33  | 8.44  | 8.84  | 8.42  | 7.72  |
| Vietnam            | Unit value        | 10.41 | 10.55 | 10.43 | 8.78  | 8.51  |
| Other FTA sources  | Unit value        | 10.92 | 11.05 | 10.22 | 10.81 | 10.03 |
| All other sources  | Unit value        | 10.89 | 12.08 | 11.19 | 9.05  | 7.93  |
| All import sources | Unit value        | 9.45  | 9.46  | 9.28  | 8.22  | 7.44  |
| Canada             | Share of quantity | 6.2   | 4.0   | 2.8   | 2.7   | 2.0   |
| China              | Share of quantity | 0.7   | 0.5   | 1.3   | 1.1   | 1.3   |
| Czechia            | Share of quantity | 1.9   | 1.8   | 1.8   | 1.4   | 1.2   |
| India              | Share of quantity | 20.5  | 27.7  | 32.5  | 30.5  | 36.2  |
| Israel             | Share of quantity | 7.1   | 3.7   | 3.0   | 1.3   | 0.6   |
| Italy              | Share of quantity | 3.1   | 2.6   | 1.5   | 0.9   | 0.5   |
| Malaysia           | Share of quantity | 9.4   | 8.2   | 2.8   | 2.7   | 4.3   |
| Mexico             | Share of quantity | 0.1   | 0.0   | 0.0   | 0.0   | 0.0   |
| Spain              | Share of quantity | 19.0  | 18.5  | 20.9  | 16.9  | 14.6  |
| Taiwan             | Share of quantity | 3.2   | 2.7   | 2.0   | 2.3   | 1.3   |
| Thailand           | Share of quantity | 1.1   | 2.1   | 6.6   | 11.1  | 12.0  |
| Turkey             | Share of quantity | 4.0   | 5.3   | 4.5   | 3.6   | 2.6   |
| Vietnam            | Share of quantity | 14.8  | 16.8  | 16.4  | 20.9  | 18.6  |
| Other FTA sources  | Share of quantity | 4.3   | 2.8   | 0.9   | 0.8   | 0.5   |
| All other sources  | Share of quantity | 4.3   | 3.4   | 3.1   | 3.8   | 4.2   |
| All import sources | Share of quantity | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Table continued.



**Table 2.2 (Continued) QSP: U.S. imports, by source and period**

Unit values in dollars per square foot; Share in percent; Interim period is January through September

| Source             | Measure           | Interim 2024 | Interim 2025 |
|--------------------|-------------------|--------------|--------------|
| Canada             | Unit value        | 12.39        | 12.28        |
| China              | Unit value        | 3.14         | 3.28         |
| Czechia            | Unit value        | 7.55         | 8.18         |
| India              | Unit value        | 6.08         | 6.28         |
| Israel             | Unit value        | 9.26         | 9.00         |
| Italy              | Unit value        | 5.51         | 11.86        |
| Malaysia           | Unit value        | 6.99         | 7.72         |
| Mexico             | Unit value        | 14.94        | 15.64        |
| Spain              | Unit value        | 7.50         | 6.30         |
| Taiwan             | Unit value        | 9.61         | 9.54         |
| Thailand           | Unit value        | 10.05        | 8.89         |
| Turkey             | Unit value        | 7.68         | 8.18         |
| Vietnam            | Unit value        | 8.53         | 8.67         |
| Other FTA sources  | Unit value        | 10.48        | 8.84         |
| All other sources  | Unit value        | 8.23         | 6.78         |
| All import sources | Unit value        | 7.60         | 7.33         |
| Canada             | Share of quantity | 2.2          | 1.6          |
| China              | Share of quantity | 1.5          | 0.2          |
| Czechia            | Share of quantity | 1.2          | 1.1          |
| India              | Share of quantity | 35.1         | 39.1         |
| Israel             | Share of quantity | 0.7          | 0.3          |
| Italy              | Share of quantity | 0.5          | 0.2          |
| Malaysia           | Share of quantity | 3.8          | 5.2          |
| Mexico             | Share of quantity | 0.0          | 0.0          |
| Spain              | Share of quantity | 14.7         | 14.1         |
| Taiwan             | Share of quantity | 1.4          | 0.9          |
| Thailand           | Share of quantity | 11.4         | 11.9         |
| Turkey             | Share of quantity | 2.8          | 2.2          |
| Vietnam            | Share of quantity | 19.5         | 17.9         |
| Other FTA sources  | Share of quantity | 0.6          | 0.4          |
| All other sources  | Share of quantity | 4.3          | 4.9          |
| All import sources | Share of quantity | 100.0        | 100.0        |

Table continued.

**Table 2.2 (Continued) QSP: U.S. imports, by source and period**

Share and ratio in percent; Ratio represents the ratio to U.S. production

| Source             | Measure        | 2020  | 2021  | 2022  | 2023  | 2024  |
|--------------------|----------------|-------|-------|-------|-------|-------|
| Canada             | Share of value | 7.5   | 5.0   | 4.1   | 4.3   | 3.4   |
| China              | Share of value | 0.7   | 0.6   | 0.8   | 0.5   | 0.6   |
| Czechia            | Share of value | 1.5   | 1.5   | 1.8   | 1.4   | 1.3   |
| India              | Share of value | 14.4  | 20.2  | 28.6  | 24.2  | 29.5  |
| Israel             | Share of value | 8.2   | 4.1   | 3.4   | 1.7   | 0.8   |
| Italy              | Share of value | 3.1   | 2.6   | 1.6   | 0.9   | 0.3   |
| Malaysia           | Share of value | 8.3   | 8.1   | 2.9   | 2.4   | 4.0   |
| Mexico             | Share of value | 0.1   | 0.0   | 0.0   | 0.0   | 0.0   |
| Spain              | Share of value | 21.8  | 21.4  | 19.1  | 17.2  | 13.4  |
| Taiwan             | Share of value | 3.7   | 3.2   | 2.5   | 2.6   | 1.7   |
| Thailand           | Share of value | 0.8   | 2.1   | 7.7   | 13.5  | 15.9  |
| Turkey             | Share of value | 3.5   | 4.7   | 4.3   | 3.6   | 2.7   |
| Vietnam            | Share of value | 16.3  | 18.8  | 18.4  | 22.3  | 21.3  |
| Other FTA sources  | Share of value | 5.0   | 3.3   | 1.0   | 1.0   | 0.7   |
| All other sources  | Share of value | 5.0   | 4.3   | 3.8   | 4.2   | 4.4   |
| All import sources | Share of value | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |
| Canada             | Ratio          | 20.6  | 17.8  | 13.2  | 12.5  | 14.4  |
| China              | Ratio          | 2.5   | 2.4   | 6.0   | 5.1   | 9.6   |
| Czechia            | Ratio          | 6.4   | 7.9   | 8.7   | 6.4   | 8.9   |
| India              | Ratio          | 68.3  | 124.9 | 153.7 | 142.6 | 258.9 |
| Israel             | Ratio          | 23.7  | 16.7  | 14.0  | 6.3   | 4.6   |
| Italy              | Ratio          | 10.3  | 11.8  | 7.2   | 4.2   | 3.4   |
| Malaysia           | Ratio          | 31.4  | 37.0  | 13.1  | 12.6  | 30.6  |
| Mexico             | Ratio          | 0.5   | 0.1   | 0.0   | 0.1   | 0.2   |
| Spain              | Ratio          | 63.2  | 83.4  | 98.9  | 79.1  | 104.3 |
| Taiwan             | Ratio          | 10.6  | 12.0  | 9.4   | 10.6  | 9.5   |
| Thailand           | Ratio          | 3.5   | 9.3   | 31.4  | 51.8  | 85.5  |
| Turkey             | Ratio          | 13.3  | 23.9  | 21.2  | 16.6  | 18.5  |
| Vietnam            | Ratio          | 49.3  | 76.0  | 77.6  | 97.5  | 133.4 |
| Other FTA sources  | Ratio          | 14.3  | 12.7  | 4.2   | 3.7   | 3.9   |
| All other sources  | Ratio          | 14.3  | 15.3  | 14.8  | 17.9  | 29.8  |
| All import sources | Ratio          | 332.3 | 451.3 | 473.3 | 466.9 | 715.7 |

Table continued.

**Table 2.2 (Continued) QSP: U.S. imports, by source and period**

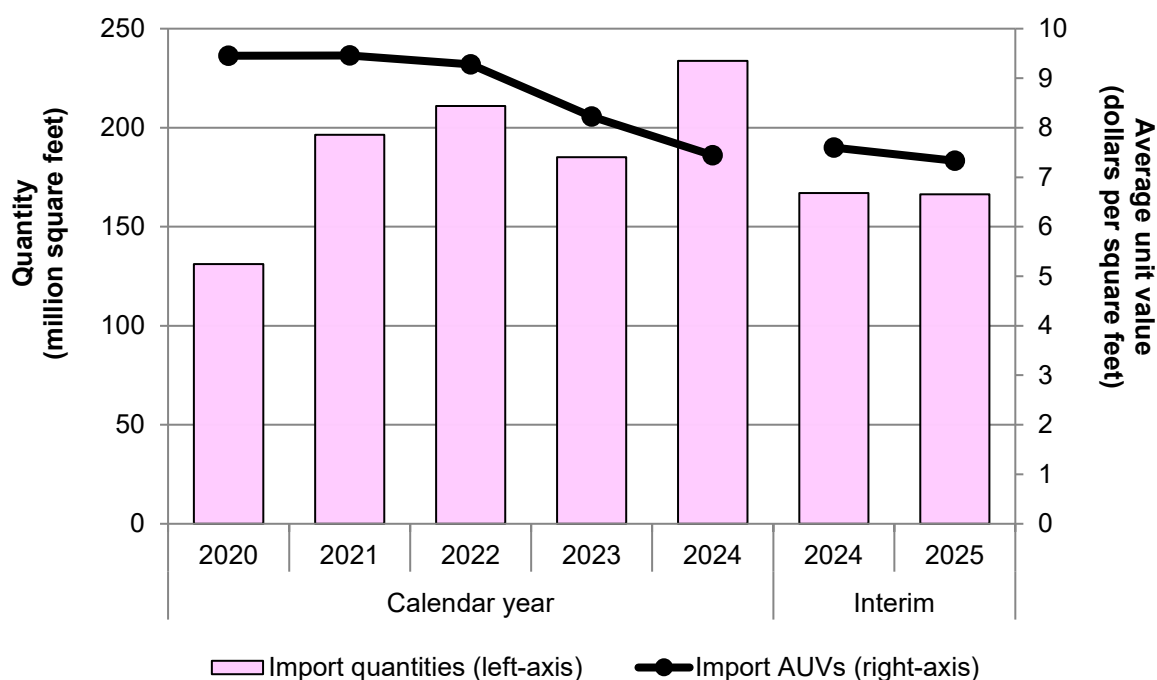
Share and ratio in percent; Ratio represents the ratio to U.S. production; Interim period is January through September

| Source             | Measure        | Interim 2024 | Interim 2025 |
|--------------------|----------------|--------------|--------------|
| Canada             | Share of value | 3.6          | 2.6          |
| China              | Share of value | 0.6          | 0.1          |
| Czechia            | Share of value | 1.2          | 1.3          |
| India              | Share of value | 28.1         | 33.4         |
| Israel             | Share of value | 0.9          | 0.4          |
| Italy              | Share of value | 0.4          | 0.3          |
| Malaysia           | Share of value | 3.5          | 5.5          |
| Mexico             | Share of value | 0.0          | 0.1          |
| Spain              | Share of value | 14.5         | 12.1         |
| Taiwan             | Share of value | 1.8          | 1.2          |
| Thailand           | Share of value | 15.0         | 14.4         |
| Turkey             | Share of value | 2.9          | 2.5          |
| Vietnam            | Share of value | 21.9         | 21.2         |
| Other FTA sources  | Share of value | 0.8          | 0.5          |
| All other sources  | Share of value | 4.7          | 4.5          |
| All import sources | Share of value | 100.0        | 100.0        |
| Canada             | Ratio          | 14.9         | 10.5         |
| China              | Ratio          | 10.4         | 1.7          |
| Czechia            | Ratio          | 8.3          | 7.6          |
| India              | Ratio          | 237.3        | 264.6        |
| Israel             | Ratio          | 4.8          | 2.2          |
| Italy              | Ratio          | 3.7          | 1.2          |
| Malaysia           | Ratio          | 26.0         | 35.1         |
| Mexico             | Ratio          | 0.1          | 0.3          |
| Spain              | Ratio          | 99.5         | 95.4         |
| Taiwan             | Ratio          | 9.7          | 6.2          |
| Thailand           | Ratio          | 76.8         | 80.4         |
| Turkey             | Ratio          | 19.2         | 15.1         |
| Vietnam            | Ratio          | 132.0        | 121.3        |
| Other FTA sources  | Ratio          | 3.9          | 3.0          |
| All other sources  | Ratio          | 29.3         | 33.0         |
| All import sources | Ratio          | 676.0        | 677.6        |

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics from the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, accessed on December 15, 2025. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values. Official U.S. import statistics were adjusted to remove out-of-scope imports under the primary HTS numbers and add in-scope imports under other HTS numbers according to data submitted in the questionnaires.

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

**Figure 2.1 QSP: U.S. import quantities and average unit values, by source and period**



Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics from the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, accessed on December 15, 2025. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values. Official U.S. import statistics were adjusted to remove out-of-scope imports under the primary HTS numbers and add in-scope imports under other HTS numbers according to data submitted in the questionnaires.

## U.S. imports from other FTA partners

Table 2.3 present information on imports of QSP from countries other than Canada, Israel, and Mexico where the United States has a free trade agreement (“FTA”). Among these other FTA sources, U.S. imports from Oman and South Korea were among the highest, accounting for nearly all imports of QSP from these other FTA sources in each period examined.

The ratio of imports from other FTA sources to total imports was relatively small and decreased over the period of investigation. The ratio did not exceed 4.5 percent in any period examined.

**Table 2.3 QSP: U.S. imports from other FTA partners, by source and period**

Quantity in 1,000 square feet; Share in percent; Interim period is January through September

| Source                                     | Measure           | 2020  | 2021  | 2022  | 2023  | 2024  | Interim 2024 | Interim 2025 |
|--------------------------------------------|-------------------|-------|-------|-------|-------|-------|--------------|--------------|
| Australia                                  | Quantity          | 0     | —     | —     | —     | 16    | 12           | 3            |
| Bahrain                                    | Quantity          | —     | —     | —     | —     | —     | —            | —            |
| Chile                                      | Quantity          | —     | —     | —     | —     | —     | —            | —            |
| Colombia                                   | Quantity          | —     | 6     | 6     | 1     | —     | —            | 0            |
| Costa Rica                                 | Quantity          | —     | —     | —     | —     | —     | —            | —            |
| Dominican Republic                         | Quantity          | 0     | 8     | —     | —     | 2     | 2            | —            |
| El Salvador                                | Quantity          | —     | —     | —     | —     | —     | —            | —            |
| Guatemala                                  | Quantity          | —     | —     | —     | —     | —     | —            | —            |
| Honduras                                   | Quantity          | —     | —     | —     | —     | —     | —            | —            |
| Jordan                                     | Quantity          | —     | —     | —     | —     | 0     | —            | —            |
| Morocco                                    | Quantity          | —     | —     | —     | 12    | 27    | 17           | 5            |
| Nicaragua                                  | Quantity          | —     | —     | —     | —     | —     | —            | —            |
| Oman                                       | Quantity          | 147   | 108   | 1,118 | 953   | 576   | 516          | 296          |
| Panama                                     | Quantity          | 1     | —     | —     | 3     | —     | —            | —            |
| Peru                                       | Quantity          | —     | —     | —     | —     | —     | —            | —            |
| Singapore                                  | Quantity          | 2     | 35    | 5     | —     | 0     | —            | —            |
| South Korea                                | Quantity          | 5,609 | 5,452 | 834   | 592   | 743   | 486          | 489          |
| Total imports, other FTA partners          | Quantity          | 5,760 | 5,609 | 1,963 | 1,560 | 1,365 | 1,034        | 794          |
| Questionnaire adjustment                   | Quantity          | 102   | 97    | 88    | 96    | 81    | 59           | 47           |
| Adjusted total imports, other FTA partners | Quantity          | 5,658 | 5,512 | 1,875 | 1,464 | 1,284 | 975          | 747          |
| Australia                                  | Share of quantity | 0.0   | —     | —     | —     | 1.2   | 1.1          | 0.4          |
| Bahrain                                    | Share of quantity | —     | —     | —     | —     | —     | —            | —            |
| Chile                                      | Share of quantity | —     | —     | —     | —     | —     | —            | —            |
| Colombia                                   | Share of quantity | —     | 0.1   | 0.3   | 0.1   | —     | —            | 0.0          |
| Costa Rica                                 | Share of quantity | —     | —     | —     | —     | —     | —            | —            |
| Dominican Republic                         | Share of quantity | 0.0   | 0.1   | —     | —     | 0.1   | 0.2          | —            |
| El Salvador                                | Share of quantity | —     | —     | —     | —     | —     | —            | —            |
| Guatemala                                  | Share of quantity | —     | —     | —     | —     | —     | —            | —            |
| Honduras                                   | Share of quantity | —     | —     | —     | —     | —     | —            | —            |
| Jordan                                     | Share of quantity | —     | —     | —     | —     | 0.0   | —            | —            |
| Morocco                                    | Share of quantity | —     | —     | —     | 0.8   | 2.0   | 1.7          | 0.7          |
| Nicaragua                                  | Share of quantity | —     | —     | —     | —     | —     | —            | —            |
| Oman                                       | Share of quantity | 2.5   | 1.9   | 56.9  | 61.1  | 42.2  | 49.9         | 37.4         |
| Panama                                     | Share of quantity | 0.0   | —     | —     | 0.2   | —     | —            | —            |
| Peru                                       | Share of quantity | —     | —     | —     | —     | —     | —            | —            |
| Singapore                                  | Share of quantity | 0.0   | 0.6   | 0.3   | —     | 0.0   | —            | —            |
| South Korea                                | Share of quantity | 97.4  | 97.2  | 42.5  | 37.9  | 54.4  | 47.1         | 61.6         |
| Total imports, other FTA partners          | Share of quantity | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

Table continued.

**Table 2.3 (Continued) QSP: U.S. imports from other FTA partners, by source and period**

Ratio represents the ratio to U.S. imports; Interim period is January through September

| Source                                     | Measure | 2020 | 2021 | 2022 | 2023 | 2024 | Interim 2024 | Interim 2025 |
|--------------------------------------------|---------|------|------|------|------|------|--------------|--------------|
| Australia                                  | Ratio   | 0.0  | —    | —    | —    | 0.0  | 0.0          | 0.0          |
| Bahrain                                    | Ratio   | —    | —    | —    | —    | —    | —            | —            |
| Chile                                      | Ratio   | —    | —    | —    | —    | —    | —            | —            |
| Colombia                                   | Ratio   | —    | 0.0  | 0.0  | 0.0  | —    | —            | 0.0          |
| Costa Rica                                 | Ratio   | —    | —    | —    | —    | —    | —            | —            |
| Dominican Republic                         | Ratio   | 0.0  | 0.0  | —    | —    | 0.0  | 0.0          | —            |
| El Salvador                                | Ratio   | —    | —    | —    | —    | —    | —            | —            |
| Guatemala                                  | Ratio   | —    | —    | —    | —    | —    | —            | —            |
| Honduras                                   | Ratio   | —    | —    | —    | —    | —    | —            | —            |
| Jordan                                     | Ratio   | —    | —    | —    | —    | 0.0  | —            | —            |
| Morocco                                    | Ratio   | —    | —    | —    | 0.0  | 0.0  | 0.0          | 0.0          |
| Nicaragua                                  | Ratio   | —    | —    | —    | —    | —    | —            | —            |
| Oman                                       | Ratio   | 0.1  | 0.1  | 0.5  | 0.5  | 0.2  | 0.3          | 0.2          |
| Panama                                     | Ratio   | 0.0  | —    | —    | 0.0  | —    | —            | —            |
| Peru                                       | Ratio   | —    | —    | —    | —    | —    | —            | —            |
| Singapore                                  | Ratio   | 0.0  | 0.0  | 0.0  | —    | 0.0  | —            | —            |
| South Korea                                | Ratio   | 4.3  | 2.8  | 0.4  | 0.3  | 0.3  | 0.3          | 0.3          |
| Total imports, other FTA partners          | Ratio   | 4.4  | 2.9  | 0.9  | 0.8  | 0.6  | 0.6          | 0.5          |
| Questionnaire adjustment                   | Ratio   | 0.1  | 0.0  | 0.0  | 0.1  | 0.0  | 0.0          | 0.0          |
| Adjusted total imports, other FTA partners | Ratio   | 4.3  | 2.8  | 0.9  | 0.8  | 0.5  | 0.6          | 0.4          |

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, accessed on December 15, 2025. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

Note: Quantity and value questionnaire adjustment row presents firms' reported imports of out-of-scope merchandise from other FTA partners using primary HTS numbers. Share of quantity is the share of imports to the unadjusted total imports from other FTA partners. For the ratio to U.S. imports, the imports from the other FTA partners were unadjusted, while the total adjusted U.S. imports were adjusted to remove out-of-scope imports under the primary HTS numbers and add in-scope imports under other HTS numbers.

Note: Quantity shown as "0" represent values greater than zero, but less than "500". Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

## U.S. importers' U.S. shipments by product types

### U.S. importers' U.S. shipments by product form

In this investigation, U.S. importers were asked to report their U.S. shipments of QSP by product form: slab versus fabricated slab. Table 2.4 presents U.S. importers' U.S. shipments of these types of QSP. The majority of U.S. importers' U.S. shipments were of slabs, which accounted for over half of their U.S. shipments in each period examined.

**Table 2.4 QSP: U.S. importers' imports, by product form and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares in percent

| Product form               | Measure           | 2020      | 2021      | 2022      | 2023      | 2024      |
|----------------------------|-------------------|-----------|-----------|-----------|-----------|-----------|
| Slab                       | Quantity          | 105,827   | 153,127   | 155,261   | 119,972   | 149,384   |
| Fabricated slab            | Quantity          | 1,706     | 3,158     | 2,483     | 2,551     | 3,989     |
| Unknown                    | Quantity          | 23,536    | 40,182    | 53,256    | 62,535    | 80,342    |
| All imported product forms | Quantity          | 131,069   | 196,467   | 210,999   | 185,058   | 233,715   |
| Slab                       | Value             | 1,009,765 | 1,488,733 | 1,476,065 | 1,033,374 | 1,180,157 |
| Fabricated slab            | Value             | 20,274    | 37,787    | 31,276    | 30,655    | 45,686    |
| Unknown                    | Value             | 209,024   | 331,673   | 449,948   | 457,889   | 514,092   |
| All imported product forms | Value             | 1,239,063 | 1,858,193 | 1,957,290 | 1,521,918 | 1,739,935 |
| Slab                       | Unit value        | 9.54      | 9.72      | 9.51      | 8.61      | 7.90      |
| Fabricated slab            | Unit value        | 11.88     | 11.97     | 12.60     | 12.02     | 11.45     |
| Unknown                    | Unit value        | 8.88      | 8.25      | 8.45      | 7.32      | 6.40      |
| All imported product forms | Unit value        | 9.45      | 9.46      | 9.28      | 8.22      | 7.44      |
| Slab                       | Share of quantity | 80.7      | 77.9      | 73.6      | 64.8      | 63.9      |
| Fabricated slab            | Share of quantity | 1.3       | 1.6       | 1.2       | 1.4       | 1.7       |
| Unknown                    | Share of quantity | 18.0      | 20.5      | 25.2      | 33.8      | 34.4      |
| All imported product forms | Share of quantity | 100.0     | 100.0     | 100.0     | 100.0     | 100.0     |
| Slab                       | Share of value    | 81.5      | 80.1      | 75.4      | 67.9      | 67.8      |
| Fabricated slab            | Share of value    | 1.6       | 2.0       | 1.6       | 2.0       | 2.6       |
| Unknown                    | Share of value    | 16.9      | 17.8      | 23.0      | 30.1      | 29.5      |
| All imported product forms | Share of value    | 100.0     | 100.0     | 100.0     | 100.0     | 100.0     |

Table continued.

**Table 2.4 (Continued) QSP: U.S. importers' imports, by product form and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares in percent; Interim period is January through September

| Product form               | Measure           | Interim 2024 | Interim 2025 |
|----------------------------|-------------------|--------------|--------------|
| Slab                       | Quantity          | 107,915      | 103,679      |
| Fabricated slab            | Quantity          | 2,800        | 3,782        |
| Unknown                    | Quantity          | 56,341       | 58,844       |
| All imported product forms | Quantity          | 167,057      | 166,305      |
| Slab                       | Value             | 870,778      | 777,008      |
| Fabricated slab            | Value             | 31,380       | 37,035       |
| Unknown                    | Value             | 367,490      | 405,227      |
| All imported product forms | Value             | 1,269,648    | 1,219,270    |
| Slab                       | Unit value        | 8.07         | 7.49         |
| Fabricated slab            | Unit value        | 11.21        | 9.79         |
| Unknown                    | Unit value        | 6.52         | 6.89         |
| All imported product forms | Unit value        | 7.60         | 7.33         |
| Slab                       | Share of quantity | 64.6         | 62.3         |
| Fabricated slab            | Share of quantity | 1.7          | 2.3          |
| Unknown                    | Share of quantity | 33.7         | 35.4         |
| All imported product forms | Share of quantity | 100.0        | 100.0        |
| Slab                       | Share of value    | 68.6         | 63.7         |
| Fabricated slab            | Share of value    | 2.5          | 3.0          |
| Unknown                    | Share of value    | 28.9         | 33.2         |
| All imported product forms | Share of value    | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics from the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, accessed on December 15, 2025. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values. Official U.S. import statistics were adjusted to remove out-of-scope imports under the primary HTS numbers and add in-scope imports under other HTS numbers according to data submitted in the questionnaires. All imported product forms are adjusted official U.S. import statistics. Unknown imported product is the amount of imports that have not been reported in questionnaire submissions.

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



## U.S. importers' U.S. shipments by caliber

U.S. importers were asked to report their U.S. shipments of QSP by caliber type: premium brands versus mass market brands (as defined by the responding firms themselves). Table 2.5 presents U.S. importers' U.S. shipments of these QSP types. The majority of U.S. importers' U.S. shipments were of mass market brands. Though the share of U.S. shipments of mass market brands to all other U.S. shipments decreased from 2020 to 2024 and were lower in interim 2025 compared with interim 2024.

**Table 2.5 QSP: U.S. importers' U.S. shipments of imports, by caliber and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares in percent

| Caliber            | Measure           | 2020      | 2021      | 2022      | 2023      | 2024      |
|--------------------|-------------------|-----------|-----------|-----------|-----------|-----------|
| Premium brands     | Quantity          | 43,787    | 55,501    | 64,774    | 60,477    | 64,442    |
| Mass market brands | Quantity          | 76,206    | 90,435    | 87,211    | 72,250    | 73,308    |
| All calibers       | Quantity          | 119,993   | 145,935   | 151,985   | 132,727   | 137,750   |
| Premium brands     | Value             | 763,809   | 987,423   | 1,149,889 | 1,038,601 | 979,464   |
| Mass market brands | Value             | 928,447   | 1,068,096 | 1,097,871 | 816,086   | 716,534   |
| All calibers       | Value             | 1,692,256 | 2,055,518 | 2,247,760 | 1,854,687 | 1,695,999 |
| Premium brands     | Unit value        | 17.44     | 17.79     | 17.75     | 17.17     | 15.20     |
| Mass market brands | Unit value        | 12.18     | 11.81     | 12.59     | 11.30     | 9.77      |
| All calibers       | Unit value        | 14.10     | 14.09     | 14.79     | 13.97     | 12.31     |
| Premium brands     | Share of quantity | 36.5      | 38.0      | 42.6      | 45.6      | 46.8      |
| Mass market brands | Share of quantity | 63.5      | 62.0      | 57.4      | 54.4      | 53.2      |
| All calibers       | Share of quantity | 100.0     | 100.0     | 100.0     | 100.0     | 100.0     |
| Premium brands     | Share of value    | 45.1      | 48.0      | 51.2      | 56.0      | 57.8      |
| Mass market brands | Share of value    | 54.9      | 52.0      | 48.8      | 44.0      | 42.2      |
| All calibers       | Share of value    | 100.0     | 100.0     | 100.0     | 100.0     | 100.0     |

Table continued.

**Table 2.5 (Continued) QSP: U.S. importers' U.S. shipments of imports, by caliber and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares in percent; Interim period is January through September

| Source             | Measure           | Interim 2024 | Interim 2025 |
|--------------------|-------------------|--------------|--------------|
| Premium brands     | Quantity          | 48,249       | 49,805       |
| Mass market brands | Quantity          | 52,849       | 49,175       |
| All calibers       | Quantity          | 101,098      | 98,980       |
| Premium brands     | Value             | 745,560      | 725,498      |
| Mass market brands | Value             | 519,231      | 502,422      |
| All calibers       | Value             | 1,264,791    | 1,227,920    |
| Premium brands     | Unit value        | 15.45        | 14.57        |
| Mass market brands | Unit value        | 9.82         | 10.22        |
| All calibers       | Unit value        | 12.51        | 12.41        |
| Premium brands     | Share of quantity | 47.7         | 50.3         |
| Mass market brands | Share of quantity | 52.3         | 49.7         |
| All calibers       | Share of quantity | 100.0        | 100.0        |
| Premium brands     | Share of value    | 58.9         | 59.1         |
| Mass market brands | Share of value    | 41.1         | 40.9         |
| All calibers       | Share of value    | 100.0        | 100.0        |

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

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

## U.S. importers' U.S. shipments by attribute and thickness

U.S. importers were asked to report their 2024 U.S. shipments of QSP by attribute and thickness. Table 2.6 and figures 2.2 and 2.3 present U.S. importers' U.S. shipments of these QSP types. During 2024, the majority of U.S. importers' U.S. shipments were of marble design with short- and long-veining of 3 cm thickness. U.S. importer's U.S. shipments of marble design with long-veining, regardless of thickness, had the highest unit value of all the attributes.

**Table 2.6 QSP: U.S. importers' U.S. shipments of imports in 2024, by attribute and thickness**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot

| Attribute                                   | Measure    | 1 cm thickness | 2 cm thickness | 3 cm thickness | All thicknesses |
|---------------------------------------------|------------|----------------|----------------|----------------|-----------------|
| Granite design                              | Quantity   | 8              | 1,164          | 4,379          | 5,551           |
| Marble design with short veining            | Quantity   | 199            | 11,350         | 21,750         | 33,299          |
| Marble design with long veining             | Quantity   | 197            | 12,383         | 35,061         | 47,641          |
| Uniform with white color design             | Quantity   | 1,120          | 15,389         | 14,534         | 31,044          |
| Uniform with neutral and light color design | Quantity   | 87             | 2,634          | 3,513          | 6,233           |
| Uniform with dark and black color design    | Quantity   | 31             | 2,514          | 2,377          | 4,921           |
| Crushed glass design                        | Quantity   | 4              | 994            | 1,203          | 2,201           |
| All other designs                           | Quantity   | 26             | 1,722          | 5,111          | 6,859           |
| All designs                                 | Quantity   | 1,671          | 48,151         | 87,928         | 137,750         |
| Granite design                              | Value      | 63             | 13,194         | 68,329         | 81,587          |
| Marble design with short veining            | Value      | 1,971          | 114,526        | 281,698        | 398,195         |
| Marble design with long veining             | Value      | 2,659          | 161,302        | 563,803        | 727,765         |
| Uniform with white color design             | Value      | 5,719          | 115,466        | 136,452        | 257,637         |
| Uniform with neutral and light color design | Value      | 508            | 26,092         | 49,779         | 76,378          |
| Uniform with dark and black color design    | Value      | 203            | 25,777         | 33,080         | 59,060          |
| Crushed glass design                        | Value      | 52             | 14,897         | 9,808          | 24,757          |
| All other designs                           | Value      | 154            | 17,027         | 53,438         | 70,620          |
| All designs                                 | Value      | 11,330         | 488,281        | 1,196,389      | 1,695,999       |
| Granite design                              | Unit value | 7.93           | 11.34          | 15.60          | 14.70           |
| Marble design with short veining            | Unit value | 9.89           | 10.09          | 12.95          | 11.96           |
| Marble design with long veining             | Unit value | 13.51          | 13.03          | 16.08          | 15.28           |
| Uniform with white color design             | Unit value | 5.11           | 7.50           | 9.39           | 8.30            |
| Uniform with neutral and light color design | Unit value | 5.87           | 9.91           | 14.17          | 12.25           |
| Uniform with dark and black color design    | Unit value | 6.65           | 10.25          | 13.92          | 12.00           |
| Crushed glass design                        | Unit value | 12.17          | 14.99          | 8.15           | 11.25           |
| All other designs                           | Unit value | 6.02           | 9.89           | 10.46          | 10.30           |
| All designs                                 | Unit value | 6.78           | 10.14          | 13.61          | 12.31           |

Table continued.

**Table 2.6 (Continued) QSP: U.S. importers' U.S. shipments of imports in 2024, by attribute and thickness**

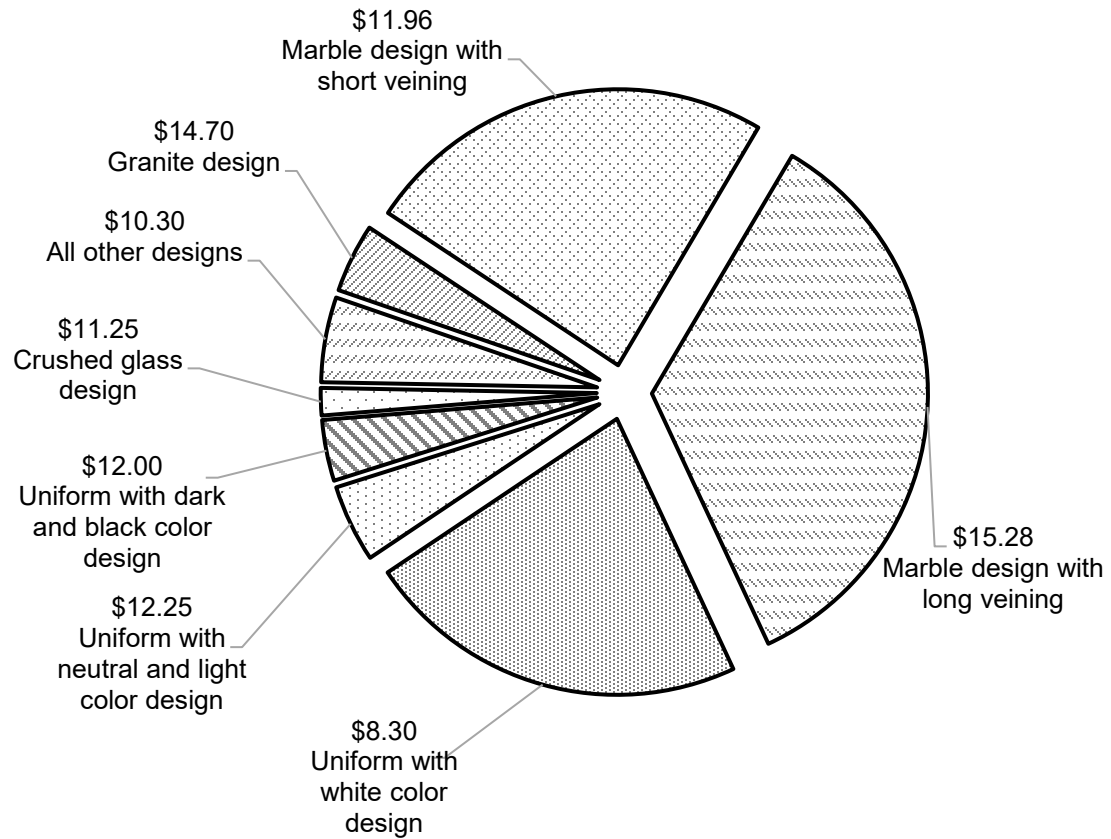
Shares of quantity down and across in percent

| Attribute                                   | Share of quantity      | 1 cm thickness | 2 cm thickness | 3 cm thickness | All thicknesses |
|---------------------------------------------|------------------------|----------------|----------------|----------------|-----------------|
| Granite design                              | Shares down            | 0.5            | 2.4            | 5.0            | 4.0             |
| Marble design with short veining            | Shares down            | 11.9           | 23.6           | 24.7           | 24.2            |
| Marble design with long veining             | Shares down            | 11.8           | 25.7           | 39.9           | 34.6            |
| Uniform with white color design             | Shares down            | 67.0           | 32.0           | 16.5           | 22.5            |
| Uniform with neutral and light color design | Shares down            | 5.2            | 5.5            | 4.0            | 4.5             |
| Uniform with dark and black color design    | Shares down            | 1.8            | 5.2            | 2.7            | 3.6             |
| Crushed glass design                        | Shares down            | 0.3            | 2.1            | 1.4            | 1.6             |
| All other designs                           | Shares down            | 1.5            | 3.6            | 5.8            | 5.0             |
| All designs                                 | Shares down            | 100.0          | 100.0          | 100.0          | 100.0           |
| Granite design                              | Shares across          | 0.1            | 21.0           | 78.9           | 100.0           |
| Marble design with short veining            | Shares across          | 0.6            | 34.1           | 65.3           | 100.0           |
| Marble design with long veining             | Shares across          | 0.4            | 26.0           | 73.6           | 100.0           |
| Uniform with white color design             | Shares across          | 3.6            | 49.6           | 46.8           | 100.0           |
| Uniform with neutral and light color design | Shares across          | 1.4            | 42.3           | 56.4           | 100.0           |
| Uniform with dark and black color design    | Shares across          | 0.6            | 51.1           | 48.3           | 100.0           |
| Crushed glass design                        | Shares across          | 0.2            | 45.1           | 54.7           | 100.0           |
| All other designs                           | Shares across          | 0.4            | 25.1           | 74.5           | 100.0           |
| All designs                                 | Shares across          | 1.2            | 35.0           | 63.8           | 100.0           |
| Granite design                              | Shares down and across | 0.0            | 0.8            | 3.2            | 4.0             |
| Marble design with short veining            | Shares down and across | 0.1            | 8.2            | 15.8           | 24.2            |
| Marble design with long veining             | Shares down and across | 0.1            | 9.0            | 25.5           | 34.6            |
| Uniform with white color design             | Shares down and across | 0.8            | 11.2           | 10.6           | 22.5            |
| Uniform with neutral and light color design | Shares down and across | 0.1            | 1.9            | 2.5            | 4.5             |
| Uniform with dark and black color design    | Shares down and across | 0.0            | 1.8            | 1.7            | 3.6             |
| Crushed glass design                        | Shares down and across | 0.0            | 0.7            | 0.9            | 1.6             |
| All other designs                           | Shares down and across | 0.0            | 1.3            | 3.7            | 5.0             |
| All designs                                 | Shares down and across | 1.2            | 35.0           | 63.8           | 100.0           |

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

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

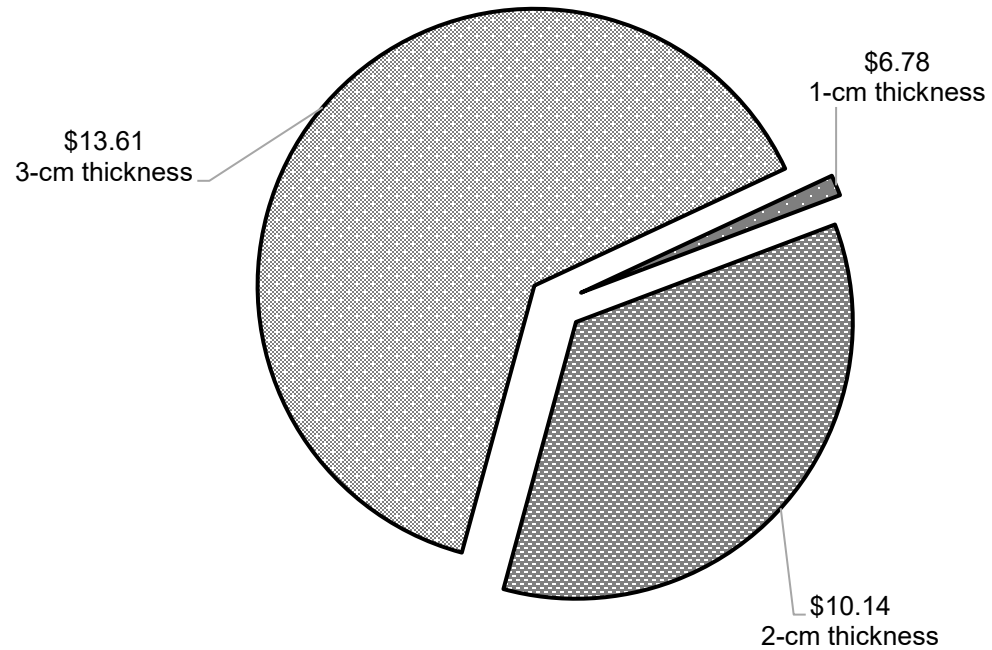
**Figure 2.2 QSP: U.S. importers' average unit values and share of U.S. shipments in 2024, by attribute**



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

Note: Unit values are presented in dollars per square foot.

**Figure 2.3 QSP: U.S. importers' average unit values and share of U.S. shipments in 2024, by thickness**



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

Note: Unit values are presented in dollars per square foot.

## U.S. importers' imports subsequent to September 30, 2025

The Commission requested importers to indicate whether they had imported or arranged for the importation of QSP for delivery after September 30, 2025. The quarterly data reported by 66 responding importers are presented in table 2.7. Imports from Spain, Thailand, and Vietnam accounted for approximately two-thirds of all arranged imports reported.

**Table 2.7 QSP: Arranged imports, by source and by period**

Quantity in 1,000 square feet

| Source             | Q4 2025 | Q1 2026 | Q2 2026 | Q3 2026 | Total  |
|--------------------|---------|---------|---------|---------|--------|
| Canada             | 852     | 931     | 968     | 949     | 3,700  |
| China              | 7       | —       | —       | —       | 7      |
| Czechia            | 273     | 258     | 380     | 150     | 1,061  |
| India              | 1,837   | 1,238   | 636     | 288     | 3,998  |
| Israel             | 183     | 6       | —       | —       | 189    |
| Italy              | 88      | 148     | 11      | —       | 246    |
| Malaysia           | 1,195   | 1,162   | 1,024   | 621     | 4,001  |
| Mexico             | 15      | 4       | —       | —       | 19     |
| Spain              | 8,773   | —       | —       | —       | 8,773  |
| Taiwan             | 203     | 26      | —       | —       | 229    |
| Thailand           | 8,969   | 938     | 132     | 76      | 10,115 |
| Turkey             | 612     | 509     | 158     | 16      | 1,295  |
| Vietnam            | 5,691   | 3,519   | 779     | 445     | 10,434 |
| Other FTA sources  | 366     | 415     | 230     | 212     | 1,223  |
| All other sources  | 941     | 429     | 132     | 45      | 1,547  |
| All import sources | 30,005  | 9,583   | 4,447   | 2,802   | 46,837 |

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

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

## U.S. importers' inventories

Table 2.8 presents U.S. importers' end-of-period inventories and the ratio of these inventories to U.S. imports, U.S. shipments of imports, and total shipments of imports. Importers' inventories irregularly increased from 2020 to 2024. Importers inventories increased from 2020 to 2022 before decreasing in 2023 and then increasing in 2024 to level higher than in 2020. Importers inventories were higher in interim 2025 compared with interim 2024. The ratios of U.S. importers inventories to the U.S. imports and total shipments of imports also irregularly increased from 2020 to 2024 and these ratios were higher in interim 2025 compared with interim 2024.

**Table 2.8 QSP: U.S. importers' inventories and their ratio to select items, by period**

Quantity in 1,000 square feet; Ratios in percent; Interim period is January through September

| Item                                               | 2020   | 2021   | 2022   | 2023   | 2024   | Interim 2024 | Interim 2025 |
|----------------------------------------------------|--------|--------|--------|--------|--------|--------------|--------------|
| End-of-period inventory quantity                   | 39,935 | 45,379 | 54,883 | 45,824 | 58,654 | 52,286       | 66,517       |
| Inventory ratio to U.S. imports                    | 37.1   | 29.0   | 34.8   | 37.4   | 38.2   | 35.4         | 46.4         |
| Inventory ratio to U.S. shipments of U.S. imports  | 33.3   | 31.1   | 36.1   | 34.5   | 42.6   | 38.8         | 50.4         |
| Inventory ratio to total shipments of U.S. imports | 33.0   | 30.8   | 35.8   | 34.2   | 42.4   | 38.6         | 50.2         |

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

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



## **Part 3: U.S. producers' production, shipments, and employment**

The term “domestic industry” is defined in section 202(c)(6)(A)(i) of the Trade Act as “the domestic producers as a whole of the like or directly competitive article or those producers whose collective production of the like or directly competitive article constitutes a major proportion of the total domestic production of such article.”<sup>1</sup> Part 1 of this report presents the list of eight firms which responded to the Commission’s U.S. producer’s questionnaire in this proceeding and each company’s position on the petition, production locations, and share of reported production of QSP slab during 2024 (see table 1.12).

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<sup>1</sup> 19 U.S.C. § 2252(c)(6)(A)(i).

## U.S. producers' ownership and related or affiliated firms

The Commission asked firms responding to the U.S. producer questionnaire to identify their owners and any related or affiliated firms involved in the production or U.S. import of QSP. U.S. producers' responses to the Commission's request for information are presented in table 3.1.

**Table 3.1 QSP: U.S. producers' ownership, related and/or affiliated firms**

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

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

## Reported changes experienced and anticipated by the industry

Table 3.2 presents events in the U.S. industry since January 1, 2020.

**Table 3.2 QSP: Important industry events since January 1, 2020**

| Item                         | Firm                       | Event                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|------------------------------|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Expansion                    | LX Hausys                  | In March 2020, LX Hausys completed an expansion of its quartz surface products facility in Adairsville, GA, adding a third production line. The new line increased the company's QSP capacity by 50 percent and led to the hiring of an additional 40 employees. As of February 2026, the company had reduced operating shifts for all three of its QSP production lines and reduced QSP production by 40 percent from 2021 to 2025.                                                                                                                                                                              |
| Plant opening                | Elite Quartz Manufacturing | In September 2020, Spectrum Quartz (part of the Hirsch Glass Corporation) completed construction of a new 360,000-square-foot QSP facility in Latta, SC, that operates as Elite Quartz. The company hired 150 new employees upon opening the plant and had two of four production lines operational. During the planning and construction phase, Spectrum entered into a partnership with MSI (a QSP distributor) in which MSI agreed to provide financial support and its sales and distribution network for QSP produced by Elite. Spectrum provided its QSP manufacturing expertise and production technology. |
| Plant opening                | Guidoni                    | In December 2020, Guidoni completed construction of a new quartz surface products factory in McRae-Helena, GA. The cost of the investment was \$96 million. The facility hired 455 new employees when it opened. As of February 2026, Guidoni had reduced its workforce and the plant was operating a single 8-hour shift, two days per week.                                                                                                                                                                                                                                                                     |
| New plant under construction | American Quartz Max        | In July 2021, it was reported that the American Quartz Group was close to opening a new QSP plant in Barstow, CA. The new plant, operating under the name American Quartz Max, was expected to be the first QSP plant on the west coast of the United States. Groundbreaking for construction of the new multi-million-dollar plant took place in November 2019. It was not clear when the company planned to begin operations at the plant.                                                                                                                                                                      |
| New plant under construction | Hendrix                    | In December 2021, Hendrix broke ground on a new QSP plant in Sealy, TX. It would be the only QSP plant in Texas and employees from 130 to 150 workers.                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Plant closing                | USA Quartz                 | In early 2022, QSP producer USA Quartz ceased operations at its plant in Jacksonville, FL. According to the CEO of USA Quartz, imports from China and other countries, in addition to other challenges, contributed to the decision to shut down. USA Quartz began commercial production at the 62,000 square foot site in early 2019 and was expecting to employ about 50 workers by the end of 2019.                                                                                                                                                                                                            |

| Item                  | Firm                                        | Event                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------------------|---------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Expansion             | Cambria                                     | In November 2022, Cambria completed a factory expansion valued at \$130 million. The expansion added a sixth production line and the capacity to add 50 more employees.                                                                                                                                                                                                                                                                                                                                                                                       |
| Plant expansion       | Dal-Tile                                    | In 2023, Dal-Tile added a second production line to its QSP plant in Dickson, TN. The company invested \$80 million in the line to expand its QSP production capacity and expected to open the line by the end of 2023. According to the president of Dal-Tile, the installation and ramp-up of the new line was delayed and the company was in the process of finalizing testing of the line as of February 2026.                                                                                                                                            |
| Planned plant opening | Cosentino                                   | In April 2023, Cosentino, a Spanish company with facilities in the United States, announced plans to build a new QSP production facility in Jacksonville, FL. In 2025, Cosentino purchased 330 acres of land for the production site and plans to open the plant by 2030. The initial investment in the plant is \$270 million and Cosentino expects to hire 180 employees. Total investment in the project could increase to \$440 million in the future. As of February 2026, progress towards completing the facility was ongoing, according to Cosentino. |
| Planned plant opening | Hendrix                                     | In June 2023, Hendrix hosted a ribbon cutting for its new QSP plant in Sealy, TX with local Chamber of Commerce members and other officials in attendance. A company representative stated that the plant was scheduled to open after onsite employees finished “working out the bugs” at the plant.                                                                                                                                                                                                                                                          |
| Plant closing         | Caesarstone                                 | In December 2023, Caesarstone announced that it was closing its Richmond Hill, GA, slab plant in January 2024. The closure eliminated approximately 129 employees. According to the company the closure was part of a restructuring plan that was intended to “optimiz{e} its global manufacturing footprint.”                                                                                                                                                                                                                                                |
| Plant opening         | Hendrix                                     | In 2024, Hendrix began developing QSP at its new plant in Sealy, TX. The plant had the capacity to produce up to 12 million square feet per year of QSP. The company was developing a range of low silica QSP. According to testimony at the Commission’s hearing, the plant began producing QSP in 2025.                                                                                                                                                                                                                                                     |
| Litigation            | Caesarstone, Cambria, and Color Marble Inc. | In August 2024, a Los Angeles County court awarded \$52 million in damages to a plaintiff that accused engineered stone manufacturers Caesarstone, Cambria, and Color Marble Inc. (a distributor) of responsibility for his silicosis (a lung disease linked to inhaling silica dust generated during fabrication of QSP). The plaintiff was a fabrication worker that contracted the illness while working with QSP.                                                                                                                                         |

| Item                      | Firm         | Event                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------------|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Planned plant opening     | Cambria      | In August 2025, Cambria announced plans to build a new \$80 quartz processing plant and rail center in Randolph, MN. Cambria is planning to move some of its Canadian quartz processing operations to the United States when the new plant is completed. Cambria operates quartz mines in Canada and will send mined quartz to the new processing facility from Canada by rail when it is operational. A company official stated the new plant will “optimize our cost to the tune of several million a year and improve reliability.”                                                                                                                 |
| Capital investment        | Elite Quartz | Since opening in 2020, Elite Quartz invested in an additional quartz forming line, veining systems, material-handling equipment, and other systems at its plant in SC. During 2024 to 2025, Elite Quartz added a new polishing line and related investments that were intended to improve throughput and production reliability.                                                                                                                                                                                                                                                                                                                       |
| New product line          | Caesarstone  | In July 2025, Caesarstone introduced a new line of QSP called “Caesarstone ICON” that is silica-free and contains 80 percent recycled materials (including glass and other materials). The company was transitioning 19 of its existing quartz designs to this silica-free product line.                                                                                                                                                                                                                                                                                                                                                               |
| Planned plant opening     | Ok Stone     | Ok Stone (a joint venture with Breton S.p.A.) announced plans to build a new QSP factory in Fort Worth, TX. The company started construction on the facility in 2024 and was projected to open the plant in 2026. The plant will use Breton manufacturing technology to produce QSP. Reports indicate that OK Stone will market and sell its silica-free QSP under the name Radical Surfaces and might be close to operational, but its status could not be confirmed as of March 2026.                                                                                                                                                                |
| Section 337 investigation | Cambria      | In January 2026, the Commission instituted an unfair imports (a.k.a., Section 337) investigation of certain processed slabs and methods for making same in response to a complaint filed in December 2025 by Cambria. In its complaint, Cambria alleges that the importation into the United States of certain processed slabs and methods for making them infringe on patents owned by Cambria. Cambria requests that the Commission issue a general exclusion order, or a limited exclusion order, and cease and desist orders. The respondents identified in the investigation include several domestic and foreign QSP producers and distributors. |
| Production curtailment    | Cambria      | As of February 2026, Cambria had reduced production shifts at its QSP plant from seven days per week to four to five days per week and was operating at 60 percent capacity utilization.                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

Table continued.

**Table 3.2 (Continued) QSP: Important industry events since January 1, 2020**

Source: Jacksonville Daily Record, "USA Quartz buys Imeson warehouse; Burlock and Barrel building out in Brooklyn," January 11, 2018, [USA Quartz buys Imeson warehouse; Burlock and Barrel building out in Brooklyn | Jax Daily Record](#); Chris Gadd, "100 jobs at new Dickson Dal-Tile facility, company reps at Dickson Co. fair," The Tennessean, September 2018, <https://www.tennessean.com/story/news/local/dickson/2018/09/04/100-jobs-new-dickson-dal-tile-facility-company-reps-dickson-co-fair/1162202002/>; Albany Herald News, "Exporter Guidoni Group to locate facility in Telfair County," The Albany Herald, November 2019, <https://albanyherald.com/news/business-news-2/exporter-guidoni-group-to-locate-facility-in-telfair-county/>; The Penetron Group, "Penetron Adds Durability to Georgia (USA) Stone Manufacturing Plant," PRweb.com, May 2021, <https://www.prweb.com/releases/penetron-adds-durability-to-georgia-usa-stone-manufacturing-plant-808575439.html>; Countertop Resource, "LG Hausys Expands Viatera Operations," Countertopresource.com, March 2020, <https://countertopresource.com/lg-hausys-expands-viatera-operations/>; MSI Surfaces, "MSI's Lumaluxe Technology And Elite Quartz Manufacturing Collaboration," MSI Surfaces, September 2022, <https://www.msisurfaces.com/blogs/post/2022/09/09/msis-domestically-sourced-quartz-from-elite-quartz-manufacturing-facility.aspx>; MSI Surfaces, "MSI Announces Joint Venture with Spectrum Quartz to Build a Domestic State-of-the-Art Quartz Manufacturing Facility," MSISurfaces.com, December 2019, <https://www.msisurfaces.com/news/msi-announces-joint-venture-with-spectrum-quartz-to-build-a-domestic-state-of-the-art-quartz-manufacturing-facility/>; Victorville Daily Press, "American Quartz Group breaks ground at former Yellow Freight facility," November 21, 2019, <https://www.vvdailypress.com/story/news/local/desert-dispatch/2019/11/21/american-quartz-group-breaks-ground/2238881007/>; BetterBarstow, "American Quartz Group Opening Soon...", July 6, 2021, <https://betterbarstow.com/american-quartz-group-opening-soon/>; Elite Quartz Manufacturing, "Who We Are," Elitequartz.com, no date, <https://www.elitequartz.com/>; The Sealy News, "Hendrix Industries holds groundbreaking ceremony," December 17, 2021, <https://www.sealynews.com/local-news/hendrix-industries-holds-groundbreaking-ceremony/>; Dee DePass, "It's Hard But We Just Hustle," Star Tribune, November 2022, <https://www.startribune.com/cambria-known-for-its-luxury-countertops-expands-again/600227748>; Dan Macdonald, "Cosentino buys land at the Cecil Commerce Center megasite for \$20.39 million," Jaxdailyrecord.com, January 2025, <https://www.jaxdailyrecord.com/news/2025/jan/27/cosentino-buys-land-at-the-cecil-commerce-center-megasite-for-2039-million/>; Mike Mendenhall, "Plan to sell 330 acres of Cecil megasite to Spanish manufacturer Cosentino headed to City Council," Jaxdailyrecord.com, April, 2023, <https://www.jaxdailyrecord.com/news/2023/apr/24/plan-to-sell-330-acres-of-cecil-megasite-to-spanish-manufacturer-cosentino-headed-to-city-council/>; OK Stone, homepage, OKStoneinc.com, <https://okstoneinc.com/>; Caesarstone, "Caesarstone Provides Business Updates," <https://ir.caesarstone.com/news/news-details/2023/Caesarstone-Provides-Business-Updates/default.aspx>, December 13, 2023; WTOC, "Caesarstone Technologies announces closure of Richmond Hill Manufacturing Facility impacting over 100 employees," <https://www.wtoc.com/2023/12/18/caesarstone-technologies-announces-closure-richmond-hill-manufacturing-facility-impacting-over-100-employees/>, December 18, 2023; Stone Update, "L.A. Jury Finds \$52.4 Million in Damages in Silicosis Case," August 13, 2024, <https://stoneupdate.com/l-a-jury-finds-52-4-million-in-damages-in-silicosis-case/>; Daily Journal, "Engineered Stone Companies Found Partially Liable for Worker's Silicosis," August 9, 2024, <https://www.dailyjournal.com/articles/380327-engineered-stone-companies-found-partially-liable-for-worker-s-silicosis>; Caesarstone, "Caesarstone ICON: Introducing a New Era of Surface Design," July 8, 2025, <https://www.caesarstoneus.com/blog/caesarstone-icon-introducing-a-new-era-of-surface-design/>; Caesarstone, "The Art and Innovation Behind Caesarstone ICON," August 28, 2025, <https://www.caesarstoneus.com/blog/the-art-and-innovation-behind-caesarstone-icon/>; North Star Insider, "Cambria shifts quartz processing from Canada to Dakota County," <https://www.startribune.com/cambria-quartz-new-factory-minnesota-reshoring-canadian-operations-struggling-industry/601454082>, August 18, 2025; Invertor Brand Network, "OK Stone Engineering Inc.," <https://www.investorbrandnetwork.com/clients/ok-stone-engineering-inc/>, retrieved January 20, 2026;

Table continued.

**Table 3.2 (Continued) QSP: Important industry events since January 1, 2020**

Source: The Bannerpress Newspaper, “Hendrix Industries cuts ribbon with Sealy Chamber, June 28, 2023, <https://www.bannerpresspaper.com/article/2078,hendrix-industries-cuts-ribbon-with-sealy-chamber>; Hendrix Industries, “Technological Innovation,” <https://hendrixindustries.com/>, retrieved January 30, 2026; USITC, “.USITC Institutes Section 337 Investigation of Certain Processed Slabs and Methods for Making Same,” January 23, 2026, [https://www.usitc.gov/press\\_room/news\\_release/2026/er0123\\_68024.htm](https://www.usitc.gov/press_room/news_release/2026/er0123_68024.htm); Silica Free News, “Radical Surfaces Changes the Game for Distributors’ Business Model,” October 21, 2025, <https://silicafreenews.com/p/ok-stone-changes-the-game-for-distributors-business-model>; Petition, p. 39; Respondent Arizona, Elite, and MSI’s joint prehearing brief, February 17, 2026, Exh. 1.C, p. 2; Hearing transcript, pp. 69 to 71 (Kahny), 89 (Vaz De Melo Sa), 112 (Meisner), 121 (Morici), 199 to 200 (Calvo); Petitioner’s posthearing brief, March 3, 2026, pp. 44 to 46, Exh. 2; Consentino posthearing brief, March 3, 2026, p. 1. Respondent Arizona, Elite, and MSI’s posthearing brief, March 3, 2026, p. 63.

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of QSP since 2020. All eight producers indicated in their questionnaires that they had experienced such changes. Table 3.3 presents the changes identified by these producers. U.S. producers which reported “other” changes, noted increasing imports as a challenge to competitiveness.

**Table 3.3 QSP: U.S. producers' reported changes in operations, since January 1, 2020**

| <b>Item</b>             | <b>Firm name and narrative response on changes in operations</b> |
|-------------------------|------------------------------------------------------------------|
| Plant openings          | ***                                                              |
| Plant openings          | ***                                                              |
| Plant openings          | ***                                                              |
| Plant closings          | ***                                                              |
| Prolonged shutdowns     | ***                                                              |
| Production curtailments | ***                                                              |
| Production curtailments | ***                                                              |
| Production curtailments | ***                                                              |
| Production curtailments | ***                                                              |
| Production curtailments | ***                                                              |



| Item                                          | Firm name and narrative response on changes in operations |
|-----------------------------------------------|-----------------------------------------------------------|
| Expansions                                    | ***                                                       |
| Expansions                                    | ***                                                       |
| Expansions                                    | ***                                                       |
| Expansions                                    | ***                                                       |
| Weather-related<br>or force majeure<br>events | ***                                                       |
| Other                                         | ***                                                       |

| Item  | Firm name and narrative response on changes in operations |
|-------|-----------------------------------------------------------|
| Other | ***                                                       |

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

## U.S. production, capacity, and capacity utilization

Table 3.4 presents U.S. producers' installed and practical capacity and production on the same equipment. Installed overall capacity increased irregularly during the period of investigation, peaking in 2023 before decreasing a level in 2024, as U.S. producer Caesarstone closed its production plant the same year. Installed overall capacity was higher in interim 2025 compared to interim 2024, as U.S. producer Hendrix began QSP operations in 2025.

Practical overall capacity and QSP capacity were the same from 2020 to 2023, as no firm reported alternative production on the same machinery used to produce QSP during that period. However, the capacity figures were different in 2024 and interim 2025, as \*\*\* reported that it had begun production of alternative products on the same machinery.<sup>2</sup>

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<sup>2</sup> The firm reported production of out-of-scope mineral surfaces \*\*\*.

**Table 3.4 QSP: U.S. producers' installed and practical capacity, production, and utilization on the same equipment as subject production, by period**

Capacity and production in 1,000 square feet; utilization in percent; Interim period is January through September

| Item              | Measure     | 2020   | 2021   | 2022   | 2023   | 2024   |
|-------------------|-------------|--------|--------|--------|--------|--------|
| Installed overall | Capacity    | 76,623 | 81,779 | 81,779 | 93,711 | 80,292 |
| Installed overall | Production  | 39,445 | 43,530 | 44,579 | 39,638 | 32,785 |
| Installed overall | Utilization | 51.5   | 53.2   | 54.5   | 42.3   | 40.8   |
| Practical overall | Capacity    | 50,178 | 52,990 | 52,340 | 51,590 | 45,807 |
| Practical overall | Production  | 39,445 | 43,530 | 44,579 | 39,638 | 32,785 |
| Practical overall | Utilization | 78.6   | 82.1   | 85.2   | 76.8   | 71.6   |
| Practical QSP     | Capacity    | 50,178 | 52,990 | 52,340 | 51,590 | 45,650 |
| Practical QSP     | Production  | 39,445 | 43,530 | 44,579 | 39,638 | 32,656 |
| Practical QSP     | Utilization | 78.6   | 82.1   | 85.2   | 76.8   | 71.5   |

Table continued.

**Table 3.4 (Continued) QSP: U.S. producers' installed and practical capacity, production, and utilization on the same equipment as subject production, by period**

Capacity and production in 1,000 square feet; utilization in percent; Interim period is January through September

| Item              | Measure     | Interim 2024 | Interim 2025 |
|-------------------|-------------|--------------|--------------|
| Installed overall | Capacity    | 60,188       | 72,376       |
| Installed overall | Production  | 24,840       | 24,564       |
| Installed overall | Utilization | 41.3         | 33.9         |
| Practical overall | Capacity    | 35,234       | 38,961       |
| Practical overall | Production  | 24,840       | 24,564       |
| Practical overall | Utilization | 70.5         | 63.0         |
| Practical QSP     | Capacity    | 34,999       | 38,919       |
| Practical QSP     | Production  | 24,712       | 24,544       |
| Practical QSP     | Utilization | 70.6         | 63.1         |

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

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

Table 3.5 presents U.S. producers' reported narratives regarding practical capacity constraints. Production bottlenecks, firms' existing labor force, and "other" were the constraints cited by most firms (four firms each).<sup>3</sup> Producers which reported "other" noted such constraints as import competition and lost sales.

**Table 3.5 QSP: U.S. producers' reported constraints to practical overall capacity, since January 1, 2020**

| Item                   | Firm name and narrative response on constraints to practical overall capacity |
|------------------------|-------------------------------------------------------------------------------|
| Production bottlenecks | ***                                                                           |
| Production bottlenecks | ***                                                                           |
| Production bottlenecks | ***                                                                           |
| Production bottlenecks | ***                                                                           |
| Existing labor force   | ***                                                                           |
| Existing labor force   | ***                                                                           |

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<sup>3</sup> In the U.S. producers' questionnaire, firms could choose multiple constraints in response to this question. Therefore, these counts can encompass the same firm(s) identifying multiple constraints.

| Item                      | Firm name and narrative response on constraints to practical overall capacity |
|---------------------------|-------------------------------------------------------------------------------|
| Existing labor force      | ***                                                                           |
| Existing labor force      | ***                                                                           |
| Supply of material inputs | ***                                                                           |
| Other constraints         | ***                                                                           |
| Other constraints         | ***                                                                           |
| Other constraints         | ***                                                                           |
| Other constraints         | ***                                                                           |
| Other constraints         | ***                                                                           |

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

Table 3.6 and figure 3.1 present U.S. producers' practical QSP capacity, production, and capacity utilization. Practical capacity and production increased from 2020 to 2022 but began to decrease in 2023 and 2024, where they were both at a lower level than they were in 2020. Production was steady in interim 2024 and interim 2025; however, capacity was higher in interim 2025 compared with interim 2024, as U.S. producer Hendrix began QSP operations in that period. Capacity utilization followed similar trends. It increased from 2020 to 2022 before decreasing in 2023 and 2024. It was also lower in interim 2025 compared with interim 2024.

**Table 3.6 QSP: U.S. producers' output: Practical capacity, by firm and period**

Capacity in 1,000 square feet; Interim period is January through September

| Firm        | 2020   | 2021   | 2022   | 2023   | 2024   | Interim 2024 | Interim 2025 |
|-------------|--------|--------|--------|--------|--------|--------------|--------------|
| Caesarstone | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| Cambria     | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| Dal-Tile    | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| Elite       | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| Estone      | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| Guidoni     | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| Hendrix     | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| LX Hausys   | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| All firms   | 50,178 | 52,990 | 52,340 | 51,590 | 45,650 | 34,999       | 38,919       |

Table continued.

**Table 3.6 (Continued) QSP: U.S. producers' output: Production, by firm and period**

Production in 1,000 square feet; Interim period is January through September

| Firm        | 2020   | 2021   | 2022   | 2023   | 2024   | Interim 2024 | Interim 2025 |
|-------------|--------|--------|--------|--------|--------|--------------|--------------|
| Caesarstone | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| Cambria     | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| Dal-Tile    | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| Elite       | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| Estone      | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| Guidoni     | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| Hendrix     | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| LX Hausys   | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| All firms   | 39,445 | 43,530 | 44,579 | 39,638 | 32,656 | 24,712       | 24,544       |

Table continued.

**Table 3.6 (Continued) QSP: U.S. producers' output: Capacity utilization, by firm and period**

Capacity utilization ratios in percent; Interim period is January through September

| Firm        | 2020 | 2021 | 2022 | 2023 | 2024 | Interim 2024 | Interim 2025 |
|-------------|------|------|------|------|------|--------------|--------------|
| Caesarstone | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Cambria     | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Dal-Tile    | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Elite       | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Estone      | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Guidoni     | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Hendrix     | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| LX Hausys   | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| All firms   | 78.6 | 82.1 | 85.2 | 76.8 | 71.5 | 70.6         | 63.1         |

Table continued.

**Table 3.6 (Continued) QSP: U.S. producers' output: Share of production, by firm and period**

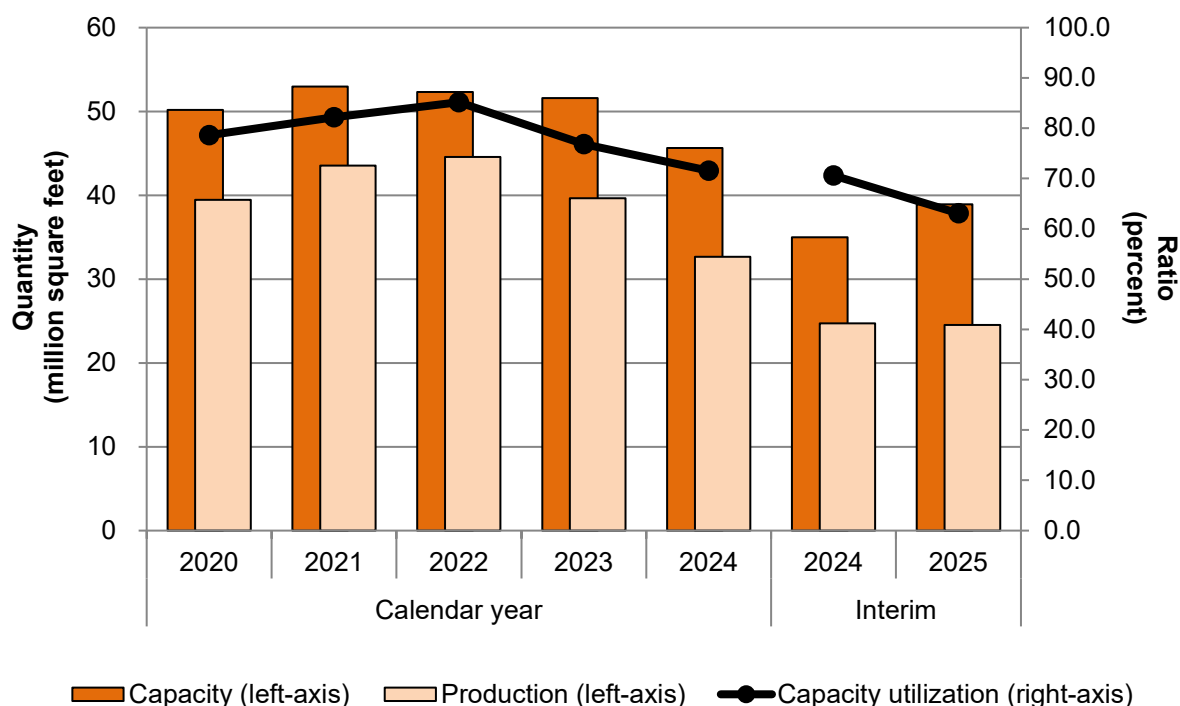
Share of production in percent; Interim period is January through September

| Firm        | 2020  | 2021  | 2022  | 2023  | 2024  | Interim 2024 | Interim 2025 |
|-------------|-------|-------|-------|-------|-------|--------------|--------------|
| Caesarstone | ***   | ***   | ***   | ***   | ***   | ***          | ***          |
| Cambria     | ***   | ***   | ***   | ***   | ***   | ***          | ***          |
| Dal-Tile    | ***   | ***   | ***   | ***   | ***   | ***          | ***          |
| Elite       | ***   | ***   | ***   | ***   | ***   | ***          | ***          |
| Estone      | ***   | ***   | ***   | ***   | ***   | ***          | ***          |
| Guidoni     | ***   | ***   | ***   | ***   | ***   | ***          | ***          |
| Hendrix     | ***   | ***   | ***   | ***   | ***   | ***          | ***          |
| LX Hausys   | ***   | ***   | ***   | ***   | ***   | ***          | ***          |
| All firms   | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 | 100.0        | 100.0        |

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

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

**Figure 3.1 QSP: U.S. producers' practical capacity, production, and capacity utilization, by period**



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

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

Table 3.7 presents data on U.S. producers' U.S. shipments by type. Commercial U.S. shipments accounted for the largest share (80.0 percent or more) of U.S. producers' total U.S. shipments in each period examined. From 2020 to 2024, U.S. producers' commercial shipments increased while U.S. producers' internal consumption shipments and transfers to related firms decreased.<sup>4 5</sup> Commercial shipments and internal consumption shipments were higher in interim 2025 compared with interim 2024, while transfers to related firms were lower in interim 2025 compared with interim 2024.

In each period examined, the unit value of U.S. producers' commercial shipments was higher than the unit value for internal consumption or transfer shipments.

<sup>4</sup> \*\*\* reported internal consumption \*\*\*. \*\*\*'s U.S. producer questionnaire at II-12 and V-2.

<sup>5</sup> \*\*\* reported transfers to related firms.



**Table 3.7 QSP: U.S. producers' U.S. shipments, by type and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot

| Item                       | Measure           | 2020    | 2021    | 2022    | 2023    | 2024    |
|----------------------------|-------------------|---------|---------|---------|---------|---------|
| Commercial U.S. shipments  | Quantity          | 25,914  | 34,309  | 33,044  | 30,882  | 28,868  |
| Internal consumption       | Quantity          | 401     | 509     | 562     | 423     | 292     |
| Transfers to related firms | Quantity          | 5,329   | 5,707   | 5,094   | 4,313   | 1,741   |
| U.S. shipments             | Quantity          | 31,645  | 40,525  | 38,700  | 35,618  | 30,900  |
| Commercial U.S. shipments  | Value             | 592,550 | 785,013 | 853,222 | 800,386 | 721,401 |
| Internal consumption       | Value             | 5,654   | 5,633   | 6,372   | 6,769   | 4,490   |
| Transfers to related firms | Value             | 64,600  | 63,215  | 72,088  | 55,153  | 22,812  |
| U.S. shipments             | Value             | 662,804 | 853,861 | 931,682 | 862,308 | 748,704 |
| Commercial U.S. shipments  | Unit value        | 22.87   | 22.88   | 25.82   | 25.92   | 24.99   |
| Internal consumption       | Unit value        | 14.09   | 11.07   | 11.35   | 16.01   | 15.40   |
| Transfers to related firms | Unit value        | 12.12   | 11.08   | 14.15   | 12.79   | 13.11   |
| U.S. shipments             | Unit value        | 20.94   | 21.07   | 24.07   | 24.21   | 24.23   |
| Commercial U.S. shipments  | Share of quantity | 81.9    | 84.7    | 85.4    | 86.7    | 93.4    |
| Internal consumption       | Share of quantity | 1.3     | 1.3     | 1.5     | 1.2     | 0.9     |
| Transfers to related firms | Share of quantity | 16.8    | 14.1    | 13.2    | 12.1    | 5.6     |
| U.S. shipments             | Share of quantity | 100.0   | 100.0   | 100.0   | 100.0   | 100.0   |
| Commercial U.S. shipments  | Share of value    | 89.4    | 91.9    | 91.6    | 92.8    | 96.4    |
| Internal consumption       | Share of value    | 0.9     | 0.7     | 0.7     | 0.8     | 0.6     |
| Transfers to related firms | Share of value    | 9.7     | 7.4     | 7.7     | 6.4     | 3.0     |
| U.S. shipments             | Share of value    | 100.0   | 100.0   | 100.0   | 100.0   | 100.0   |

Table continued.

**Table 3.7 (Continued) QSP: U.S. producers' U.S. shipments, by type and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Interim period is January through September

| Item                       | Measure           | Interim 2024 | Interim 2025 |
|----------------------------|-------------------|--------------|--------------|
| Commercial U.S. shipments  | Quantity          | 21,988       | 21,208       |
| Internal consumption       | Quantity          | 207          | 250          |
| Transfers to related firms | Quantity          | 1,384        | 656          |
| U.S. shipments             | Quantity          | 23,579       | 22,114       |
| Commercial U.S. shipments  | Value             | 550,493      | 527,939      |
| Internal consumption       | Value             | 3,115        | 3,978        |
| Transfers to related firms | Value             | 19,156       | 12,732       |
| U.S. shipments             | Value             | 572,764      | 544,649      |
| Commercial U.S. shipments  | Unit value        | 25.04        | 24.89        |
| Internal consumption       | Unit value        | 15.06        | 15.91        |
| Transfers to related firms | Unit value        | 13.84        | 19.40        |
| U.S. shipments             | Unit value        | 24.29        | 24.63        |
| Commercial U.S. shipments  | Share of quantity | 93.3         | 95.9         |
| Internal consumption       | Share of quantity | 0.9          | 1.1          |
| Transfers to related firms | Share of quantity | 5.9          | 3.0          |
| U.S. shipments             | Share of quantity | 100.0        | 100.0        |
| Commercial U.S. shipments  | Share of value    | 96.1         | 96.9         |
| Internal consumption       | Share of value    | 0.5          | 0.7          |
| Transfers to related firms | Share of value    | 3.3          | 2.3          |
| U.S. shipments             | Share of value    | 100.0        | 100.0        |

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

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

Table 3.8 presents U.S. producers' U.S. shipments, export shipments, and total shipments. The substantial majority of U.S. producers' shipments were within the United States. U.S. producers' exports as a share of their total shipments did not exceed 10.0 percent in any full year or interim period.<sup>6</sup> Total shipments, by quantity, irregularly decreased from 2020 to 2024. Total shipments increased from 2020 to 2021 before decreasing in 2022, 2023 and further declining in 2024 to a level lower than in 2020. Total shipments by quantity were also lower in interim 2025 compared with interim 2024. Conversely, total shipments by value irregularly increased from 2020 to 2024. Total shipments by value increased from 2020 to 2022 before decreasing in 2023 and further declining in 2024, but still at a higher level than in 2020. Total shipments by value were lower in interim 2025 compared with interim 2024.

<sup>6</sup> U.S. producers which reported exports listed their export destinations as Canada, Mexico, South Korea, and the European Union.

**Table 3.8 QSP: U.S. producers' total shipments, by destination and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares in percent

| Item             | Measure           | 2020    | 2021    | 2022    | 2023    | 2024    |
|------------------|-------------------|---------|---------|---------|---------|---------|
| U.S. shipments   | Quantity          | 31,645  | 40,525  | 38,700  | 35,618  | 30,900  |
| Export shipments | Quantity          | 3,294   | 4,180   | 4,182   | 3,099   | 1,566   |
| Total shipments  | Quantity          | 34,940  | 44,705  | 42,882  | 38,717  | 32,466  |
| U.S. shipments   | Value             | 662,804 | 853,861 | 931,682 | 862,308 | 748,704 |
| Export shipments | Value             | 43,185  | 60,865  | 63,574  | 52,357  | 25,305  |
| Total shipments  | Value             | 705,989 | 914,726 | 995,256 | 914,665 | 774,008 |
| U.S. shipments   | Unit value        | 20.94   | 21.07   | 24.07   | 24.21   | 24.23   |
| Export shipments | Unit value        | 13.11   | 14.56   | 15.20   | 16.90   | 16.16   |
| Total shipments  | Unit value        | 20.21   | 20.46   | 23.21   | 23.62   | 23.84   |
| U.S. shipments   | Share of quantity | 90.6    | 90.7    | 90.2    | 92.0    | 95.2    |
| Export shipments | Share of quantity | 9.4     | 9.3     | 9.8     | 8.0     | 4.8     |
| Total shipments  | Share of quantity | 100.0   | 100.0   | 100.0   | 100.0   | 100.0   |
| U.S. shipments   | Share of value    | 93.9    | 93.3    | 93.6    | 94.3    | 96.7    |
| Export shipments | Share of value    | 6.1     | 6.7     | 6.4     | 5.7     | 3.3     |
| Total shipments  | Share of value    | 100.0   | 100.0   | 100.0   | 100.0   | 100.0   |

Table continued.

**Table 3.8 (Continued) QSP: U.S. producers' total shipments, by destination and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares in percent; Interim period is January through September

| Item             | Measure           | Interim 2024 | Interim 2025 |
|------------------|-------------------|--------------|--------------|
| U.S. shipments   | Quantity          | 23,579       | 22,114       |
| Export shipments | Quantity          | 1,289        | 1,402        |
| Total shipments  | Quantity          | 24,868       | 23,516       |
| U.S. shipments   | Value             | 572,764      | 544,649      |
| Export shipments | Value             | 20,148       | 16,269       |
| Total shipments  | Value             | 592,912      | 560,918      |
| U.S. shipments   | Unit value        | 24.29        | 24.63        |
| Export shipments | Unit value        | 15.63        | 11.60        |
| Total shipments  | Unit value        | 23.84        | 23.85        |
| U.S. shipments   | Share of quantity | 94.8         | 94.0         |
| Export shipments | Share of quantity | 5.2          | 6.0          |
| Total shipments  | Share of quantity | 100.0        | 100.0        |
| U.S. shipments   | Share of value    | 96.6         | 97.1         |
| Export shipments | Share of value    | 3.4          | 2.9          |
| Total shipments  | Share of value    | 100.0        | 100.0        |

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

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

## U.S. producers' U.S. shipments by product types

### U.S. shipments by product form

In this investigation, U.S. producers were asked to report their U.S. shipments of QSP by product form: slab versus fabricated slab. Table 3.9 presents U.S. producers' U.S. shipments of these types of QSP.<sup>7</sup> The vast majority of U.S. producers' U.S. shipments were of unfabricated slab, which accounted for over \*\*\* percent of their U.S. shipments in each period examined.

**Table 3.9 QSP: U.S. producers' U.S. shipments, by product form and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares in percent

| Product form      | Measure           | 2020    | 2021    | 2022    | 2023    | 2024    |
|-------------------|-------------------|---------|---------|---------|---------|---------|
| Slab              | Quantity          | ***     | ***     | ***     | ***     | ***     |
| Fabricated slab   | Quantity          | ***     | ***     | ***     | ***     | ***     |
| All product forms | Quantity          | 31,645  | 40,525  | 38,700  | 35,618  | 30,900  |
| Slab              | Value             | ***     | ***     | ***     | ***     | ***     |
| Fabricated slab   | Value             | ***     | ***     | ***     | ***     | ***     |
| All product forms | Value             | 662,804 | 853,861 | 931,682 | 862,308 | 748,704 |
| Slab              | Unit value        | ***     | ***     | ***     | ***     | ***     |
| Fabricated slab   | Unit value        | ***     | ***     | ***     | ***     | ***     |
| All product forms | Unit value        | 20.94   | 21.07   | 24.07   | 24.21   | 24.23   |
| Slab              | Share of quantity | ***     | ***     | ***     | ***     | ***     |
| Fabricated slab   | Share of quantity | ***     | ***     | ***     | ***     | ***     |
| All product forms | Share of quantity | 100.0   | 100.0   | 100.0   | 100.0   | 100.0   |
| Slab              | Share of value    | ***     | ***     | ***     | ***     | ***     |
| Fabricated slab   | Share of value    | ***     | ***     | ***     | ***     | ***     |
| All product forms | Share of value    | 100.0   | 100.0   | 100.0   | 100.0   | 100.0   |

Table continued.

<sup>7</sup> \*\*\* reported U.S. shipments of fabricated slab. \*\*\*. U.S. producer questionnaire responses, sections 2.6, 2.14, and 5.2.

**Table 3.9 (Continued) QSP: U.S. producers' U.S. shipments, by product form and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares in percent; Interim period is January through September

| Source            | Measure           | Interim 2024 | Interim 2025 |
|-------------------|-------------------|--------------|--------------|
| Slab              | Quantity          | ***          | ***          |
| Fabricated slab   | Quantity          | ***          | ***          |
| All product forms | Quantity          | 23,579       | 22,114       |
| Slab              | Value             | ***          | ***          |
| Fabricated slab   | Value             | ***          | ***          |
| All product forms | Value             | 572,764      | 544,649      |
| Slab              | Unit value        | ***          | ***          |
| Fabricated slab   | Unit value        | ***          | ***          |
| All product forms | Unit value        | 24.29        | 24.63        |
| Slab              | Share of quantity | ***          | ***          |
| Fabricated slab   | Share of quantity | ***          | ***          |
| All product forms | Share of quantity | 100.0        | 100.0        |
| Slab              | Share of value    | ***          | ***          |
| Fabricated slab   | Share of value    | ***          | ***          |
| All product forms | Share of value    | 100.0        | 100.0        |

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

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

## U.S. shipments by caliber

U.S. producers were asked to report their U.S. shipments of QSP by caliber type: premium brands versus mass market brands (as defined by the responding firms themselves). Table 3.10 presents U.S. producers' U.S. shipments of these QSP types. The majority of U.S. producers' U.S. shipments were of mass market brands. Though the share of U.S. shipments of mass market brands to all other U.S. shipments decreased from 2020 to 2024 and were lower in interim 2025 compared with interim 2024.

**Table 3.10 QSP: U.S. producers' U.S. shipments, by caliber and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares in percent

| Caliber            | Measure           | 2020    | 2021    | 2022    | 2023    | 2024    |
|--------------------|-------------------|---------|---------|---------|---------|---------|
| Premium brands     | Quantity          | 11,397  | 15,817  | 17,497  | 17,639  | 16,271  |
| Mass market brands | Quantity          | 20,248  | 24,708  | 21,203  | 17,979  | 14,629  |
| All calibers       | Quantity          | 31,645  | 40,525  | 38,700  | 35,618  | 30,900  |
| Premium brands     | Value             | 248,297 | 330,449 | 418,839 | 432,452 | 406,733 |
| Mass market brands | Value             | 414,507 | 523,412 | 512,843 | 429,855 | 341,970 |
| All calibers       | Value             | 662,804 | 853,861 | 931,682 | 862,308 | 748,704 |
| Premium brands     | Unit value        | 21.79   | 20.89   | 23.94   | 24.52   | 25.00   |
| Mass market brands | Unit value        | 20.47   | 21.18   | 24.19   | 23.91   | 23.38   |
| All calibers       | Unit value        | 20.94   | 21.07   | 24.07   | 24.21   | 24.23   |
| Premium brands     | Share of quantity | 36.0    | 39.0    | 45.2    | 49.5    | 52.7    |
| Mass market brands | Share of quantity | 64.0    | 61.0    | 54.8    | 50.5    | 47.3    |
| All calibers       | Share of quantity | 100.0   | 100.0   | 100.0   | 100.0   | 100.0   |
| Premium brands     | Share of value    | 37.5    | 38.7    | 45.0    | 50.2    | 54.3    |
| Mass market brands | Share of value    | 62.5    | 61.3    | 55.0    | 49.8    | 45.7    |
| All calibers       | Share of value    | 100.0   | 100.0   | 100.0   | 100.0   | 100.0   |

Table continued.

**Table 3.10 (Continued) QSP: U.S. producers' U.S. shipments, by caliber and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares in percent; Interim period is January through September

| Source             | Measure           | Interim 2024 | Interim 2025 |
|--------------------|-------------------|--------------|--------------|
| Premium brands     | Quantity          | 12,208       | 10,565       |
| Mass market brands | Quantity          | 11,371       | 11,549       |
| All calibers       | Quantity          | 23,579       | 22,114       |
| Premium brands     | Value             | 304,480      | 283,092      |
| Mass market brands | Value             | 268,284      | 261,557      |
| All calibers       | Value             | 572,764      | 544,649      |
| Premium brands     | Unit value        | 24.94        | 26.80        |
| Mass market brands | Unit value        | 23.59        | 22.65        |
| All calibers       | Unit value        | 24.29        | 24.63        |
| Premium brands     | Share of quantity | 51.8         | 47.8         |
| Mass market brands | Share of quantity | 48.2         | 52.2         |
| All calibers       | Share of quantity | 100.0        | 100.0        |
| Premium brands     | Share of value    | 53.2         | 52.0         |
| Mass market brands | Share of value    | 46.8         | 48.0         |
| All calibers       | Share of value    | 100.0        | 100.0        |

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

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

### U.S. shipments by attribute and thickness

U.S. producers were asked to report their 2024 U.S. shipments of QSP by attribute and thickness. Table 3.11 and figures 3.2 and 3.3 present U.S. producers' U.S. shipments of these QSP types. During 2024, the majority of U.S. producers' U.S. shipments were of marble design with short- and long-veining of 3 cm thickness. U.S. producers' U.S. shipments of marble design with long-veining, regardless of thickness, had the highest unit value of all the attributes.

**Table 3.11 QSP: U.S. producers' U.S. shipments in 2024, by attribute and thickness**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot

| Attribute                                   | Measure    | 1 cm thickness | 2 cm thickness | 3 cm thickness | All thicknesses |
|---------------------------------------------|------------|----------------|----------------|----------------|-----------------|
| Granite design                              | Quantity   | 6              | 510            | 3,098          | 3,614           |
| Marble design with short veining            | Quantity   | 12             | 1,887          | 5,858          | 7,757           |
| Marble design with long veining             | Quantity   | 193            | 3,367          | 11,916         | 15,476          |
| Uniform with white color design             | Quantity   | 6              | 845            | 1,099          | 1,950           |
| Uniform with neutral and light color design | Quantity   | 3              | 105            | 178            | 286             |
| Uniform with dark and black color design    | Quantity   | 5              | 334            | 375            | 715             |
| Crushed glass design                        | Quantity   | 824            | —              | 2              | 826             |
| All other designs                           | Quantity   | —              | 129            | 147            | 276             |
| All designs                                 | Quantity   | 1,051          | 7,177          | 22,672         | 30,900          |
| Granite design                              | Value      | 201            | 13,278         | 81,748         | 95,226          |
| Marble design with short veining            | Value      | 424            | 36,516         | 136,575        | 173,515         |
| Marble design with long veining             | Value      | 3,990          | 87,482         | 317,101        | 408,573         |
| Uniform with white color design             | Value      | 211            | 15,394         | 22,100         | 37,705          |
| Uniform with neutral and light color design | Value      | 124            | 2,149          | 3,537          | 5,809           |
| Uniform with dark and black color design    | Value      | 188            | 8,013          | 10,154         | 18,355          |
| Crushed glass design                        | Value      | 4,092          | —              | 15             | 4,106           |
| All other designs                           | Value      | —              | 2,083          | 3,331          | 5,414           |
| All designs                                 | Value      | 9,229          | 164,914        | 574,561        | 748,704         |
| Granite design                              | Unit value | 30.97          | 26.04          | 26.39          | 26.35           |
| Marble design with short veining            | Unit value | 35.26          | 19.36          | 23.31          | 22.37           |
| Marble design with long veining             | Unit value | 20.67          | 25.98          | 26.61          | 26.40           |
| Uniform with white color design             | Unit value | 33.32          | 18.22          | 20.12          | 19.34           |
| Uniform with neutral and light color design | Unit value | 36.59          | 20.43          | 19.92          | 20.30           |
| Uniform with dark and black color design    | Unit value | 34.29          | 23.98          | 27.07          | 25.68           |
| Crushed glass design                        | Unit value | 4.96           | —              | 7.41           | 4.97            |
| All other designs                           | Unit value | —              | 16.14          | 22.71          | 19.63           |
| All designs                                 | Unit value | 8.78           | 22.98          | 25.34          | 24.23           |

Table continued.



**Table 3.11 (Continued) QSP: U.S. producers' U.S. shipments in 2024, by attribute and thickness**

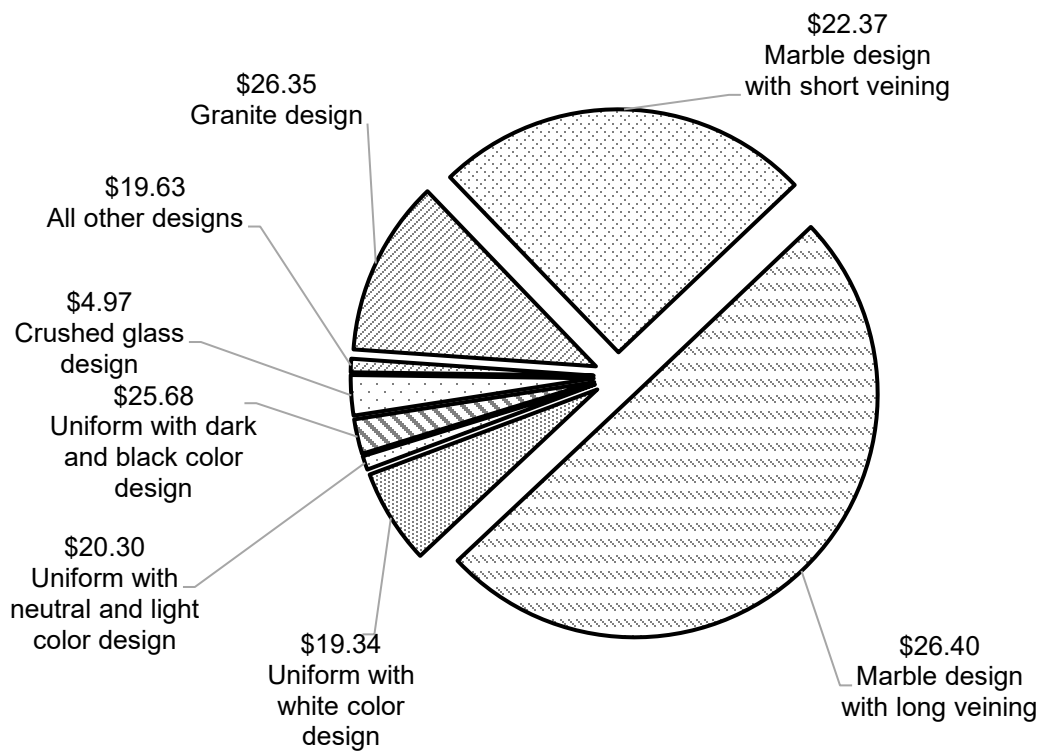
Shares of quantity down and across in percent

| <b>Attribute</b>                            | <b>Share of quantity</b> | <b>1 cm thickness</b> | <b>2 cm thickness</b> | <b>3 cm thickness</b> | <b>All thicknesses</b> |
|---------------------------------------------|--------------------------|-----------------------|-----------------------|-----------------------|------------------------|
| Granite design                              | Shares down              | 0.6                   | 7.1                   | 13.7                  | 11.7                   |
| Marble design with short veining            | Shares down              | 1.1                   | 26.3                  | 25.8                  | 25.1                   |
| Marble design with long veining             | Shares down              | 18.4                  | 46.9                  | 52.6                  | 50.1                   |
| Uniform with white color design             | Shares down              | 0.6                   | 11.8                  | 4.8                   | 6.3                    |
| Uniform with neutral and light color design | Shares down              | 0.3                   | 1.5                   | 0.8                   | 0.9                    |
| Uniform with dark and black color design    | Shares down              | 0.5                   | 4.7                   | 1.7                   | 2.3                    |
| Crushed glass design                        | Shares down              | 78.4                  | —                     | 0.0                   | 2.7                    |
| All other designs                           | Shares down              | —                     | 1.8                   | 0.6                   | 0.9                    |
| All designs                                 | Shares down              | 100.0                 | 100.0                 | 100.0                 | 100.0                  |
| Granite design                              | Shares across            | 0.2                   | 14.1                  | 85.7                  | 100.0                  |
| Marble design with short veining            | Shares across            | 0.2                   | 24.3                  | 75.5                  | 100.0                  |
| Marble design with long veining             | Shares across            | 1.2                   | 21.8                  | 77.0                  | 100.0                  |
| Uniform with white color design             | Shares across            | 0.3                   | 43.3                  | 56.3                  | 100.0                  |
| Uniform with neutral and light color design | Shares across            | 1.2                   | 36.8                  | 62.1                  | 100.0                  |
| Uniform with dark and black color design    | Shares across            | 0.8                   | 46.7                  | 52.5                  | 100.0                  |
| Crushed glass design                        | Shares across            | 99.8                  | —                     | 0.2                   | 100.0                  |
| All other designs                           | Shares across            | —                     | 46.8                  | 53.2                  | 100.0                  |
| All designs                                 | Shares across            | 3.4                   | 23.2                  | 73.4                  | 100.0                  |
| Granite design                              | Shares down and across   | 0.0                   | 1.6                   | 10.0                  | 11.7                   |
| Marble design with short veining            | Shares down and across   | 0.0                   | 6.1                   | 19.0                  | 25.1                   |
| Marble design with long veining             | Shares down and across   | 0.6                   | 10.9                  | 38.6                  | 50.1                   |
| Uniform with white color design             | Shares down and across   | 0.0                   | 2.7                   | 3.6                   | 6.3                    |
| Uniform with neutral and light color design | Shares down and across   | 0.0                   | 0.3                   | 0.6                   | 0.9                    |
| Uniform with dark and black color design    | Shares down and across   | 0.0                   | 1.1                   | 1.2                   | 2.3                    |
| Crushed glass design                        | Shares down and across   | 2.7                   | —                     | 0.0                   | 2.7                    |
| All other designs                           | Shares down and across   | —                     | 0.4                   | 0.5                   | 0.9                    |
| All designs                                 | Shares down and across   | 3.4                   | 23.2                  | 73.4                  | 100.0                  |

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

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

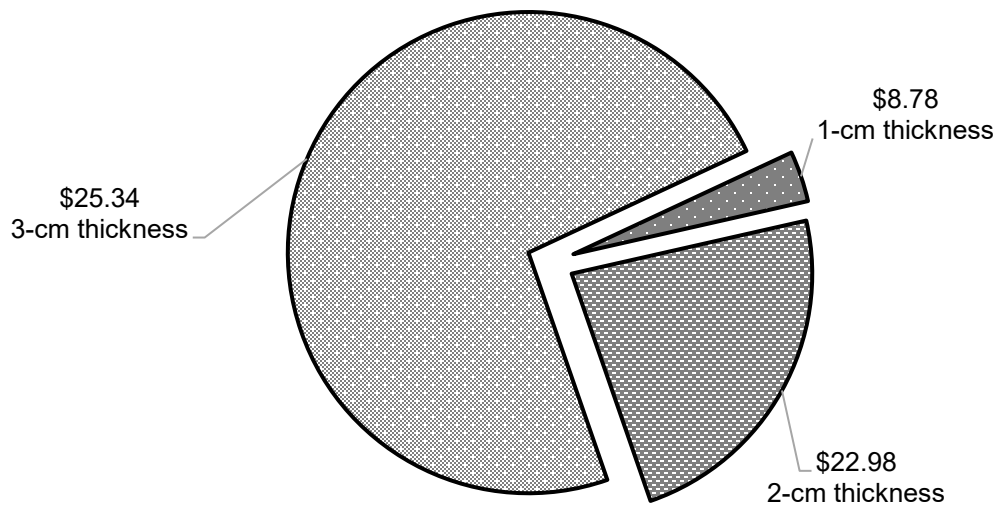
**Figure 3.2 QSP: U.S. producers' average unit values and share of U.S. shipments in 2024, by attribute**



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

Note: Unit values presented in dollars per square foot.

**Figure 3.3 QSP: U.S. producers' average unit values and share of U.S. shipments in 2024, by thickness**



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

Note: Unit values presented in dollars per square foot.

## U.S. producers' inventories

Table 3.12 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments. Aside from a dip in 2021, U.S. producers' ending inventories increased from 2020 to 2024 and were higher in interim 2025 compared with interim 2024. The ratios of ending inventories to production and total shipments also had a dip in 2021 but generally increased from 2020 to 2024 and were higher in interim 2025 compared with interim 2024.

**Table 3.12 QSP: U.S. producers' inventories and their ratio to select items, by period**

Quantity in 1,000 square feet; Ratios in percent; Interim period is January through September

| Item                               | 2020   | 2021   | 2022   | 2023   | 2024   | Interim 2024 | Interim 2025 |
|------------------------------------|--------|--------|--------|--------|--------|--------------|--------------|
| End-of-period inventory quantity   | 19,006 | 17,806 | 19,411 | 20,256 | 20,423 | 20,085       | 21,401       |
| Inventory ratio to U.S. production | 48.2   | 40.9   | 43.5   | 51.1   | 62.5   | 61.0         | 65.4         |
| Inventory ratio to U.S. shipments  | 60.1   | 43.9   | 50.2   | 56.9   | 66.1   | 63.9         | 72.6         |
| Inventory ratio to total shipments | 54.4   | 39.8   | 45.3   | 52.3   | 62.9   | 60.6         | 68.3         |

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

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

## U.S. producers' imports

Four U.S. producers, \*\*\*, reported U.S. imports of QSP.<sup>8</sup> Table 3.13 presents U.S. producers' combined U.S. imports of QSP and the share of these imports to total imports by source during the period of investigation. Table 3.14 presents U.S. producers' reasons for importing QSP.

Of the four U.S. producers, \*\*\* was the leading importer of QSP during the period of investigation, followed by \*\*\*. Although, \*\*\*'s imports of QSP declined from 2020 to 2024, while \*\*\*'s imports increased during the same period. Import patterns for \*\*\* and \*\*\* were mixed. Generally, however, their imports were higher in 2024 compared with 2020.

Overall, imports from these four firms peaked in 2022, before irregularly declining in 2023 into 2024 and they were lower in interim 2025 compared with interim 2024. During the period of investigation, the leading import source for these firms was Israel, followed by India. However, the firms' imports from Israel declined from 2020 to 2024, while their imports from India increased during the same period.

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<sup>8</sup> None of the firms identified any affiliated importers.

**Table 3.13 QSP: U.S. producers' U.S. imports, by source and period**

Quantity in 1,000 square feet; Shares in percent; Interim period is January through September

| Item               | Measure  | 2020 | 2021 | 2022 | 2023 | 2024 | Interim 2024 | Interim 2025 |
|--------------------|----------|------|------|------|------|------|--------------|--------------|
| Canada             | Quantity | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| China              | Quantity | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Czechia            | Quantity | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| India              | Quantity | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Israel             | Quantity | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Italy              | Quantity | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Malaysia           | Quantity | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Mexico             | Quantity | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Spain              | Quantity | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Taiwan             | Quantity | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Thailand           | Quantity | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Turkey             | Quantity | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Vietnam            | Quantity | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Other FTA sources  | Quantity | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| All other sources  | Quantity | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| All import sources | Quantity | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Canada             | Share    | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| China              | Share    | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Czechia            | Share    | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| India              | Share    | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Israel             | Share    | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Italy              | Share    | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Malaysia           | Share    | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Mexico             | Share    | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Spain              | Share    | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Taiwan             | Share    | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Thailand           | Share    | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Turkey             | Share    | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Vietnam            | Share    | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Other FTA sources  | Share    | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| All other sources  | Share    | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| All import sources | Share    | ***  | ***  | ***  | ***  | ***  | ***          | ***          |

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics from the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, accessed on December 15, 2025. Imports are based on the imports for consumption data series. Official U.S. import statistics were adjusted to remove out-of-scope imports under the primary HTS numbers and add in-scope imports under other HTS numbers according to data submitted in the questionnaires.

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

**Table 3.14 QSP: U.S. producers' reasons for importing**

| <b>Firm</b> | <b>Narrative response on reasons for importing</b> |
|-------------|----------------------------------------------------|
| ***         | ***                                                |
| ***         | ***                                                |
| ***         | ***                                                |
| ***         | ***                                                |

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

## U.S. employment, wages, and productivity

Table 3.15 shows U.S. producers' employment-related data. The number of production and related workers (PRWs) increased from 2020 to 2021 before it began to decrease from 2022 to 2024, where it was at a level lower than in 2020. Although certain firms such as \*\*\* increased the number of PRWs from 2020 to 2024, larger producers such as \*\*\* decreased their PRWs over the same period. Generally, U.S. producers reported a high demand for QSP in late 2020 and in 2021 during the height of the COVID-19 pandemic. However, as demand began to return to normal, firms began to reduce their workforce starting in 2022. U.S. producers also noted market conditions and import competition as additional factors for the decrease in the number of their PRWs. The number of PRWs was higher in interim 2025 compared to interim 2024, largely due to the entrance of a new U.S. producer, Hendrix, into the QSP market starting in 2025.

Total hours worked, hours worked by PRWs, wages paid, and productivity, all followed similar trends as noted above. Generally, these metrics increased from 2020 to 2021 and 2022 before decreasing in 2023 and 2024. Interim period trends for these metrics were mixed, however. Hourly wages and unit labor costs were the only metrics that increased steadily from 2020 to 2024. These metrics were also higher in interim 2025 compared with interim 2024.

**Table 3.15 QSP: U.S. producers' employment related information, by item and period**

Interim period is January through September

| Item                                           | 2020    | 2021    | 2022    | 2023    | 2024    | Interim 2024 | Interim 2025 |
|------------------------------------------------|---------|---------|---------|---------|---------|--------------|--------------|
| Production and related workers (PRWs) (number) | 1,592   | 1,685   | 1,669   | 1,601   | 1,446   | 1,410        | 1,455        |
| Total hours worked (1,000 hours)               | 3,314   | 3,634   | 3,652   | 3,438   | 3,153   | 2,342        | 2,375        |
| Hours worked per PRW (hours)                   | 2,082   | 2,157   | 2,188   | 2,147   | 2,181   | 1,661        | 1,632        |
| Wages paid (\$1,000)                           | 91,956  | 105,802 | 111,429 | 107,011 | 103,843 | 76,996       | 79,023       |
| Hourly wages (dollars per hour)                | \$27.75 | \$29.11 | \$30.51 | \$31.13 | \$32.93 | \$32.88      | \$33.27      |
| Productivity (square feet per hour)            | 11.9    | 12.0    | 12.2    | 11.5    | 10.4    | 10.6         | 10.3         |
| Unit labor costs (dollars per square foot)     | \$2.33  | \$2.43  | \$2.50  | \$2.70  | \$3.18  | \$3.12       | \$3.22       |

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





## Part 4: Financial experience of U.S. producers

### Background<sup>1</sup>

Eight U.S. producers provided usable financial results on their QSP operations.<sup>2</sup> All U.S. producers reported financial data on a calendar-year basis, and seven producers reported that their QSP financial information are based on information from accounting systems designed to generate/report overall financial results on a U.S. GAAP basis.<sup>3</sup> Staff verified the financial results of Dal-Tile with its corporate records, and all adjustments were incorporated into this report.<sup>4</sup>

As described in more detail in Part 3 of this report, there were changes to the composition of U.S. producers of QSP during the period examined. Three firms (Elite, Guidoni, and Hendrix) began operations during the period examined and one firm (Caesarstone) ceased its QSP production in January 2024.<sup>5</sup> Figure 4.1 presents each responding U.S. producers' share of the total reported net sales quantity in 2024.

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

<sup>2</sup> In addition, 23 independent U.S. fabricators provided financial results on their QSP operations. \*\*\*. All financial information for fabricators is provided in appendix J.

<sup>3</sup> \*\*\* reported that its accounting systems rely on a tax (accrual) basis. \*\*\* U.S. producer questionnaire response, section 3.2 B.4.

<sup>4</sup> Staff verification report, Dal-Tile, March 2, 2026. Staff performed a limited-scope verification that was focused on the company's financial results. Dal-Tile's U.S. producer questionnaire response was revised to update: \*\*\*. Ibid.

<sup>5</sup> See industry events at table 3.2. Hendrix opened its QSP production facility in 2024. The company reported that its 2024 and 2025 production operations \*\*\*. Table 3.2; Hendrix's U.S. producer questionnaire response, sections 2.2a and 3.3. The company provided financial data \*\*\*. Email from \*\*\*, February 2, 2026.

Guidoni started producing QSP in 2022 \*\*\*. Table 3.2; Guidoni's U.S. producer questionnaire response, sections 2.2a and 3.9a.

Elite completed construction of a QSP manufacturing facility in September 2020, \*\*\*. Table 3.2; Elite's U.S. producer questionnaire response, section 2.2a. \*\*\*. Elite's U.S. producer questionnaire response, section 2.12.

**Figure 4.1 QSP: U.S. producers’ share of net sales quantity in 2024, by firm**

\* \* \* \* \*

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

Note: \*\*\*. The figure shows that the largest three U.S. producers accounted for approximately three-quarters of 2024 net sales quantity.

**Operations on QSP**

Table 4.1 presents aggregated data on U.S. producers’ operations in relation to QSP, while table 4.2 presents corresponding changes in AUVs.<sup>6</sup> Table 4.3 presents selected company-specific financial data.

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<sup>6</sup> U.S. producers’ aggregate financial data include fabrication operations performed on the firms’ own, internally produced slab. \*\*\* were the only U.S. producers to report U.S. shipments of fabricated QSP, however \*\*\*. U.S. producer questionnaire response, sections \*\*\*, 2.14, and 5.2.

**Table 4.1 QSP: U.S. producers' results of operations, by item and period**

Quantity in 1,000 square feet; value in 1,000 dollars; ratios and shares in percent; unit values in dollars per square foot; count in number of firms reporting

| Item                       | Measure       | 2020    | 2021    | 2022    | 2023     | 2024    |
|----------------------------|---------------|---------|---------|---------|----------|---------|
| Total net sales            | Quantity      | 34,940  | 44,705  | 42,882  | 38,717   | 32,465  |
| Total net sales            | Value         | 705,989 | 914,726 | 995,256 | 914,665  | 774,005 |
| COGS: Raw materials        | Value         | 211,298 | 313,473 | 355,795 | 301,750  | 241,111 |
| COGS: Direct labor         | Value         | 86,000  | 103,199 | 106,723 | 103,844  | 100,683 |
| COGS: Other factory        | Value         | 149,482 | 176,587 | 196,344 | 190,681  | 136,607 |
| COGS: Total                | Value         | 446,779 | 593,259 | 658,862 | 596,276  | 478,402 |
| Gross profit or (loss)     | Value         | 259,209 | 321,467 | 336,394 | 318,389  | 295,603 |
| SG&A expenses              | Value         | 195,473 | 239,836 | 279,575 | 260,970  | 245,051 |
| Operating income or (loss) | Value         | 63,737  | 81,631  | 56,819  | 57,420   | 50,552  |
| Interest expense           | Value         | 16,333  | 12,644  | 25,214  | 43,617   | 39,122  |
| All other expenses         | Value         | 17,916  | 17,723  | 20,735  | 78,322   | 29,680  |
| All other income           | Value         | 1,448   | 2,955   | 1,268   | 1,434    | 15,852  |
| Net income or (loss)       | Value         | 30,936  | 54,220  | 12,138  | (63,086) | (2,398) |
| Depreciation/amortization  | Value         | 56,503  | 60,876  | 60,770  | 67,174   | 54,787  |
| Cash flow                  | Value         | 87,439  | 115,096 | 72,908  | 4,089    | 52,389  |
| COGS: Raw materials        | Ratio to NS   | 29.9    | 34.3    | 35.7    | 33.0     | 31.2    |
| COGS: Direct labor         | Ratio to NS   | 12.2    | 11.3    | 10.7    | 11.4     | 13.0    |
| COGS: Other factory        | Ratio to NS   | 21.2    | 19.3    | 19.7    | 20.8     | 17.6    |
| COGS: Total                | Ratio to NS   | 63.3    | 64.9    | 66.2    | 65.2     | 61.8    |
| Gross profit               | Ratio to NS   | 36.7    | 35.1    | 33.8    | 34.8     | 38.2    |
| SG&A expense               | Ratio to NS   | 27.7    | 26.2    | 28.1    | 28.5     | 31.7    |
| Operating income or (loss) | Ratio to NS   | 9.0     | 8.9     | 5.7     | 6.3      | 6.5     |
| Net income or (loss)       | Ratio to NS   | 4.4     | 5.9     | 1.2     | (6.9)    | (0.3)   |
| COGS: Raw materials        | Share of COGS | 47.3    | 52.8    | 54.0    | 50.6     | 50.4    |
| COGS: Direct labor         | Share of COGS | 19.2    | 17.4    | 16.2    | 17.4     | 21.0    |
| COGS: Other factory        | Share of COGS | 33.5    | 29.8    | 29.8    | 32.0     | 28.6    |
| COGS: Total                | Share of COGS | 100.0   | 100.0   | 100.0   | 100.0    | 100.0   |
| Total net sales            | Unit value    | 20.21   | 20.46   | 23.21   | 23.62    | 23.84   |
| COGS: Raw materials        | Unit value    | 6.05    | 7.01    | 8.30    | 7.79     | 7.43    |
| COGS: Direct labor         | Unit value    | 2.46    | 2.31    | 2.49    | 2.68     | 3.10    |
| COGS: Other factory        | Unit value    | 4.28    | 3.95    | 4.58    | 4.93     | 4.21    |
| COGS: Total                | Unit value    | 12.79   | 13.27   | 15.36   | 15.40    | 14.74   |
| Gross profit or (loss)     | Unit value    | 7.42    | 7.19    | 7.84    | 8.22     | 9.11    |
| SG&A expenses              | Unit value    | 5.59    | 5.36    | 6.52    | 6.74     | 7.55    |
| Operating income or (loss) | Unit value    | 1.82    | 1.83    | 1.32    | 1.48     | 1.56    |
| Net income or (loss)       | Unit value    | 0.89    | 1.21    | 0.28    | (1.63)   | (0.07)  |
| Operating losses           | Count         | 3       | 3       | 2       | 3        | 3       |
| Net losses                 | Count         | 3       | 2       | 3       | 4        | 3       |
| Data                       | Count         | 6       | 6       | 6       | 7        | 7       |

Table continued.

**Table 4.1 (Continued) QSP: U.S. producers' results of operations, by item and period**

Quantity in 1,000 square feet; value in 1,000 dollars; ratios and shares in percent; unit values in dollars per square foot; count in number of firms reporting; interim is January through September

| Item                       | Measure       | Interim 2024 | Interim 2025 |
|----------------------------|---------------|--------------|--------------|
| Total net sales            | Quantity      | 24,868       | 23,515       |
| Total net sales            | Value         | 592,909      | 560,911      |
| COGS: Raw materials        | Value         | 184,469      | 173,603      |
| COGS: Direct labor         | Value         | 74,300       | 76,609       |
| COGS: Other factory        | Value         | 102,557      | 99,497       |
| COGS: Total                | Value         | 361,327      | 349,709      |
| Gross profit or (loss)     | Value         | 231,582      | 211,202      |
| SG&A expenses              | Value         | 184,838      | 189,332      |
| Operating income or (loss) | Value         | 46,744       | 21,870       |
| Interest expense           | Value         | 31,279       | 28,908       |
| All other expenses         | Value         | 14,169       | 15,865       |
| All other income           | Value         | 7,668        | 1,433        |
| Net income or (loss)       | Value         | 8,963        | (21,470)     |
| Depreciation/amortization  | Value         | 41,098       | 41,080       |
| Cash flow                  | Value         | 50,061       | 19,611       |
| COGS: Raw materials        | Ratio to NS   | 31.1         | 31.0         |
| COGS: Direct labor         | Ratio to NS   | 12.5         | 13.7         |
| COGS: Other factory        | Ratio to NS   | 17.3         | 17.7         |
| COGS: Total                | Ratio to NS   | 60.9         | 62.3         |
| Gross profit               | Ratio to NS   | 39.1         | 37.7         |
| SG&A expense               | Ratio to NS   | 31.2         | 33.8         |
| Operating income or (loss) | Ratio to NS   | 7.9          | 3.9          |
| Net income or (loss)       | Ratio to NS   | 1.5          | (3.8)        |
| COGS: Raw materials        | Share of COGS | 51.1         | 49.6         |
| COGS: Direct labor         | Share of COGS | 20.6         | 21.9         |
| COGS: Other factory        | Share of COGS | 28.4         | 28.5         |
| COGS: Total                | Share of COGS | 100.0        | 100.0        |
| Total net sales            | Unit value    | 23.84        | 23.85        |
| COGS: Raw materials        | Unit value    | 7.42         | 7.38         |
| COGS: Direct labor         | Unit value    | 2.99         | 3.26         |
| COGS: Other factory        | Unit value    | 4.12         | 4.23         |
| COGS: Total                | Unit value    | 14.53        | 14.87        |
| Gross profit or (loss)     | Unit value    | 9.31         | 8.98         |
| SG&A expenses              | Unit value    | 7.43         | 8.05         |
| Operating income or (loss) | Unit value    | 1.88         | 0.93         |
| Net income or (loss)       | Unit value    | 0.36         | (0.91)       |
| Operating losses           | Count         | 4            | 4            |
| Net losses                 | Count         | 4            | 5            |
| Data                       | Count         | 7            | 7            |

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

**Table 4.2 QSP: Changes in AUVs between comparison periods**

Changes in percent; interim is January through September

| Item                | 2020–24 | 2020–21 | 2021–22 | 2022–23 | 2023–24 | Interim<br>2024–25 |
|---------------------|---------|---------|---------|---------|---------|--------------------|
| Total net sales     | ▲18.0   | ▲1.3    | ▲13.4   | ▲1.8    | ▲0.9    | ▲0.0               |
| COGS: Raw materials | ▲22.8   | ▲16.0   | ▲18.3   | ▼(6.1)  | ▼(4.7)  | ▼(0.5)             |
| COGS: Direct labor  | ▲26.0   | ▼(6.2)  | ▲7.8    | ▲7.8    | ▲15.6   | ▲9.0               |
| COGS: Other factory | ▼(1.6)  | ▼(7.7)  | ▲15.9   | ▲7.6    | ▼(14.6) | ▲2.6               |
| COGS: Total         | ▲15.2   | ▲3.8    | ▲15.8   | ▲0.2    | ▼(4.3)  | ▲2.4               |

Table continued.

**Table 4.2 (Continued) QSP: Changes in AUVs between comparison periods**

Changes in dollars per square foot; interim is January through September

| Item                       | 2020–24 | 2020–21 | 2021–22 | 2022–23 | 2023–24 | Interim<br>2024–25 |
|----------------------------|---------|---------|---------|---------|---------|--------------------|
| Total net sales            | ▲3.64   | ▲0.26   | ▲2.75   | ▲0.42   | ▲0.22   | ▲0.01              |
| COGS: Raw materials        | ▲1.38   | ▲0.96   | ▲1.28   | ▼(0.50) | ▼(0.37) | ▼(0.04)            |
| COGS: Direct labor         | ▲0.64   | ▼(0.15) | ▲0.18   | ▲0.19   | ▲0.42   | ▲0.27              |
| COGS: Other factory        | ▼(0.07) | ▼(0.33) | ▲0.63   | ▲0.35   | ▼(0.72) | ▲0.11              |
| COGS: Total                | ▲1.95   | ▲0.48   | ▲2.09   | ▲0.04   | ▼(0.67) | ▲0.34              |
| Gross profit or (loss)     | ▲1.69   | ▼(0.23) | ▲0.65   | ▲0.38   | ▲0.88   | ▼(0.33)            |
| SG&A expense               | ▲1.95   | ▼(0.23) | ▲1.15   | ▲0.22   | ▲0.81   | ▲0.62              |
| Operating income or (loss) | ▼(0.27) | ▲0.00   | ▼(0.50) | ▲0.16   | ▲0.07   | ▼(0.95)            |
| Net income or (loss)       | ▼(0.96) | ▲0.33   | ▼(0.93) | ▼(1.91) | ▲1.56   | ▼(1.27)            |

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

Note: Percentages and unit values shown as “0.0” or “0.00” represent values greater than zero, but less than “0.05” or “0.005,” respectively. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

**Table 4.3 QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Net sales quantity**

Quantity in 1,000 square feet; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim<br/>2024</b> | <b>Interim<br/>2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|-------------------------|-------------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| All firms   | 34,940      | 44,705      | 42,882      | 38,717      | 32,465      | 24,868                  | 23,515                  |

Table continued.

**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Net sales value**

Value in 1,000 dollars; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim<br/>2024</b> | <b>Interim<br/>2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|-------------------------|-------------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| All firms   | 705,989     | 914,726     | 995,256     | 914,665     | 774,005     | 592,909                 | 560,911                 |

Table continued.

**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**COGS**

Value in 1,000 dollars; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim<br/>2024</b> | <b>Interim<br/>2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|-------------------------|-------------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| All firms   | 446,779     | 593,259     | 658,862     | 596,276     | 478,402     | 361,327                 | 349,709                 |

Table continued.

**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Gross profit or (loss)**

Value in 1,000 dollars; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim<br/>2024</b> | <b>Interim<br/>2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|-------------------------|-------------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| All firms   | 259,209     | 321,467     | 336,394     | 318,389     | 295,603     | 231,582                 | 211,202                 |

Table continued.

**Table 4.3 (Continued)QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**SG&A expenses**

Value in 1,000 dollars; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim<br/>2024</b> | <b>Interim<br/>2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|-------------------------|-------------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| All firms   | 195,473     | 239,836     | 279,575     | 260,970     | 245,051     | 184,838                 | 189,332                 |

Table continued.

**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Operating income or (loss)**

Value in 1,000 dollars; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim<br/>2024</b> | <b>Interim<br/>2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|-------------------------|-------------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| All firms   | 63,737      | 81,631      | 56,819      | 57,420      | 50,552      | 46,744                  | 21,870                  |

Table continued.



**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net income or (loss)**

Value in 1,000 dollars; interim is January through September

| Firm        | 2020   | 2021   | 2022   | 2023     | 2024    | Interim 2024 | Interim 2025 |
|-------------|--------|--------|--------|----------|---------|--------------|--------------|
| Caesarstone | ***    | ***    | ***    | ***      | ***     | ***          | ***          |
| Cambria     | ***    | ***    | ***    | ***      | ***     | ***          | ***          |
| Dal-Tile    | ***    | ***    | ***    | ***      | ***     | ***          | ***          |
| Elite       | ***    | ***    | ***    | ***      | ***     | ***          | ***          |
| Estone      | ***    | ***    | ***    | ***      | ***     | ***          | ***          |
| Guidoni     | ***    | ***    | ***    | ***      | ***     | ***          | ***          |
| Hendrix     | ***    | ***    | ***    | ***      | ***     | ***          | ***          |
| LX Hausys   | ***    | ***    | ***    | ***      | ***     | ***          | ***          |
| All firms   | 30,936 | 54,220 | 12,138 | (63,086) | (2,398) | 8,963        | (21,470)     |

Table continued.

**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**COGS to net sales ratio**

Ratios in percent; interim is January through September

| Firm        | 2020 | 2021 | 2022 | 2023 | 2024 | Interim 2024 | Interim 2025 |
|-------------|------|------|------|------|------|--------------|--------------|
| Caesarstone | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Cambria     | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Dal-Tile    | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Elite       | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Estone      | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Guidoni     | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Hendrix     | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| LX Hausys   | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| All firms   | 63.3 | 64.9 | 66.2 | 65.2 | 61.8 | 60.9         | 62.3         |

Table continued.

**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Gross profit or (loss) to net sales ratio**

Ratios in percent; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim 2024</b> | <b>Interim 2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|---------------------|---------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| All firms   | 36.7        | 35.1        | 33.8        | 34.8        | 38.2        | 39.1                | 37.7                |

Table continued.

**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**SG&A expenses to net sales ratio**

Ratios in percent; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim 2024</b> | <b>Interim 2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|---------------------|---------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| All firms   | 27.7        | 26.2        | 28.1        | 28.5        | 31.7        | 31.2                | 33.8                |

Table continued.

**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Operating income or (loss) to net sales ratio**

Ratios in percent; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim 2024</b> | <b>Interim 2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|---------------------|---------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| All firms   | 9.0         | 8.9         | 5.7         | 6.3         | 6.5         | 7.9                 | 3.9                 |

Table continued.

**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net income or (loss) to net sales ratio**

Ratios in percent; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim 2024</b> | <b>Interim 2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|---------------------|---------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| All firms   | 4.4         | 5.9         | 1.2         | (6.9)       | (0.3)       | 1.5                 | (3.8)               |

Table continued.

**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit net sales value**

Unit values in dollars per square foot; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim<br/>2024</b> | <b>Interim<br/>2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|-------------------------|-------------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| All firms   | 20.21       | 20.46       | 23.21       | 23.62       | 23.84       | 23.84                   | 23.85                   |

Table continued.

**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit raw material costs**

Unit values in dollars per square foot; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim<br/>2024</b> | <b>Interim<br/>2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|-------------------------|-------------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| All firms   | 6.05        | 7.01        | 8.30        | 7.79        | 7.43        | 7.42                    | 7.38                    |

Table continued.

**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit direct labor costs**

Unit values in dollars per square foot; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim 2024</b> | <b>Interim 2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|---------------------|---------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| All firms   | 2.46        | 2.31        | 2.49        | 2.68        | 3.10        | 2.99                | 3.26                |

Table continued.

**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit other factory costs**

Unit values in dollars per square foot; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim 2024</b> | <b>Interim 2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|---------------------|---------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| All firms   | 4.28        | 3.95        | 4.58        | 4.93        | 4.21        | 4.12                | 4.23                |

Table continued.

**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit COGS**

Unit values in dollars per square foot; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim<br/>2024</b> | <b>Interim<br/>2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|-------------------------|-------------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| All firms   | 12.79       | 13.27       | 15.36       | 15.40       | 14.74       | 14.53                   | 14.87                   |

Table continued.

**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit gross profit or (loss)**

Unit values in dollars per square foot; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim<br/>2024</b> | <b>Interim<br/>2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|-------------------------|-------------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| All firms   | 7.42        | 7.19        | 7.84        | 8.22        | 9.11        | 9.31                    | 8.98                    |

Table continued.

**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit SG&A expenses**

Unit values in dollars per square foot; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim 2024</b> | <b>Interim 2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|---------------------|---------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| All firms   | 5.59        | 5.36        | 6.52        | 6.74        | 7.55        | 7.43                | 8.05                |

Table continued.

**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit operating income or (loss)**

Unit values in dollars per square foot; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim 2024</b> | <b>Interim 2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|---------------------|---------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| All firms   | 1.82        | 1.83        | 1.32        | 1.48        | 1.56        | 1.88                | 0.93                |

Table continued.

**Table 4.3 (Continued) QSP: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit net income or (loss)**

Unit values in dollars per square foot; interim is January through September

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim 2024</b> | <b>Interim 2025</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|---------------------|---------------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Cambria     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Elite       | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Estone      | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Guidoni     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Hendrix     | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| All firms   | 0.89        | 1.21        | 0.28        | (1.63)      | (0.07)      | 0.36                | (0.91)              |

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

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

## Net sales<sup>7</sup>

As shown in table 4.1, U.S. producers' aggregate net sales quantity increased from 2020 to 2021 but decreased in each subsequent year from 2021 to 2024, for an overall decrease of 7.1 percent from 2020 to 2024. On a value basis, U.S. producers' net sales increased from 2020 to 2022, and then decreased from 2022 to 2024, for an overall increase of 9.6 percent from 2020 to 2024. Net sales quantity and value were both 5.4 percent lower in interim 2025 than in interim 2024. U.S. producers' aggregate net sales AUV increased each year from 2020 to 2024 and was slightly higher in interim 2025 than in interim 2024.

<sup>7</sup> For U.S. producers, net sales primarily reflect commercial sales but also include transfers to related firms and a very small amount of internal consumption. Internal consumption and transfers combined accounted for 7.8 percent of total net sales quantity in 2024.

Non-commercial sales for U.S. producers are included but not shown separately in this section of the report. Internal consumption, representing 0.9 percent of U.S. producers' aggregate net sales quantity in 2024, was reported by \*\*\*. Transfers to related firms were reported by \*\*\*. In response to questions from staff, \*\*\*. U.S. producer questionnaire responses, section 3.9a; email from \*\*\*, January 21, 2026.



Of the firms that reported net sales of QSP in each calendar year, five firms reported a decrease in net sales volume from 2020 to 2024, while only one firm (Elite) reported an increase.<sup>8</sup> Of the firms that had sales in both interim periods, only one (Estone) reported a net sales volume in interim 2025 that was higher than in interim 2024.

There was a relatively wide range of net sales AUVs reported by U.S. producers, which is at least partially attributable to differences in product mix and level of trade. \*\*\*.<sup>9</sup>

Due to the relatively wide range of net sales AUVs among the firms, some of the fluctuations in the U.S. producers' average net sales AUV were the result of changes in market share. For instance, between 2023 and 2024 the average net sales AUV increased by \$0.22 per square foot. However, table 4.3 shows that all but one firm (Cambria) reported a decrease in net sales AUVs during this time. While \*\*\*, a bigger factor was the \*\*\*. U.S. producers also reported changes in product mix that impacted their net sales average unit values.<sup>10</sup>

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<sup>8</sup> As previously mentioned, construction of Elite's QSP facility was completed in 2020, \*\*\*.

<sup>9</sup> As discussed in footnote 5, \*\*\* were the only U.S. producers to report any U.S. shipments of fabricated QSP. \*\*\* U.S. shipments of fabricated QSP represented \*\*\* percent of its 2024 U.S. shipment value, while \*\*\* represented \*\*\* percent. For both companies, the calculated AUVs for their U.S. shipments of fabricated QSP were \*\*\* higher than their shipments of QSP slabs \*\*\*. U.S. producer questionnaire responses, section 2.14.

<sup>10</sup> \*\*\*. Email from \*\*\*, March 3, 2026; email from \*\*\*, March 4, 2026; email from \*\*\*, March 2, 2026.

## **Cost of goods sold and gross profit or loss**

### **Raw material costs**

Raw material costs were the largest component of COGS, representing 50.4 percent of total COGS in 2024. The average unit raw material cost (on a per-square foot basis) increased from 2020 to 2022, and then decreased in 2023 and 2024, for an overall increase of 22.8 percent from 2020 to 2024; it was 0.5 percent lower in interim 2025 than in interim 2024.

As shown in table 4.3, other than from 2022 to 2023, company-specific directional trends for raw material costs were mostly uniform year over year.<sup>11</sup> All but one company reported an increase in raw material cost AUVs from 2020 to 2021, all companies reported an increase from 2021 to 2022, and all companies reported a decrease from 2023 to 2024. However, from 2022 to 2023, half of the companies reported an increase and half reported a decrease. Of the firms with QSP sales in both interim periods, five of six reported a lower raw material cost AUV in interim 2025 when compared with interim 2024.

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<sup>11</sup> Caesarstone's \*\*\*. Email from \*\*\*, January 29, 2026. In response to requests from staff, the company reported that it \*\*\*. Email from \*\*\*, February 5, 2026.

Table 4.4 presents costs of raw materials, by type.<sup>12</sup> The table shows that silica and resin binder accounted for the majority of U.S. producers' raw material costs in 2024.

**Table 4.4 QSP: U.S. producers' raw material costs in 2024**

Value in 1,000 dollars; unit values in dollars per square foot; share of value in percent

| Item                                 | Value   | Unit value | Share of value |
|--------------------------------------|---------|------------|----------------|
| Silica (e.g., quartz, quartz powder) | 126,127 | 2.94       | 52.3           |
| Resin binder                         | 87,571  | 2.04       | 36.3           |
| Pigments                             | 14,403  | 0.34       | 6.0            |
| Other material inputs                | 13,010  | 0.30       | 5.4            |
| All raw materials                    | 241,111 | 5.62       | 100.0          |

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

### Direct labor costs

Direct labor costs were the smallest component of COGS, representing 21.0 percent of total COGS in 2024. Direct labor cost AUVs decreased from 2020 to 2021, then increased each year from 2021 to 2024; they were higher in interim 2025 than in interim 2024. All but two companies, Caesarstone and Elite, reported an increase in their direct labor cost AUVs from 2020 to 2024. As previously mentioned, Caesarstone ceased operations in 2024, and had \*\*\*. Elite began its QSP operations in \*\*\*. When rounded to the nearest cent, only one firm, \*\*\*, reported per-square foot direct labor cost AUVs that were lower in interim 2025 than in interim 2024.

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<sup>12</sup> \*\*\* reported purchasing inputs from related suppliers. \*\*\*. Email from \*\*\*, January 21, 2026. \*\*\* U.S. producer questionnaire response, sections 3.6 and 3.7a.

\*\*\*. \*\*\* U.S. producer questionnaire response, sections 3.6 and 3.7a.

## Other factory costs

Other factory costs were the second-largest component of COGS, representing 28.6 percent of total COGS in 2024. On a per-square foot basis, other factory costs fluctuated from 2020 to 2024, with a period low in 2021 and a period high in 2023; they were higher in interim 2025 than in interim 2024.<sup>13</sup>

\*\*\* than in the other annual year periods. The company indicated that this was \*\*\*.<sup>14</sup>

\*\*\*. The company reported that the increase was primarily attributable to \*\*\*.<sup>15</sup>

## Total COGS and gross profit or loss

The U.S. producers' ratio of total COGS to net sales value increased from 2020 to 2022, and then decreased from 2022 to 2024, for an overall decrease of 1.5 percentage points from 2020 to 2024. The COGS to net sales ratio was 1.4 percentage points higher in interim 2025 than in interim 2024.

U.S. producers' aggregate gross profit increased from 2020 to 2022 but decreased from 2022 to 2024, for an overall increase of 14.0 percent from 2020 to 2024; it was 8.8 percent lower in interim 2025 than in interim 2024.

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<sup>13</sup> \*\*\*. U.S. producer questionnaire responses, section 3.9h. Distribution costs can include items such as internal transportation costs (e.g., between plant and warehouse or distribution location), warehousing costs, and costs associated with distribution centers and networks, among others.

<sup>14</sup> Email from \*\*\*, January 21, 2026.

<sup>15</sup> \*\*\* U.S. producer questionnaire response, section 3.9g; email from \*\*\*, January 29, 2026.

## SG&A expenses and operating income or loss

Total SG&A expenses increased from 2020 to 2022 and decreased from 2022 to 2024, for an overall increase between 2020 and 2024; they were higher in interim 2025 than in interim 2024.<sup>16</sup> The SG&A expense ratio increased irregularly from 2020 to 2024 and was higher in interim 2025 than in interim 2024.<sup>17 18 19</sup>

U.S. producers' aggregate operating income fluctuated from 2020 to 2024 but decreased overall from \$63.7 million in 2020 to \$50.6 million in 2024. It was lower in interim 2025, at \$21.9 million, than in interim 2024, at \$46.7 million. The operating income margin also decreased overall from 2020 to 2024 and was lower in interim 2025 than in interim 2024.

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<sup>16</sup> \*\*\*. Email from \*\*\*, January 15, 2026.

<sup>17</sup> \*\*\*. U.S. producer questionnaire responses, section 3.9h.

<sup>18</sup> \*\*\*.

<sup>19</sup> \*\*\*. Of the categories included within SG&A expenses, \*\*\*. Email from \*\*\*, March 3, 2026.

\*\*\* reported that its SG&A expenses are primarily composed of \*\*\*. The company indicated that the primary driver behind the \*\*\*. Email from \*\*\*, March 4, 2026.

\*\*\*. Email from \*\*\*, March 2, 2026.

Table 4.5 presents the classification of the U.S. producers' COGS, SG&A expenses, and combined operating expenses as variable costs or fixed costs.

**Table 4.5 QSP: U.S. producers' fixed and variable costs in 2024, by type and classification**

Value in 1,000 dollars; shares in percent

| Item                     | Measure | COGS    | SG&A expenses | Operating expenses |
|--------------------------|---------|---------|---------------|--------------------|
| Variable costs           | Value   | 377,682 | 20,699        | 398,381            |
| Fixed costs              | Value   | 100,719 | 174,774       | 275,493            |
| Variable and fixed costs | Value   | 478,402 | 195,473       | 673,874            |
| Variable costs           | Share   | 78.9    | 10.6          | 59.1               |
| Fixed costs              | Share   | 21.1    | 89.4          | 40.9               |
| Variable and fixed costs | Share   | 100.0   | 100.0         | 100.0              |

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

### **All other expenses and net income or loss**

Classified below the operating income levels are interest expense, all other expense, and all other income, which are usually allocated to the product line from high levels in the corporation. With respect to U.S. producers, interest expenses increased overall from 2020 to 2024 but were lower in interim 2025 than in interim 2024.

All other expenses increased irregularly from 2020 to 2024, with a notably higher amount reported in 2023 relative to all other years; it was higher in interim 2025 than in interim 2024.<sup>20</sup> The higher all other expenses in 2023 were primarily attributable to \*\*\* reported nonrecurring charges classified within all other expenses that year.<sup>21</sup> All other income increased irregularly from 2020 to 2024 but was lower in interim 2025 than in interim 2024.<sup>22</sup>

The U.S. producers aggregate net income decreased irregularly from 2020 to 2024 and was lower in interim 2025 than in interim 2024. As a ratio to net sales value, net income decreased irregularly from 4.4 percent in 2020 to negative 0.3 percent in 2025. It was lower in interim 2025 (negative 3.8 percent) than in interim 2024 (1.5 percent).<sup>23</sup>

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<sup>20</sup> \*\*\* were the only U.S. producers to report any notable amount of expenses related to silicosis litigation in their financial results during the period for which data were collected. \*\*\*. These expenses were included in the company's \*\*\*. As a ratio to the company's net sales revenue, these amounts were between \*\*\* percent during those periods. Emails from \*\*\*, March 5 and 10, 2026.

\*\*\*. \*\*\* U.S. producer questionnaire response, section 3.10; email from \*\*\*, March 4, 2026.

<sup>21</sup> Additionally, the following nonrecurring items were also reported within all other expenses: \*\*\*. U.S. producer questionnaire responses, section 3.10.

<sup>22</sup> The substantially higher all other income in 2024 was primarily attributable to \*\*\*. U.S. producer questionnaire responses, section 3.10; Email from \*\*\*, January 21, 2026.

<sup>23</sup> A variance analysis is not shown due to the wide range in U.S. producers' net sales AUVs coupled with shifts in market share from the entrance and exit of firms during the period examined.

## Capital expenditures and research and development expenses

Table 4.6 presents capital expenditures, by firm, and table 4.8 presents R&D expenses, by firm. Tables 4.7 and 4.9 present the firms' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively.

The U.S. producers' aggregate capital expenditures increased from 2020 to 2022 but decreased from 2022 to 2024; they were higher in interim 2025 than in interim 2024. The aggregate trend primarily reflects the timing of individual firms' large capital expenditure outlays. \*\*\* reported its highest level of capital expenditures in 2020, \*\*\* reported its period-high level in 2021, \*\*\* reported its highest level in 2022, and \*\*\* had notably higher capital expenditures in 2023.

R&D expenses, which were reported by \*\*\*, increased from 2020 to 2024 and were higher in interim 2025 than in interim 2024.

**Table 4.6 QSP: U.S. producers' capital expenditures, by firm and period**

Value in 1,000 dollars; interim is January through September

| Firm        | 2020   | 2021   | 2022   | 2023   | 2024   | Interim 2024 | Interim 2025 |
|-------------|--------|--------|--------|--------|--------|--------------|--------------|
| Caesarstone | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| Cambria     | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| Dal-Tile    | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| Elite       | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| Estone      | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| Guidoni     | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| Hendrix     | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| LX Hausys   | ***    | ***    | ***    | ***    | ***    | ***          | ***          |
| All firms   | 49,316 | 89,569 | 95,676 | 80,527 | 31,044 | 22,692       | 44,389       |

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

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



**Table 4.7 QSP: U.S. producers' narrative descriptions of their capital expenditures, by firm**

| Firm        | Narrative on capital expenditures |
|-------------|-----------------------------------|
| Caesarstone | ***                               |
| Cambria     | ***                               |
| Dal-Tile    | ***                               |
| Elite       | ***                               |
| Estone      | ***                               |
| Guidoni     | ***                               |
| Hendrix     | ***                               |
| LX Hausys   | ***                               |

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

**Table 4.8 QSP: U.S. producers' R&D expenses, by firm and period**

Value in 1,000 dollars; interim is January through September

| Firm        | 2020  | 2021  | 2022  | 2023  | 2024  | Interim 2024 | Interim 2025 |
|-------------|-------|-------|-------|-------|-------|--------------|--------------|
| Caesarstone | ***   | ***   | ***   | ***   | ***   | ***          | ***          |
| Cambria     | ***   | ***   | ***   | ***   | ***   | ***          | ***          |
| Dal-Tile    | ***   | ***   | ***   | ***   | ***   | ***          | ***          |
| Elite       | ***   | ***   | ***   | ***   | ***   | ***          | ***          |
| Estone      | ***   | ***   | ***   | ***   | ***   | ***          | ***          |
| Guidoni     | ***   | ***   | ***   | ***   | ***   | ***          | ***          |
| Hendrix     | ***   | ***   | ***   | ***   | ***   | ***          | ***          |
| LX Hausys   | ***   | ***   | ***   | ***   | ***   | ***          | ***          |
| All firms   | 3,957 | 5,166 | 5,613 | 5,934 | 6,310 | 4,676        | 4,701        |

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

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

**Table 4.9 QSP: U.S. producers' narrative descriptions of their R&D expenses, by firm**

| Firm        | Narrative on R&D expenses |
|-------------|---------------------------|
| Caesarstone | ***                       |
| Cambria     | ***                       |
| Dal-Tile    | ***                       |
| Elite       | ***                       |
| Estone      | ***                       |
| Guidoni     | ***                       |
| Hendrix     | ***                       |
| LX Hausys   | ***                       |

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

## Assets and return on assets

Table 4.10 presents data on the U.S. producers' total assets while table 4.11 presents their operating ROA.<sup>24</sup> Table 4.12 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. Total assets increased from 2020 to 2022, and then decreased from 2022 to 2024, for an overall increase from 2020 to 2024. The U.S. producers' operating ROA decreased irregularly from 7.3 percent in 2020 to 5.7 percent in 2024.

**Table 4.10 QSP: U.S. producers' total net assets, by firm and period**

Value in 1,000 dollars

| Firm        | 2020    | 2021    | 2022      | 2023    | 2024    |
|-------------|---------|---------|-----------|---------|---------|
| Caesarstone | ***     | ***     | ***       | ***     | ***     |
| Cambria     | ***     | ***     | ***       | ***     | ***     |
| Dal-Tile    | ***     | ***     | ***       | ***     | ***     |
| Elite       | ***     | ***     | ***       | ***     | ***     |
| Estone      | ***     | ***     | ***       | ***     | ***     |
| Guidoni     | ***     | ***     | ***       | ***     | ***     |
| Hendrix     | ***     | ***     | ***       | ***     | ***     |
| LX Hausys   | ***     | ***     | ***       | ***     | ***     |
| All firms   | 895,256 | 973,679 | 1,064,017 | 950,534 | 929,463 |

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

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

<sup>24</sup> The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

**Table 4.11 QSP: U.S. producers' ROA, by firm and period**

Ratio in percent

| <b>Firm</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> |
|-------------|-------------|-------------|-------------|-------------|-------------|
| Caesarstone | ***         | ***         | ***         | ***         | ***         |
| Cambria     | ***         | ***         | ***         | ***         | ***         |
| Dal-Tile    | ***         | ***         | ***         | ***         | ***         |
| Elite       | ***         | ***         | ***         | ***         | ***         |
| Estone      | ***         | ***         | ***         | ***         | ***         |
| Guidoni     | ***         | ***         | ***         | ***         | ***         |
| Hendrix     | ***         | ***         | ***         | ***         | ***         |
| LX Hausys   | ***         | ***         | ***         | ***         | ***         |
| All firms   | 7.3         | 8.6         | 5.6         | 6.6         | 5.7         |

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

Note: \*\*\* operating income was excluded from the calculation of operating return on assets because the company did not provide total asset values.

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

**Table 4.12 QSP: U.S. producers' narrative descriptions of their total net assets, by firm**

| <b>Firm</b> | <b>Narrative on assets</b> |
|-------------|----------------------------|
| Caesarstone | ***                        |
| Cambria     | ***                        |
| Dal-Tile    | ***                        |
| Elite       | ***                        |
| Estone      | ***                        |
| Guidoni     | ***                        |
| Hendrix     | ***                        |
| LX Hausys   | ***                        |

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

## Capital and investment

The Commission requested U.S. producers of QSP to describe any actual or potential negative effects of imports of QSP on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table 4.13 presents the number of firms reporting an impact in each category and table 4.14 provides the U.S. producers' narrative responses.

**Table 4.13 QSP: Count of firms indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2020, by effect**

Number of firms reporting

| Effect                                                                                               | Category   | Count |
|------------------------------------------------------------------------------------------------------|------------|-------|
| Inability to generate adequate capital to finance the modernization of domestic plants and equipment | Investment | 2     |
| Inability to maintain existing levels of expenditures for research and development                   | Investment | 3     |
| Cancellation, postponement, or rejection of expansion projects                                       | Investment | 4     |
| Denial or rejection of investment proposal                                                           | Investment | 4     |
| Reduction in the size of capital investments                                                         | Investment | 4     |
| Return on specific investments negatively impacted                                                   | Investment | 5     |
| Other investment effects                                                                             | Investment | 2     |
| Any negative effects on investment                                                                   | Investment | 6     |
| Rejection of bank loans                                                                              | Growth     | 1     |
| Lowering of credit rating                                                                            | Growth     | 2     |
| Problem related to the issue of stocks or bonds                                                      | Growth     | 0     |
| Ability to service debt                                                                              | Growth     | 2     |
| Other growth and development effects                                                                 | Growth     | 5     |
| Any negative effects on growth and development                                                       | Growth     | 6     |
| Anticipated negative effects of imports                                                              | Future     | 5     |

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

Note: \*\*\*.

**Table 4.14 QSP: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2020, by firm and effect**

| Item                                                                                                 | Firm name and narrative on impact of imports |
|------------------------------------------------------------------------------------------------------|----------------------------------------------|
| Inability to generate adequate capital to finance the modernization of domestic plants and equipment | ***                                          |
| Inability to generate adequate capital to finance the modernization of domestic plants and equipment | ***                                          |
| Inability to maintain existing levels of expenditures for research and development                   | ***                                          |
| Inability to maintain existing levels of expenditures for research and development                   | ***                                          |
| Inability to maintain existing levels of expenditures for research and development                   | ***                                          |
| Cancellation, postponement, or rejection of expansion projects                                       | ***                                          |
| Cancellation, postponement, or rejection of expansion projects                                       | ***                                          |
| Cancellation, postponement, or rejection of expansion projects                                       | ***                                          |
| Cancellation, postponement, or rejection of expansion projects                                       | ***                                          |

| Item                                               | Firm name and narrative on impact of imports |
|----------------------------------------------------|----------------------------------------------|
| Denial or rejection of investment proposal         | ***                                          |
| Denial or rejection of investment proposal         | ***                                          |
| Denial or rejection of investment proposal         | ***                                          |
| Denial or rejection of investment proposal         | ***                                          |
| Reduction in the size of capital investments       | ***                                          |
| Reduction in the size of capital investments       | ***                                          |
| Reduction in the size of capital investments       | ***                                          |
| Reduction in the size of capital investments       | ***                                          |
| Return on specific investments negatively impacted | ***                                          |
| Return on specific investments negatively impacted | ***                                          |
| Return on specific investments negatively impacted | ***                                          |
| Return on specific investments negatively impacted | ***                                          |
| Return on specific investments negatively impacted | ***                                          |

| Item                      | Firm name and narrative on impact of imports |
|---------------------------|----------------------------------------------|
| Other                     | ***                                          |
| Other                     | ***                                          |
| Other                     | ***                                          |
| Rejection of bank loans   | ***                                          |
| Lowering of credit rating | ***                                          |
| Lowering of credit rating | ***                                          |
| Ability to service debt   | ***                                          |
| Ability to service debt   | ***                                          |
| Other                     | ***                                          |
| Other                     | ***                                          |
| Other                     | ***                                          |
| Other                     | ***                                          |

| Item                           | Firm name and narrative on impact of imports |
|--------------------------------|----------------------------------------------|
| Other                          | ***                                          |
| Anticipated effects of imports | ***                                          |
| Anticipated effects of imports | ***                                          |
| Anticipated effects of imports | ***                                          |
| Anticipated effects of imports | ***                                          |
| Anticipated effects of imports | ***                                          |

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



## **Part 5: U.S. market and foreign industries**

This part of the report provides information from questionnaire responses and public sources on the U.S. market and foreign industries for QSP.

### **Apparent U.S. consumption and market shares**

#### **Quantity**

Table 5.1 and figure 5.1 present data on apparent U.S. consumption and U.S. market shares by quantity for QSP. U.S. producers' U.S. shipments increased from 2020 to 2021 but then decreased from 2021 to 2024, ending at level lower than in 2020. U.S. imports, by comparison, increased from 2020 to 2022 before they decreased in 2023 and then increased in 2024, to a level higher than in 2020. The volume of U.S. imports compared to U.S. producers' shipments was large enough that apparent U.S. consumption increased from 2020 to 2024. However, apparent U.S. consumption was lower in interim 2025 compared with interim 2024.

U.S. producers' share of apparent U.S. consumption declined from 2020 to 2024 and was lower in interim 2025 compared with interim 2024. Although the share of apparent U.S. consumption from certain import sources declined from 2020 to 2024, the increasing high volume of imports from China, India, Spain, Thailand, and Vietnam caused the share of apparent U.S. consumption from all import sources to increase during the same period and it was higher in interim 2025 compared with interim 2024.

**Table 5.1 QSP: Apparent U.S. consumption and market shares based on quantity data, defining the domestic industry as U.S. producers only, by source and period**

Quantity in 1,000 square feet; Shares in percent

| Source             | Measure  | 2020    | 2021    | 2022    | 2023    | 2024    |
|--------------------|----------|---------|---------|---------|---------|---------|
| U.S. producers     | Quantity | 31,645  | 40,525  | 38,700  | 35,618  | 30,900  |
| Canada             | Quantity | 8,142   | 7,760   | 5,896   | 4,945   | 4,714   |
| China              | Quantity | 976     | 1,024   | 2,654   | 2,017   | 3,151   |
| Czechia            | Quantity | 2,514   | 3,448   | 3,879   | 2,533   | 2,911   |
| India              | Quantity | 26,924  | 54,381  | 68,521  | 56,508  | 84,547  |
| Israel             | Quantity | 9,360   | 7,274   | 6,227   | 2,491   | 1,501   |
| Italy              | Quantity | 4,077   | 5,153   | 3,221   | 1,671   | 1,121   |
| Malaysia           | Quantity | 12,385  | 16,127  | 5,836   | 4,981   | 9,990   |
| Mexico             | Quantity | 189     | 35      | 17      | 36      | 54      |
| Spain              | Quantity | 24,948  | 36,304  | 44,067  | 31,348  | 34,052  |
| Taiwan             | Quantity | 4,175   | 5,245   | 4,169   | 4,197   | 3,112   |
| Thailand           | Quantity | 1,382   | 4,053   | 13,994  | 20,518  | 27,931  |
| Turkey             | Quantity | 5,242   | 10,388  | 9,460   | 6,589   | 6,055   |
| Vietnam            | Quantity | 19,437  | 33,103  | 34,587  | 38,664  | 43,562  |
| Other FTA sources  | Quantity | 5,658   | 5,512   | 1,875   | 1,464   | 1,284   |
| All other sources  | Quantity | 5,660   | 6,660   | 6,595   | 7,096   | 9,729   |
| All import sources | Quantity | 131,069 | 196,467 | 210,999 | 185,058 | 233,715 |
| All sources        | Quantity | 162,714 | 236,992 | 249,699 | 220,676 | 264,615 |
| U.S. producers     | Share    | 19.4    | 17.1    | 15.5    | 16.1    | 11.7    |
| Canada             | Share    | 5.0     | 3.3     | 2.4     | 2.2     | 1.8     |
| China              | Share    | 0.6     | 0.4     | 1.1     | 0.9     | 1.2     |
| Czechia            | Share    | 1.5     | 1.5     | 1.6     | 1.1     | 1.1     |
| India              | Share    | 16.5    | 22.9    | 27.4    | 25.6    | 32.0    |
| Israel             | Share    | 5.8     | 3.1     | 2.5     | 1.1     | 0.6     |
| Italy              | Share    | 2.5     | 2.2     | 1.3     | 0.8     | 0.4     |
| Malaysia           | Share    | 7.6     | 6.8     | 2.3     | 2.3     | 3.8     |
| Mexico             | Share    | 0.1     | 0.0     | 0.0     | 0.0     | 0.0     |
| Spain              | Share    | 15.3    | 15.3    | 17.6    | 14.2    | 12.9    |
| Taiwan             | Share    | 2.6     | 2.2     | 1.7     | 1.9     | 1.2     |
| Thailand           | Share    | 0.8     | 1.7     | 5.6     | 9.3     | 10.6    |
| Turkey             | Share    | 3.2     | 4.4     | 3.8     | 3.0     | 2.3     |
| Vietnam            | Share    | 11.9    | 14.0    | 13.9    | 17.5    | 16.5    |
| Other FTA sources  | Share    | 3.5     | 2.3     | 0.8     | 0.7     | 0.5     |
| All other sources  | Share    | 3.5     | 2.8     | 2.6     | 3.2     | 3.7     |
| All import sources | Share    | 80.6    | 82.9    | 84.5    | 83.9    | 88.3    |
| All sources        | Share    | 100.0   | 100.0   | 100.0   | 100.0   | 100.0   |

Table continued.

**Table 5.1 (Continued) QSP: Apparent U.S. consumption and market shares based on quantity data, defining the domestic industry as U.S. producers only, by source and period**

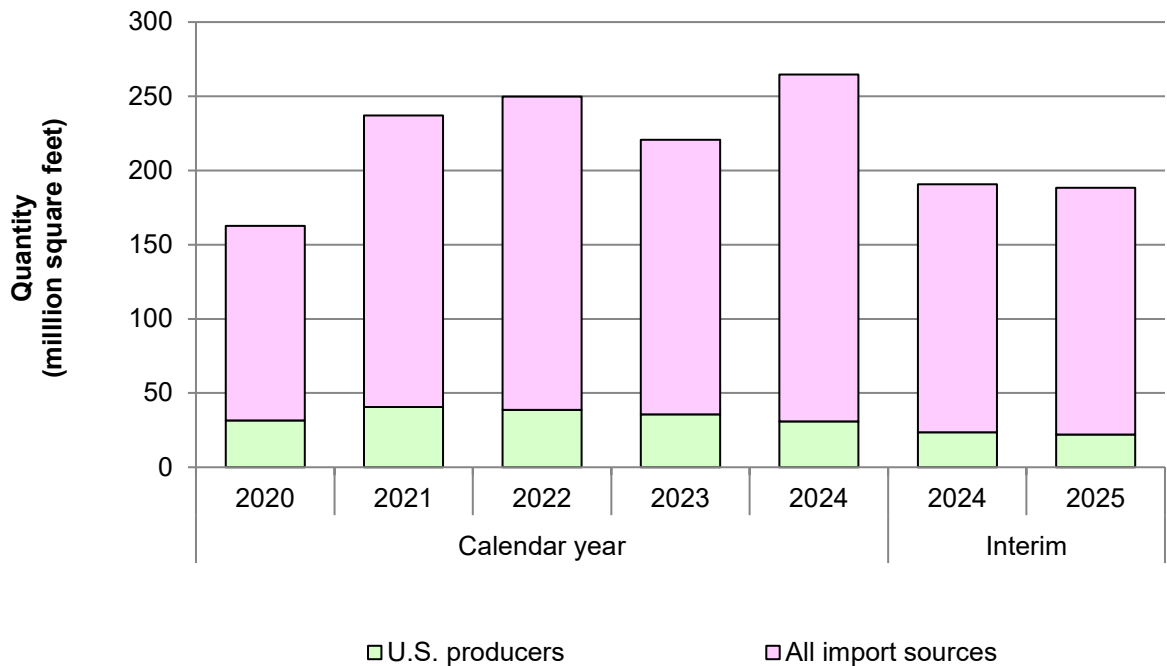
Quantity in 1,000 square feet; Shares in percent; Interim period is January through September

| Source             | Measure  | Interim 2024 | Interim 2025 |
|--------------------|----------|--------------|--------------|
| U.S. producers     | Quantity | 23,579       | 22,114       |
| Canada             | Quantity | 3,688        | 2,584        |
| China              | Quantity | 2,570        | 405          |
| Czechia            | Quantity | 2,046        | 1,864        |
| India              | Quantity | 58,648       | 64,947       |
| Israel             | Quantity | 1,187        | 542          |
| Italy              | Quantity | 911          | 296          |
| Malaysia           | Quantity | 6,431        | 8,622        |
| Mexico             | Quantity | 30           | 65           |
| Spain              | Quantity | 24,579       | 23,414       |
| Taiwan             | Quantity | 2,402        | 1,517        |
| Thailand           | Quantity | 18,982       | 19,727       |
| Turkey             | Quantity | 4,744        | 3,709        |
| Vietnam            | Quantity | 32,629       | 29,766       |
| Other FTA sources  | Quantity | 975          | 747          |
| All other sources  | Quantity | 7,235        | 8,101        |
| All import sources | Quantity | 167,057      | 166,305      |
| All sources        | Quantity | 190,635      | 188,419      |
| U.S. producers     | Share    | 12.4         | 11.7         |
| Canada             | Share    | 1.9          | 1.4          |
| China              | Share    | 1.3          | 0.2          |
| Czechia            | Share    | 1.1          | 1.0          |
| India              | Share    | 30.8         | 34.5         |
| Israel             | Share    | 0.6          | 0.3          |
| Italy              | Share    | 0.5          | 0.2          |
| Malaysia           | Share    | 3.4          | 4.6          |
| Mexico             | Share    | 0.0          | 0.0          |
| Spain              | Share    | 12.9         | 12.4         |
| Taiwan             | Share    | 1.3          | 0.8          |
| Thailand           | Share    | 10.0         | 10.5         |
| Turkey             | Share    | 2.5          | 2.0          |
| Vietnam            | Share    | 17.1         | 15.8         |
| Other FTA sources  | Share    | 0.5          | 0.4          |
| All other sources  | Share    | 3.8          | 4.3          |
| All import sources | Share    | 87.6         | 88.3         |
| All sources        | Share    | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics from the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, accessed on December 15, 2025. Imports are based on the imports for consumption data series. Official U.S. import statistics were adjusted to remove out-of-scope imports under the primary HTS numbers and add in-scope imports under other HTS numbers according to data submitted in the questionnaires.

Note: U.S. producers consist of integrated slab producers inclusive of their internal fabrication operations.

**Figure 5.1 QSP: Apparent U.S. consumption based on quantity data, defining the domestic industry as U.S. producers only, by source and period**



Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics from the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, accessed on December 15, 2025. Imports are based on the imports for consumption data series. Official U.S. import statistics were adjusted to remove out-of-scope imports under the primary HTS numbers and add in-scope imports under other HTS numbers according to data submitted in the questionnaires.

**Value**

Table 5.2 and figure 5.2 present data on apparent U.S. consumption and U.S. market shares by value for QSP. U.S. producers’ U.S. shipments, U.S. imports, and, consequently, apparent U.S. consumption by value followed similar trends in that they increased from 2020 to 2022 before they decreased in 2023 and 2024, where they ended at a level still higher than in 2020. However, apparent U.S. consumption by value was lower in interim 2025 compared with interim 2024.

**Table 5.2 QSP: Apparent U.S. consumption and market shares based on value data, defining the domestic industry as U.S. producers only, by source and period**

Value in 1,000 dollars; Shares in percent

| Source             | Measure | 2020      | 2021      | 2022      | 2023      | 2024      |
|--------------------|---------|-----------|-----------|-----------|-----------|-----------|
| U.S. producers     | Value   | 662,804   | 853,861   | 931,682   | 862,308   | 748,704   |
| Canada             | Value   | 92,989    | 92,961    | 80,854    | 65,264    | 58,647    |
| China              | Value   | 8,306     | 11,386    | 15,318    | 8,365     | 10,306    |
| Czechia            | Value   | 18,712    | 28,403    | 35,683    | 20,722    | 22,292    |
| India              | Value   | 178,190   | 374,932   | 559,355   | 368,604   | 513,591   |
| Israel             | Value   | 101,463   | 76,669    | 66,271    | 25,361    | 13,702    |
| Italy              | Value   | 38,758    | 48,559    | 30,905    | 13,709    | 5,147     |
| Malaysia           | Value   | 103,227   | 149,671   | 56,968    | 36,140    | 69,901    |
| Mexico             | Value   | 1,532     | 502       | 108       | 455       | 713       |
| Spain              | Value   | 270,658   | 398,494   | 374,201   | 262,527   | 232,591   |
| Taiwan             | Value   | 45,683    | 59,424    | 49,580    | 39,505    | 29,560    |
| Thailand           | Value   | 10,181    | 38,787    | 150,860   | 206,175   | 275,905   |
| Turkey             | Value   | 43,647    | 87,717    | 83,647    | 55,489    | 46,774    |
| Vietnam            | Value   | 202,315   | 349,342   | 360,581   | 339,561   | 370,790   |
| Other FTA sources  | Value   | 61,788    | 60,898    | 19,155    | 15,819    | 12,878    |
| All other sources  | Value   | 61,615    | 80,448    | 73,804    | 64,221    | 77,138    |
| All import sources | Value   | 1,239,063 | 1,858,193 | 1,957,290 | 1,521,918 | 1,739,935 |
| All sources        | Value   | 1,901,867 | 2,712,054 | 2,888,971 | 2,384,226 | 2,488,639 |
| U.S. producers     | Share   | 34.9      | 31.5      | 32.2      | 36.2      | 30.1      |
| Canada             | Share   | 4.9       | 3.4       | 2.8       | 2.7       | 2.4       |
| China              | Share   | 0.4       | 0.4       | 0.5       | 0.4       | 0.4       |
| Czechia            | Share   | 1.0       | 1.0       | 1.2       | 0.9       | 0.9       |
| India              | Share   | 9.4       | 13.8      | 19.4      | 15.5      | 20.6      |
| Israel             | Share   | 5.3       | 2.8       | 2.3       | 1.1       | 0.6       |
| Italy              | Share   | 2.0       | 1.8       | 1.1       | 0.6       | 0.2       |
| Malaysia           | Share   | 5.4       | 5.5       | 2.0       | 1.5       | 2.8       |
| Mexico             | Share   | 0.1       | 0.0       | 0.0       | 0.0       | 0.0       |
| Spain              | Share   | 14.2      | 14.7      | 13.0      | 11.0      | 9.3       |
| Taiwan             | Share   | 2.4       | 2.2       | 1.7       | 1.7       | 1.2       |
| Thailand           | Share   | 0.5       | 1.4       | 5.2       | 8.6       | 11.1      |
| Turkey             | Share   | 2.3       | 3.2       | 2.9       | 2.3       | 1.9       |
| Vietnam            | Share   | 10.6      | 12.9      | 12.5      | 14.2      | 14.9      |
| Other FTA sources  | Share   | 3.2       | 2.2       | 0.7       | 0.7       | 0.5       |
| All other sources  | Share   | 3.2       | 3.0       | 2.6       | 2.7       | 3.1       |
| All import sources | Share   | 65.1      | 68.5      | 67.8      | 63.8      | 69.9      |
| All sources        | Share   | 100.0     | 100.0     | 100.0     | 100.0     | 100.0     |

Table continued.

**Table 5.2 (Continued) QSP: Apparent U.S. consumption and market shares based on value data, defining the domestic industry as U.S. producers only, by source and period**

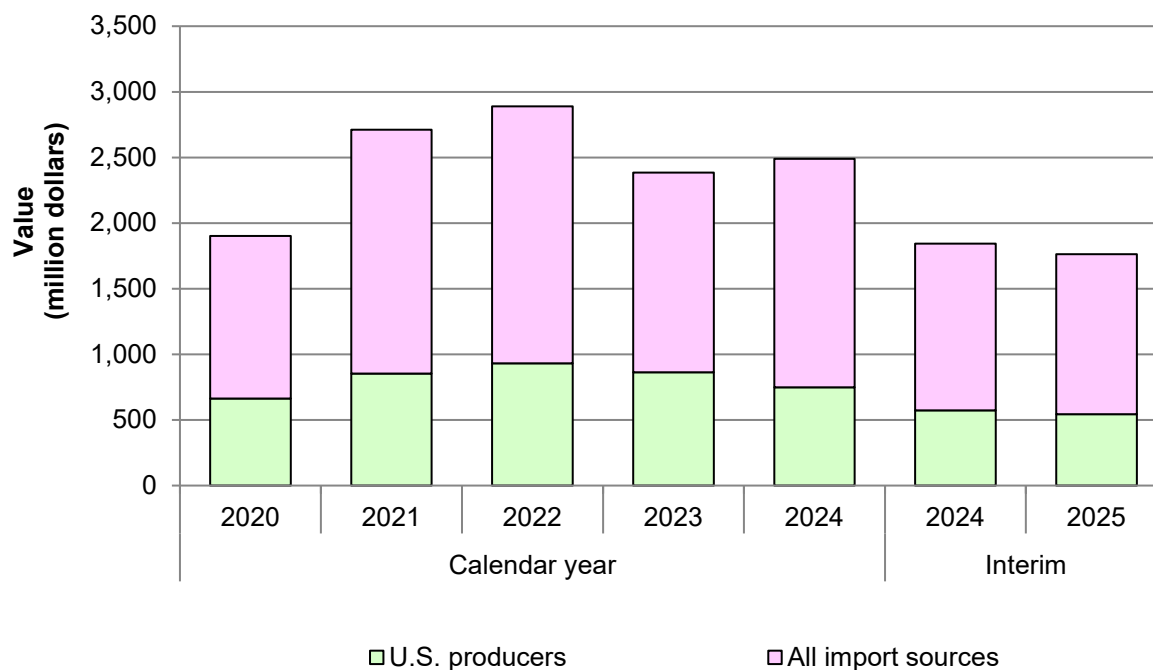
Value in 1,000 dollars; Shares in percent; Interim period is January through September

| Source             | Measure | Interim 2024 | Interim 2025 |
|--------------------|---------|--------------|--------------|
| U.S. producers     | Value   | 572,764      | 544,649      |
| Canada             | Value   | 45,706       | 31,742       |
| China              | Value   | 8,063        | 1,330        |
| Czechia            | Value   | 15,438       | 15,249       |
| India              | Value   | 356,641      | 407,631      |
| Israel             | Value   | 10,997       | 4,878        |
| Italy              | Value   | 5,015        | 3,517        |
| Malaysia           | Value   | 44,959       | 66,590       |
| Mexico             | Value   | 455          | 1,009        |
| Spain              | Value   | 184,255      | 147,580      |
| Taiwan             | Value   | 23,072       | 14,469       |
| Thailand           | Value   | 190,681      | 175,318      |
| Turkey             | Value   | 36,428       | 30,355       |
| Vietnam            | Value   | 278,177      | 258,052      |
| Other FTA sources  | Value   | 10,217       | 6,601        |
| All other sources  | Value   | 59,543       | 54,950       |
| All import sources | Value   | 1,269,648    | 1,219,270    |
| All sources        | Value   | 1,842,411    | 1,763,920    |
| U.S. producers     | Share   | 31.1         | 30.9         |
| Canada             | Share   | 2.5          | 1.8          |
| China              | Share   | 0.4          | 0.1          |
| Czechia            | Share   | 0.8          | 0.9          |
| India              | Share   | 19.4         | 23.1         |
| Israel             | Share   | 0.6          | 0.3          |
| Italy              | Share   | 0.3          | 0.2          |
| Malaysia           | Share   | 2.4          | 3.8          |
| Mexico             | Share   | 0.0          | 0.1          |
| Spain              | Share   | 10.0         | 8.4          |
| Taiwan             | Share   | 1.3          | 0.8          |
| Thailand           | Share   | 10.3         | 9.9          |
| Turkey             | Share   | 2.0          | 1.7          |
| Vietnam            | Share   | 15.1         | 14.6         |
| Other FTA sources  | Share   | 0.6          | 0.4          |
| All other sources  | Share   | 3.2          | 3.1          |
| All import sources | Share   | 68.9         | 69.1         |
| All sources        | Share   | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics from the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, accessed on December 15, 2025. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values. Official U.S. import statistics were adjusted to remove out-of-scope imports under the primary HTS numbers and add in-scope imports under other HTS numbers according to data submitted in the questionnaires.

Note: U.S. producers consist of slab producers inclusive of slab producers with internal fabrication operations. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

**Figure 5.2 QSP: Apparent U.S. consumption based on value data, defining the domestic industry as U.S. producers only, by source and period**



Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics from the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, accessed on December 15, 2025. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values. Official U.S. import statistics were adjusted to remove out-of-scope imports under the primary HTS numbers and add in-scope imports under other HTS numbers according to data submitted in the questionnaires.

## U.S. shipments by caliber

In this investigation, U.S. producers and U.S. importers were asked to report their U.S. shipments of QSP by caliber type: premium brands versus mass market brands (as defined by the responding firms themselves). Tables 5.3 and 5.4 and figure 5.3 present firms' U.S. shipments of these QSP types. Generally, the majority of U.S. producers and U.S. importers' U.S. shipments consisted of mass market brands. However, the share of U.S. shipments of mass market brands and the ratio of these shipments to apparent U.S. consumption decreased over the periods examined, as U.S. shipments of premium brands increased.

**Table 5.3 QSP: U.S. producers' and importers' U.S. shipments of premium caliber QSP, by period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares and ratio in percent; Ratio is to apparent consumption quantity

| Source         | Measure           | 2020   | 2021   | 2022   | 2023   | 2024   |
|----------------|-------------------|--------|--------|--------|--------|--------|
| U.S. producers | Quantity          | 11,397 | 15,817 | 17,497 | 17,639 | 16,271 |
| Importers      | Quantity          | 43,787 | 55,501 | 64,774 | 60,477 | 64,442 |
| All sources    | Quantity          | 55,184 | 71,317 | 82,271 | 78,116 | 80,713 |
| U.S. producers | Share of quantity | 20.7   | 22.2   | 21.3   | 22.6   | 20.2   |
| Importers      | Share of quantity | 79.3   | 77.8   | 78.7   | 77.4   | 79.8   |
| All sources    | Share of quantity | 100.0  | 100.0  | 100.0  | 100.0  | 100.0  |
| U.S. producers | Ratio             | 7.0    | 6.7    | 7.0    | 8.0    | 6.1    |
| Importers      | Ratio             | 26.9   | 23.4   | 25.9   | 27.4   | 24.4   |
| All sources    | Ratio             | 33.9   | 30.1   | 32.9   | 35.4   | 30.5   |

Table continued.

**Table 5.3 (Continued) QSP: U.S. producers' and importers' U.S. shipments of premium caliber QSP, by period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares and ratio in percent; Ratio is to apparent consumption quantity; Interim period is January through September

| Source         | Measure           | Interim 2024 | Interim 2025 |
|----------------|-------------------|--------------|--------------|
| U.S. producers | Quantity          | 12,208       | 10,565       |
| Importers      | Quantity          | 48,249       | 49,805       |
| All sources    | Quantity          | 60,457       | 60,370       |
| U.S. producers | Share of quantity | 20.2         | 17.5         |
| Importers      | Share of quantity | 79.8         | 82.5         |
| All sources    | Share of quantity | 100.0        | 100.0        |
| U.S. producers | Ratio             | 6.4          | 5.6          |
| Importers      | Ratio             | 25.3         | 26.4         |
| All sources    | Ratio             | 31.7         | 32.0         |

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

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



**Table 5.4 QSP: U.S. producers' and importers' U.S. shipments of mass market caliber QSP, by period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares and ratio in percent; Ratio is to apparent consumption quantity

| Source         | Measure           | 2020   | 2021    | 2022    | 2023   | 2024   |
|----------------|-------------------|--------|---------|---------|--------|--------|
| U.S. producers | Quantity          | 20,248 | 24,708  | 21,203  | 17,979 | 14,629 |
| Importers      | Quantity          | 76,206 | 90,435  | 87,211  | 72,250 | 73,308 |
| All sources    | Quantity          | 96,454 | 115,143 | 108,414 | 90,229 | 87,937 |
| U.S. producers | Share of quantity | 21.0   | 21.5    | 19.6    | 19.9   | 16.6   |
| Importers      | Share of quantity | 79.0   | 78.5    | 80.4    | 80.1   | 83.4   |
| All sources    | Share of quantity | 100.0  | 100.0   | 100.0   | 100.0  | 100.0  |
| U.S. producers | Ratio             | 12.4   | 10.4    | 8.5     | 8.1    | 5.5    |
| Importers      | Ratio             | 46.8   | 38.2    | 34.9    | 32.7   | 27.7   |
| All sources    | Ratio             | 59.3   | 48.6    | 43.4    | 40.9   | 33.2   |

Table continued.

**Table 5.4 (Continued) QSP: U.S. producers' and importers' U.S. shipments of mass market caliber QSP, by period**

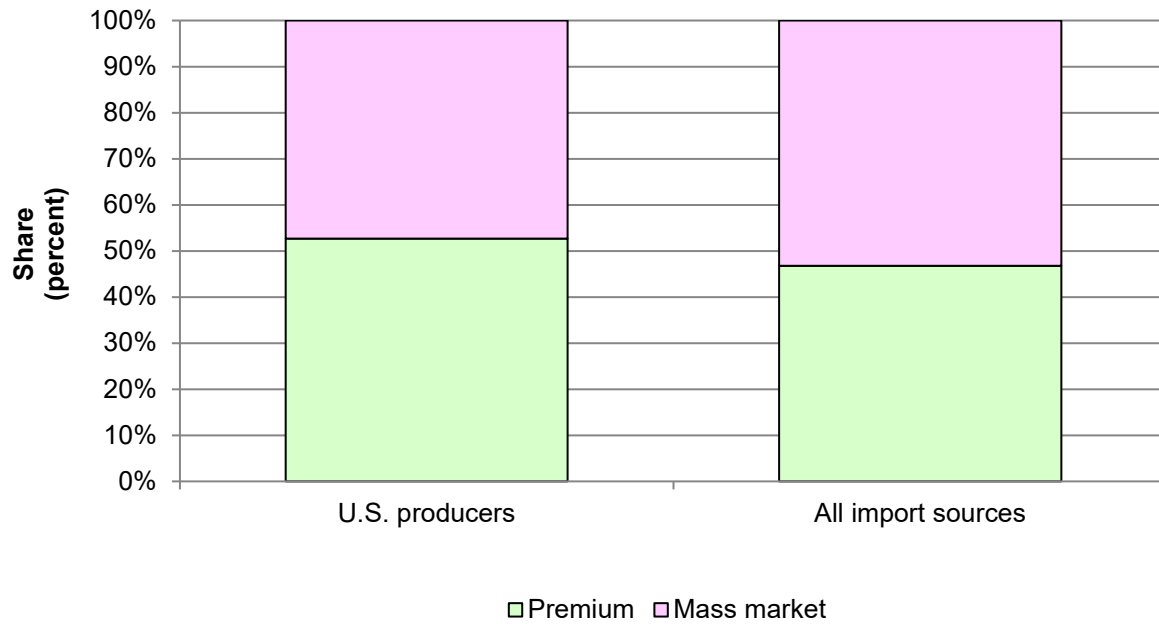
Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares and ratio in percent; Ratio is to apparent consumption quantity; Interim period is January through September

| Source         | Measure           | Interim 2024 | Interim 2025 |
|----------------|-------------------|--------------|--------------|
| U.S. producers | Quantity          | 11,371       | 11,549       |
| Importers      | Quantity          | 52,849       | 49,175       |
| All sources    | Quantity          | 64,220       | 60,724       |
| U.S. producers | Share of quantity | 17.7         | 19.0         |
| Importers      | Share of quantity | 82.3         | 81.0         |
| All sources    | Share of quantity | 100.0        | 100.0        |
| U.S. producers | Ratio             | 6.0          | 6.1          |
| Importers      | Ratio             | 27.7         | 26.1         |
| All sources    | Ratio             | 33.7         | 32.2         |

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

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

**Figure 5.3 QSP: U.S. producers' and importers' share of U.S. shipments quantity in 2024, by caliber**



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

## Foreign industries

The Commission issued foreign producers' or exporters' questionnaires to approximately 500 firms believed to produce slabs, fabricate slabs, and/or export QSP.<sup>1</sup> Usable responses to the Commission's questionnaire were received from 71 firms in total.<sup>2</sup> Table 5.5 presents a summary count of the number of producers, fabricators, and exporters which responded to the Commission's questionnaire and their exports to the United States as a share of U.S. imports during 2024.

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

<sup>2</sup> The Commission also received a questionnaire response from six firms which certified that they had not produced, fabricated, or exported QSP at any time since January 1, 2020.

**Table 5.5 QSP: Number of responding producers and ratio of exports to the United States to adjusted official U.S. imports in 2024, by foreign industry**

| Foreign industry             | Number of responding foreign slab producers | Number of responding foreign slab producers with fabrication operations | Number of responding foreign slab producers and fabricators | Exports as a ratio to adjusted official U.S. imports from subject country (percent) |
|------------------------------|---------------------------------------------|-------------------------------------------------------------------------|-------------------------------------------------------------|-------------------------------------------------------------------------------------|
| Canada                       | ***                                         | ***                                                                     | ***                                                         | ***                                                                                 |
| China                        | ***                                         | ***                                                                     | ***                                                         | ***                                                                                 |
| Czechia                      | ***                                         | ***                                                                     | ***                                                         | ***                                                                                 |
| India                        | ***                                         | ***                                                                     | ***                                                         | ***                                                                                 |
| Israel                       | ***                                         | ***                                                                     | ***                                                         | ***                                                                                 |
| Italy                        | ***                                         | ***                                                                     | ***                                                         | ***                                                                                 |
| Malaysia                     | ***                                         | ***                                                                     | ***                                                         | ***                                                                                 |
| Mexico                       | ***                                         | ***                                                                     | ***                                                         | ***                                                                                 |
| Spain                        | ***                                         | ***                                                                     | ***                                                         | ***                                                                                 |
| Taiwan                       | ***                                         | ***                                                                     | ***                                                         | ***                                                                                 |
| Thailand                     | ***                                         | ***                                                                     | ***                                                         | ***                                                                                 |
| Turkey                       | ***                                         | ***                                                                     | ***                                                         | ***                                                                                 |
| Vietnam                      | ***                                         | ***                                                                     | ***                                                         | ***                                                                                 |
| Other FTA partner countries  | ***                                         | ***                                                                     | ***                                                         | ***                                                                                 |
| All other foreign industries | ***                                         | ***                                                                     | ***                                                         | ***                                                                                 |
| All foreign industries       | 70                                          | 31                                                                      | 70                                                          | 87.0                                                                                |

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

Note: One firm, \*\*\*, reported only resale exports of QSP to the United States. The table does not include data on resellers. As such, the firm's data is not presented in the table. In 2024, there were 10 firms which reported resale exports to the United States. Accounting for these resellers, the 71 responding foreign firms' exports of product to the United States accounted for 88.3 percent of U.S. imports of QSP from all sources in 2024.

Note: No independent foreign fabricator responded to the Commission's questionnaire. Staff believe that all foreign firms which reported both production of slabs and fabrication of slabs are integrated firms.

Note: Other FTA partner countries include Indonesia, South Korea, and Oman. All other foreign industries include Cambodia, Philippines, Portugal, and the UAE.

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

Table 5.6 presents summary data on the responding foreign producers' production of QSP (both slab and fabricated slab), as well as foreign producers' and resellers' exports of QSP to the United States and their total shipments of QSP.

**Table 5.6 QSP: Summary data for foreign producers in 2024**

| <b>Foreign producers</b>              | <b>Production of slab (1,000 square feet)</b> | <b>Share of reported production of slab (percent)</b> | <b>Production of fabricated slab (1,000 square feet)</b> | <b>Share of reported production of fabricated slab (percent)</b> |
|---------------------------------------|-----------------------------------------------|-------------------------------------------------------|----------------------------------------------------------|------------------------------------------------------------------|
| Canada                                | ***                                           | ***                                                   | ***                                                      | ***                                                              |
| China                                 | ***                                           | ***                                                   | ***                                                      | ***                                                              |
| Czechia                               | ***                                           | ***                                                   | ***                                                      | ***                                                              |
| India                                 | ***                                           | ***                                                   | ***                                                      | ***                                                              |
| Israel                                | ***                                           | ***                                                   | ***                                                      | ***                                                              |
| Italy                                 | ***                                           | ***                                                   | ***                                                      | ***                                                              |
| Malaysia                              | ***                                           | ***                                                   | ***                                                      | ***                                                              |
| Mexico                                | ***                                           | ***                                                   | ***                                                      | ***                                                              |
| Spain                                 | ***                                           | ***                                                   | ***                                                      | ***                                                              |
| Taiwan                                | ***                                           | ***                                                   | ***                                                      | ***                                                              |
| Thailand                              | ***                                           | ***                                                   | ***                                                      | ***                                                              |
| Turkey                                | ***                                           | ***                                                   | ***                                                      | ***                                                              |
| Vietnam                               | ***                                           | ***                                                   | ***                                                      | ***                                                              |
| Other FTA partner countries           | ***                                           | ***                                                   | ***                                                      | ***                                                              |
| All other reporting foreign producers | ***                                           | ***                                                   | ***                                                      | ***                                                              |
| All foreign producers                 | 303,237                                       | 100.0                                                 | 15,529                                                   | 100.0                                                            |

Table continued.

**Table 5.6 (Continued) QSP: Summary data for foreign producers and resellers in 2024**

| <b>Foreign producers and resellers</b> | <b>Slab: Exports to the U.S. (1,000 square feet)</b> | <b>Slab: Share of reported exports to the U.S. (percent)</b> | <b>Fab: Exports to the U.S. (1,000 square feet)</b> | <b>Fab: Share of reported exports to the U.S. (percent)</b> | <b>Combined: Exports to U.S. (1,000 square feet)</b> | <b>Combined: Share of reported exports to the U.S. (percent)</b> |
|----------------------------------------|------------------------------------------------------|--------------------------------------------------------------|-----------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------|------------------------------------------------------------------|
| Canada                                 | ***                                                  | ***                                                          | ***                                                 | ***                                                         | ***                                                  | ***                                                              |
| China                                  | ***                                                  | ***                                                          | ***                                                 | ***                                                         | ***                                                  | ***                                                              |
| Czechia                                | ***                                                  | ***                                                          | ***                                                 | ***                                                         | ***                                                  | ***                                                              |
| India                                  | ***                                                  | ***                                                          | ***                                                 | ***                                                         | ***                                                  | ***                                                              |
| Israel                                 | ***                                                  | ***                                                          | ***                                                 | ***                                                         | ***                                                  | ***                                                              |
| Italy                                  | ***                                                  | ***                                                          | ***                                                 | ***                                                         | ***                                                  | ***                                                              |
| Malaysia                               | ***                                                  | ***                                                          | ***                                                 | ***                                                         | ***                                                  | ***                                                              |
| Mexico                                 | ***                                                  | ***                                                          | ***                                                 | ***                                                         | ***                                                  | ***                                                              |
| Spain                                  | ***                                                  | ***                                                          | ***                                                 | ***                                                         | ***                                                  | ***                                                              |
| Taiwan                                 | ***                                                  | ***                                                          | ***                                                 | ***                                                         | ***                                                  | ***                                                              |
| Thailand                               | ***                                                  | ***                                                          | ***                                                 | ***                                                         | ***                                                  | ***                                                              |
| Turkey                                 | ***                                                  | ***                                                          | ***                                                 | ***                                                         | ***                                                  | ***                                                              |
| Vietnam                                | ***                                                  | ***                                                          | ***                                                 | ***                                                         | ***                                                  | ***                                                              |
| Other FTA partner countries            | ***                                                  | ***                                                          | ***                                                 | ***                                                         | ***                                                  | ***                                                              |
| All other reporting foreign producers  | ***                                                  | ***                                                          | ***                                                 | ***                                                         | ***                                                  | ***                                                              |
| All foreign producers                  | 192,552                                              | 98.5                                                         | 10,718                                              | 100.0                                                       | 203,270                                              | 98.5                                                             |
| All resellers                          | 2,994                                                | 1.5                                                          | —                                                   | —                                                           | 2,994                                                | 1.5                                                              |
| All foreign producers and resellers    | 195,545                                              | 100.0                                                        | 10,718                                              | 100.0                                                       | 206,264                                              | 100.0                                                            |

Table continued.

**Table 5.6 (Continued) QSP: Summary data for foreign producers and resellers in 2024**

| <b>Foreign producers</b>              | <b>Total shipments of slab (1,000 square feet)</b> | <b>Share of reported total shipments of slab (percent)</b> | <b>Total shipments of fabricated slab (1,000 square feet)</b> | <b>Share of reported total shipments of fabricated slab (percent)</b> |
|---------------------------------------|----------------------------------------------------|------------------------------------------------------------|---------------------------------------------------------------|-----------------------------------------------------------------------|
| Canada                                | ***                                                | ***                                                        | ***                                                           | ***                                                                   |
| China                                 | ***                                                | ***                                                        | ***                                                           | ***                                                                   |
| Czechia                               | ***                                                | ***                                                        | ***                                                           | ***                                                                   |
| India                                 | ***                                                | ***                                                        | ***                                                           | ***                                                                   |
| Israel                                | ***                                                | ***                                                        | ***                                                           | ***                                                                   |
| Italy                                 | ***                                                | ***                                                        | ***                                                           | ***                                                                   |
| Malaysia                              | ***                                                | ***                                                        | ***                                                           | ***                                                                   |
| Mexico                                | ***                                                | ***                                                        | ***                                                           | ***                                                                   |
| Spain                                 | ***                                                | ***                                                        | ***                                                           | ***                                                                   |
| Taiwan                                | ***                                                | ***                                                        | ***                                                           | ***                                                                   |
| Thailand                              | ***                                                | ***                                                        | ***                                                           | ***                                                                   |
| Turkey                                | ***                                                | ***                                                        | ***                                                           | ***                                                                   |
| Vietnam                               | ***                                                | ***                                                        | ***                                                           | ***                                                                   |
| Other FTA partner countries           | ***                                                | ***                                                        | ***                                                           | ***                                                                   |
| All other reporting foreign producers | ***                                                | ***                                                        | ***                                                           | ***                                                                   |
| All foreign producers                 | 306,822                                            | 100.0                                                      | 13,113                                                        | 100.0                                                                 |

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

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

## Industry events in the foreign industries

Table 5.7 presents information on important events in the foreign industries since January 1, 2020.

**Table 5.7 QSP: Important industry events in the foreign industries since January 1, 2020**

| Item                    | Foreign industry | Event                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-------------------------|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Plant opening           | India            | In 2020, Marudhar Rocks opened a new plant in Hosur that produces QSP slabs using BretonStone equipment. The company subsequently acquired a second BretonStone QSP slab plant in Jaipur, 18 months after the Hosur plant opened. The company exported about 25 percent of its total Indian quartz production to the United States. According to reports, Marudhar Rocks has the capacity to produce two million square meters of QSP per year.                                                |
| Planned plant expansion | Korea            | In February 2020, Hyundai L&C announced plans to install additional production capacity at its QSP plant in Sejong. The company was investing \$41 to build a new BretonStone QSP production line at the plant. This is in addition to the current QSP production line at this plant. Upon completion in 2022, the plant's capacity increased to 1.1 million square meters of QSP per year. Hyundai L&C also operates a QSP plant in Canada with similar production capacity to that in Korea. |
| Plant opening           | Cambodia         | In December 2020, Zulite Stone Co., Ltd. completed a pilot run and started production at a new QSP plant in Preah Sihanouk Province, Cambodia. The plant had over 100 employees and produces quartz slabs and fabricated products in a variety of colors and patterns.                                                                                                                                                                                                                         |
| Plant expansion         | Turkey           | In January 2021, Belenco, wholly owned by Lotte Chemical (South Korea), announced that it would begin operation of a third production line in Manisa, Turkey. The new production line expanded Belenco's production capacity by 120,000 quartz slabs per year, increasing their total capacity to 350,000 slabs per year. Lotte Chemical also operate a quartz slab facility in South Korea that has capacity to produce 440,000 slabs per year.                                               |
| Plant opening           | Thailand         | In August 2021, LE Surfaces announced that it opened a new QSP factory near Bangkok, Thailand. The plant had 10 operating production lines and was scheduled to have eight more installed by the end of 2021. The firm said that the factory could accommodate up to 70 QSP production lines if fully utilized. The plant operates under the name Leta Stone in Thailand.                                                                                                                      |
| Plant expansion         | Malaysia         | In May 2021, Mquartz announced that it was adding a new quartz slab production line near Klang, Malaysia. The new line was planned to start in September 2021, additional capacity information was not reported.                                                                                                                                                                                                                                                                               |
| Plant closure           | Israel           | In May 2023, Caesarstone announced that it was closing its QSP plant in Kibbutz Sdot Yam, Israel, and lay off 150 employees there. The closure was part of a corporate restructuring plan to improve efficiency.                                                                                                                                                                                                                                                                               |



| Item                             | Foreign industry | Event                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------------------------------|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Plant opening                    | Malaysia         | In June 2022, MXM Surfaces started production at a new QSP plant in Johor. The plant uses equipment from BretonStone and other suppliers and the first two production lines that opened have the capacity to produce 400,000 to 500,000 square meters of QSP per year. A jumbo QSP line was scheduled to open in December 2023, and the company plans to expand to a total of six QSP production lines in the future.                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Plant opening                    | India            | In September 2023, Pacific opened a new plant in southern India that produces QSP using BretonStone equipment. The plant has a high-efficiency mixing machine, four multi-axial anthropomorphic robots, and finishing machines. The plant also has a fabrication division with cutting machines and edge polishers. The plant has the capacity to produce 1.1 million square meters of QSP slabs per year.                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Plant expansion                  | India            | In January 2024, Tab Surfaces, a company operating out of Bangalore, India, announced that it was adding a new production line to its Hosur facility, expanding production capacity by an additional 10,000 to 11,000 slabs per month. The new line was scheduled to start by yearend 2024.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Plant opening                    | Dubai            | In February 2024, Global Surfaces commenced commercial production at a new QSP plant in the Jebel Ali Free Trade Zone. The plant has the capacity to produce 622,896 square meters of QSP annually and the company states that its location gives it direct access to global markets. Global Surfaces also operates QSP facilities in India.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Plant opening                    | India            | In April 2024, a partnership between StonePlus and the Raj Kesari Group, operating under the name of QROCKS, announced it had begun operations at a new QSP plant in Udaipur, Rajasthan, India. The facility was highly automated, and capacity was reported to be over 21,000 square feet per day. According to the company, the expansion was aimed at “aimed at meeting the growing demand for premium quartz surfaces globally while enhancing its production capacity and operational efficiency.”                                                                                                                                                                                                                                                                                                                                      |
| Ban on engineered stone products | Australia        | On July 1, 2024, the government of Australia made it illegal to manufacture, supply, process, or install engineered stone benchtops, panels, or slabs. The ban covered engineered stone products that contain at least one percent crystalline silica, by weight, that are created by combining natural stone materials with other constituents into a hardened form. Under this definition, the ban includes QSP. On January 1, 2025, the government of Australia also banned the importation of engineered stone benchtops, panels, and slabs. This ban was instituted in response to an increase in silicosis diagnoses reported by engineered stone workers. Silicosis is a lung disease that has been linked to workers breathing in silica dust generated during fabrication (e.g., cutting or drilling) of engineered stone products. |
| Plant expansion                  | India            | In November 2024, Pokarna Ltd. (PESL), announced plans to add an additional production line at its plant in Mekaguda, Telangana, India. The investment is expected to total over \$51 million and will increase capacity by 8.7 million square feet. The plant uses Breton technology to produce QSP. The new production line is expected to become active in March 2026.                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

| Item            | Foreign industry | Event                                                                                                                                                                                                                                                                                                                                                                                                              |
|-----------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Plant expansion | Spain            | In April 2025, Cosentino announced a three-year investment plan of more than \$470 million by 2027. The focus of the plan is expanding production capacity and efficiency at its facilities. Part of the investment plan includes building a new QSP production line at its plant in Cantoria and expanding the automated logistics platform. The plant will have four QSP lines once the new line is operational. |
| Plant opening   | India            | In July 2025, it was reported that Specta, a QSP brand under the ARL Group, planned to open a new plant in Jaipur by yearend 2025. The new plant has production capacity to produce 30,000 square feet of quartz slabs per day and is part of the company's expansion plans. The facility will use Breton manufacturing technology to produce QSP.                                                                 |
| Plant closing   | Israel           | In December 2025, Caesarstone closed its QSP plant near Karmiel, Israel. According to reports, the company had 371 employees at the plant in Israel, and they were expected to be laid off. The company stated that the closure was a "strategic step designed to improve profitability and cash flow and optimize production."                                                                                    |
| Plant closing   | Israel           | In December 2025, Caesarstone closed its QSP plant near Karmiel, Israel. According to reports, the company had 371 employees at the plant in Israel, and they were expected to be laid off. The company stated that the closure was a "strategic step designed to improve profitability and cash flow and optimize production."                                                                                    |

Source: Hanstone, "Hyundai L&C invests \$41 million to increase production capacity of 'Engineered stone'," September 2020, [https://www.hanstone.com/board/news/board\\_view.php?&page=1&num=5](https://www.hanstone.com/board/news/board_view.php?&page=1&num=5); Breton, "A coffee with...Jitendra Kumar Kothari (Marudhar Rocks, India)," [https://breton.it/en\\_na/customer-stories/a-coffee-with-jitendra-kumar-kothari-marudhar-rocks-ltd](https://breton.it/en_na/customer-stories/a-coffee-with-jitendra-kumar-kothari-marudhar-rocks-ltd), retrieved March 2, 2026; Stone Update, "Marudhar Rocks Gets \$18.2 Million Investment," September 4, 2024, <https://stoneupdate.com/marudhar-rocks-gets-18-2-million-investment/>; Pamin, "Successful Pilot Run of Cambodian Zulite Stone Factory," December 20, 2020, <https://www.panmin.com/successful-pilot-run-of-cambodian-zulite-stone-factory/>; Stone Update, "Stone Plus Expands into Quartz Manufacturing with QROCKS in Udaipur, India," Stoneupdate.com, January 2021, <https://stoneupdate.com/lotte-expands-belanco-quartz-production/>; Pacific, "PACIFIC Unveils Cutting-Edge Quartz Manufacturing Plant," <https://www.pacific-surfaces.com/post/pacific-unveils-cutting-edge-quartz-manufacturing-plant>, retrieved March 2, 2026; Stone Update, "PACIFIC Unveils Cutting-Edge Quartz Manufacturing Plant," September 11, 2023, <https://stoneupdate.com/pacific-unveils-cutting-edge-quartz-manufacturing-plant/>; YouTube, "Welcome to MXM Surfaces -- Your Friendly Guide to Our Malaysian Factory!," October 30, 2023, <https://www.youtube.com/watch?v=hf2HUvBQk0U>; Jennifer Richinelli, "A New Quartz Line Born from Experience and Technology," Stone World, January 2024, <https://www.stoneworld.com/articles/93638-a-new-quartz-line-born-from-experience-and-technology>; Care Edge Ratings, "Tab India Granites Private Limited," Careratings.com, undated, <https://www.careratings.com/search?Id=rrotp3zsz7wsnPOgK8Fgxw==>; Safe Work Australia, "Engineered Stone Ban," <https://www.safeworkaustralia.gov.au/safety-topic/hazards/silica/engineered-stone-ban>, retrieved March 3, 2026; Australian Government, Department of Employment and Workplace Relations, "Understanding the Engineered Stone Ban," <https://www.dewr.gov.au/engineeredstone/understanding-engineered-stone-ban>, retrieved March 3, 2026; Times of India, "Pokarna to invest Rs 440 crore in expanding Telangana plant capacity," TimesofIndia.com, November 2024, <https://timesofindia.indiatimes.com/business/india-business/pokarna-to-invest-rs-440-crore-in-expanding-telangana-plant-capacity/articleshow/115227330.cms>;

Table continued.

**Table 5.7 (Continued) QSP: Important industry events in the foreign industries since January 1, 2020**

Source: Stone Update, "New Production Line Slated for Quantra," Stoneupdate.com, November 2024, <https://stoneupdate.com/new-production-line-slanted-for-quantra/>; Global Surfaces, "Quartz Division Dubai," <https://globalsurfaces.in/quartz-division-dubai>, retrieved March 2, 2026; Global Surfaces, "Global Surfaces Limited Transcript of 33rd Annual General Meeting," September 21, 2024, <https://globalsurfaces.in/frontend/images/documents/Transcript%20of%2033rd%20AGM.pdf>; Global Surfaces, "Global Surfaces Limited Transcript of 34rd Annual General Meeting," September 18, 2025, <https://globalsurfaces.in/frontend/images/documents/Trascript-of-34th--AGM.pdf>; Stone Update, "Stone Plus Expands into Quartz Manufacturing with QROCKS in Udaipur, India," Stoneupdate.com, April 2025, <https://stoneupdate.com/stone-plus-expands-into-quartz-manufacturing-with-qrocks-in-udaipur-india/>; Globes, "Caesarstone closes plant in northern Israel, lays off 200," November 12, 2025, <https://en.globes.co.il/en/article-caesarstone-closes-plant-in-northern-israel-lays-off-200-1001526307>; The Times of Israel, "Countertop maker Caesarstone to shut Sdot Yam plant, lay off over 100 workers," May 11, 2023, <https://www.timesofisrael.com/countertop-maker-caesarstone-to-shut-sdot-yam-plant-lay-off-over-100-workers/>; Manufacturing from The Economic Times, "Specta to commission new quartz manufacturing facility in Jaipur," July 16, 2025, <https://manufacturing.economictimes.indiatimes.com/news/industry/specta-to-commission-new-quartz-manufacturing-facility-in-jaipur/122567636>; Mquartz, "New Quartz Line is in Progress," May 17, 2021, <https://mquartz.com/article-3297-5028.html>; Stone Update, "Cosentino Posts \$1.5 Billion in 2024 Revenues," April 11, 2025, <https://stoneupdate.com/cosentino-posts-1-5-billion-in-2024-revenues/>; LE Surfaces, "Global Quartz Manufacturer LE Surfaces Opens New Factory in Thailand," April 21, 2025, <https://lesurfaces.com/global-quartz-manufacturer-le-surfaces-opens-new-factory-in-thailand/>; LE Mac Surfaces, "Industrial Chain, <https://lemac.com.cn/Honor/>, retrieved February 5, 2026.

## Changes in operations

Foreign firms were asked to report any change in the character of their operations or organization relating to the production of QSP since 2020. Fifty-five of seventy-one firms indicated in their questionnaires that they had experienced such changes. Table 5.8 presents the changes identified by these producers and table 5.9 presents their narrative explanations, while table 5.10 presents anticipated changes expected by these firms.

**Table 5.8 QSP: Count of reported changes in operations since January 1, 2020, by type of change**

Count in number of firms reporting

| Item                                    | All responding foreign firms | Foreign industries                                                              |
|-----------------------------------------|------------------------------|---------------------------------------------------------------------------------|
| Plant openings                          | 21                           | India, Italy, Malaysia, Thailand, Vietnam, Other FTA sources, All other sources |
| Plant closings                          | 2                            | India, Israel                                                                   |
| Prolonged shutdowns                     | 12                           | Czechia, India, Italy, Malaysia, Turkey, Vietnam                                |
| Production curtailments                 | 17                           | Canada, India, Italy, Malaysia, Taiwan, Vietnam                                 |
| Relocations                             | 2                            | Malaysia, Vietnam                                                               |
| Expansions                              | 21                           | India, Malaysia, Thailand, Turkey, Vietnam, All other sources                   |
| Acquisitions                            | 2                            | India                                                                           |
| Consolidations                          | 0                            | —                                                                               |
| Weather-related or force majeure events | 7                            | Spain, Taiwan, Turkey, Vietnam                                                  |
| Other                                   | 12                           | Canada, Czechia, India, Vietnam, All other sources                              |
| Any change                              | 55                           | See above                                                                       |

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

**Table 5.9 QSP: Reported changes in operations in foreign producers since January 1, 2020, by reported change category and firm**

| Item           | Foreign producer, firm name, and accompanying narrative response regarding changes in operations |
|----------------|--------------------------------------------------------------------------------------------------|
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant openings | ***                                                                                              |
| Plant closings | ***                                                                                              |

| Item                    | Foreign producer, firm name, and accompanying narrative response regarding changes in operations |
|-------------------------|--------------------------------------------------------------------------------------------------|
| Plant closings          | ***                                                                                              |
| Prolonged shutdowns     | ***                                                                                              |
| Prolonged shutdowns     | ***                                                                                              |
| Prolonged shutdowns     | ***                                                                                              |
| Prolonged shutdowns     | ***                                                                                              |
| Prolonged shutdowns     | ***                                                                                              |
| Prolonged shutdowns     | ***                                                                                              |
| Prolonged shutdowns     | ***                                                                                              |
| Prolonged shutdowns     | ***                                                                                              |
| Prolonged shutdowns     | ***                                                                                              |
| Prolonged shutdowns     | ***                                                                                              |
| Prolonged shutdowns     | ***                                                                                              |
| Prolonged shutdowns     | ***                                                                                              |
| Prolonged shutdowns     | ***                                                                                              |
| Production curtailments | ***                                                                                              |
| Production curtailments | ***                                                                                              |

| Item                    | Foreign producer, firm name, and accompanying narrative response regarding changes in operations |
|-------------------------|--------------------------------------------------------------------------------------------------|
| Production curtailments | ***                                                                                              |
| Production curtailments | ***                                                                                              |
| Production curtailments | ***                                                                                              |
| Production curtailments | ***                                                                                              |
| Production curtailments | ***                                                                                              |
| Production curtailments | ***                                                                                              |
| Production curtailments | ***                                                                                              |
| Production curtailments | ***                                                                                              |
| Production curtailments | ***                                                                                              |
| Production curtailments | ***                                                                                              |
| Production curtailments | ***                                                                                              |
| Production curtailments | ***                                                                                              |

| Item                    | Foreign producer, firm name, and accompanying narrative response regarding changes in operations |
|-------------------------|--------------------------------------------------------------------------------------------------|
| Production curtailments | ***                                                                                              |
| Production curtailments | ***                                                                                              |
| Production curtailments | ***                                                                                              |
| Relocations             | ***                                                                                              |
| Relocations             | ***                                                                                              |
| Expansions              | ***                                                                                              |
| Expansions              | ***                                                                                              |
| Expansions              | ***                                                                                              |
| Expansions              | ***                                                                                              |
| Expansions              | ***                                                                                              |
| Expansions              | ***                                                                                              |
| Expansions              | ***                                                                                              |
| Expansions              | ***                                                                                              |
| Expansions              | ***                                                                                              |



| Item                                    | Foreign producer, firm name, and accompanying narrative response regarding changes in operations |
|-----------------------------------------|--------------------------------------------------------------------------------------------------|
| Expansions                              | ***                                                                                              |
| Expansions                              | ***                                                                                              |
| Expansions                              | ***                                                                                              |
| Expansions                              | ***                                                                                              |
| Expansions                              | ***                                                                                              |
| Expansions                              | ***                                                                                              |
| Expansions                              | ***                                                                                              |
| Expansions                              | ***                                                                                              |
| Expansions                              | ***                                                                                              |
| Expansions                              | ***                                                                                              |
| Expansions                              | ***                                                                                              |
| Expansions                              | ***                                                                                              |
| Acquisitions                            | ***                                                                                              |
| Acquisitions                            | ***                                                                                              |
| Weather-related or force majeure events | ***                                                                                              |
| Weather-related or force majeure events | ***                                                                                              |
| Weather-related or force majeure events | ***                                                                                              |
| Weather-related or force majeure events | ***                                                                                              |

| Item                                    | Foreign producer, firm name, and accompanying narrative response regarding changes in operations |
|-----------------------------------------|--------------------------------------------------------------------------------------------------|
| Weather-related or force majeure events | ***                                                                                              |
| Weather-related or force majeure events | ***                                                                                              |
| Weather-related or force majeure events | ***                                                                                              |
| Other                                   | ***                                                                                              |
| Other                                   | ***                                                                                              |
| Other                                   | ***                                                                                              |
| Other                                   | ***                                                                                              |
| Other                                   | ***                                                                                              |
| Other                                   | ***                                                                                              |
| Other                                   | ***                                                                                              |
| Other                                   | ***                                                                                              |
| Other                                   | ***                                                                                              |
| Other                                   | ***                                                                                              |
| Other                                   | ***                                                                                              |
| Other                                   | ***                                                                                              |
| Other                                   | ***                                                                                              |

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

**Table 5.10 QSP: Anticipated changes in operations in foreign industries, by firm**

| Item                              | Foreign industry, firm name, and accompanying narrative response regarding anticipated changes in operations |
|-----------------------------------|--------------------------------------------------------------------------------------------------------------|
| Anticipated changes in operations | ***                                                                                                          |
| Anticipated changes in operations | ***                                                                                                          |
| Anticipated changes in operations | ***                                                                                                          |
| Anticipated changes in operations | ***                                                                                                          |
| Anticipated changes in operations | ***                                                                                                          |
| Anticipated changes in operations | ***                                                                                                          |
| Anticipated changes in operations | ***                                                                                                          |
| Anticipated changes in operations | ***                                                                                                          |
| Anticipated changes in operations | ***                                                                                                          |
| Anticipated changes in operations | ***                                                                                                          |
| Anticipated changes in operations | ***                                                                                                          |
| Anticipated changes in operations | ***                                                                                                          |
| Anticipated changes in operations | ***                                                                                                          |
| Anticipated changes in operations | ***                                                                                                          |

| Item                              | Foreign industry, firm name, and accompanying narrative response regarding anticipated changes in operations |
|-----------------------------------|--------------------------------------------------------------------------------------------------------------|
| Anticipated changes in operations | ***                                                                                                          |
| Anticipated changes in operations | ***                                                                                                          |
| Anticipated changes in operations | ***                                                                                                          |

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

## Installed and practical overall capacity

Table 5.11 presents data on foreign slab producers' installed and practical capacity and production on the same equipment, while table 5.12 presents foreign slab fabricators' installed and practical capacity and production on the same equipment. Both foreign slab producers' and slab fabricators' installed overall capacity increased from 2020 to 2024 and was higher in interim 2025 compared with interim 2024. Both foreign slab producers' and slab fabricators' practical overall capacity also increased from 2020 to 2024, but interim period data were mixed.

**Table 5.11 QSP: Slab: Foreign producers' installed and practical capacity and production on the same equipment as production, by period**

Capacity and production in 1,000 square feet; Utilization in percent

| Item              | Measure     | 2020    | 2021    | 2022    | 2023    | 2024    |
|-------------------|-------------|---------|---------|---------|---------|---------|
| Installed overall | Capacity    | 417,044 | 501,657 | 583,920 | 617,729 | 675,771 |
| Installed overall | Production  | 207,888 | 289,259 | 304,476 | 274,227 | 303,453 |
| Installed overall | Utilization | 49.8    | 57.7    | 52.1    | 44.4    | 44.9    |
| Practical overall | Capacity    | 290,565 | 355,801 | 394,767 | 409,334 | 446,089 |
| Practical overall | Production  | 207,888 | 289,259 | 304,476 | 274,227 | 303,453 |
| Practical overall | Utilization | 71.5    | 81.3    | 77.1    | 67.0    | 68.0    |
| Practical QSP     | Capacity    | 289,890 | 355,126 | 392,387 | 408,659 | 445,093 |
| Practical QSP     | Production  | 207,888 | 289,259 | 304,476 | 274,227 | 303,237 |
| Practical QSP     | Utilization | 71.7    | 81.5    | 77.6    | 67.1    | 68.1    |

Table continued.

**Table 5.11 (Continued) QSP: Slab: Foreign producers' installed and practical capacity and production on the same equipment as production, by period**

Capacity and production in 1,000 square feet; Utilization in percent; Interim period is January through September

| Item              | Measure     | Interim 2024 | Interim 2025 |
|-------------------|-------------|--------------|--------------|
| Installed overall | Capacity    | 510,140      | 532,662      |
| Installed overall | Production  | 225,364      | 207,329      |
| Installed overall | Utilization | 44.2         | 38.9         |
| Practical overall | Capacity    | 336,808      | 325,901      |
| Practical overall | Production  | 225,364      | 207,329      |
| Practical overall | Utilization | 66.9         | 63.6         |
| Practical QSP     | Capacity    | 336,702      | 325,378      |
| Practical QSP     | Production  | 225,364      | 206,908      |
| Practical QSP     | Utilization | 66.9         | 63.6         |

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

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

**Table 5.12 QSP: Fab: Foreign producers' installed and practical capacity and production on the same equipment as production, by period**

Capacity and production in 1,000 square feet; Utilization in percent

| Item              | Measure     | 2020   | 2021   | 2022   | 2023   | 2024   |
|-------------------|-------------|--------|--------|--------|--------|--------|
| Installed overall | Capacity    | 35,781 | 40,500 | 44,463 | 50,939 | 55,533 |
| Installed overall | Production  | 13,956 | 15,621 | 18,585 | 24,106 | 27,262 |
| Installed overall | Utilization | 39.0   | 38.6   | 41.8   | 47.3   | 49.1   |
| Practical overall | Capacity    | 20,052 | 26,176 | 25,973 | 33,245 | 37,876 |
| Practical overall | Production  | 13,956 | 15,621 | 18,585 | 24,106 | 27,262 |
| Practical overall | Utilization | 69.6   | 59.7   | 71.6   | 72.5   | 72.0   |
| Practical QSP     | Capacity    | 14,602 | 16,990 | 19,142 | 20,664 | 23,598 |
| Practical QSP     | Production  | 10,959 | 9,942  | 12,449 | 13,099 | 15,529 |
| Practical QSP     | Utilization | 75.1   | 58.5   | 65.0   | 63.4   | 65.8   |

Table continued.

**Table 5.12 (Continued) QSP: Fab: Foreign producers' installed and practical capacity and production on the same equipment as production, by period**

Capacity and production in 1,000 square feet; Utilization in percent; Interim period is January through September

| Item              | Measure     | Interim 2024 | Interim 2025 |
|-------------------|-------------|--------------|--------------|
| Installed overall | Capacity    | 41,561       | 47,364       |
| Installed overall | Production  | 20,811       | 23,571       |
| Installed overall | Utilization | 50.1         | 49.8         |
| Practical overall | Capacity    | 28,252       | 32,106       |
| Practical overall | Production  | 20,811       | 23,571       |
| Practical overall | Utilization | 73.7         | 73.4         |
| Practical QSP     | Capacity    | 17,552       | 19,228       |
| Practical QSP     | Production  | 11,883       | 12,258       |
| Practical QSP     | Utilization | 67.7         | 63.7         |

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

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

## Constraints on capacity

Table 5.13 presents responding foreign firms' reported production and capacity constraints since January 1, 2020, and table 5.14 presents their narrative explanations. The existing labor force, production bottlenecks, and "other" were the constraints most cited by responding firms.<sup>3</sup> Firms which reported "other," noted such constraints as competition, market demand, reduced customer orders, low sales, and normal downtime due to maintenance and repair.

**Table 5.13 QSP: Count of reported production constraints, by type of constraint**

Count in number of firms reporting

| Type of constraint        | All responding foreign firms | Foreign industry                                                                                               |
|---------------------------|------------------------------|----------------------------------------------------------------------------------------------------------------|
| Production bottlenecks    | 30                           | Canada, Czechia, India, Italy, Malaysia, Thailand, Vietnam, Other FTA sources, All other sources               |
| Existing labor force      | 34                           | Canada, Czechia, India, Israel, Italy, Malaysia, Taiwan, Turkey, Vietnam, Other FTA sources, All other sources |
| Supply of material inputs | 26                           | India, Israel, Italy, Malaysia, Turkey, Vietnam, All other sources                                             |
| Fuel or energy            | 12                           | India, Malaysia, Vietnam, All other sources                                                                    |
| Storage capacity          | 9                            | India, Italy, Malaysia, Vietnam, All other sources                                                             |
| Logistics/transportation  | 11                           | India, Malaysia, Vietnam, All other sources                                                                    |
| Other constraints         | 33                           | Canada, Czechia, India, Israel, Italy, Malaysia, Spain, Taiwan, Thailand, Turkey, Vietnam, All other sources   |

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

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<sup>3</sup> In the foreign producer/exporter questionnaire, firms could choose multiple constraints in response to this question. Therefore, these counts can encompass the same firm(s) identifying multiple constraints.

**Table 5.14 QSP: Foreign industries reported constraints to practical overall capacity since January 1, 2020, by foreign industry, firm, and type of constraint**

| Type of constraint     | Foreign producers, firm name, and narrative response on constraints to practical overall capacity |
|------------------------|---------------------------------------------------------------------------------------------------|
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |



| Type of constraint     | Foreign producers, firm name, and narrative response on constraints to practical overall capacity |
|------------------------|---------------------------------------------------------------------------------------------------|
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |

| Type of constraint     | Foreign producers, firm name, and narrative response on constraints to practical overall capacity |
|------------------------|---------------------------------------------------------------------------------------------------|
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Production bottlenecks | ***                                                                                               |
| Existing labor force   | ***                                                                                               |
| Existing labor force   | ***                                                                                               |
| Existing labor force   | ***                                                                                               |
| Existing labor force   | ***                                                                                               |
| Existing labor force   | ***                                                                                               |
| Existing labor force   | ***                                                                                               |
| Existing labor force   | ***                                                                                               |

| Type of constraint   | Foreign producers, firm name, and narrative response on constraints to practical overall capacity |
|----------------------|---------------------------------------------------------------------------------------------------|
| Existing labor force | ***                                                                                               |
| Existing labor force | ***                                                                                               |
| Existing labor force | ***                                                                                               |
| Existing labor force | ***                                                                                               |
| Existing labor force | ***                                                                                               |
| Existing labor force | ***                                                                                               |
| Existing labor force | ***                                                                                               |
| Existing labor force | ***                                                                                               |
| Existing labor force | ***                                                                                               |
| Existing labor force | ***                                                                                               |
| Existing labor force | ***                                                                                               |
| Existing labor force | ***                                                                                               |
| Existing labor force | ***                                                                                               |
| Existing labor force | ***                                                                                               |
| Existing labor force | ***                                                                                               |
| Existing labor force | ***                                                                                               |
| Existing labor force | ***                                                                                               |
| Existing labor force | ***                                                                                               |
| Existing labor force | ***                                                                                               |

| Type of constraint        | Foreign producers, firm name, and narrative response on constraints to practical overall capacity |
|---------------------------|---------------------------------------------------------------------------------------------------|
| Existing labor force      | ***                                                                                               |
| Existing labor force      | ***                                                                                               |
| Existing labor force      | ***                                                                                               |
| Existing labor force      | ***                                                                                               |
| Existing labor force      | ***                                                                                               |
| Existing labor force      | ***                                                                                               |
| Existing labor force      | ***                                                                                               |
| Existing labor force      | ***                                                                                               |
| Existing labor force      | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |

| Type of constraint        | Foreign producers, firm name, and narrative response on constraints to practical overall capacity |
|---------------------------|---------------------------------------------------------------------------------------------------|
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |

| Type of constraint        | Foreign producers, firm name, and narrative response on constraints to practical overall capacity |
|---------------------------|---------------------------------------------------------------------------------------------------|
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Supply of material inputs | ***                                                                                               |
| Fuel or energy            | ***                                                                                               |
| Fuel or energy            | ***                                                                                               |
| Fuel or energy            | ***                                                                                               |
| Fuel or energy            | ***                                                                                               |
| Fuel or energy            | ***                                                                                               |
| Fuel or energy            | ***                                                                                               |
| Fuel or energy            | ***                                                                                               |
| Fuel or energy            | ***                                                                                               |
| Fuel or energy            | ***                                                                                               |
| Fuel or energy            | ***                                                                                               |
| Fuel or energy            | ***                                                                                               |

| Type of constraint       | Foreign producers, firm name, and narrative response on constraints to practical overall capacity |
|--------------------------|---------------------------------------------------------------------------------------------------|
| Storage capacity         | ***                                                                                               |
| Storage capacity         | ***                                                                                               |
| Storage capacity         | ***                                                                                               |
| Storage capacity         | ***                                                                                               |
| Storage capacity         | ***                                                                                               |
| Storage capacity         | ***                                                                                               |
| Storage capacity         | ***                                                                                               |
| Storage capacity         | ***                                                                                               |
| Storage capacity         | ***                                                                                               |
| Logistics/transportation | ***                                                                                               |
| Logistics/transportation | ***                                                                                               |
| Logistics/transportation | ***                                                                                               |
| Logistics/transportation | ***                                                                                               |
| Logistics/transportation | ***                                                                                               |
| Logistics/transportation | ***                                                                                               |
| Logistics/transportation | ***                                                                                               |
| Logistics/transportation | ***                                                                                               |
| Logistics/transportation | ***                                                                                               |
| Logistics/transportation | ***                                                                                               |
| Other constraints        | ***                                                                                               |

| Type of constraint | Foreign producers, firm name, and narrative response on constraints to practical overall capacity |
|--------------------|---------------------------------------------------------------------------------------------------|
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |



| Type of constraint | Foreign producers, firm name, and narrative response on constraints to practical overall capacity |
|--------------------|---------------------------------------------------------------------------------------------------|
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |
| Other constraints  | ***                                                                                               |

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

## Operations on QSP

### Summary data

#### *Slab summary data*

Table 5.15 and figure 5.4 present an aggregate summary on the slab operations of responding foreign producers, exporters, and resellers. Slab producers' operational data by source is presented in subsequent breakout tables below.

**Table 5.15 QSP: Slab: Data on foreign industries, by item and period**

Quantity in 1,000 square feet

| Item                                             | Measure  | 2020    | 2021    | 2022    | 2023    | 2024    |
|--------------------------------------------------|----------|---------|---------|---------|---------|---------|
| Capacity                                         | Quantity | 289,890 | 355,126 | 392,387 | 408,659 | 445,093 |
| Production                                       | Quantity | 207,888 | 289,259 | 304,476 | 274,227 | 303,237 |
| End-of-period inventories                        | Quantity | 47,296  | 55,341  | 69,544  | 75,115  | 74,001  |
| Internal consumption for use in fabrication      | Quantity | 10,811  | 9,722   | 12,158  | 12,948  | 15,440  |
| Internal consumption or transfers for other uses | Quantity | 1,033   | 1,252   | 1,819   | 1,236   | 1,808   |
| Total internal consumption or transfers          | Quantity | 11,844  | 10,973  | 13,977  | 14,184  | 17,248  |
| Commercial home market shipments                 | Quantity | 29,382  | 39,664  | 40,060  | 40,275  | 40,091  |
| Home market shipments                            | Quantity | 41,226  | 50,638  | 54,037  | 54,458  | 57,339  |
| Exports to the U.S.                              | Quantity | 98,275  | 147,832 | 157,853 | 150,234 | 192,552 |
| Exports to all other markets                     | Quantity | 63,996  | 76,936  | 75,379  | 62,308  | 56,931  |
| Export shipments                                 | Quantity | 162,271 | 224,768 | 233,231 | 212,543 | 249,482 |
| Total shipments                                  | Quantity | 203,497 | 275,405 | 287,268 | 267,001 | 306,822 |
| Resales exported to the U.S.                     | Quantity | 1,345   | 2,589   | 948     | 382     | 2,994   |
| Total adjusted exports to the U.S.               | Quantity | 99,620  | 150,421 | 158,801 | 150,616 | 195,545 |

Table continued.

**Table 5.15 (Continued) QSP: Slab: Data on foreign industries, by item and period**

Quantity in 1,000 square feet; Interim period is January through September

| Item                                             | Measure  | Interim 2024 | Interim 2025 | Projection 2025 | Projection 2026 |
|--------------------------------------------------|----------|--------------|--------------|-----------------|-----------------|
| Capacity                                         | Quantity | 336,702      | 325,378      | 426,051         | 440,479         |
| Production                                       | Quantity | 225,364      | 206,908      | 267,843         | 293,714         |
| End-of-period inventories                        | Quantity | 75,764       | 71,917       | 72,663          | 74,614          |
| Internal consumption for use in fabrication      | Quantity | 11,817       | 12,132       | 16,063          | 17,055          |
| Internal consumption or transfers for other uses | Quantity | 1,173        | 1,209        | 1,414           | 1,609           |
| Total internal consumption or transfers          | Quantity | 12,990       | 13,341       | 17,477          | 18,664          |
| Commercial home market shipments                 | Quantity | 29,890       | 29,366       | 38,889          | 41,660          |
| Home market shipments                            | Quantity | 42,880       | 42,708       | 56,365          | 60,324          |
| Exports to the U.S.                              | Quantity | 140,191      | 121,266      | 155,290         | 168,215         |
| Exports to all other markets                     | Quantity | 41,133       | 44,544       | 54,388          | 63,574          |
| Export shipments                                 | Quantity | 181,324      | 165,810      | 209,678         | 231,789         |
| Total shipments                                  | Quantity | 224,204      | 208,518      | 266,043         | 292,113         |
| Resales exported to the U.S.                     | Quantity | 2,445        | 1,189        | 1,616           | 1,662           |
| Total adjusted exports to the U.S.               | Quantity | 142,636      | 122,455      | 156,906         | 169,877         |

Table continued.

**Table 5.15 (Continued) QSP: Slab: Data on foreign industries, by item and period**

Shares and ratios in percent

| Item                                                    | Measure | 2020  | 2021  | 2022  | 2023  | 2024  |
|---------------------------------------------------------|---------|-------|-------|-------|-------|-------|
| Capacity utilization                                    | Ratio   | 71.7  | 81.5  | 77.6  | 67.1  | 68.1  |
| Inventory to production                                 | Ratio   | 22.8  | 19.1  | 22.8  | 27.4  | 24.4  |
| Inventory to total shipments                            | Ratio   | 23.2  | 20.1  | 24.2  | 28.1  | 24.1  |
| Internal consumption for use in fabrication             | Share   | 5.3   | 3.5   | 4.2   | 4.8   | 5.0   |
| Internal consumption or transfers for other uses        | Share   | 0.5   | 0.5   | 0.6   | 0.5   | 0.6   |
| Total internal consumption or transfers                 | Share   | 5.8   | 4.0   | 4.9   | 5.3   | 5.6   |
| Commercial home market shipments                        | Share   | 14.4  | 14.4  | 13.9  | 15.1  | 13.1  |
| Home market shipments                                   | Share   | 20.3  | 18.4  | 18.8  | 20.4  | 18.7  |
| Exports to the U.S.                                     | Share   | 48.3  | 53.7  | 54.9  | 56.3  | 62.8  |
| Exports to all other markets                            | Share   | 31.4  | 27.9  | 26.2  | 23.3  | 18.6  |
| Export shipments                                        | Share   | 79.7  | 81.6  | 81.2  | 79.6  | 81.3  |
| Total shipments                                         | Share   | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |
| Total exports to the U.S. exported by foreign producers | Share   | 98.6  | 98.3  | 99.4  | 99.7  | 98.5  |
| Total exports to the U.S. exported by resellers         | Share   | 1.4   | 1.7   | 0.6   | 0.3   | 1.5   |
| Total adjusted exports to the U.S.                      | Share   | 49.0  | 54.6  | 55.3  | 56.4  | 63.7  |

Table continued.

**Table 5.15 (Continued) QSP: Slab: Data on foreign industries, by item and period**

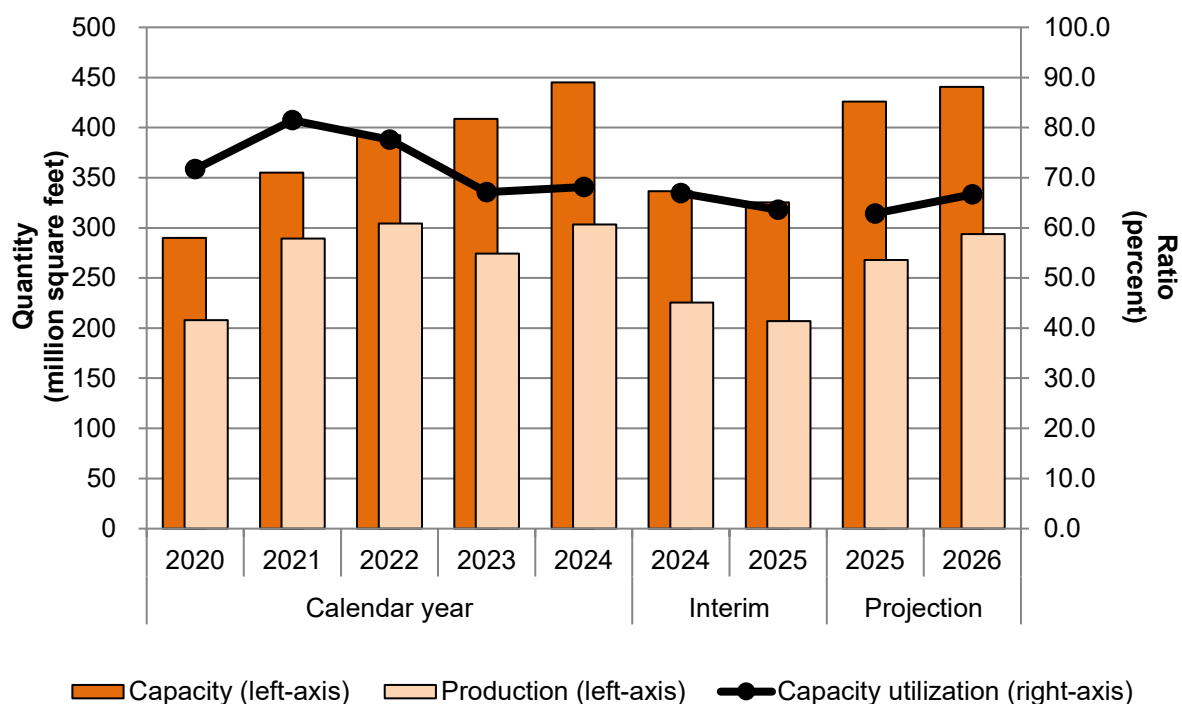
Shares and ratios in percent; Interim period is January through September

| Item                                                    | Measure | Interim<br>2024 | Interim<br>2025 | Projection<br>2025 | Projection<br>2026 |
|---------------------------------------------------------|---------|-----------------|-----------------|--------------------|--------------------|
| Capacity utilization                                    | Ratio   | 66.9            | 63.6            | 62.9               | 66.7               |
| Inventory to production                                 | Ratio   | 25.2            | 26.1            | 27.1               | 25.4               |
| Inventory to total shipments                            | Ratio   | 25.3            | 25.9            | 27.3               | 25.5               |
| Internal consumption for use in fabrication             | Share   | 5.3             | 5.8             | 6.0                | 5.8                |
| Internal consumption or transfers for other uses        | Share   | 0.5             | 0.6             | 0.5                | 0.6                |
| Total internal consumption or transfers                 | Share   | 5.8             | 6.4             | 6.6                | 6.4                |
| Commercial home market shipments                        | Share   | 13.3            | 14.1            | 14.6               | 14.3               |
| Home market shipments                                   | Share   | 19.1            | 20.5            | 21.2               | 20.7               |
| Exports to the U.S.                                     | Share   | 62.5            | 58.2            | 58.4               | 57.6               |
| Exports to all other markets                            | Share   | 18.3            | 21.4            | 20.4               | 21.8               |
| Export shipments                                        | Share   | 80.9            | 79.5            | 78.8               | 79.3               |
| Total shipments                                         | Share   | 100.0           | 100.0           | 100.0              | 100.0              |
| Total exports to the U.S. exported by foreign producers | Share   | 98.3            | 99.0            | 99.0               | 99.0               |
| Total exports to the U.S. exported by resellers         | Share   | 1.7             | 1.0             | 1.0                | 1.0                |
| Total adjusted exports to the U.S.                      | Share   | 63.6            | 58.7            | 59.0               | 58.2               |

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

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

Figure 5.4 QSP: Slab: Foreign industries' capacity, production, and capacity utilization, by period



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

### ***Fab summary data***

Table 5.16 and figure 5.5 present an aggregate summary on the fabricating operations of responding foreign producers and exporters. Slab fabricators' operational data by source is presented in subsequent breakout tables below.

Virtually all (more than 97 percent in any period) of fabrication production used internally produced slab, with remaining using another firm's slab produced in the home market (none reported using imported slab).

**Table 5.16 QSP: Fab: Data on foreign industries, by item and period**

Quantity in 1,000 square feet

| Item                                        | Measure  | 2020   | 2021   | 2022   | 2023   | 2024   |
|---------------------------------------------|----------|--------|--------|--------|--------|--------|
| Capacity                                    | Quantity | 14,602 | 16,990 | 19,142 | 20,664 | 23,598 |
| Production using internally consumed slab   | Quantity | 10,811 | 9,722  | 12,158 | 12,948 | 15,440 |
| Production using purchased home market slab | Quantity | 148    | 220    | 292    | 152    | 89     |
| Production using imported slab              | Quantity | —      | —      | —      | —      | —      |
| Total production                            | Quantity | 10,959 | 9,942  | 12,449 | 13,099 | 15,529 |
| End-of-period inventories                   | Quantity | 503    | 521    | 603    | 855    | 879    |
| Internal consumption                        | Quantity | 2,531  | 187    | 1,061  | 655    | 906    |
| Commercial home market shipments            | Quantity | 387    | 445    | 724    | 639    | 695    |
| Home market shipments                       | Quantity | 2,918  | 632    | 1,785  | 1,293  | 1,601  |
| Exports to the U.S.                         | Quantity | 4,241  | 5,950  | 7,186  | 9,399  | 10,718 |
| Exports to all other markets                | Quantity | 992    | 1,284  | 1,504  | 1,112  | 793    |
| Export shipments                            | Quantity | 5,233  | 7,234  | 8,690  | 10,511 | 11,512 |
| Total shipments                             | Quantity | 8,151  | 7,867  | 10,475 | 11,805 | 13,113 |

Table continued.

**Table 5.16 (Continued) QSP: Fab: Data on foreign industries, by item and period**

Quantity in 1,000 square feet; Interim period is January through September

| Item                                        | Measure  | Interim<br>2024 | Interim<br>2025 | Projection<br>2025 | Projection<br>2026 |
|---------------------------------------------|----------|-----------------|-----------------|--------------------|--------------------|
| Capacity                                    | Quantity | 17,552          | 19,228          | 25,503             | 25,760             |
| Production using internally consumed slab   | Quantity | 11,817          | 12,132          | 16,063             | 17,055             |
| Production using purchased home market slab | Quantity | 66              | 61              | 64                 | 11                 |
| Production using imported slab              | Quantity | —               | 65              | 65                 | —                  |
| Total production                            | Quantity | 11,883          | 12,258          | 16,191             | 17,066             |
| End-of-period inventories                   | Quantity | 933             | 711             | 612                | 502                |
| Internal consumption                        | Quantity | 723             | 1,077           | 1,430              | 1,462              |
| Commercial home market shipments            | Quantity | 535             | 477             | 653                | 703                |
| Home market shipments                       | Quantity | 1,258           | 1,554           | 2,083              | 2,166              |
| Exports to the U.S.                         | Quantity | 8,158           | 8,401           | 11,104             | 11,265             |
| Exports to all other markets                | Quantity | 592             | 719             | 959                | 586                |
| Export shipments                            | Quantity | 8,750           | 9,120           | 12,063             | 11,851             |
| Total shipments                             | Quantity | 10,008          | 10,674          | 14,146             | 14,016             |

Table continued.



**Table 5.16 (Continued) QSP: Fab: Data on foreign industries, by item and period**

Shares and ratios in percent

| Item                                        | Measure | 2020  | 2021  | 2022  | 2023  | 2024  |
|---------------------------------------------|---------|-------|-------|-------|-------|-------|
| Capacity utilization                        | Ratio   | 75.1  | 58.5  | 65.0  | 63.4  | 65.8  |
| Inventory to production                     | Ratio   | 4.6   | 5.2   | 4.8   | 6.5   | 5.7   |
| Inventory to total shipments                | Ratio   | 6.2   | 6.6   | 5.8   | 7.2   | 6.7   |
| Production using internally consumed slab   | Share1  | 98.6  | 97.8  | 97.7  | 98.8  | 99.4  |
| Production using purchased home market slab | Share1  | 1.4   | 2.2   | 2.3   | 1.2   | 0.6   |
| Production using imported slab              | Share1  | —     | —     | —     | —     | —     |
| Total production                            | Share1  | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |
| Internal consumption                        | Share2  | 31.1  | 2.4   | 10.1  | 5.5   | 6.9   |
| Commercial home market shipments            | Share2  | 4.8   | 5.7   | 6.9   | 5.4   | 5.3   |
| Home market shipments                       | Share2  | 35.8  | 8.0   | 17.0  | 11.0  | 12.2  |
| Exports to the U.S.                         | Share2  | 52.0  | 75.6  | 68.6  | 79.6  | 81.7  |
| Exports to all other markets                | Share2  | 12.2  | 16.3  | 14.4  | 9.4   | 6.1   |
| Export shipments                            | Share2  | 64.2  | 92.0  | 83.0  | 89.0  | 87.8  |
| Total shipments                             | Share2  | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Table continued.

**Table 5.16 (Continued) QSP: Fab: Data on foreign industries, by item and period**

Shares and ratios in percent; Interim period is January through September

| Item                                        | Measure | Interim<br>2024 | Interim<br>2025 | Projection<br>2025 | Projection<br>2026 |
|---------------------------------------------|---------|-----------------|-----------------|--------------------|--------------------|
| Capacity utilization                        | Ratio   | 67.3            | 63.1            | 63.0               | 66.2               |
| Inventory to production                     | Ratio   | 5.9             | 4.3             | 3.8                | 2.9                |
| Inventory to total shipments                | Ratio   | 7.0             | 5.0             | 4.3                | 3.6                |
| Production using internally consumed slab   | Share1  | 99.4            | 99.0            | 99.2               | 99.9               |
| Production using purchased home market slab | Share1  | 0.6             | 0.5             | 0.4                | 0.1                |
| Production using imported slab              | Share1  | —               | 0.5             | 0.4                | —                  |
| Total production                            | Share1  | 100.0           | 100.0           | 100.0              | 100.0              |
| Internal consumption                        | Share2  | 7.2             | 10.1            | 10.1               | 10.4               |
| Commercial home market shipments            | Share2  | 5.3             | 4.5             | 4.6                | 5.0                |
| Home market shipments                       | Share2  | 12.6            | 14.6            | 14.7               | 15.5               |
| Exports to the U.S.                         | Share2  | 81.5            | 78.7            | 78.5               | 80.4               |
| Exports to all other markets                | Share2  | 5.9             | 6.7             | 6.8                | 4.2                |
| Export shipments                            | Share2  | 87.4            | 85.4            | 85.3               | 84.5               |
| Total shipments                             | Share2  | 100.0           | 100.0           | 100.0              | 100.0              |

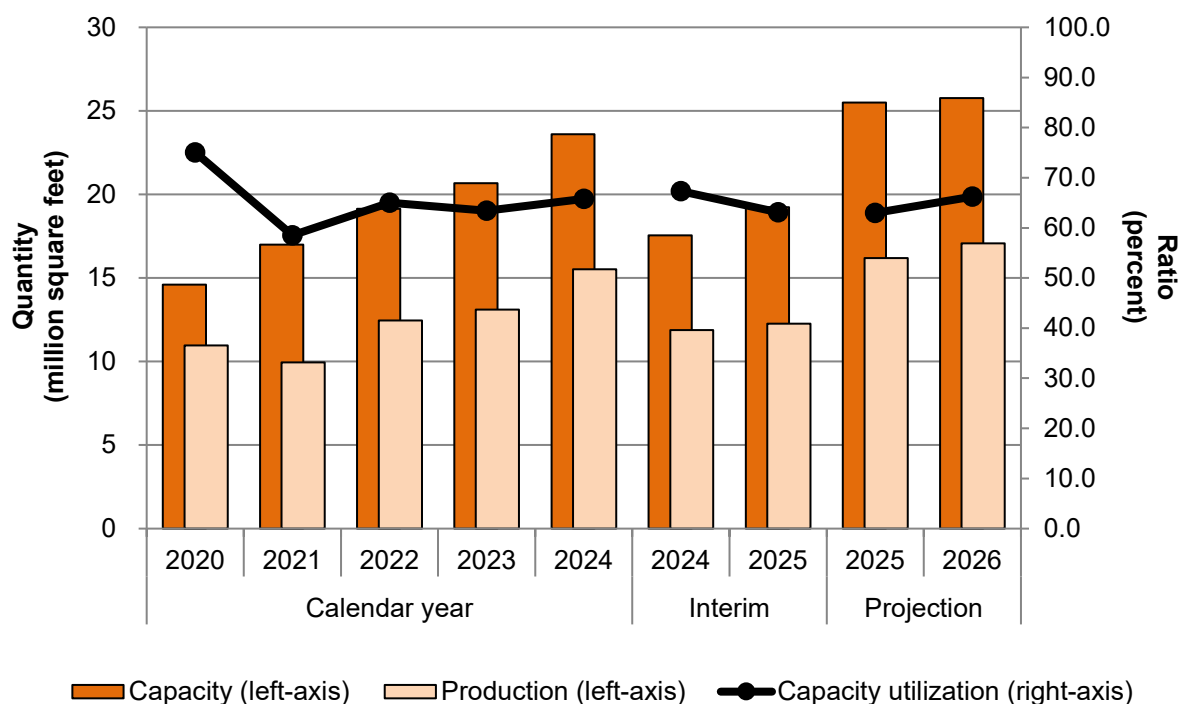
Source: Compiled from data submitted in response to Commission questionnaires.

Note: Resales of fabricated slabs to the United States are presented in the breakout exports table below.

Note: Share1 is the share of fabrication production by source of input. Share2 is the share of total shipments by destination market. Among the responding foreign producers, there were no independent fabricators. In other words, all foreign producers that had fabrication operations also produced slab. While the two datasets are not additive except as it relates to exports to U.S. (see by country exports to countries below), relying on the slab tables does not undercount in aggregate the foreign industry data, but rather, these slab producers fabrication operations shifts some of slab home market shipments to export shipments post-fabrication.

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

**Figure 5.5 QSP: Fab: Foreign industries' capacity, production, and capacity utilization, by period**



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

Note: Among the responding foreign producers, there were no independent fabricators. In other words, all foreign producers that had fabrication operations also produced slab. While the two datasets are not additive, relying on the slab tables does not undercount in aggregate the foreign industry data, but rather, these slab producers fabrication operations shifts some of slab home market shipments to export shipments post-fabrication.

## Practical capacity and production by source

### *Slab practical capacity and production by source*

Table 5.17 presents information on slab producers' production, capacity, and capacity utilization in the foreign industries by source.

**Table 5.17 QSP: Slab: Foreign industries' output: Practical capacity, by foreign industry and period**

Quantity in 1,000 square feet

| Foreign industry             | 2020    | 2021    | 2022    | 2023    | 2024    |
|------------------------------|---------|---------|---------|---------|---------|
| Canada                       | ***     | ***     | ***     | ***     | ***     |
| China                        | ***     | ***     | ***     | ***     | ***     |
| Czechia                      | ***     | ***     | ***     | ***     | ***     |
| India                        | ***     | ***     | ***     | ***     | ***     |
| Israel                       | ***     | ***     | ***     | ***     | ***     |
| Italy                        | ***     | ***     | ***     | ***     | ***     |
| Malaysia                     | ***     | ***     | ***     | ***     | ***     |
| Mexico                       | ***     | ***     | ***     | ***     | ***     |
| Spain                        | ***     | ***     | ***     | ***     | ***     |
| Taiwan                       | ***     | ***     | ***     | ***     | ***     |
| Thailand                     | ***     | ***     | ***     | ***     | ***     |
| Turkey                       | ***     | ***     | ***     | ***     | ***     |
| Vietnam                      | ***     | ***     | ***     | ***     | ***     |
| Other FTA partner countries  | ***     | ***     | ***     | ***     | ***     |
| All other foreign industries | ***     | ***     | ***     | ***     | ***     |
| All foreign industries       | 289,890 | 355,126 | 392,387 | 408,659 | 445,093 |

Table continued.

**Table 5.17 (Continued) QSP: Slab: Foreign industries' output: Practical capacity, by foreign industry and period**

Quantity in 1,000 square feet; Interim period is January through September; Ranked by source with 1 as the greatest quantity

| Foreign industry                       | Interim<br>2024 | Interim<br>2025 | Projection<br>2025 | Projection<br>2026 | Rank |
|----------------------------------------|-----------------|-----------------|--------------------|--------------------|------|
| Canada                                 | ***             | ***             | ***                | ***                | 10   |
| China                                  | ***             | ***             | ***                | ***                | —    |
| Czechia                                | ***             | ***             | ***                | ***                | 11   |
| India                                  | ***             | ***             | ***                | ***                | 1    |
| Israel                                 | ***             | ***             | ***                | ***                | 6    |
| Italy                                  | ***             | ***             | ***                | ***                | 12   |
| Malaysia                               | ***             | ***             | ***                | ***                | 9    |
| Mexico                                 | ***             | ***             | ***                | ***                | —    |
| Spain                                  | ***             | ***             | ***                | ***                | 3    |
| Taiwan                                 | ***             | ***             | ***                | ***                | 13   |
| Thailand                               | ***             | ***             | ***                | ***                | 5    |
| Turkey                                 | ***             | ***             | ***                | ***                | 4    |
| Vietnam                                | ***             | ***             | ***                | ***                | 2    |
| Other FTA partner countries            | ***             | ***             | ***                | ***                | 8    |
| All other reporting foreign industries | ***             | ***             | ***                | ***                | 7    |
| All foreign industries                 | 336,702         | 325,378         | 426,051            | 440,479            | NA   |

Table continued.

**Table 5.17 (Continued) QSP: Slab: Foreign industries' output: Production, by foreign industry and period**

Quantity in 1,000 square feet

| Foreign industry             | 2020    | 2021    | 2022    | 2023    | 2024    |
|------------------------------|---------|---------|---------|---------|---------|
| Canada                       | ***     | ***     | ***     | ***     | ***     |
| China                        | ***     | ***     | ***     | ***     | ***     |
| Czechia                      | ***     | ***     | ***     | ***     | ***     |
| India                        | ***     | ***     | ***     | ***     | ***     |
| Israel                       | ***     | ***     | ***     | ***     | ***     |
| Italy                        | ***     | ***     | ***     | ***     | ***     |
| Malaysia                     | ***     | ***     | ***     | ***     | ***     |
| Mexico                       | ***     | ***     | ***     | ***     | ***     |
| Spain                        | ***     | ***     | ***     | ***     | ***     |
| Taiwan                       | ***     | ***     | ***     | ***     | ***     |
| Thailand                     | ***     | ***     | ***     | ***     | ***     |
| Turkey                       | ***     | ***     | ***     | ***     | ***     |
| Vietnam                      | ***     | ***     | ***     | ***     | ***     |
| Other FTA partner countries  | ***     | ***     | ***     | ***     | ***     |
| All other foreign industries | ***     | ***     | ***     | ***     | ***     |
| All foreign industries       | 207,888 | 289,259 | 304,476 | 274,227 | 303,237 |

Table continued.

**Table 5.17 (Continued) QSP: Slab: Foreign industries' output: Production, by foreign industry and period**

Quantity in 1,000 square feet; Interim period is January through September; Ranked by source with 1 as the greatest quantity

| Foreign industry                       | Interim 2024 | Interim 2025 | Projection 2025 | Projection 2026 | Rank |
|----------------------------------------|--------------|--------------|-----------------|-----------------|------|
| Canada                                 | ***          | ***          | ***             | ***             | 11   |
| China                                  | ***          | ***          | ***             | ***             | —    |
| Czechia                                | ***          | ***          | ***             | ***             | 9    |
| India                                  | ***          | ***          | ***             | ***             | 1    |
| Israel                                 | ***          | ***          | ***             | ***             | 6    |
| Italy                                  | ***          | ***          | ***             | ***             | 12   |
| Malaysia                               | ***          | ***          | ***             | ***             | 7    |
| Mexico                                 | ***          | ***          | ***             | ***             | —    |
| Spain                                  | ***          | ***          | ***             | ***             | 2    |
| Taiwan                                 | ***          | ***          | ***             | ***             | 13   |
| Thailand                               | ***          | ***          | ***             | ***             | 5    |
| Turkey                                 | ***          | ***          | ***             | ***             | 4    |
| Vietnam                                | ***          | ***          | ***             | ***             | 3    |
| Other FTA partner countries            | ***          | ***          | ***             | ***             | 10   |
| All other reporting foreign industries | ***          | ***          | ***             | ***             | 8    |
| All foreign industries                 | 225,364      | 206,908      | 267,843         | 293,714         | NA   |

Table continued.

**Table 5.17 (Continued) QSP: Slab: Foreign industries' output: Capacity utilization ratio, by foreign industry and period**

Ratio in percent

| Foreign industry             | 2020 | 2021 | 2022 | 2023 | 2024 |
|------------------------------|------|------|------|------|------|
| Canada                       | ***  | ***  | ***  | ***  | ***  |
| China                        | ***  | ***  | ***  | ***  | ***  |
| Czechia                      | ***  | ***  | ***  | ***  | ***  |
| India                        | ***  | ***  | ***  | ***  | ***  |
| Israel                       | ***  | ***  | ***  | ***  | ***  |
| Italy                        | ***  | ***  | ***  | ***  | ***  |
| Malaysia                     | ***  | ***  | ***  | ***  | ***  |
| Mexico                       | ***  | ***  | ***  | ***  | ***  |
| Spain                        | ***  | ***  | ***  | ***  | ***  |
| Taiwan                       | ***  | ***  | ***  | ***  | ***  |
| Thailand                     | ***  | ***  | ***  | ***  | ***  |
| Turkey                       | ***  | ***  | ***  | ***  | ***  |
| Vietnam                      | ***  | ***  | ***  | ***  | ***  |
| Other FTA partner countries  | ***  | ***  | ***  | ***  | ***  |
| All other foreign industries | ***  | ***  | ***  | ***  | ***  |
| All foreign industries       | 71.7 | 81.5 | 77.6 | 67.1 | 68.1 |

Table continued.

**Table 5.17 (Continued) QSP: Slab: Foreign industries' output: Capacity utilization ratio, by foreign industry and period**

Ratio in percent; Interim period is January through September; Ranked by source with 1 as the greatest ratio

| Foreign industry                       | Interim 2024 | Interim 2025 | Projection 2025 | Projection 2026 | Rank |
|----------------------------------------|--------------|--------------|-----------------|-----------------|------|
| Canada                                 | ***          | ***          | ***             | ***             | 10   |
| China                                  | ***          | ***          | ***             | ***             | —    |
| Czechia                                | ***          | ***          | ***             | ***             | 8    |
| India                                  | ***          | ***          | ***             | ***             | 11   |
| Israel                                 | ***          | ***          | ***             | ***             | 1    |
| Italy                                  | ***          | ***          | ***             | ***             | 2    |
| Malaysia                               | ***          | ***          | ***             | ***             | 4    |
| Mexico                                 | ***          | ***          | ***             | ***             | —    |
| Spain                                  | ***          | ***          | ***             | ***             | 6    |
| Taiwan                                 | ***          | ***          | ***             | ***             | 9    |
| Thailand                               | ***          | ***          | ***             | ***             | 3    |
| Turkey                                 | ***          | ***          | ***             | ***             | 5    |
| Vietnam                                | ***          | ***          | ***             | ***             | 13   |
| Other FTA partner countries            | ***          | ***          | ***             | ***             | 12   |
| All other reporting foreign industries | ***          | ***          | ***             | ***             | 7    |
| All foreign industries                 | 66.9         | 63.6         | 62.9            | 66.7            | NA   |

Table continued.

**Table 5.17 (Continued) QSP: Slab: Foreign industries' output: Share of production, by foreign industry and period**

Share in percent

| Foreign industry             | 2020  | 2021  | 2022  | 2023  | 2024  |
|------------------------------|-------|-------|-------|-------|-------|
| Canada                       | ***   | ***   | ***   | ***   | ***   |
| China                        | ***   | ***   | ***   | ***   | ***   |
| Czechia                      | ***   | ***   | ***   | ***   | ***   |
| India                        | ***   | ***   | ***   | ***   | ***   |
| Israel                       | ***   | ***   | ***   | ***   | ***   |
| Italy                        | ***   | ***   | ***   | ***   | ***   |
| Malaysia                     | ***   | ***   | ***   | ***   | ***   |
| Mexico                       | ***   | ***   | ***   | ***   | ***   |
| Spain                        | ***   | ***   | ***   | ***   | ***   |
| Taiwan                       | ***   | ***   | ***   | ***   | ***   |
| Thailand                     | ***   | ***   | ***   | ***   | ***   |
| Turkey                       | ***   | ***   | ***   | ***   | ***   |
| Vietnam                      | ***   | ***   | ***   | ***   | ***   |
| Other FTA partner countries  | ***   | ***   | ***   | ***   | ***   |
| All other foreign industries | ***   | ***   | ***   | ***   | ***   |
| All foreign industries       | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Table continued.

**Table 5.17 (Continued) QSP: Slab: Foreign industries' output: Share of production, by foreign industry and period**

Share in percent; Interim period is January through September; Ranked by source with 1 as the highest share

| Foreign industry                       | Interim 2024 | Interim 2025 | Projection 2025 | Projection 2026 | Rank |
|----------------------------------------|--------------|--------------|-----------------|-----------------|------|
| Canada                                 | ***          | ***          | ***             | ***             | 11   |
| China                                  | ***          | ***          | ***             | ***             | —    |
| Czechia                                | ***          | ***          | ***             | ***             | 9    |
| India                                  | ***          | ***          | ***             | ***             | 1    |
| Israel                                 | ***          | ***          | ***             | ***             | 6    |
| Italy                                  | ***          | ***          | ***             | ***             | 12   |
| Malaysia                               | ***          | ***          | ***             | ***             | 7    |
| Mexico                                 | ***          | ***          | ***             | ***             | —    |
| Spain                                  | ***          | ***          | ***             | ***             | 2    |
| Taiwan                                 | ***          | ***          | ***             | ***             | 13   |
| Thailand                               | ***          | ***          | ***             | ***             | 5    |
| Turkey                                 | ***          | ***          | ***             | ***             | 4    |
| Vietnam                                | ***          | ***          | ***             | ***             | 3    |
| Other FTA partner countries            | ***          | ***          | ***             | ***             | 10   |
| All other reporting foreign industries | ***          | ***          | ***             | ***             | 8    |
| All foreign industries                 | 100.0        | 100.0        | 100.0           | 100.0           | NA   |

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

Note: Rank compares the sources across the full and projection year data. Interim periods are not included in the rank calculation since the quantities are already included in the full and projection years. Ranks for share and ratio data are based on recalculated totals across the full and projection years. Zeroes, null values, and undefined calculations are suppressed and shown as "—".



***Fab practical capacity and production by source***

Table 5.18 presents information on slab fabricators' production, capacity, and capacity utilization in the foreign industries by source.

**Table 5.18 QSP: Fab: Foreign industries' output: Practical capacity, by foreign industry and period**

Quantity in 1,000 square feet

| <b>Foreign industry</b>      | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> |
|------------------------------|-------------|-------------|-------------|-------------|-------------|
| Canada                       | ***         | ***         | ***         | ***         | ***         |
| China                        | ***         | ***         | ***         | ***         | ***         |
| Czechia                      | ***         | ***         | ***         | ***         | ***         |
| India                        | ***         | ***         | ***         | ***         | ***         |
| Israel                       | ***         | ***         | ***         | ***         | ***         |
| Italy                        | ***         | ***         | ***         | ***         | ***         |
| Malaysia                     | ***         | ***         | ***         | ***         | ***         |
| Mexico                       | ***         | ***         | ***         | ***         | ***         |
| Spain                        | ***         | ***         | ***         | ***         | ***         |
| Taiwan                       | ***         | ***         | ***         | ***         | ***         |
| Thailand                     | ***         | ***         | ***         | ***         | ***         |
| Turkey                       | ***         | ***         | ***         | ***         | ***         |
| Vietnam                      | ***         | ***         | ***         | ***         | ***         |
| Other FTA partner countries  | ***         | ***         | ***         | ***         | ***         |
| All other foreign industries | ***         | ***         | ***         | ***         | ***         |
| All foreign industries       | 14,602      | 16,990      | 19,142      | 20,664      | 23,598      |

Table continued.

**Table 5.18 (Continued) QSP: Fab: Foreign industries' output: Practical capacity, by foreign industry and period**

Quantity in 1,000 square feet; Interim period is January through September; Ranked by source with 1 as the highest quantity

| Foreign industry                       | Interim<br>2024 | Interim<br>2025 | Projection<br>2025 | Projection<br>2026 | Rank |
|----------------------------------------|-----------------|-----------------|--------------------|--------------------|------|
| Canada                                 | ***             | ***             | ***                | ***                | —    |
| China                                  | ***             | ***             | ***                | ***                | —    |
| Czechia                                | ***             | ***             | ***                | ***                | —    |
| India                                  | ***             | ***             | ***                | ***                | 5    |
| Israel                                 | ***             | ***             | ***                | ***                | —    |
| Italy                                  | ***             | ***             | ***                | ***                | —    |
| Malaysia                               | ***             | ***             | ***                | ***                | 6    |
| Mexico                                 | ***             | ***             | ***                | ***                | —    |
| Spain                                  | ***             | ***             | ***                | ***                | 2    |
| Taiwan                                 | ***             | ***             | ***                | ***                | 8    |
| Thailand                               | ***             | ***             | ***                | ***                | 4    |
| Turkey                                 | ***             | ***             | ***                | ***                | 7    |
| Vietnam                                | ***             | ***             | ***                | ***                | 1    |
| Other FTA partner countries            | ***             | ***             | ***                | ***                | 9    |
| All other reporting foreign industries | ***             | ***             | ***                | ***                | 3    |
| All foreign industries                 | 17,552          | 19,228          | 25,503             | 25,760             | NA   |

Table continued.

**Table 5.18 (Continued) QSP: Fab: Foreign industries' output: Production, by foreign industry and period**

Quantity in 1,000 square feet

| Foreign industry             | 2020   | 2021  | 2022   | 2023   | 2024   |
|------------------------------|--------|-------|--------|--------|--------|
| Canada                       | ***    | ***   | ***    | ***    | ***    |
| China                        | ***    | ***   | ***    | ***    | ***    |
| Czechia                      | ***    | ***   | ***    | ***    | ***    |
| India                        | ***    | ***   | ***    | ***    | ***    |
| Israel                       | ***    | ***   | ***    | ***    | ***    |
| Italy                        | ***    | ***   | ***    | ***    | ***    |
| Malaysia                     | ***    | ***   | ***    | ***    | ***    |
| Mexico                       | ***    | ***   | ***    | ***    | ***    |
| Spain                        | ***    | ***   | ***    | ***    | ***    |
| Taiwan                       | ***    | ***   | ***    | ***    | ***    |
| Thailand                     | ***    | ***   | ***    | ***    | ***    |
| Turkey                       | ***    | ***   | ***    | ***    | ***    |
| Vietnam                      | ***    | ***   | ***    | ***    | ***    |
| Other FTA partner countries  | ***    | ***   | ***    | ***    | ***    |
| All other foreign industries | ***    | ***   | ***    | ***    | ***    |
| All foreign industries       | 10,959 | 9,942 | 12,449 | 13,099 | 15,529 |

Table continued.

**Table 5.18 (Continued) QSP: Fab: Foreign industries' output: Production, by foreign industry and period**

Quantity in 1,000 square feet; Interim period is January through September; Ranked by source with 1 as the greatest quantity

| Foreign industry                       | Interim 2024 | Interim 2025 | Projection 2025 | Projection 2026 | Rank |
|----------------------------------------|--------------|--------------|-----------------|-----------------|------|
| Canada                                 | ***          | ***          | ***             | ***             | —    |
| China                                  | ***          | ***          | ***             | ***             | —    |
| Czechia                                | ***          | ***          | ***             | ***             | —    |
| India                                  | ***          | ***          | ***             | ***             | 6    |
| Israel                                 | ***          | ***          | ***             | ***             | —    |
| Italy                                  | ***          | ***          | ***             | ***             | —    |
| Malaysia                               | ***          | ***          | ***             | ***             | 5    |
| Mexico                                 | ***          | ***          | ***             | ***             | —    |
| Spain                                  | ***          | ***          | ***             | ***             | 2    |
| Taiwan                                 | ***          | ***          | ***             | ***             | 8    |
| Thailand                               | ***          | ***          | ***             | ***             | 4    |
| Turkey                                 | ***          | ***          | ***             | ***             | 7    |
| Vietnam                                | ***          | ***          | ***             | ***             | 1    |
| Other FTA partner countries            | ***          | ***          | ***             | ***             | 9    |
| All other reporting foreign industries | ***          | ***          | ***             | ***             | 3    |
| All foreign industries                 | 11,883       | 12,258       | 16,191          | 17,066          | NA   |

Table continued.

**Table 5.18 (Continued) QSP: Fab: Foreign industries' output: Capacity utilization ratio, by foreign industry and period**

Ratio in percent

| Foreign industry             | 2020 | 2021 | 2022 | 2023 | 2024 |
|------------------------------|------|------|------|------|------|
| Canada                       | ***  | ***  | ***  | ***  | ***  |
| China                        | ***  | ***  | ***  | ***  | ***  |
| Czechia                      | ***  | ***  | ***  | ***  | ***  |
| India                        | ***  | ***  | ***  | ***  | ***  |
| Israel                       | ***  | ***  | ***  | ***  | ***  |
| Italy                        | ***  | ***  | ***  | ***  | ***  |
| Malaysia                     | ***  | ***  | ***  | ***  | ***  |
| Mexico                       | ***  | ***  | ***  | ***  | ***  |
| Spain                        | ***  | ***  | ***  | ***  | ***  |
| Taiwan                       | ***  | ***  | ***  | ***  | ***  |
| Thailand                     | ***  | ***  | ***  | ***  | ***  |
| Turkey                       | ***  | ***  | ***  | ***  | ***  |
| Vietnam                      | ***  | ***  | ***  | ***  | ***  |
| Other FTA partner countries  | ***  | ***  | ***  | ***  | ***  |
| All other foreign industries | ***  | ***  | ***  | ***  | ***  |
| All foreign industries       | 75.1 | 58.5 | 65.0 | 63.4 | 65.8 |

Table continued.

**Table 5.18 (Continued) QSP: Fab: Foreign industries' output: Capacity utilization ratio, by foreign industry and period**

Ratio in percent; Interim period is January through September; Ranked by source with 1 as the highest ratio

| Foreign industry                       | Interim 2024 | Interim 2025 | Projection 2025 | Projection 2026 | Rank |
|----------------------------------------|--------------|--------------|-----------------|-----------------|------|
| Canada                                 | ***          | ***          | ***             | ***             | —    |
| China                                  | ***          | ***          | ***             | ***             | —    |
| Czechia                                | ***          | ***          | ***             | ***             | —    |
| India                                  | ***          | ***          | ***             | ***             | 9    |
| Israel                                 | ***          | ***          | ***             | ***             | —    |
| Italy                                  | ***          | ***          | ***             | ***             | —    |
| Malaysia                               | ***          | ***          | ***             | ***             | 3    |
| Mexico                                 | ***          | ***          | ***             | ***             | —    |
| Spain                                  | ***          | ***          | ***             | ***             | 1    |
| Taiwan                                 | ***          | ***          | ***             | ***             | 6    |
| Thailand                               | ***          | ***          | ***             | ***             | 5    |
| Turkey                                 | ***          | ***          | ***             | ***             | 7    |
| Vietnam                                | ***          | ***          | ***             | ***             | 8    |
| Other FTA partner countries            | ***          | ***          | ***             | ***             | 1    |
| All other reporting foreign industries | ***          | ***          | ***             | ***             | 4    |
| All foreign industries                 | 67.7         | 63.7         | 63.5            | 66.2            | NA   |

Table continued.

**Table 5.18 (Continued) QSP: Fab: Foreign industries' output: Share of production, by foreign industry and period**

Share in percent

| Foreign industry             | 2020  | 2021  | 2022  | 2023  | 2024  |
|------------------------------|-------|-------|-------|-------|-------|
| Canada                       | ***   | ***   | ***   | ***   | ***   |
| China                        | ***   | ***   | ***   | ***   | ***   |
| Czechia                      | ***   | ***   | ***   | ***   | ***   |
| India                        | ***   | ***   | ***   | ***   | ***   |
| Israel                       | ***   | ***   | ***   | ***   | ***   |
| Italy                        | ***   | ***   | ***   | ***   | ***   |
| Malaysia                     | ***   | ***   | ***   | ***   | ***   |
| Mexico                       | ***   | ***   | ***   | ***   | ***   |
| Spain                        | ***   | ***   | ***   | ***   | ***   |
| Taiwan                       | ***   | ***   | ***   | ***   | ***   |
| Thailand                     | ***   | ***   | ***   | ***   | ***   |
| Turkey                       | ***   | ***   | ***   | ***   | ***   |
| Vietnam                      | ***   | ***   | ***   | ***   | ***   |
| Other FTA partner countries  | ***   | ***   | ***   | ***   | ***   |
| All other foreign industries | ***   | ***   | ***   | ***   | ***   |
| All foreign industries       | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Table continued.

**Table 5.18 (Continued) QSP: Fab: Foreign industries' output: Share of production, by foreign industry and period**

Share in percent; Interim period is January through September; Ranked by source with 1 as the highest share

| Foreign industry                       | Interim 2024 | Interim 2025 | Projection 2025 | Projection 2026 | Rank |
|----------------------------------------|--------------|--------------|-----------------|-----------------|------|
| Canada                                 | ***          | ***          | ***             | ***             | —    |
| China                                  | ***          | ***          | ***             | ***             | —    |
| Czechia                                | ***          | ***          | ***             | ***             | —    |
| India                                  | ***          | ***          | ***             | ***             | 6    |
| Israel                                 | ***          | ***          | ***             | ***             | —    |
| Italy                                  | ***          | ***          | ***             | ***             | —    |
| Malaysia                               | ***          | ***          | ***             | ***             | 5    |
| Mexico                                 | ***          | ***          | ***             | ***             | —    |
| Spain                                  | ***          | ***          | ***             | ***             | 2    |
| Taiwan                                 | ***          | ***          | ***             | ***             | 8    |
| Thailand                               | ***          | ***          | ***             | ***             | 4    |
| Turkey                                 | ***          | ***          | ***             | ***             | 7    |
| Vietnam                                | ***          | ***          | ***             | ***             | 1    |
| Other FTA partner countries            | ***          | ***          | ***             | ***             | 9    |
| All other reporting foreign industries | ***          | ***          | ***             | ***             | 3    |
| All foreign industries                 | 100.0        | 100.0        | 100.0           | 100.0           | NA   |

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

Note: Rank compares the sources across the full and projection year data. Interim periods are not included in the rank calculation since the quantities are already included in the full and projection years. Ranks for share and ratio data are based on recalculated totals across the full and projection years. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

## Exports to the United States by source

### *Slab exports to the United States by source*

Table 5.19 presents responding foreign firms' exports of slabs to the United States by source.

**Table 5.19 QSP: Slab: Foreign industries' exports: Exports to the U.S., by foreign industry and period**

Quantity in 1,000 square feet

| Foreign industry                     | 2020   | 2021    | 2022    | 2023    | 2024    |
|--------------------------------------|--------|---------|---------|---------|---------|
| Canada                               | ***    | ***     | ***     | ***     | ***     |
| China                                | ***    | ***     | ***     | ***     | ***     |
| Czechia                              | ***    | ***     | ***     | ***     | ***     |
| India                                | ***    | ***     | ***     | ***     | ***     |
| Israel                               | ***    | ***     | ***     | ***     | ***     |
| Italy                                | ***    | ***     | ***     | ***     | ***     |
| Malaysia                             | ***    | ***     | ***     | ***     | ***     |
| Mexico                               | ***    | ***     | ***     | ***     | ***     |
| Spain                                | ***    | ***     | ***     | ***     | ***     |
| Taiwan                               | ***    | ***     | ***     | ***     | ***     |
| Thailand                             | ***    | ***     | ***     | ***     | ***     |
| Turkey                               | ***    | ***     | ***     | ***     | ***     |
| Vietnam                              | ***    | ***     | ***     | ***     | ***     |
| Other FTA partner countries          | ***    | ***     | ***     | ***     | ***     |
| All other foreign industries         | ***    | ***     | ***     | ***     | ***     |
| All foreign industries               | 98,275 | 147,832 | 157,853 | 150,234 | 192,552 |
| All resellers                        | 1,345  | 2,589   | 948     | 382     | 2,994   |
| All foreign industries and resellers | 99,620 | 150,421 | 158,801 | 150,616 | 195,545 |

Table continued.

**Table 5.19 (Continued) QSP: Slab: Foreign industries' exports: Exports to the U.S., by foreign industry and period**

Quantity in 1,000 square feet; Interim period is January through September; Ranked by source with 1 as the greatest quantity

| Foreign industry                       | Interim<br>2024 | Interim<br>2025 | Projection<br>2025 | Projection<br>2026 | Rank |
|----------------------------------------|-----------------|-----------------|--------------------|--------------------|------|
| Canada                                 | ***             | ***             | ***                | ***                | 6    |
| China                                  | ***             | ***             | ***                | ***                | —    |
| Czechia                                | ***             | ***             | ***                | ***                | 10   |
| India                                  | ***             | ***             | ***                | ***                | 1    |
| Israel                                 | ***             | ***             | ***                | ***                | 7    |
| Italy                                  | ***             | ***             | ***                | ***                | 13   |
| Malaysia                               | ***             | ***             | ***                | ***                | 5    |
| Mexico                                 | ***             | ***             | ***                | ***                | —    |
| Spain                                  | ***             | ***             | ***                | ***                | 2    |
| Taiwan                                 | ***             | ***             | ***                | ***                | 12   |
| Thailand                               | ***             | ***             | ***                | ***                | 4    |
| Turkey                                 | ***             | ***             | ***                | ***                | 9    |
| Vietnam                                | ***             | ***             | ***                | ***                | 3    |
| Other FTA partner countries            | ***             | ***             | ***                | ***                | 11   |
| All other reporting foreign industries | ***             | ***             | ***                | ***                | 8    |
| All foreign industries                 | 140,191         | 121,266         | 155,290            | 168,215            | NA   |
| All resellers                          | 2,445           | 1,189           | 1,616              | 1,662              | NA   |
| All foreign industries and resellers   | 142,636         | 122,455         | 156,906            | 169,877            | NA   |

Table continued.

**Table 5.19 (Continued) QSP: Slab: Foreign industries' exports: Share of total shipments exported to the U.S., by foreign industry and period**

Share in percent

| Foreign industry                     | 2020 | 2021 | 2022 | 2023 | 2024 |
|--------------------------------------|------|------|------|------|------|
| Canada                               | ***  | ***  | ***  | ***  | ***  |
| China                                | ***  | ***  | ***  | ***  | ***  |
| Czechia                              | ***  | ***  | ***  | ***  | ***  |
| India                                | ***  | ***  | ***  | ***  | ***  |
| Israel                               | ***  | ***  | ***  | ***  | ***  |
| Italy                                | ***  | ***  | ***  | ***  | ***  |
| Malaysia                             | ***  | ***  | ***  | ***  | ***  |
| Mexico                               | ***  | ***  | ***  | ***  | ***  |
| Spain                                | ***  | ***  | ***  | ***  | ***  |
| Taiwan                               | ***  | ***  | ***  | ***  | ***  |
| Thailand                             | ***  | ***  | ***  | ***  | ***  |
| Turkey                               | ***  | ***  | ***  | ***  | ***  |
| Vietnam                              | ***  | ***  | ***  | ***  | ***  |
| Other FTA partner countries          | ***  | ***  | ***  | ***  | ***  |
| All other foreign industries         | ***  | ***  | ***  | ***  | ***  |
| All foreign industries               | 48.3 | 53.7 | 54.9 | 56.3 | 62.8 |
| All resellers                        | 0.7  | 0.9  | 0.3  | 0.1  | 1.0  |
| All foreign industries and resellers | 49.0 | 54.6 | 55.3 | 56.4 | 63.7 |

Table continued.



**Table 5.19 (Continued) QSP: Slab: Foreign industries' exports: Share of total shipments exported to the U.S., by foreign industry and period**

Share in percent; Interim period is January through September; Ranked by source with 1 as the highest share

| Foreign industry                       | Interim<br>2024 | Interim<br>2025 | Projection<br>2025 | Projection<br>2026 | Rank |
|----------------------------------------|-----------------|-----------------|--------------------|--------------------|------|
| Canada                                 | ***             | ***             | ***                | ***                | 5    |
| China                                  | ***             | ***             | ***                | ***                | —    |
| Czechia                                | ***             | ***             | ***                | ***                | 8    |
| India                                  | ***             | ***             | ***                | ***                | 4    |
| Israel                                 | ***             | ***             | ***                | ***                | 10   |
| Italy                                  | ***             | ***             | ***                | ***                | 11   |
| Malaysia                               | ***             | ***             | ***                | ***                | 3    |
| Mexico                                 | ***             | ***             | ***                | ***                | —    |
| Spain                                  | ***             | ***             | ***                | ***                | 7    |
| Taiwan                                 | ***             | ***             | ***                | ***                | 2    |
| Thailand                               | ***             | ***             | ***                | ***                | 1    |
| Turkey                                 | ***             | ***             | ***                | ***                | 13   |
| Vietnam                                | ***             | ***             | ***                | ***                | 6    |
| Other FTA partner countries            | ***             | ***             | ***                | ***                | 12   |
| All other reporting foreign industries | ***             | ***             | ***                | ***                | 9    |
| All foreign industries                 | 62.5            | 58.2            | 58.4               | 57.6               | NA   |
| All resellers                          | 1.1             | 0.6             | 0.6                | 0.6                | NA   |
| All foreign industries and resellers   | 63.6            | 58.7            | 59.0               | 58.2               | NA   |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Rank compares the sources across the full and projection year data. Interim periods are not included in the rank calculation since the quantities are already included in the full and projection years. Ranks for share and ratio data are based on recalculated totals across the full and projection years.

***Fab exports to the United States by source***

Table 5.20 presents responding foreign firms' exports of fabricated slabs to the United States by source.

**Table 5.20 QSP: Fab: Foreign industries' exports: Exports to the U.S., by foreign industry and period**

Quantity in 1,000 square feet

| <b>Foreign producers</b>              | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> |
|---------------------------------------|-------------|-------------|-------------|-------------|-------------|
| Canada                                | ***         | ***         | ***         | ***         | ***         |
| China                                 | ***         | ***         | ***         | ***         | ***         |
| Czechia                               | ***         | ***         | ***         | ***         | ***         |
| India                                 | ***         | ***         | ***         | ***         | ***         |
| Israel                                | ***         | ***         | ***         | ***         | ***         |
| Italy                                 | ***         | ***         | ***         | ***         | ***         |
| Malaysia                              | ***         | ***         | ***         | ***         | ***         |
| Mexico                                | ***         | ***         | ***         | ***         | ***         |
| Spain                                 | ***         | ***         | ***         | ***         | ***         |
| Taiwan                                | ***         | ***         | ***         | ***         | ***         |
| Thailand                              | ***         | ***         | ***         | ***         | ***         |
| Turkey                                | ***         | ***         | ***         | ***         | ***         |
| Vietnam                               | ***         | ***         | ***         | ***         | ***         |
| Other FTA partner countries           | ***         | ***         | ***         | ***         | ***         |
| All other reporting foreign producers | ***         | ***         | ***         | ***         | ***         |
| All foreign producers                 | 4,241       | 5,950       | 7,186       | 9,399       | 10,718      |
| All resellers                         | 2           | 3           | 11          | —           | —           |
| All foreign producers and resellers   | 4,243       | 5,953       | 7,197       | 9,399       | 10,718      |

Table continued.

**Table 5.20 (Continued) QSP: Fab: Foreign industries' exports: Exports to the U.S., by foreign industry and period**

Quantity in 1,000 square feet; Interim period is January through September; Ranked by source with 1 as the greatest quantity

| Foreign industry                       | Interim<br>2024 | Interim<br>2025 | Projection<br>2025 | Projection<br>2026 | Rank |
|----------------------------------------|-----------------|-----------------|--------------------|--------------------|------|
| Canada                                 | ***             | ***             | ***                | ***                | —    |
| China                                  | ***             | ***             | ***                | ***                | —    |
| Czechia                                | ***             | ***             | ***                | ***                | —    |
| India                                  | ***             | ***             | ***                | ***                | 6    |
| Israel                                 | ***             | ***             | ***                | ***                | —    |
| Italy                                  | ***             | ***             | ***                | ***                | —    |
| Malaysia                               | ***             | ***             | ***                | ***                | 5    |
| Mexico                                 | ***             | ***             | ***                | ***                | —    |
| Spain                                  | ***             | ***             | ***                | ***                | 4    |
| Taiwan                                 | ***             | ***             | ***                | ***                | 8    |
| Thailand                               | ***             | ***             | ***                | ***                | 3    |
| Turkey                                 | ***             | ***             | ***                | ***                | 7    |
| Vietnam                                | ***             | ***             | ***                | ***                | 1    |
| Other FTA partner countries            | ***             | ***             | ***                | ***                | 9    |
| All other reporting foreign industries | ***             | ***             | ***                | ***                | 2    |
| All foreign industries                 | 8,158           | 8,401           | 11,104             | 11,265             | NA   |
| All resellers                          | —               | —               | —                  | —                  | NA   |
| All foreign industries and resellers   | 8,158           | 8,401           | 11,104             | 11,265             | NA   |

Table continued.

**Table 5.20 (Continued) QSP: Fab: Foreign industries' exports: Share of total shipments exported to the U.S., by foreign industry and period**

Share in percent

| <b>Foreign producers</b>              | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> |
|---------------------------------------|-------------|-------------|-------------|-------------|-------------|
| Canada                                | ***         | ***         | ***         | ***         | ***         |
| China                                 | ***         | ***         | ***         | ***         | ***         |
| Czechia                               | ***         | ***         | ***         | ***         | ***         |
| India                                 | ***         | ***         | ***         | ***         | ***         |
| Israel                                | ***         | ***         | ***         | ***         | ***         |
| Italy                                 | ***         | ***         | ***         | ***         | ***         |
| Malaysia                              | ***         | ***         | ***         | ***         | ***         |
| Mexico                                | ***         | ***         | ***         | ***         | ***         |
| Spain                                 | ***         | ***         | ***         | ***         | ***         |
| Taiwan                                | ***         | ***         | ***         | ***         | ***         |
| Thailand                              | ***         | ***         | ***         | ***         | ***         |
| Turkey                                | ***         | ***         | ***         | ***         | ***         |
| Vietnam                               | ***         | ***         | ***         | ***         | ***         |
| Other FTA partner countries           | ***         | ***         | ***         | ***         | ***         |
| All other reporting foreign producers | ***         | ***         | ***         | ***         | ***         |
| All foreign producers                 | 52.0        | 75.6        | 68.6        | 79.6        | 81.7        |
| All resellers                         | 0.0         | 0.0         | 0.1         | —           | —           |
| All foreign producers and resellers   | 52.1        | 75.7        | 68.7        | 79.6        | 81.7        |

Table continued.

**Table 5.20 (Continued) QSP: Fab: Foreign industries' exports: Share of total shipments exported to the U.S., by foreign industry and period**

Share in percent; Interim period is January through September; Ranked by source with 1 as the highest share

| Foreign industry                       | Interim 2024 | Interim 2025 | Projection 2025 | Projection 2026 | Rank |
|----------------------------------------|--------------|--------------|-----------------|-----------------|------|
| Canada                                 | ***          | ***          | ***             | ***             | —    |
| China                                  | ***          | ***          | ***             | ***             | —    |
| Czechia                                | ***          | ***          | ***             | ***             | —    |
| India                                  | ***          | ***          | ***             | ***             | 6    |
| Israel                                 | ***          | ***          | ***             | ***             | —    |
| Italy                                  | ***          | ***          | ***             | ***             | —    |
| Malaysia                               | ***          | ***          | ***             | ***             | 7    |
| Mexico                                 | ***          | ***          | ***             | ***             | —    |
| Spain                                  | ***          | ***          | ***             | ***             | 9    |
| Taiwan                                 | ***          | ***          | ***             | ***             | 1    |
| Thailand                               | ***          | ***          | ***             | ***             | 5    |
| Turkey                                 | ***          | ***          | ***             | ***             | 4    |
| Vietnam                                | ***          | ***          | ***             | ***             | 8    |
| Other FTA partner countries            | ***          | ***          | ***             | ***             | 2    |
| All other reporting foreign industries | ***          | ***          | ***             | ***             | 3    |
| All foreign industries                 | 81.5         | 78.7         | 78.5            | 80.4            | NA   |
| All resellers                          | —            | —            | —               | —               | NA   |
| All foreign industries and resellers   | 81.5         | 78.7         | 78.5            | 80.4            | NA   |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Rank compares the sources across the full and projection year data. Interim periods are not included in the rank calculation since the quantities are already included in the full and projection years. Ranks for share and ratio data are based on recalculated totals across the full and projection years.

***Combined slab and fab exports to the United States by source***

Table 5.21 presents responding foreign firms' combined exports of slabs and fabricated slabs to the United States by source.

**Table 5.21 QSP: Combined slabs and fabs: Foreign industries' exports: Exports to the U.S., by foreign industry and period**

Quantity in 1,000 square feet

| <b>Foreign industry</b>              | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> |
|--------------------------------------|-------------|-------------|-------------|-------------|-------------|
| Canada                               | ***         | ***         | ***         | ***         | ***         |
| China                                | ***         | ***         | ***         | ***         | ***         |
| Czechia                              | ***         | ***         | ***         | ***         | ***         |
| India                                | ***         | ***         | ***         | ***         | ***         |
| Israel                               | ***         | ***         | ***         | ***         | ***         |
| Italy                                | ***         | ***         | ***         | ***         | ***         |
| Malaysia                             | ***         | ***         | ***         | ***         | ***         |
| Mexico                               | ***         | ***         | ***         | ***         | ***         |
| Spain                                | ***         | ***         | ***         | ***         | ***         |
| Taiwan                               | ***         | ***         | ***         | ***         | ***         |
| Thailand                             | ***         | ***         | ***         | ***         | ***         |
| Turkey                               | ***         | ***         | ***         | ***         | ***         |
| Vietnam                              | ***         | ***         | ***         | ***         | ***         |
| Other FTA partner countries          | ***         | ***         | ***         | ***         | ***         |
| All other foreign industries         | ***         | ***         | ***         | ***         | ***         |
| All foreign industries               | 102,516     | 153,782     | 165,039     | 159,633     | 203,270     |
| All resellers                        | 1,347       | 2,593       | 960         | 382         | 2,994       |
| All foreign industries and resellers | 103,863     | 156,375     | 165,998     | 160,015     | 206,264     |

Table continued.

**Table 5.21 (Continued) QSP: Combined slabs and fabs: Foreign industries' exports: Exports to the U.S., by foreign industry and period**

Quantity in 1,000 square feet; Interim period is January through September; Ranked by source with 1 as the highest quantity

| Foreign industry                       | Interim<br>2024 | Interim<br>2025 | Projection<br>2025 | Projection<br>2026 | Rank |
|----------------------------------------|-----------------|-----------------|--------------------|--------------------|------|
| Canada                                 | ***             | ***             | ***                | ***                | 6    |
| China                                  | ***             | ***             | ***                | ***                | —    |
| Czechia                                | ***             | ***             | ***                | ***                | 10   |
| India                                  | ***             | ***             | ***                | ***                | 1    |
| Israel                                 | ***             | ***             | ***                | ***                | 8    |
| Italy                                  | ***             | ***             | ***                | ***                | 13   |
| Malaysia                               | ***             | ***             | ***                | ***                | 5    |
| Mexico                                 | ***             | ***             | ***                | ***                | —    |
| Spain                                  | ***             | ***             | ***                | ***                | 3    |
| Taiwan                                 | ***             | ***             | ***                | ***                | 12   |
| Thailand                               | ***             | ***             | ***                | ***                | 4    |
| Turkey                                 | ***             | ***             | ***                | ***                | 9    |
| Vietnam                                | ***             | ***             | ***                | ***                | 2    |
| Other FTA partner countries            | ***             | ***             | ***                | ***                | 11   |
| All other reporting foreign industries | ***             | ***             | ***                | ***                | 7    |
| All foreign industries                 | 148,350         | 129,667         | 166,393            | 179,480            | NA   |
| All resellers                          | 2,445           | 1,189           | 1,616              | 1,662              | NA   |
| All foreign industries and resellers   | 150,795         | 130,857         | 168,010            | 181,142            | NA   |

Table continued.

**Table 5.21 (Continued) QSP: Combined slabs and fabs: Foreign industries' exports: Share of total shipments exported to the U.S., by foreign industry and period**

Share in percent

| Foreign industry                     | 2020 | 2021 | 2022 | 2023 | 2024 |
|--------------------------------------|------|------|------|------|------|
| Canada                               | ***  | ***  | ***  | ***  | ***  |
| China                                | ***  | ***  | ***  | ***  | ***  |
| Czechia                              | ***  | ***  | ***  | ***  | ***  |
| India                                | ***  | ***  | ***  | ***  | ***  |
| Israel                               | ***  | ***  | ***  | ***  | ***  |
| Italy                                | ***  | ***  | ***  | ***  | ***  |
| Malaysia                             | ***  | ***  | ***  | ***  | ***  |
| Mexico                               | ***  | ***  | ***  | ***  | ***  |
| Spain                                | ***  | ***  | ***  | ***  | ***  |
| Taiwan                               | ***  | ***  | ***  | ***  | ***  |
| Thailand                             | ***  | ***  | ***  | ***  | ***  |
| Turkey                               | ***  | ***  | ***  | ***  | ***  |
| Vietnam                              | ***  | ***  | ***  | ***  | ***  |
| Other FTA partner countries          | ***  | ***  | ***  | ***  | ***  |
| All other foreign industries         | ***  | ***  | ***  | ***  | ***  |
| All foreign industries               | 50.4 | 55.8 | 57.5 | 59.8 | 66.3 |
| All resellers                        | 0.7  | 0.9  | 0.3  | 0.1  | 1.0  |
| All foreign industries and resellers | 51.0 | 56.8 | 57.8 | 59.9 | 67.2 |

Table continued.



**Table 5.21 (Continued) QSP: Combined slabs and fabs: Foreign industries' exports: Share of total shipments exported to the U.S., by foreign industry and period**

Share in percent; Interim period is January through September; Ranked by source with 1 as the highest share

| Foreign industry                       | Interim 2024 | Interim 2025 | Projection 2025 | Projection 2026 | Rank |
|----------------------------------------|--------------|--------------|-----------------|-----------------|------|
| Canada                                 | ***          | ***          | ***             | ***             | 5    |
| China                                  | ***          | ***          | ***             | ***             | —    |
| Czechia                                | ***          | ***          | ***             | ***             | 9    |
| India                                  | ***          | ***          | ***             | ***             | 4    |
| Israel                                 | ***          | ***          | ***             | ***             | 10   |
| Italy                                  | ***          | ***          | ***             | ***             | 11   |
| Malaysia                               | ***          | ***          | ***             | ***             | 3    |
| Mexico                                 | ***          | ***          | ***             | ***             | —    |
| Spain                                  | ***          | ***          | ***             | ***             | 8    |
| Taiwan                                 | ***          | ***          | ***             | ***             | 1    |
| Thailand                               | ***          | ***          | ***             | ***             | 2    |
| Turkey                                 | ***          | ***          | ***             | ***             | 13   |
| Vietnam                                | ***          | ***          | ***             | ***             | 6    |
| Other FTA partner countries            | ***          | ***          | ***             | ***             | 12   |
| All other reporting foreign industries | ***          | ***          | ***             | ***             | 7    |
| All foreign industries                 | 66.2         | 62.2         | 62.5            | 61.4            | NA   |
| All resellers                          | 1.1          | 0.6          | 0.6             | 0.6             | NA   |
| All foreign industries and resellers   | 67.3         | 62.8         | 63.2            | 62.0            | NA   |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Rank compares the sources across the full and projection year data. Interim periods are not included in the rank calculation since the quantities are already included in the full and projection years. Ranks for share and ratio data are based on recalculated totals across the full and projection years.

## Total exports by source

### *Slab total exports by source*

Table 5.22 presents responding foreign firms' exports of slabs to all destinations by source.

**Table 5.22 QSP: Slab: Foreign industries' exports: Total exports, by foreign industry and period**

Quantity in 1,000 square feet

| Foreign industry             | 2020    | 2021    | 2022    | 2023    | 2024    |
|------------------------------|---------|---------|---------|---------|---------|
| Canada                       | ***     | ***     | ***     | ***     | ***     |
| China                        | ***     | ***     | ***     | ***     | ***     |
| Czechia                      | ***     | ***     | ***     | ***     | ***     |
| India                        | ***     | ***     | ***     | ***     | ***     |
| Israel                       | ***     | ***     | ***     | ***     | ***     |
| Italy                        | ***     | ***     | ***     | ***     | ***     |
| Malaysia                     | ***     | ***     | ***     | ***     | ***     |
| Mexico                       | ***     | ***     | ***     | ***     | ***     |
| Spain                        | ***     | ***     | ***     | ***     | ***     |
| Taiwan                       | ***     | ***     | ***     | ***     | ***     |
| Thailand                     | ***     | ***     | ***     | ***     | ***     |
| Turkey                       | ***     | ***     | ***     | ***     | ***     |
| Vietnam                      | ***     | ***     | ***     | ***     | ***     |
| Other FTA partner countries  | ***     | ***     | ***     | ***     | ***     |
| All other foreign industries | ***     | ***     | ***     | ***     | ***     |
| All foreign industries       | 162,271 | 224,768 | 233,231 | 212,543 | 249,482 |

Table continued.

**Table 5.22 (Continued) QSP: Slab: Foreign industries' exports: Total exports, by foreign industry and period**

Quantity in 1,000 square feet; Interim period is January through September; Ranked by source with 1 as the greatest quantity

| Foreign industry                       | Interim<br>2024 | Interim<br>2025 | Projection<br>2025 | Projection<br>2026 | Rank |
|----------------------------------------|-----------------|-----------------|--------------------|--------------------|------|
| Canada                                 | ***             | ***             | ***                | ***                | 9    |
| China                                  | ***             | ***             | ***                | ***                | —    |
| Czechia                                | ***             | ***             | ***                | ***                | 8    |
| India                                  | ***             | ***             | ***                | ***                | 1    |
| Israel                                 | ***             | ***             | ***                | ***                | 4    |
| Italy                                  | ***             | ***             | ***                | ***                | 11   |
| Malaysia                               | ***             | ***             | ***                | ***                | 6    |
| Mexico                                 | ***             | ***             | ***                | ***                | —    |
| Spain                                  | ***             | ***             | ***                | ***                | 2    |
| Taiwan                                 | ***             | ***             | ***                | ***                | 13   |
| Thailand                               | ***             | ***             | ***                | ***                | 5    |
| Turkey                                 | ***             | ***             | ***                | ***                | 10   |
| Vietnam                                | ***             | ***             | ***                | ***                | 3    |
| Other FTA partner countries            | ***             | ***             | ***                | ***                | 12   |
| All other reporting foreign industries | ***             | ***             | ***                | ***                | 7    |
| All foreign industries                 | 181,324         | 165,810         | 209,678            | 231,789            | NA   |

Table continued.

**Table 5.22 (Continued) QSP: Slab: Foreign industries' exports: Share of total shipments exported, by foreign industry and period**

Share in percent

| Foreign industry             | 2020 | 2021 | 2022 | 2023 | 2024 |
|------------------------------|------|------|------|------|------|
| Canada                       | ***  | ***  | ***  | ***  | ***  |
| China                        | ***  | ***  | ***  | ***  | ***  |
| Czechia                      | ***  | ***  | ***  | ***  | ***  |
| India                        | ***  | ***  | ***  | ***  | ***  |
| Israel                       | ***  | ***  | ***  | ***  | ***  |
| Italy                        | ***  | ***  | ***  | ***  | ***  |
| Malaysia                     | ***  | ***  | ***  | ***  | ***  |
| Mexico                       | ***  | ***  | ***  | ***  | ***  |
| Spain                        | ***  | ***  | ***  | ***  | ***  |
| Taiwan                       | ***  | ***  | ***  | ***  | ***  |
| Thailand                     | ***  | ***  | ***  | ***  | ***  |
| Turkey                       | ***  | ***  | ***  | ***  | ***  |
| Vietnam                      | ***  | ***  | ***  | ***  | ***  |
| Other FTA partner countries  | ***  | ***  | ***  | ***  | ***  |
| All other foreign industries | ***  | ***  | ***  | ***  | ***  |
| All foreign industries       | 79.7 | 81.6 | 81.2 | 79.6 | 81.3 |

Table continued.

**Table 5.22 (Continued) QSP: Slab: Foreign industries' exports: Share of total shipments exported, by foreign industry and period**

Share in percent; Interim period is January through September; Ranked by source with 1 as the highest share

| Foreign industry                       | Interim 2024 | Interim 2025 | Projection 2025 | Projection 2026 | Rank |
|----------------------------------------|--------------|--------------|-----------------|-----------------|------|
| Canada                                 | ***          | ***          | ***             | ***             | 10   |
| China                                  | ***          | ***          | ***             | ***             | —    |
| Czechia                                | ***          | ***          | ***             | ***             | 1    |
| India                                  | ***          | ***          | ***             | ***             | 7    |
| Israel                                 | ***          | ***          | ***             | ***             | 2    |
| Italy                                  | ***          | ***          | ***             | ***             | 11   |
| Malaysia                               | ***          | ***          | ***             | ***             | 3    |
| Mexico                                 | ***          | ***          | ***             | ***             | —    |
| Spain                                  | ***          | ***          | ***             | ***             | 6    |
| Taiwan                                 | ***          | ***          | ***             | ***             | 5    |
| Thailand                               | ***          | ***          | ***             | ***             | 4    |
| Turkey                                 | ***          | ***          | ***             | ***             | 13   |
| Vietnam                                | ***          | ***          | ***             | ***             | 9    |
| Other FTA partner countries            | ***          | ***          | ***             | ***             | 12   |
| All other reporting foreign industries | ***          | ***          | ***             | ***             | 8    |
| All foreign industries                 | 80.9         | 79.5         | 78.8            | 79.3            | NA   |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Rank compares the sources across the full and projection year data. Interim periods are not included in the rank calculation since the quantities are already included in the full and projection years. Ranks for share and ratio data are based on recalculated totals across the full and projection years.

***Fab total exports by source***

Table 5.23 presents responding foreign firms' exports of fabricated slabs to all destinations by source.

**Table 5.23 QSP: Fab: Foreign industries' exports: Total exports, by foreign industry and period**

Quantity in 1,000 square feet

| <b>Foreign industry</b>      | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> |
|------------------------------|-------------|-------------|-------------|-------------|-------------|
| Canada                       | ***         | ***         | ***         | ***         | ***         |
| China                        | ***         | ***         | ***         | ***         | ***         |
| Czechia                      | ***         | ***         | ***         | ***         | ***         |
| India                        | ***         | ***         | ***         | ***         | ***         |
| Israel                       | ***         | ***         | ***         | ***         | ***         |
| Italy                        | ***         | ***         | ***         | ***         | ***         |
| Malaysia                     | ***         | ***         | ***         | ***         | ***         |
| Mexico                       | ***         | ***         | ***         | ***         | ***         |
| Spain                        | ***         | ***         | ***         | ***         | ***         |
| Taiwan                       | ***         | ***         | ***         | ***         | ***         |
| Thailand                     | ***         | ***         | ***         | ***         | ***         |
| Turkey                       | ***         | ***         | ***         | ***         | ***         |
| Vietnam                      | ***         | ***         | ***         | ***         | ***         |
| Other FTA partner countries  | ***         | ***         | ***         | ***         | ***         |
| All other foreign industries | ***         | ***         | ***         | ***         | ***         |
| All foreign industries       | 5,233       | 7,234       | 8,690       | 10,511      | 11,512      |

Table continued.

**Table 5.23 (Continued) QSP: Fab: Foreign industries' exports: Total exports, by foreign industry and period**

Quantity in 1,000 square feet; Interim period is January through September; Ranked by source with 1 as the greatest quantity

| Foreign industry                       | Interim 2024 | Interim 2025 | Projection 2025 | Projection 2026 | Rank |
|----------------------------------------|--------------|--------------|-----------------|-----------------|------|
| Canada                                 | ***          | ***          | ***             | ***             | —    |
| China                                  | ***          | ***          | ***             | ***             | —    |
| Czechia                                | ***          | ***          | ***             | ***             | —    |
| India                                  | ***          | ***          | ***             | ***             | 6    |
| Israel                                 | ***          | ***          | ***             | ***             | —    |
| Italy                                  | ***          | ***          | ***             | ***             | —    |
| Malaysia                               | ***          | ***          | ***             | ***             | 5    |
| Mexico                                 | ***          | ***          | ***             | ***             | —    |
| Spain                                  | ***          | ***          | ***             | ***             | 3    |
| Taiwan                                 | ***          | ***          | ***             | ***             | 8    |
| Thailand                               | ***          | ***          | ***             | ***             | 4    |
| Turkey                                 | ***          | ***          | ***             | ***             | 7    |
| Vietnam                                | ***          | ***          | ***             | ***             | 1    |
| Other FTA partner countries            | ***          | ***          | ***             | ***             | 9    |
| All other reporting foreign industries | ***          | ***          | ***             | ***             | 2    |
| All foreign industries                 | 8,750        | 9,120        | 12,063          | 11,851          | NA   |

Table continued.

**Table 5.23 (Continued) QSP: Fab: Foreign industries' exports: Share of total shipments exported, by foreign industry and period**

Share in percent

| Foreign industry             | 2020 | 2021 | 2022 | 2023 | 2024 |
|------------------------------|------|------|------|------|------|
| Canada                       | ***  | ***  | ***  | ***  | ***  |
| China                        | ***  | ***  | ***  | ***  | ***  |
| Czechia                      | ***  | ***  | ***  | ***  | ***  |
| India                        | ***  | ***  | ***  | ***  | ***  |
| Israel                       | ***  | ***  | ***  | ***  | ***  |
| Italy                        | ***  | ***  | ***  | ***  | ***  |
| Malaysia                     | ***  | ***  | ***  | ***  | ***  |
| Mexico                       | ***  | ***  | ***  | ***  | ***  |
| Spain                        | ***  | ***  | ***  | ***  | ***  |
| Taiwan                       | ***  | ***  | ***  | ***  | ***  |
| Thailand                     | ***  | ***  | ***  | ***  | ***  |
| Turkey                       | ***  | ***  | ***  | ***  | ***  |
| Vietnam                      | ***  | ***  | ***  | ***  | ***  |
| Other FTA partner countries  | ***  | ***  | ***  | ***  | ***  |
| All other foreign industries | ***  | ***  | ***  | ***  | ***  |
| All foreign industries       | 64.2 | 92.0 | 83.0 | 89.0 | 87.8 |

Table continued.



**Table 5.23 (Continued) QSP: Fab: Foreign industries' exports: Share of total shipments exported, by foreign industry and period**

Share in percent; Interim period is January through September; Ranked by source with 1 as the highest share

| Foreign industry                       | Interim 2024 | Interim 2025 | Projection 2025 | Projection 2026 | Rank |
|----------------------------------------|--------------|--------------|-----------------|-----------------|------|
| Canada                                 | ***          | ***          | ***             | ***             | —    |
| China                                  | ***          | ***          | ***             | ***             | —    |
| Czechia                                | ***          | ***          | ***             | ***             | —    |
| India                                  | ***          | ***          | ***             | ***             | 6    |
| Israel                                 | ***          | ***          | ***             | ***             | —    |
| Italy                                  | ***          | ***          | ***             | ***             | —    |
| Malaysia                               | ***          | ***          | ***             | ***             | 9    |
| Mexico                                 | ***          | ***          | ***             | ***             | —    |
| Spain                                  | ***          | ***          | ***             | ***             | 5    |
| Taiwan                                 | ***          | ***          | ***             | ***             | 1    |
| Thailand                               | ***          | ***          | ***             | ***             | 7    |
| Turkey                                 | ***          | ***          | ***             | ***             | 4    |
| Vietnam                                | ***          | ***          | ***             | ***             | 8    |
| Other FTA partner countries            | ***          | ***          | ***             | ***             | 2    |
| All other reporting foreign industries | ***          | ***          | ***             | ***             | 3    |
| All foreign industries                 | 87.4         | 85.4         | 85.3            | 84.5            | NA   |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Rank compares the sources across the full and projection year data. Interim periods are not included in the rank calculation since the quantities are already included in the full and projection years. Ranks for share and ratio data are based on recalculated totals across the full and projection years.

## Ending inventories by source

### *Slab inventories by source*

Table 5.24 presents responding foreign firms' slab end-of-period inventories by source.

**Table 5.24 QSP: Slab: Foreign industries' inventories: End of period inventories, by foreign industry and period**

Quantity in 1,000 square feet

| Foreign industry             | 2020   | 2021   | 2022   | 2023   | 2024   |
|------------------------------|--------|--------|--------|--------|--------|
| Canada                       | ***    | ***    | ***    | ***    | ***    |
| China                        | ***    | ***    | ***    | ***    | ***    |
| Czechia                      | ***    | ***    | ***    | ***    | ***    |
| India                        | ***    | ***    | ***    | ***    | ***    |
| Israel                       | ***    | ***    | ***    | ***    | ***    |
| Italy                        | ***    | ***    | ***    | ***    | ***    |
| Malaysia                     | ***    | ***    | ***    | ***    | ***    |
| Mexico                       | ***    | ***    | ***    | ***    | ***    |
| Spain                        | ***    | ***    | ***    | ***    | ***    |
| Taiwan                       | ***    | ***    | ***    | ***    | ***    |
| Thailand                     | ***    | ***    | ***    | ***    | ***    |
| Turkey                       | ***    | ***    | ***    | ***    | ***    |
| Vietnam                      | ***    | ***    | ***    | ***    | ***    |
| Other FTA partner countries  | ***    | ***    | ***    | ***    | ***    |
| All other foreign industries | ***    | ***    | ***    | ***    | ***    |
| All foreign industries       | 47,296 | 55,341 | 69,544 | 75,115 | 74,001 |

Table continued.

**Table 5.24 (Continued) QSP: Slab: Foreign industries' inventories: End of period inventories, by foreign industry and period**

Quantity in 1,000 square feet; Interim period is January through September; Ranked by source with 1 as the greatest quantity

| Foreign industry                       | Interim<br>2024 | Interim<br>2025 | Projection<br>2025 | Projection<br>2026 | Rank |
|----------------------------------------|-----------------|-----------------|--------------------|--------------------|------|
| Canada                                 | ***             | ***             | ***                | ***                | 13   |
| China                                  | ***             | ***             | ***                | ***                | —    |
| Czechia                                | ***             | ***             | ***                | ***                | 7    |
| India                                  | ***             | ***             | ***                | ***                | 2    |
| Israel                                 | ***             | ***             | ***                | ***                | 5    |
| Italy                                  | ***             | ***             | ***                | ***                | 8    |
| Malaysia                               | ***             | ***             | ***                | ***                | 12   |
| Mexico                                 | ***             | ***             | ***                | ***                | —    |
| Spain                                  | ***             | ***             | ***                | ***                | 3    |
| Taiwan                                 | ***             | ***             | ***                | ***                | 4    |
| Thailand                               | ***             | ***             | ***                | ***                | 10   |
| Turkey                                 | ***             | ***             | ***                | ***                | 9    |
| Vietnam                                | ***             | ***             | ***                | ***                | 1    |
| Other FTA partner countries            | ***             | ***             | ***                | ***                | 11   |
| All other reporting foreign industries | ***             | ***             | ***                | ***                | 6    |
| All foreign industries                 | 75,764          | 71,917          | 72,663             | 74,614             | NA   |

Table continued.

**Table 5.24 (Continued) QSP: Slab: Foreign industries' inventories: Ratio of inventories to total shipments, by foreign industry and period**

Ratio in percent

| Foreign industry             | 2020 | 2021 | 2022 | 2023 | 2024 |
|------------------------------|------|------|------|------|------|
| Canada                       | ***  | ***  | ***  | ***  | ***  |
| China                        | ***  | ***  | ***  | ***  | ***  |
| Czechia                      | ***  | ***  | ***  | ***  | ***  |
| India                        | ***  | ***  | ***  | ***  | ***  |
| Israel                       | ***  | ***  | ***  | ***  | ***  |
| Italy                        | ***  | ***  | ***  | ***  | ***  |
| Malaysia                     | ***  | ***  | ***  | ***  | ***  |
| Mexico                       | ***  | ***  | ***  | ***  | ***  |
| Spain                        | ***  | ***  | ***  | ***  | ***  |
| Taiwan                       | ***  | ***  | ***  | ***  | ***  |
| Thailand                     | ***  | ***  | ***  | ***  | ***  |
| Turkey                       | ***  | ***  | ***  | ***  | ***  |
| Vietnam                      | ***  | ***  | ***  | ***  | ***  |
| Other FTA partner countries  | ***  | ***  | ***  | ***  | ***  |
| All other foreign industries | ***  | ***  | ***  | ***  | ***  |
| All foreign industries       | 23.2 | 20.1 | 24.2 | 28.1 | 24.1 |

Table continued.

**Table 5.24 (Continued) QSP: Slab: Foreign industries' inventories: Ratio of inventories to total shipments, by foreign industry and period**

Ratio in percent; Interim period is January through September; Ranked by source with 1 as the highest ratio

| Foreign industry                       | Interim 2024 | Interim 2025 | Projection 2025 | Projection 2026 | Rank |
|----------------------------------------|--------------|--------------|-----------------|-----------------|------|
| Canada                                 | ***          | ***          | ***             | ***             | 9    |
| China                                  | ***          | ***          | ***             | ***             | —    |
| Czechia                                | ***          | ***          | ***             | ***             | 5    |
| India                                  | ***          | ***          | ***             | ***             | 4    |
| Israel                                 | ***          | ***          | ***             | ***             | 8    |
| Italy                                  | ***          | ***          | ***             | ***             | 3    |
| Malaysia                               | ***          | ***          | ***             | ***             | 10   |
| Mexico                                 | ***          | ***          | ***             | ***             | —    |
| Spain                                  | ***          | ***          | ***             | ***             | 13   |
| Taiwan                                 | ***          | ***          | ***             | ***             | 1    |
| Thailand                               | ***          | ***          | ***             | ***             | 11   |
| Turkey                                 | ***          | ***          | ***             | ***             | 12   |
| Vietnam                                | ***          | ***          | ***             | ***             | 2    |
| Other FTA partner countries            | ***          | ***          | ***             | ***             | 7    |
| All other reporting foreign industries | ***          | ***          | ***             | ***             | 6    |
| All foreign industries                 | 25.3         | 25.9         | 27.3            | 25.5            | NA   |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Rank compares the sources across the full and projection year data. Interim periods are not included in the rank calculation since the quantities are already included in the full and projection years. Ranks for share and ratio data are based on recalculated totals across the full and projection years.

### ***Fab inventories by source***

Table 5.25 presents responding foreign firms' fabricated slab end-of-period inventories by source.

**Table 5.25 QSP: Fab: Foreign industries' inventories: End of period inventories, by foreign industry and period**

Quantity in 1,000 square feet

| <b>Foreign industry</b>      | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> |
|------------------------------|-------------|-------------|-------------|-------------|-------------|
| Canada                       | ***         | ***         | ***         | ***         | ***         |
| China                        | ***         | ***         | ***         | ***         | ***         |
| Czechia                      | ***         | ***         | ***         | ***         | ***         |
| India                        | ***         | ***         | ***         | ***         | ***         |
| Israel                       | ***         | ***         | ***         | ***         | ***         |
| Italy                        | ***         | ***         | ***         | ***         | ***         |
| Malaysia                     | ***         | ***         | ***         | ***         | ***         |
| Mexico                       | ***         | ***         | ***         | ***         | ***         |
| Spain                        | ***         | ***         | ***         | ***         | ***         |
| Taiwan                       | ***         | ***         | ***         | ***         | ***         |
| Thailand                     | ***         | ***         | ***         | ***         | ***         |
| Turkey                       | ***         | ***         | ***         | ***         | ***         |
| Vietnam                      | ***         | ***         | ***         | ***         | ***         |
| Other FTA partner countries  | ***         | ***         | ***         | ***         | ***         |
| All other foreign industries | ***         | ***         | ***         | ***         | ***         |
| All foreign industries       | 503         | 521         | 603         | 855         | 879         |

Table continued.

**Table 5.25 (Continued) QSP: Fab: Foreign industries' inventories: End of period inventories, by foreign industry and period**

Quantity in 1,000 square feet; Interim period is January through September; Ranked by source with 1 as the greatest quantity

| Foreign industry                       | Interim<br>2024 | Interim<br>2025 | Projection<br>2025 | Projection<br>2026 | Rank |
|----------------------------------------|-----------------|-----------------|--------------------|--------------------|------|
| Canada                                 | ***             | ***             | ***                | ***                | —    |
| China                                  | ***             | ***             | ***                | ***                | —    |
| Czechia                                | ***             | ***             | ***                | ***                | —    |
| India                                  | ***             | ***             | ***                | ***                | 7    |
| Israel                                 | ***             | ***             | ***                | ***                | —    |
| Italy                                  | ***             | ***             | ***                | ***                | —    |
| Malaysia                               | ***             | ***             | ***                | ***                | 6    |
| Mexico                                 | ***             | ***             | ***                | ***                | —    |
| Spain                                  | ***             | ***             | ***                | ***                | —    |
| Taiwan                                 | ***             | ***             | ***                | ***                | 3    |
| Thailand                               | ***             | ***             | ***                | ***                | 4    |
| Turkey                                 | ***             | ***             | ***                | ***                | 5    |
| Vietnam                                | ***             | ***             | ***                | ***                | 1    |
| Other FTA partner countries            | ***             | ***             | ***                | ***                | 8    |
| All other reporting foreign industries | ***             | ***             | ***                | ***                | 2    |
| All foreign industries                 | 933             | 711             | 612                | 502                | NA   |

Table continued.

**Table 5.25 (Continued) QSP: Fab: Foreign industries' inventories: Ratio of inventories to total shipments, by foreign industry and period**

Ratio in percent

| Foreign industry             | 2020 | 2021 | 2022 | 2023 | 2024 |
|------------------------------|------|------|------|------|------|
| Canada                       | ***  | ***  | ***  | ***  | ***  |
| China                        | ***  | ***  | ***  | ***  | ***  |
| Czechia                      | ***  | ***  | ***  | ***  | ***  |
| India                        | ***  | ***  | ***  | ***  | ***  |
| Israel                       | ***  | ***  | ***  | ***  | ***  |
| Italy                        | ***  | ***  | ***  | ***  | ***  |
| Malaysia                     | ***  | ***  | ***  | ***  | ***  |
| Mexico                       | ***  | ***  | ***  | ***  | ***  |
| Spain                        | ***  | ***  | ***  | ***  | ***  |
| Taiwan                       | ***  | ***  | ***  | ***  | ***  |
| Thailand                     | ***  | ***  | ***  | ***  | ***  |
| Turkey                       | ***  | ***  | ***  | ***  | ***  |
| Vietnam                      | ***  | ***  | ***  | ***  | ***  |
| Other FTA partner countries  | ***  | ***  | ***  | ***  | ***  |
| All other foreign industries | ***  | ***  | ***  | ***  | ***  |
| All foreign industries       | 6.2  | 6.6  | 5.8  | 7.2  | 6.7  |

Table continued.



**Table 5.25 (Continued) QSP: Fab: Foreign industries' inventories: Ratio of inventories to total shipments, by foreign industry and period**

Ratio in percent; Interim period is January through September; Ranked by source with 1 as the highest ratio

| Foreign industry                       | Interim 2024 | Interim 2025 | Projection 2025 | Projection 2026 | Rank |
|----------------------------------------|--------------|--------------|-----------------|-----------------|------|
| Canada                                 | ***          | ***          | ***             | ***             | —    |
| China                                  | ***          | ***          | ***             | ***             | —    |
| Czechia                                | ***          | ***          | ***             | ***             | —    |
| India                                  | ***          | ***          | ***             | ***             | 8    |
| Israel                                 | ***          | ***          | ***             | ***             | —    |
| Italy                                  | ***          | ***          | ***             | ***             | —    |
| Malaysia                               | ***          | ***          | ***             | ***             | 6    |
| Mexico                                 | ***          | ***          | ***             | ***             | —    |
| Spain                                  | ***          | ***          | ***             | ***             | —    |
| Taiwan                                 | ***          | ***          | ***             | ***             | 1    |
| Thailand                               | ***          | ***          | ***             | ***             | 5    |
| Turkey                                 | ***          | ***          | ***             | ***             | 2    |
| Vietnam                                | ***          | ***          | ***             | ***             | 7    |
| Other FTA partner countries            | ***          | ***          | ***             | ***             | 3    |
| All other reporting foreign industries | ***          | ***          | ***             | ***             | 4    |
| All foreign industries                 | 7.0          | 5.0          | 4.3             | 3.6             | NA   |

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Rank compares the sources across the full and projection year data. Interim periods are not included in the rank calculation since the quantities are already included in the full and projection years. Ranks for share and ratio data are based on recalculated totals across the full and projection years.

## Alternative products

### *Slab alternative products*

Table 5.26 presents responding foreign firms' reported production of other products on the same machinery and equipment used to produce slabs. \*\*\* reported production of low-silica materials and jumbo quartz products on the same equipment used to produce slabs.

**Table 5.26 QSP: Slab: Producers' in foreign industries overall production on the same equipment, by product type and period**

Quantities in 1,000 square feet; Shares in percent

| Product type   | Measure  | 2020    | 2021    | 2022    | 2023    | 2024    |
|----------------|----------|---------|---------|---------|---------|---------|
| QSP            | Quantity | 207,888 | 289,259 | 304,476 | 274,227 | 303,237 |
| Other products | Quantity | —       | —       | —       | —       | 216     |
| All products   | Quantity | 207,888 | 289,259 | 304,476 | 274,227 | 303,453 |
| QSP            | Share    | 100.0   | 100.0   | 100.0   | 100.0   | 99.9    |
| Other products | Share    | —       | —       | —       | —       | 0.1     |
| All products   | Share    | 100.0   | 100.0   | 100.0   | 100.0   | 100.0   |

Table continued.

**Table 5.26 (Continued) QSP: Slab: Producers' in foreign industries overall production on the same equipment, by product type and period**

Quantities in 1,000 square feet; Shares in percent; Interim period is January through September

| Product type   | Measure  | Interim 2024 | Interim 2025 |
|----------------|----------|--------------|--------------|
| QSP            | Quantity | 225,364      | 206,908      |
| Other products | Quantity | 0            | 421          |
| All products   | Quantity | 225,364      | 207,329      |
| QSP            | Share    | 100.0        | 99.8         |
| Other products | Share    | 0.0          | 0.2          |
| All products   | Share    | 100.0        | 100.0        |

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

Note: Quantities shown as "0" represent values greater than zero, but less than "500". Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

### ***Fab alternative products***

Table 5.27 presents responding foreign firms' reported production of other products on the same machinery and equipment used to produce fabricated slabs. \*\*\* reported production of natural and engineered marble, as well as \*\*\* slabs, on the same equipment used to fabricate slabs.

**Table 5.27 QSP: Fab: Producers' in foreign industries overall production on the same equipment, by product type and period**

Quantities in 1,000 square feet; Shares in percent

| Product type   | Measure  | 2020   | 2021   | 2022   | 2023   | 2024   |
|----------------|----------|--------|--------|--------|--------|--------|
| QSP            | Quantity | 10,959 | 9,942  | 12,449 | 13,099 | 15,529 |
| Other products | Quantity | 2,996  | 5,679  | 6,135  | 11,006 | 11,733 |
| All products   | Quantity | 13,956 | 15,621 | 18,585 | 24,106 | 27,262 |
| QSP            | Share    | 78.5   | 63.6   | 67.0   | 54.3   | 57.0   |
| Other products | Share    | 21.5   | 36.4   | 33.0   | 45.7   | 43.0   |
| All products   | Share    | 100.0  | 100.0  | 100.0  | 100.0  | 100.0  |

Table continued.

**Table 5.27 (Continued) QSP: Fab: Producers' in foreign industries overall production on the same equipment, by product type and period**

Quantities in 1,000 square feet; Shares in percent; Interim period is January through September

| Product type   | Measure  | Interim 2024 | Interim 2025 |
|----------------|----------|--------------|--------------|
| QSP            | Quantity | 11,883       | 12,258       |
| Other products | Quantity | 8,927        | 11,313       |
| All products   | Quantity | 20,811       | 23,571       |
| QSP            | Share    | 57.1         | 52.0         |
| Other products | Share    | 42.9         | 48.0         |
| All products   | Share    | 100.0        | 100.0        |

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

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

## Global exports

Table 5.28 presents Global Trade Atlas (“GTA”) global exports, from the United States and other foreign industries, by value, of articles of cement, concrete or artificial stone, whether or not reinforced, a category that includes QSP and out-of-scope products. China (24.7), Spain (12.9), and Vietnam (10.0) were the leading exporters in 2024, accounting for a combined 47.6 percent of total exports. Among the leading exporters from 2020 to 2024, China’s share of total exports declined by 17.7 percentage points while exports from Spain, India, and Vietnam all increased.

**Table 5.28 Articles of cement, concrete or artificial stone, whether or not reinforced: Global exports, by reporting country and period**

Value in 1,000 dollars

| Exporting country       | Measure | 2020      | 2021      | 2022      | 2023      | 2024      |
|-------------------------|---------|-----------|-----------|-----------|-----------|-----------|
| United States           | Value   | 117,897   | 163,022   | 147,920   | 130,202   | 119,613   |
| China                   | Value   | 2,342,657 | 2,798,937 | 2,710,762 | 1,740,013 | 1,224,517 |
| Spain                   | Value   | 556,331   | 817,627   | 833,999   | 715,921   | 639,132   |
| Vietnam                 | Value   | 348,970   | 526,518   | 538,397   | 484,989   | 498,056   |
| India                   | Value   | 139,092   | 257,081   | 287,363   | 276,938   | 316,836   |
| Germany                 | Value   | 360,672   | 472,263   | 451,697   | 314,668   | 295,771   |
| Mexico                  | Value   | —         | 212,018   | 244,155   | 253,780   | 232,096   |
| Malaysia                | Value   | 192,062   | 288,138   | 154,945   | 178,470   | 182,552   |
| Poland                  | Value   | 172,047   | 220,059   | 180,940   | 189,993   | 164,473   |
| Canada                  | Value   | 190,312   | 209,649   | 202,203   | 144,255   | 125,755   |
| Italy                   | Value   | 107,251   | 162,363   | 150,646   | 130,973   | 117,063   |
| Netherlands             | Value   | 92,465    | 137,218   | 145,899   | 118,521   | 102,946   |
| Thailand                | Value   | 20,822    | 37,726    | 50,780    | 95,286    | 91,701    |
| Turkey                  | Value   | 60,501    | 103,801   | 101,590   | 84,801    | 84,607    |
| All other exporters     | Value   | 819,675   | 956,038   | 772,671   | 723,870   | 763,718   |
| All reporting exporters | Value   | 5,520,753 | 7,362,460 | 6,973,967 | 5,582,680 | 4,958,835 |

Table continued.

**Table 5.28 (Continued) Articles of cement, concrete or artificial stone, whether or not reinforced:  
Global exports, by reporting country and period**

Share in percent

| Exporting country       | Measure        | 2020  | 2021  | 2022  | 2023  | 2024  |
|-------------------------|----------------|-------|-------|-------|-------|-------|
| United States           | Share of value | 2.1   | 2.2   | 2.1   | 2.3   | 2.4   |
| China                   | Share of value | 42.4  | 38.0  | 38.9  | 31.2  | 24.7  |
| Spain                   | Share of value | 10.1  | 11.1  | 12.0  | 12.8  | 12.9  |
| Vietnam                 | Share of value | 6.3   | 7.2   | 7.7   | 8.7   | 10.0  |
| India                   | Share of value | 2.5   | 3.5   | 4.1   | 5.0   | 6.4   |
| Germany                 | Share of value | 6.5   | 6.4   | 6.5   | 5.6   | 6.0   |
| Mexico                  | Share of value | —     | 2.9   | 3.5   | 4.5   | 4.7   |
| Malaysia                | Share of value | 3.5   | 3.9   | 2.2   | 3.2   | 3.7   |
| Poland                  | Share of value | 3.1   | 3.0   | 2.6   | 3.4   | 3.3   |
| Canada                  | Share of value | 3.4   | 2.8   | 2.9   | 2.6   | 2.5   |
| Italy                   | Share of value | 1.9   | 2.2   | 2.2   | 2.3   | 2.4   |
| Netherlands             | Share of value | 1.7   | 1.9   | 2.1   | 2.1   | 2.1   |
| Thailand                | Share of value | 0.4   | 0.5   | 0.7   | 1.7   | 1.8   |
| Turkey                  | Share of value | 1.1   | 1.4   | 1.5   | 1.5   | 1.7   |
| All other exporters     | Share of value | 14.8  | 13.0  | 11.1  | 13.0  | 15.4  |
| All reporting exporters | Share of value | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Source: Official exports statistics and official global import statistics from Vietnam (constructed exports) under HS subheading 6810.99 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed January 19, 2026.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". United States is shown at the top followed by other top exporting countries in descending order of 2024 value data.



## Part 6: Other competitive dynamics of the U.S. market

### U.S. market characteristics

Quartz surface products are used in various interior hard surface applications including countertops, backsplashes, tabletops, flooring, and other applications. QSP are a high performing, durable, and low maintenance interior surface product. QSP is typically sold as rectangular slabs or fabricated slabs with a total surface area of approximately 45 to 60 square feet and a nominal thickness of one, two, or three centimeters. The U.S. market for quartz surface products has expanded as the products have developed a reputation for being durable and low maintenance indoor surfaces, offered in a variety of patterns and colors, such as mimicking the look of natural quarried stone.<sup>1</sup>

Six of eight U.S. producers, 29 of 84 responding importers, and 11 of 25 responding purchasers indicated that the market was subject to distinctive conditions of competition. Specifically, U.S. producer \*\*\* reported that the QSP market is segmented into a premium and lower priced portion of the market. It further stated that these two segments do not overlap and it is the lower priced segment of the market that faced competition from foreign sources, specifically from Asia. U.S. producer \*\*\* reported that narrowing quality differences between products from the United States and foreign sources has caused price to become increasingly important and competition has become increasingly direct between products from the United States and importers. U.S. producer \*\*\* reported that competition is driven by price, design, and availability. U.S. producer \*\*\* reported that the QSP market was driven by construction and renovation cycles which are seasonal, as construction and renovation tends to occur mostly in the summer months and less frequently in the winter months.

A number of importers reported that factors like color, pattern, design, surface finishing, fabrication skill, and aesthetic trends are factors that are unique to the QSP market. A number of importers also reported that consumers have a choice between different materials for the same application (namely porcelain and laminate products) and this choice between materials creates unique conditions of competition in the QSP market. Importer \*\*\* reported that the QSP market is segmented into premium high-end products and standard quality mass market products. It also reported that innovative design is an important factor that has been constantly evolving throughout many years. Importer \*\*\* reported that lawsuits

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<sup>1</sup> Petition, pp. 16 to 18.

concerning the safety of fabricating quartz are a unique factor that is impacting the QSP market.

Several purchasers similarly reported that there are a number of factors such as brand, aesthetics, design, color, and pattern that are unique to the QSP market. Purchasers reported that the QSP market is especially price sensitive. Additionally, purchaser \*\*\* reported that suppliers will decrease their prices to gain more volume in the market.

Apparent U.S. consumption of QSP increased 62.6 percent from 2020 to 2024. Apparent consumption was 1.2 percent lower in interim 2025 compared to interim 2024.

## **U.S. purchasers**

The Commission received 27 usable questionnaire responses from firms that had purchased QSP during January 2020 to September 2025.<sup>2 3</sup> Sixteen responding purchasers are distributors, nine are fabricators and retailers, one is a contractor and builder, and one is a U.S. manufacturer. In general, responding U.S. purchasers were located in the North Eastern, South Eastern, Central Southwestern, Midwestern, and Pacific Coastal regions of the United States. Large purchasers of QSP include \*\*\*. Large purchasers who reported importing QSP include \*\*\*.

## **Exclusivity Agreements**

Four of eight U.S. producers reported that they have an exclusivity agreement for distribution or retail. \*\*\* reported a \*\*\*. \*\*\* reported that it \*\*\*. \*\*\* reported that it \*\*\*. \*\*\* reported that \*\*\*. \*\*\* reported an exclusivity agreement with \*\*\*.

Two of 24 responding purchasers that are not U.S. producers reported that they have an exclusivity agreement. Purchaser \*\*\* reported that it has an agreement to \*\*\*

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<sup>2</sup> The following firms provided purchaser questionnaire responses: \*\*\*.

<sup>3</sup> Of the 27 responding purchasers, 16 purchased the domestic QSP, 17 purchased imports of the subject merchandise from foreign sources, and 7 purchasers reported purchases from unknown sources.



\*\*\* reported that it has \*\*\*.

## **Impact of section 301 tariffs and of new and modified tariffs**

U.S. producers, importers, and purchasers were asked to report the impact of section 301 tariffs and of new/modified tariffs (IEEPA, reciprocal) on overall demand, supply, prices, or raw material costs (tables 6.1 and 6.2). The majority of responding U.S. producers, importers, and purchasers that did not report 'don't know' to the question indicated that section 301 and IEEPA tariffs had impacted the U.S. market for QSP. U.S. producer \*\*\* reported that section 301 tariffs increased the landed costs of Chinese imports which made them less competitive which led to an overall decline in Chinese imports. It also reported that firms began to source product from other countries which caused short-term supply disruptions which led to longer lead times that negatively impacted some projects. U.S. producer \*\*\* reported that while section 301 tariffs increased the price of QSP from China it failed to address the issue caused by Chinese firms' production in other Southeast Asian countries. U.S. producer \*\*\* reported that section 301 tariffs shifted supply chains to other countries including but not limited to Turkey, Vietnam, Malaysia, Thailand, and Indonesia. A number of importers reported that section 301 tariffs limited the presence of Chinese QSP in the U.S. market but that producers in other foreign countries entered or increased their presence in the U.S. market as a result. Purchasers generally reported that section 301 tariffs had increased the prices of QSP and had caused firms to alter their supply chains to continue to source QSP. Purchaser \*\*\* reported that section 301 tariffs caused a lack of supply, increased lead times and some homes to switch to granite as an alternative.

U.S. producers generally reported that new or modified tariffs resulted in price increases for QSP but that some import sources were able to absorb the tariffs while some were excluded from the market by them as tariff rates varied by country. Importers generally reported that new or modified tariffs resulted in price increases but were mixed as a number of firms reporting they had absorbed these costs while other firms reported that they had passed these increased costs on to their customers. Importers were also mixed with respect to how these new or modified tariffs had impacted demand. A number of firms reported that new or modified tariffs had decreased demand while others reported that demand had remained constant despite the imposition of additional tariffs. Purchasers generally reported increased prices and decreased demand as a result of new or modified tariffs.

**Table 6.1 QSP: Count of firms' responses regarding the impact of the section 301 tariffs on Chinese origin products**

Count in number of firms reporting

| Firm type      | No | Yes | Don't know |
|----------------|----|-----|------------|
| U.S. producers | 2  | 4   | 2          |
| Importers      | 21 | 36  | 28         |
| Purchasers     | 4  | 12  | 10         |

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

**Table 6.2 QSP: Count of firms' responses regarding the impact of new or modified tariffs QSP imports**

Count in number of firms reporting

| Firm type      | No | Yes | Don't know |
|----------------|----|-----|------------|
| U.S. producers | 2  | 5   | 1          |
| Importers      | 9  | 67  | 9          |
| Purchasers     | 0  | 21  | 5          |

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

## Impact of the COVID-19 pandemic

U.S. producers, importers, and purchasers were asked to report the impact of the COVID-19 pandemic on overall demand, supply, prices, or raw material costs (tables 6.3)<sup>4</sup>. A majority of responding U.S. producers reported that the COVID-19 pandemic had impacted the U.S. market for QSP, while a majority of importers, and foreign producers reported that there was no impact. U.S. producers largely reported supply chain disruptions with high freight rates caused by container shortages. These disruptions affected shipments of raw materials and finished products with often delayed deliveries. On the positive side, the COVID-19 pandemic was reported to have resulted in a brief increase in demand in 2021 and 2022 for QSP due to more renovation activity, but demand reportedly returned to normal by 2023. The pandemic-related operational challenges were reported to be largely mitigated by early 2023.

Importers and foreign producers reported similar supply chain disruptions with the addition of factory shutdowns in countries such as India, Vietnam, and China. They also reported a large increase in ocean freight costs.

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<sup>4</sup> For narratives on the impact of the COVID-19 pandemic on firms' QSP operations, see appendix H.

**Table 6.3 QSP: Count of firms' responses regarding the impact of COVID-19, by firm type**

Count in number of firms reporting

| <b>Firm type</b>  | <b>No</b> | <b>Yes</b> |
|-------------------|-----------|------------|
| U.S. producers    | 2         | 6          |
| Importers         | 66        | 26         |
| Foreign producers | 45        | 26         |

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

## Geographic distribution

U.S. producers and importers reported selling QSP to all regions of United States (table 6.4). For U.S. producers, 5.5 percent of sales were within 100 miles of their production facility, 50.2 percent were between 101 and 1,000 miles, and 44.3 percent were over 1,000 miles. Importers sold 63.1 percent within 100 miles of their U.S. point of shipment, 28.2 percent between 101 and 1,000 miles, and 8.7 percent over 1,000 miles.

**Table 6.4 QSP: Count of U.S. producers' and U.S. importers' geographic markets**

Count in number of firms reporting

| <b>Region</b>              | <b>U.S. producers</b> | <b>U.S. importers</b> |
|----------------------------|-----------------------|-----------------------|
| Northeast                  | 6                     | 47                    |
| Midwest                    | 6                     | 44                    |
| Southeast                  | 8                     | 57                    |
| Central Southwest          | 7                     | 42                    |
| Mountains                  | 7                     | 38                    |
| Pacific Coast              | 7                     | 39                    |
| Other                      | 3                     | 16                    |
| All regions (except Other) | 6                     | 28                    |
| Reporting firms            | 8                     | 83                    |

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

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

## Supply and demand considerations

### U.S. supply

Table 6.5 provides a summary of the supply factors regarding QSP from U.S. producers and from foreign sources. U.S. production capacity saw a 9.0 percent decrease from 2020 to 2024, and capacity utilization decreased 7.1 percentage points in the same period. Foreign

industry QSP production capacity grew 53.5 percent while capacity utilization decreased 3.6 percentage points as a result of capacity increases outpacing production increases.

**Table 6.5 QSP: Supply factors that affect the ability to increase shipments to the U.S. market, by country**

Quantity in 1,000 square feet; ratios and shares in percent; count in number of firms reporting

| Factor                              | Measure  | United States | Foreign industries |
|-------------------------------------|----------|---------------|--------------------|
| Capacity 2020                       | Quantity | 50,178        | 289,808            |
| Capacity 2024                       | Quantity | 45,650        | 443,432            |
| Capacity utilization 2020           | Ratio    | 78.6          | 71.7               |
| Capacity utilization 2024           | Ratio    | 71.5          | 68.4               |
| Inventories to total shipments 2020 | Ratio    | 54.4          | 23.2               |
| Inventories to total shipments 2024 | Ratio    | 62.9          | 24.1               |
| Home market shipments 2024          | Share    | 95.2          | 14.9               |
| Non-US export market shipments 2024 | Share    | 4.8           | 22.3               |
| Ability to shift production         | Count    | 1 of 7        | 2 of 70            |

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

Note: Responding U.S. producers accounted for vast majority of U.S. production of QSP slab in 2024. Responding foreign producer/exporter firms accounted for more than half of U.S. imports of QSP from all sources during 2024. Foreign industry is based on the slab operations of responding foreign producers. The share of shipments data is adjusted to include post-fabrication shipments. Foreign industry shares were based on combining slab and fab final shipment destinations. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Parts 1 and 5.

### Domestic production

Based on available information, U.S. producers of QSP have the ability to respond to changes in demand with moderate-to-large changes in the quantity of shipments of U.S.-produced QSP to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the increased availability of unused capacity, available and growing inventories, and some ability to shift shipments from alternate markets. Factors mitigating responsiveness of supply include U.S. producers' limited ability to shift shipments from alternate products.

U.S. producers' capacity, capacity utilization and production quantity of QSP have all decreased since 2020. The moderate level of capacity utilization suggests that U.S. producers may have the ability to increase production of quartz surface products in response to an increase in prices.

Several domestic producers reported idling or underutilizing their production facilities. Cambria cut production shifts from a 7-day per week target to four to five days a week with capacity utilization currently at 60 percent. LX Hausys stated that in 2020, all three of its

production lines operated on a three-shift basis, but it has since reduced operating shifts across all three production lines. Between 2021 and 2025, production at its U.S. plant declined by almost 40 percent. \*\*\*. U.S. producer Guidoni stated that it is now operating exclusively on a single eight-hour shift two days per week, producing approximately \*\*\* per year.<sup>5</sup>

All seven other U.S. producers reported that they could increase their production quantity in several months which would require recruitment and training of additional production and maintenance personnel. U.S. producers largely reported that they did not require additional equipment and achieving increased capacity utilization could be realized by adding additional production shifts with new personnel on the existing equipment.

One U.S. producer Caesarstone stopped producing slabs beginning in 2024 with no plans to restart production, irrespective of the result of the safeguard.

One of eight U.S. producers indicated an ability to produce other products on the same equipment as QSP. U.S. producer \*\*\* reported that it could produce \*\*\* with a limited domestic market for these products.

### **Foreign producers**

Based on available information, producers of QSP from foreign sources have the ability to respond to changes in demand with large changes in the quantity of shipments of QSP to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity and inventories, and the ability to shift shipments from alternate markets. Factors mitigating responsiveness of supply include limited ability to shift production to or from alternate products.

Other major export markets reported were countries in the European and Middle Eastern markets, Canada, South Korea, and Australia. Other products that three responding foreign producers reportedly can produce on the same equipment as QSP are marble-based agglomerates, eco-silicate, and slabs that use low-silica material predominantly in its raw material content.

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<sup>5</sup> Petitioner's posthearing brief, pp. 46 to 47.

## Supply constraints

A majority of U.S. producers and importers reported that they had not experienced supply constraints since January 1, 2020. Two of eight U.S. producers and 25 of 85 importers reported they had experienced supply constraints (table 6.6). For 2020 and 2021, U.S. producer \*\*\* cited shortages in raw materials, particular primary quartz and resin due to the COVID-19 pandemic related supply shortages and U.S. producer \*\*\* reported that over the entire period of the investigation it delivered less quantities and experienced longer lead times.

Constraints reported by importers in 2020 through 2022 included issues related to the COVID -19 pandemic such as constrained supply related to logistics issues, port congestion, increased ocean freight costs, container shortages, factory shutdowns, limited availability of raw materials, and extended lead times. Importer \*\*\* reported that in response, customers, such as builders, substituted natural stone (largely granite) rather than paying higher pricing for imported quartz. Constraints reported in 2023 and 2024 were issues experienced by individual firms or their suppliers such as experiencing an electricity supply shortage in their production facility or lack of local labor or raw materials in their local area. Four firms mentioned the U.S. tariffs implemented throughout 2025 as causing issues in their supply chains.

Six of 26 responding purchasers reported that they had experienced supply constraints, with four reporting supply constraints from domestic producers in 2020 through 2025 (with only three purchasers reporting domestic constraints in 2021) and three firms reported supply constraints from foreign producers or importers in 2020, two in 2021, and one in 2022. Two purchasers reported shortages in 2020 through 2022 due to the COVID -19 pandemic related supply chain disruptions. \*\*\* reported capacity constraints which persisted throughout 2023 for products sourced from the U.S., primarily related to production complications associated with polishing and trained labor.

Purchaser \*\*\* reported that it is \*\*\* U.S. producer Cambria<sup>6</sup> and had an issue where another firm with an agreement with Cambria solicited business in its territory without the required advance notice due to \*\*\*.

Purchaser \*\*\* reported that US producers will not sell to distributors, and that U.S. producers open their own distribution centers, leaving distributors unable to purchase material from within the United States. Purchaser \*\*\* reported that Cambria has its set

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<sup>6</sup> \*\*\*.

distributors and \*\*\* is unable to buy from Cambria. It also reported that \*\*\* uses much of its supply itself, and \*\*\* has its own distribution channels.

**Table 6.6 QSP: Count of firms' responses regarding supply constraints, by firm type and period**

Count in number of firms reporting

| Period of constraint | U.S. producers | Importers | Purchasers: Domestic | Purchasers: Foreign / imported |
|----------------------|----------------|-----------|----------------------|--------------------------------|
| 2020                 | 2              | 19        | 4                    | 3                              |
| 2021                 | 2              | 21        | 3                    | 2                              |
| 2022                 | 1              | 13        | 4                    | 1                              |
| 2023                 | 1              | 5         | 4                    | 0                              |
| 2024                 | 1              | 5         | 4                    | 0                              |
| 2025                 | 1              | 12        | 4                    | 0                              |

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

### New suppliers

Eight of 26 purchasers indicated that new suppliers entered the U.S. market since January 1, 2020. Purchaser \*\*\* reported an increased number of suppliers from Southeast Asian countries, specifically Vietnam, Malaysia, and Thailand. Purchasers \*\*\* reported that U.S. producers American Quartz Max and Hendrix were new suppliers in the U.S market, and purchaser \*\*\* reported that Vento Quartz and Thai Quartz were new international suppliers. Purchaser \*\*\* reported that Marudhar Rocks, Sketch, and Pacific Quartz were firms from India and that Just Stone and Thai Sunnit Stone were firms from Thailand that had entered the U.S. market.

### U.S. demand

Based on available information, the overall demand for QSP is likely to experience moderate changes in response to changes in price. The main contributing factors are the availability of substitute products and the large cost share of QSP in most of its end-use products.

A majority of responding U.S. producers, importers, and purchasers reported that domestic demand for QSP increased since 2020 (table 6.7).

U.S. demand for quartz surface products is driven by remodeling and construction. As shown in figure 6.1 and table 6.8, the remodeling market index ("RMI") rose sharply in 2020 and continued growing at a moderate rate in 2021 before seeing a slow but steady decline through 2024 with a slight increase in 2025. All quarters other than the first quarter of 2020 were above an RMI index of 50 which indicates an increase in remodeling activity. The largest

numbers indicate the greatest rate of increase. The RMI rose from a low of 47 in 2020 and peaked in the fourth quarter of 2021 at 87 before steadily declining to 64 at the end of 2025.

As shown in figure 6.2 and table 6.9, monthly new privately-owned housing starts decreased by 21.2 percent overall from 1.58 million in January 2020 to 1.25 million in October 2025. New housing starts fluctuated slightly over this period, decreasing to 936 thousand new housing units in April 2020. Over 2025, new housing starts fell by 8.2 percent, with slight fluctuations, from 1.36 million in January 2025 to 1.25 million in October 2025.

**Table 6.7 QSP: Count of firms' responses regarding overall domestic and foreign demand, by firm type**

Count in number of firms reporting

| Market                      | Firm type      | Steadily Increase | Fluctuate Up | No change | Fluctuate Down | Steadily Decrease |
|-----------------------------|----------------|-------------------|--------------|-----------|----------------|-------------------|
| Domestic demand             | U.S. producers | 3                 | 4            | 0         | 0              | 1                 |
| Domestic demand             | Importers      | 36                | 17           | 15        | 11             | 3                 |
| Domestic demand             | Purchasers     | 12                | 7            | 1         | 5              | 1                 |
| Foreign demand              | U.S. producers | 2                 | 3            | 0         | 0              | 0                 |
| Foreign demand              | Importers      | 16                | 10           | 9         | 1              | 1                 |
| Foreign demand              | Purchasers     | 4                 | 0            | 4         | 2              | 0                 |
| Demand for end use products | Purchasers     | 2                 | 3            | 5         | 5              | 0                 |

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



**Table 6.8 Homeowner improvements: Remodeling market index, seasonally adjusted, January 2020 to December 2025**

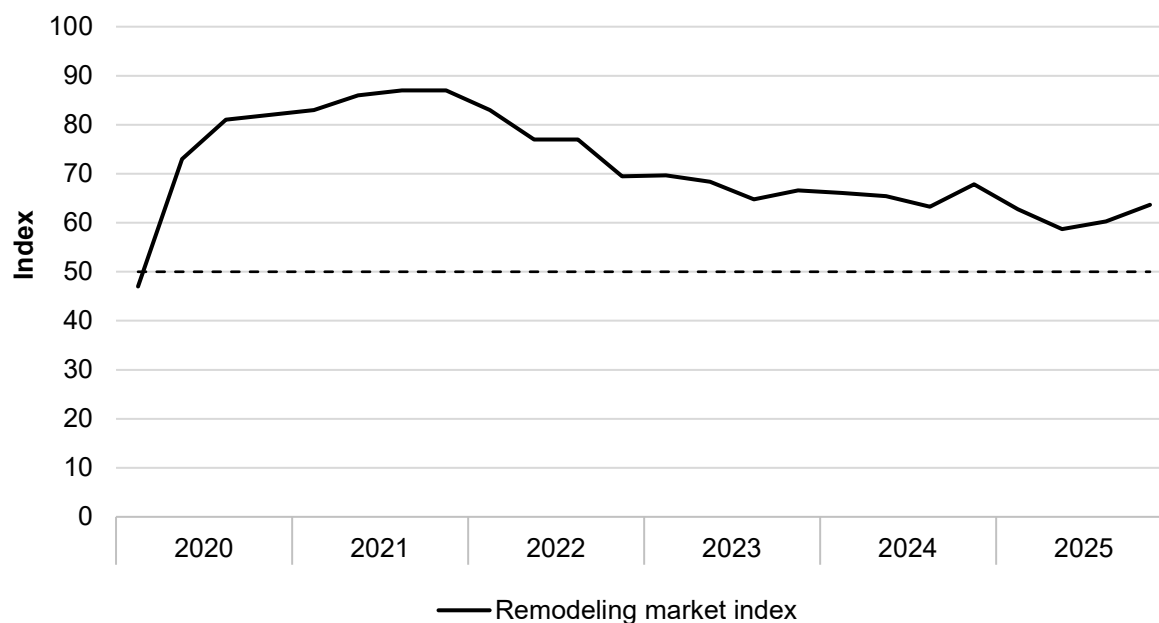
Indexed where 50 indicates a higher share of remodelers view conditions as good rather than poor

| Quarter | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 |
|---------|------|------|------|------|------|------|
| Q1      | 47   | 83   | 83   | 70   | 66   | 63   |
| Q2      | 73   | 86   | 77   | 68   | 65   | 59   |
| Q3      | 81   | 87   | 77   | 65   | 63   | 60   |
| Q4      | 82   | 87   | 69   | 67   | 68   | 64   |

Note: An index of greater than 50 indicates that a higher share of remodelers view conditions as good rather than poor for remodeling, which is represented by the dotted black line.

Source: National Association of Home Builders, Remodeling Market Index. <https://www.nahb.org/news-and-economics/housing-economics/indices/remodeling-market-index>. Retrieved on January 15, 2026.

**Figure 6.1 Homeowner improvements: Remodeling market index, seasonally adjusted, January 2020 to December 2025**



Note: An index of greater than 50 indicates that a higher share of remodelers view conditions as good rather than poor for remodeling, which is represented by the dotted black line.

Source: National Association of Home Builders, Remodeling Market Index. <https://www.nahb.org/news-and-economics/housing-economics/indices/remodeling-market-index>. Retrieved on January 15, 2026.

**Table 6.9 Housing: Seasonally adjusted new housing starts, January 2020 to October 2025, by month**

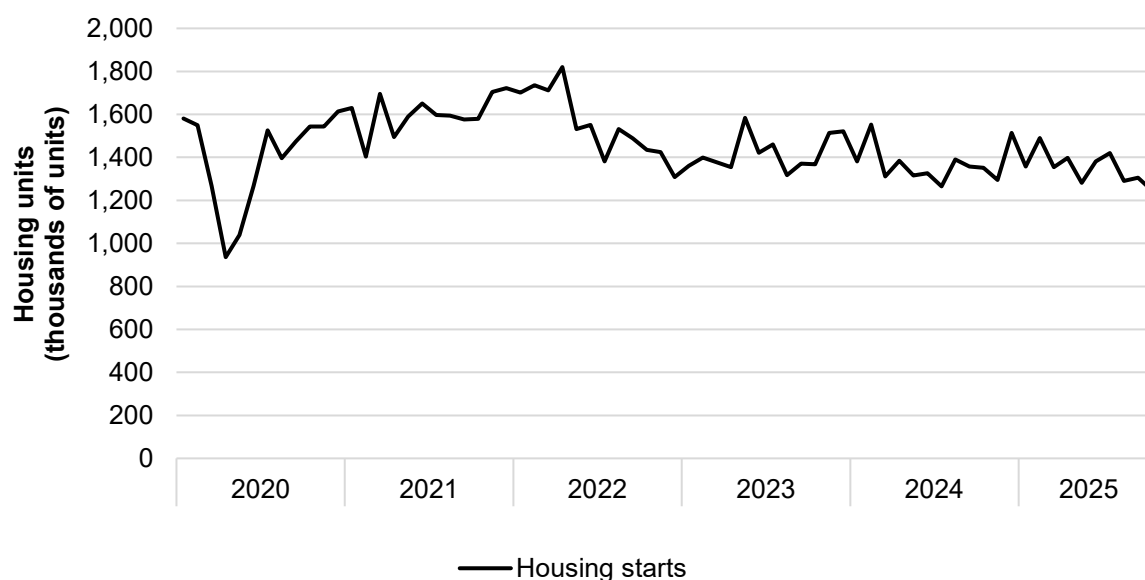
Thousands of units

| Month     | 2020  | 2021  | 2022  | 2023  | 2024  | 2025  |
|-----------|-------|-------|-------|-------|-------|-------|
| January   | 1,581 | 1,630 | 1,702 | 1,361 | 1,381 | 1,358 |
| February  | 1,549 | 1,404 | 1,735 | 1,399 | 1,552 | 1,490 |
| March     | 1,266 | 1,696 | 1,712 | 1,377 | 1,312 | 1,355 |
| April     | 936   | 1,495 | 1,820 | 1,354 | 1,385 | 1,398 |
| May       | 1,039 | 1,589 | 1,531 | 1,584 | 1,316 | 1,282 |
| June      | 1,266 | 1,650 | 1,551 | 1,421 | 1,327 | 1,382 |
| July      | 1,526 | 1,597 | 1,381 | 1,460 | 1,265 | 1,420 |
| August    | 1,396 | 1,594 | 1,531 | 1,317 | 1,391 | 1,291 |
| September | 1,473 | 1,577 | 1,488 | 1,371 | 1,357 | 1,306 |
| October   | 1,543 | 1,579 | 1,435 | 1,368 | 1,352 | 1,246 |
| November  | 1,543 | 1,705 | 1,424 | 1,514 | 1,295 | —     |
| December  | 1,614 | 1,722 | 1,308 | 1,521 | 1,514 | —     |

Source: U.S. Census Bureau. Housing Units Started.

<https://www.census.gov/construction/nrc/data/series.html>. Retrieved January 15, 2026.

**Figure 6.2 Housing: Seasonally adjusted new housing starts, January 2020 to October 2025, by month**



Source: U.S. Census Bureau. Housing Units Started.

<https://www.census.gov/construction/nrc/data/series.html>. Retrieved January 15, 2026.

## **End uses and cost share**

U.S. demand for quartz surface products depends on the demand for U.S.-produced downstream products including countertops and vanities in kitchens, bathrooms, and commercial applications. Reported end uses include fireplaces, flooring, tiles, shower walls and pans, windowsills, fireplaces, wall cladding, and cabinets.

QSP accounts for a large share of the cost of the end-use products in which it is used. Reported cost shares for quartz surface products averaged 45 percent, with the costs of other inputs made up by labor for installation and other material costs.

## **Business cycles**

Six of eight U.S. producers, 40 of 84 responding importers, and 15 of 24 responding purchasers indicated that the market was subject to business cycles. Specifically, U.S. producers, importers, and purchasers reported that the market is dependent on construction and renovation cycles. Demand is typically higher in spring and summer when construction and remodeling are strongest, and slower in fall and winter. Over the long term, firms reported that demand rises and falls with the housing market and overall economy.

## **Demand trends**

Most firms reported an increase in U.S. demand for QSP since January 1, 2020 (table 6.7). Firms largely noted that the U.S. quartz market showed strong growth, driven by increasing residential construction and rising demand for engineered quartz surfaces because of its durability and aesthetics. From 2020 through 2022, demand for QSP was reported to have risen as households invested in home renovation and new single-family home construction expanded. Beginning in 2023 and into 2024, the market cooled as the COVID-19 pandemic remodeling rise faded, and discretionary home-improvement spending normalized. This decline was reported as not material-specific; and reflected an overall contraction in housing and remodeling activity after an unsustainably high boom period. Firms reported that the overall demand trend for quartz is up and has continued to take market share from other natural stones such as granite. Firms stated that improvements in manufacturing technology have delivered more realistic and on-trend designs for QSP. Several firms reported that recent demand is down a bit in 2025 due to broad economy-wide factors.

## **Substitute products**

Substitutes for quartz surface products include marble, granite, quartzite, porcelain, solid surface, cement, laminate, and various types of stone. Seven of eight U.S. producers, 30 of 76 importers, and 14 of 22 purchasers reported that there were substitutes for quartz surface products. The majority of responding firms reported that changes in the prices of substitute products had not affected the price of quartz surface products.

When asked specifically about marble and quartzite, firms reported that these substitutes serve specific aesthetic and design-driven roles with typically higher prices and differ materially from QSP in terms of durability, maintenance requirements, and performance characteristics. Granite tends to be lower priced though firms largely report that in recent years QSP has come to dominate the industry as the cost gap between entry-level QSP and granite has narrowed. Consumers were reported to increasingly seek the simple designs and colors that are unavailable in granite, but which can be found in QSP. Furthermore, fabricators were reported as generally preferring to work with QSP due to its ease of sale, long-term performance, and simplified fabrication process.

In the United States, QSP accounts for approximately 35 percent of kitchen installations; granite for 30 percent; laminate for 13 percent; solid surface for 12 percent; marble for 5 percent; and ceramic slab for 3 percent. Likewise, the Kitchen Design Trends Report issued by the National Kitchen and Bath Association predicts that quartz will be the most popular countertop material through at least 2029 with 78 percent of surveyed experts expect quartz to remain popular.<sup>7</sup>

## **Substitutability issues**

This section assesses the degree to which U.S.-produced QSP and imports of QSP from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of QSP from domestic and imported sources based on those factors. Based on available data, staff believe that there is a generally high degree of substitutability between domestically produced QSP and QSP imported from subject sources where sustainability would be lower in cases when certain styles are only available from foreign sources.<sup>8</sup>

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<sup>7</sup> Arizona, Elite, & MSI's Joint prehearing brief, p. 26

<sup>8</sup> The degree of substitution between domestic and imported QSP depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced QSP to the QSP imported from subject countries (or vice versa)  
(continued...)

Factors contributing to this level of substitutability include similar quality, availability, and lead times for QSP from inventory, a little preference for particular country of origin or producers, differences/similarities between domestically produced QSP and QSP imported from subject countries across multiple purchase factors, and interchangeability between domestic and subject sources. Factors reducing substitutability include certain design types of QSP only being available only from certain domestic or import sources, and significant factors other than price that firms consider. A number of U.S. producers, importers and purchasers reported that the interchangeability was limited by differences in color, design, and patterns available which are key factors in customer preferences.

## **Factors affecting purchasing decisions**

### **Purchaser decisions based on source and Breton Technology**

As shown in table 6.10, most purchasers and their customers responses were mixed on decisions based on the producer, but a majority of purchasers and their customers reported sometimes or never making decisions based on the country of origin or Breton technology. Of the eight purchasers that reported that they always make decisions based on the manufacturer, three firms reported that they exclusively purchase from Wilsonart, other reasons cited include basing decisions on designs which are heavily dependent on the producer and their technology.

Five of eight U.S. producers produce QSP using the Breton manufacturing process (table 6.11). The process is also known as vibro-compression vacuum technology which involves blending natural quartz stones with a polymer mixture, the air is then removed using a vacuum, and the mixture is molded while being vibrated and compressed under pressure. Purchaser \*\*\* reported that the use of Breton technology may sometimes be considered one of several quality-related factors, as production lines based on this technology are generally associated with consistent manufacturing processes and stable product performance. However, it also reported that purchasing decisions are ultimately based on overall product quality, consistency, availability, and supplier reliability, rather than on any single production technology. Purchaser \*\*\* reported that different technologies, including Breton, can create different designs and that it makes decisions based on design and certain designs can only be produced by Breton machinery.

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when prices change. The degree of substitution may include such factors as quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

**Table 6.10 QSP: Count of purchasing decisions by purchaser or their customer, based on producer, country of origin, and use of Breton technology**

Count in number of firms reporting

| Firm making decision | Decision based on | Always | Usually | Sometimes | Never |
|----------------------|-------------------|--------|---------|-----------|-------|
| Purchaser            | Producer          | 8      | 4       | 6         | 7     |
| Customer             | Producer          | 1      | 2       | 14        | 5     |
| Purchaser            | Country           | 2      | 3       | 4         | 15    |
| Customer             | Country           | 0      | 2       | 8         | 12    |
| Purchaser            | Breton technology | 6      | 2       | 5         | 11    |
| Customer             | Breton technology | 0      | 2       | 10        | 10    |

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

**Table 6.11 QSP: Count of U.S. producers' and foreign industries' responses regarding use of Breton technology, by source**

Count in number of firms reporting

| Source                       | No  | Yes |
|------------------------------|-----|-----|
| U.S. producers               | 3   | 5   |
| Canada                       | *** | *** |
| China                        | *** | *** |
| Czechia                      | *** | *** |
| India                        | *** | *** |
| Israel                       | *** | *** |
| Italy                        | *** | *** |
| Malaysia                     | *** | *** |
| Mexico                       | *** | *** |
| Spain                        | *** | *** |
| Taiwan                       | *** | *** |
| Thailand                     | *** | *** |
| Turkey                       | *** | *** |
| Vietnam                      | *** | *** |
| Other FTA sources            | *** | *** |
| All other foreign industries | *** | *** |
| All foreign industries       | 48  | 21  |

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

## Importance of purchasing domestic product

All 19 responding purchasers reported that most or all of their purchases did not require purchasing U.S.-produced product. Three reported that domestic product was required by law (for 1.0 to 5.0 percent of their purchases), seven reported it was required by their customers (for 5.0 to 20.0 percent of their purchases), and one reported other preferences for domestic product.<sup>9</sup>

## Most important purchase factors

The most often cited top three factors firms consider in their purchasing decisions for QSP were price/cost (15 firms), quality (14 firms), availability of supply and aesthetics/design (12 firms each) as shown in table 6.12. Quality was the most frequently cited first-most important factor (cited by 8 firms), followed by price/cost and company relationships (6 firms each); availability/supply was the most frequently reported second-most important factor (7 firms); and price/cost was the most frequently reported third-most important factor (9 firms).

**Table 6.12 QSP: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor**

Count in number of firms reporting

| Factor                                    | First | Second | Third | Total |
|-------------------------------------------|-------|--------|-------|-------|
| Quality                                   | 8     | 5      | 1     | 14    |
| Price / Cost / Credit                     | 6     | 1      | 9     | 15    |
| Relationship / Exclusivity / Arrangements | 6     | 0      | 0     | 6     |
| Design / Color / Aesthetics               | 4     | 4      | 4     | 12    |
| Availability / Supply / Capacity          | 1     | 7      | 4     | 12    |
| All other factors                         | 2     | 6      | 3     | NA    |

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

Note: Other factors include project specifications, range, innovation, brand recognition, access to proprietary technology, customer service, lead time, distribution, and customer demand.

The majority of purchasers (14 of 26) reported that they only sometimes purchase the lowest-priced product, while the remaining firms reported either usually (5), or never (7) purchasing the lowest-priced product.

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<sup>9</sup> Purchaser \*\*\* reported that domestic product was required by its customers in \*\*\* percent of sales and purchaser \*\*\* reported that domestic product was required by its customers in \*\*\* percent of sales.

## Importance of specified purchase factors

Purchasers were asked to rate the importance of 20 factors in their purchasing decisions (table 6.13). The factors rated as very important by more than half of responding purchasers were availability (25 firms), reliability of supply (24 firms), product consistency and quality meets industry standards (22 firms each), color/design/aesthetics (21 firms), delivery time (19 firms), price (18 firms), warranty support (16 firms), product range (15 firms), and quality exceeds industry standards (13 firms).

**Table 6.13 QSP: Count of purchasers' responses regarding importance of purchase factors, by factor**

Count in number of firms reporting

| Factor                                 | Very important | Somewhat important | Not important |
|----------------------------------------|----------------|--------------------|---------------|
| Availability                           | 25             | 1                  | 0             |
| Reliability of supply                  | 24             | 1                  | 0             |
| Product consistency                    | 22             | 3                  | 0             |
| Quality meets industry standards       | 22             | 3                  | 0             |
| Color/design/aesthetics                | 21             | 3                  | 1             |
| Delivery time                          | 19             | 7                  | 1             |
| Price                                  | 18             | 7                  | 0             |
| Warranty support                       | 16             | 6                  | 3             |
| Product range                          | 15             | 6                  | 3             |
| Quality exceeds industry standards     | 13             | 10                 | 2             |
| Delivery terms                         | 10             | 12                 | 3             |
| Technical support/service              | 10             | 11                 | 4             |
| Discounts offered                      | 9              | 12                 | 4             |
| Brand name                             | 9              | 6                  | 11            |
| U.S. transportation costs              | 6              | 10                 | 8             |
| Breton manufacturing                   | 6              | 5                  | 14            |
| Payment terms                          | 5              | 13                 | 7             |
| Packaging                              | 5              | 8                  | 12            |
| Distribution and installation services | 5              | 2                  | 18            |
| Minimum quantity requirements          | 4              | 6                  | 15            |

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

## Lead times

QSP is primarily sold from inventory. U.S. producers reported that 83.8 percent of their commercial shipments were from domestic inventories, with lead times averaging 4 days. The remaining 16.2 percent of their commercial shipments were produced to order, with lead times averaging 30 days. Importers reported that 71.7 percent of their commercial shipments were from U.S. inventories, with lead times averaging 8 days. The remaining 21.2 percent of their commercial shipments were produced to order, and 7.1 percent were from foreign inventories, with lead times averaging 64 and 48 days respectively.



## Supplier certification

Eleven of 26 responding purchasers require their suppliers to become certified or qualified to sell QSP to their firm. Purchasers reported that the time to qualify a new supplier ranged from 5 to 90 days. One purchaser \*\*\* reported that a number of firms had lost their approved status since 2020 due to their inability to meet its quality related issues.

## Minimum quality specifications

As can be seen from table 6.14, six purchasers responded always; and 10 of 25 responded usually when asked if domestically produced product met minimum quality specifications. The majority of responding purchasers reported that QSP from foreign sources always or usually meet minimum quality specifications.

**Table 6.14 QSP: Count of U.S. purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source**

Count in number of firms reporting

| Source of purchases | Always | Usually | Sometimes | Rarely or never | Don't Know |
|---------------------|--------|---------|-----------|-----------------|------------|
| United States       | 6      | 10      | 1         | 0               | 8          |
| Canada              | 2      | 1       | 0         | 0               | 11         |
| China               | 1      | 4       | 0         | 1               | 9          |
| Czechia             | 2      | 1       | 0         | 0               | 13         |
| India               | 2      | 10      | 2         | 1               | 5          |
| Israel              | 0      | 5       | 1         | 0               | 9          |
| Italy               | 1      | 6       | 1         | 0               | 8          |
| Malaysia            | 1      | 8       | 0         | 1               | 7          |
| Mexico              | 0      | 2       | 0         | 0               | 12         |
| Spain               | 1      | 8       | 0         | 0               | 8          |
| Taiwan              | 0      | 6       | 0         | 1               | 8          |
| Thailand            | 0      | 10      | 0         | 1               | 5          |
| Turkey              | 0      | 7       | 0         | 0               | 8          |
| Vietnam             | 2      | 12      | 0         | 0               | 5          |
| Other FTA           | 1      | 3       | 0         | 0               | 11         |
| All other sources   | 1      | 7       | 1         | 0               | 7          |
| All import sources  | 5      | 11      | 1         | 0               | 5          |

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

Note: Purchasers were asked how often domestically produced or imported QSP meets minimum quality specifications for their own or their customers' uses.

Twenty-two of 26 responding purchasers reported factors that determined quality. A number of purchasers reported that consistency in flatness, finish, design, dimensions, and lack of physical defects (such as chips, scratches, or cracks) determine the quality of QSP.

## Changes in purchasing patterns

Twelve purchasers reported that they had changed suppliers since January 1, 2020, while fourteen reported that they had not. Firms added or increased purchases from firms because of better support, superior availability, aesthetics, to align inventories with consumer preferences, and to reduce supply chain risks. Firms reported decreased purchases from suppliers because of poor sales performance of their products and due to tariffs on Chinese suppliers.

Purchasers were also asked about changes in their purchasing patterns from different countries since January 1, 2020 (table 6.15). Purchasers responses about changes to their purchasing patterns were mixed.

**Table 6.15 QSP: Count of purchasers' responses regarding changes in purchase patterns from U.S., foreign countries**

Count in number of firms reporting

| Source of purchases | Steadily Increase | Fluctuate Up | No change | Fluctuate Down | Steadily Decrease | Did not purchase |
|---------------------|-------------------|--------------|-----------|----------------|-------------------|------------------|
| United States       | 6                 | 4            | 5         | 4              | 5                 | 3                |
| All other sources   | 6                 | 4            | 5         | 7              | 0                 | 2                |

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

## Purchase factor comparisons of domestic products, and foreign imports

Purchasers were asked a number of questions comparing QSP produced in the United States and foreign sources. First, purchasers were asked for a domestic to imported product comparison on the same 20 factors (table 6.16) for which they were asked to rate the importance.

A majority of purchasers reported that U.S.-produced QSP and QSP imported from foreign sources were comparable on all factors, except for price, product range, and U.S. transportation costs which only had a plurality of purchasers reporting domestic and imported QSP were comparable.

**Table 6.16 QSP: Count of U.S. purchasers' responses comparing U.S.-produced and imported product, by factor**

Count in number of firms reporting

| Factor                                 | Country pair               | Superior | Comparable | Inferior |
|----------------------------------------|----------------------------|----------|------------|----------|
| Availability                           | U.S. vs All import sources | 4        | 17         | 4        |
| Reliability of supply                  | U.S. vs All import sources | 5        | 15         | 1        |
| Product consistency                    | U.S. vs All import sources | 4        | 18         | 1        |
| Quality meets industry standards       | U.S. vs All import sources | 2        | 20         | 0        |
| Color/design/aesthetics                | U.S. vs All import sources | 4        | 16         | 5        |
| Delivery time                          | U.S. vs All import sources | 8        | 12         | 1        |
| Price                                  | U.S. vs All import sources | 3        | 11         | 9        |
| Warranty support                       | U.S. vs All import sources | 3        | 15         | 2        |
| Product range                          | U.S. vs All import sources | 5        | 11         | 7        |
| Quality exceeds industry standards     | U.S. vs All import sources | 3        | 19         | 1        |
| Delivery terms                         | U.S. vs All import sources | 5        | 16         | 0        |
| Technical support/service              | U.S. vs All import sources | 5        | 13         | 2        |
| Discounts offered                      | U.S. vs All import sources | 1        | 12         | 7        |
| Brand name                             | U.S. vs All import sources | 8        | 16         | 1        |
| U.S. transportation costs              | U.S. vs All import sources | 8        | 10         | 3        |
| Breton manufacturing                   | U.S. vs All import sources | 3        | 21         | 1        |
| Payment terms                          | U.S. vs All import sources | 1        | 18         | 2        |
| Packaging                              | U.S. vs All import sources | 2        | 17         | 1        |
| Distribution and installation services | U.S. vs All import sources | 3        | 15         | 2        |
| Minimum quantity requirements          | U.S. vs All import sources | 2        | 16         | 2        |

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

Note: With respect to cost/price factors, a rating of superior means that the cost/price for the first source in the country pair is generally lower. For example, if a firm reported "U.S. superior," it meant that the U.S. product was generally priced lower than the imported product.

## Comparison of U.S.-produced and imported QSP

In order to determine whether U.S.-produced QSP can generally be used in the same applications as imports, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in table 6.17, responses were mixed; a plurality of U.S. producers reported that QSP was always interchangeable while two U.S. producers each reported that QSP was frequently or sometimes interchangeable. U.S. producer \*\*\* reported that although all kinds of quartz products can be used as countertops, vanities, etc., they are not practically interchangeable because they are products purchased primarily on the basis of design.

A plurality of importers reported that QSP was frequently interchangeable. Importers largely reported that QSP produced in the United States and those imported are generally interchangeable and can be used in the same end applications, such as kitchen countertops,

vanities, commercial tops, and wall cladding. Product performance, fabrication methods, and installation processes were also reported as similar across sources. Differences typically relate to design availability, price, or delivery time, rather than physical fitness for use. As a result, customers can substitute U.S.-produced and imported products based primarily on cost, design preference, and availability. Importer \*\*\* reported that “Quartz surface products are interchangeable to a significant extent at the basic or commodity level, particularly for simpler colors and standard designs. Many manufacturers offer products with similar aesthetic characteristics in these segments, allowing customers to substitute among suppliers. However, interchangeability is more limited for design-driven products. Certain manufacturers offer distinctive designs supported by proprietary manufacturing processes, intellectual property, or branding, which are not readily replicated by other producers. As a result, while quartz products may be interchangeable in value-oriented segments, interchangeability decreases as design differentiation and product uniqueness increases.”

Half of purchasers reported that QSP was frequently interchangeable. Purchasers also reported that QSP can be used in the same end applications with differences typically related to design availability. Multiple purchasers reported that with the exception of basic commodity options, higher end QSP products have limited interchangeability because it comes down to the design of the slabs. Purchaser \*\*\* reported that “each producer has its own designs, of which the vast majority are unique to the vendor, including domestic vendors. Often, these designs are also patent protected.”

When asked to explain the differences between luxury and mass-market QSP U.S. producers stated that the differences are not defined by functional aspects but by visual design and how products are presented to consumers. Petitioner counsel stated “how do you even define premium versus mass market? I mean, at the end of the day, as we all agree, it's all about the aesthetics...and there are price points associated with the different designs.”<sup>10</sup> U.S. producer Cambria similarly stated that the customer base for QSP is broad as “all of the consumers, commercial or residential, are really good prospects for all of the categories” and that the distinction between premium and mass-market products often arises through the selling process, display, and how consumers are guided through design options rather than through inherent physical differences.<sup>11</sup>

Purchasers were asked if there are any types of QSP only available from certain country sources. Purchasers \*\*\* reported that certain quartz surface product designs, colors, and patterns are

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<sup>10</sup> Hearing transcript, pp. 140 to 146 (Meisner).

<sup>11</sup> Hearing transcript, pp. 146 to 147 (Davis).

only available from specific countries of origin due to differences in production lines, and design portfolios. The factories often have their own proprietary processes, meaning those designs can only be produced by those factories and can't be replicated by others. Purchaser \*\*\* reported that only certain factories have the molds to produce "Super Jumbo's" which are slabs of approximately 136 inches by 79 inches and stated that most countries that produce quartz now have at least one or more factories that can do so. They state the country of origin is not a factor; it is the factories' capabilities within those countries. Purchaser \*\*\* reported that crushed glass product is largely only available from Vietnam.

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of QSP from the United States or from imported product. As seen in table 6.17, a majority of U.S. producers as well as a plurality of importers and purchasers reported that differences other than price were sometimes significant. Purchasers reported that factors included product consistency, variety of patterns or designs, unique designs, product availability, supplier relationship, quality, warranty, transportation costs, delivery lead times, and delivery terms.

**Table 6.17 QSP: Count of firms reporting interchangeability and significance of differences other than price between product produced in the United States and in other countries reported, by firm type**

Count in number of firms reporting

| Comparison               | Firm type       | Always | Frequently | Sometimes | Never |
|--------------------------|-----------------|--------|------------|-----------|-------|
| Interchangeability       | U.S. producers  | 3      | 2          | 2         | 1     |
| Interchangeability       | U.S. importers  | 16     | 28         | 20        | 7     |
| Interchangeability       | U.S. purchasers | 5      | 12         | 6         | 1     |
| Factors other than price | U.S. producers  | 2      | 0          | 5         | 1     |
| Factors other than price | U.S. importers  | 18     | 15         | 28        | 10    |
| Factors other than price | U.S. purchasers | 4      | 6          | 9         | 2     |

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

## Elasticity estimates

This section discusses elasticity estimates based on the conditions of competition. One respondent party commented that demand for QSP is elastic because QSP competes with natural stone products such as granite, marble, and quartzite and the consumers of QSP can easily switch to an alternative product in lieu of QSP if there is a sharp spike in QSP prices.<sup>12</sup> The

<sup>12</sup> Arizona, Elite, & MSI's Joint prehearing brief, Exhibit 7-A, p. 2

same Respondent also created an partial equilibrium model to assess the impact of an ad valorem tariff.<sup>13</sup>

### **U.S. supply elasticity**

The domestic supply elasticity for QSP measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of QSP. The elasticity of domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced QSP. Analysis of these factors above indicates that the U.S. industry has the ability to moderately to greatly increase shipments to the U.S. market; an estimate in the range of 3 to 5 is suggested.

### **U.S. demand elasticity**

The U.S. demand elasticity for QSP measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of QSP. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the QSP in the production of any downstream products. Based on the available information, the aggregate demand for QSP is likely to be moderately inelastic to moderately elastic; a range of -0.75 to -1.25 is suggested.

### **Substitution elasticity**

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.<sup>14</sup> Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced QSP and imported QSP is likely to be in the range of 3 to 5. Factors contributing to this level of substitutability include similar quality,

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<sup>13</sup> Arizona, Elite, & MSI's Joint prehearing brief, Exhibit 7-A, pp. 3 to 6. Respondents submitted a COMPAS partial equilibrium model that provides quantitative estimates of the impact of a 50 percent ad valorem tariff. These results are then translated into an effect on the overall QSP industry and market based on the model's estimated effects on the quantity and price of slab, and the resulting costs and prices for QSP fabricators. Respondents state that the primary harm to the domestic industry is that a QSP price increase would cause a volume shift to alternative products.

<sup>14</sup> The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

availability, and lead times for QSP from inventory, a little preference for particular country of origin or producers, differences/similarities between domestically produced QSP and QSP imported from subject countries across multiple purchase factors, and interchangeability between domestic and subject sources. Factors reducing substitutability include certain design types of QSP only being available only from certain domestic or import sources, and significant factors other than price that firms consider, such as product quality, consistency, and design. A number of U.S. producers, importers and purchasers reported that product interchangeability was limited by differences in customer preferences.

## **Factors affecting prices**

### **Raw material costs**

Quartz is one of the most common minerals in the earth's crust, and it is also one of the hardest naturally occurring minerals. QSP is defined as slabs and other surfaces created from a mixture of materials primarily composed of crushed quartz stone or other silica-based materials (e.g. quartz powder, cristobalite) and may also include additive materials such as pigments or cement, QSP also has a resin binder (e.g., an unsaturated polyester).<sup>15</sup> QSP covered by this investigation only includes products where the silica content is greater than any other single material, by actual weight. Raw material costs, as a share of all U.S. producers' total cost of goods sold (COGS), irregularly increased from 47.3 percent to 50.4 percent from 2020 to 2024, and was lower in interim 2025 than in interim 2024.

### **Transportation costs to the U.S. market**

Transportation costs for QSP shipped from subject countries to the United States averaged 8.4 percent for foreign sources during 2024. These estimates were derived from official import data and represent the transportation and other charges on imports.<sup>16</sup>

### **U.S. inland transportation costs**

Five of eight responding U.S. producers and 60 of 81 responding importers reported that they typically arrange transportation to their customers. Most U.S. producers reported that their U.S. inland transportation costs ranged from 1 to 13 percent while most importers reported costs of 1 to 15 percent.

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<sup>15</sup> Petition, pp. 15 to 17.

<sup>16</sup> The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2024 and then dividing by the customs value based on the HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, 6810.99.0040.

## Pricing practices

### Pricing methods

U.S. producers and importers reported setting prices using a variety of methods the most common of which was set price lists and transaction-by-transaction negotiations (table 6.18).

**Table 6.18 QSP: Count of U.S. producers' and importers' reported price setting methods**

Count in number of firms reporting

| Method                     | U.S. producers | U.S. importers |
|----------------------------|----------------|----------------|
| Transaction-by-transaction | 5              | 55             |
| Contract                   | 4              | 22             |
| Set price list             | 7              | 51             |
| Other                      | 3              | 5              |
| Responding firms           | 8              | 85             |

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

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

U.S. producers and importers reported selling the vast majority of their QSP in the spot market (table 6.19).

**Table 6.19 QSP: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2024**

Share in percent

| Sale type            | U.S. producers | U.S. importers |
|----------------------|----------------|----------------|
| Long-term contracts  | 7.3            | 5.8            |
| Annual contract      | 5.4            | 3.2            |
| Short-term contracts | —              | 16.5           |
| Spot sales           | 87.3           | 74.6           |
| All sales types      | 100.0          | 100.0          |

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

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

Of the U.S. producers and importers that reported selling using contracts, no U.S. producer reported short-term contracts, U.S. producers \*\*\* reported using one-year contracts and U.S. producers \*\*\* reported long term contracts with \*\*\* reporting lengths of two to three years. U.S. producers reported that



price is typically renegotiated, contracts typically have a fixed price provision, and that prices are not indexed to raw material costs.

Twenty importers reported selling quartz surface products under short-term contracts, with average contracts ranging from 12 to 250 days. Six importers reported one-year contracts; and seven reported selling subject products under long-term contracts with the average duration of the contract ranging from two to three years. Of the responding importers, a majority reported that prices were not renegotiated under short-term and annual contracts but were renegotiated under long-term contracts. The majority of importers fixed prices in all contract lengths with prices not indexed to raw materials.

Seven purchasers reported that they purchase product daily, 11 purchase weekly, 4 purchase monthly, 1 purchases quarterly, and two firms reported that they purchase on an as needed basis. Twenty-two of 26 responding purchasers reported that their purchasing frequency had not changed since 2020. Most (19 of 23) purchasers contact 1 to 6 suppliers before making a purchase, four purchasers reported contacting as many as 10 suppliers.

## **Sales terms and discounts**

U.S. producers typically quote prices on an f.o.b. basis<sup>17</sup> and importers typically quote prices on a delivered basis.<sup>18</sup> Five of six responding U.S. producers reported offering a quantity discount, four offered a total volume discount, and two offered discounts based on a rebate

program and special price quotes for commercial jobs.<sup>19</sup> <sup>20</sup> U.S. producer \*\*\* did not offer any discounts. Most responding importers did not offer any discounts (49 of 83 firms), 29 importers reported offering quantity discounts, 17 importers reported offering total volume discounts, and 9 importers offered discounts based on other policies.<sup>21</sup>

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<sup>17</sup> Six of eight U.S. producers reported quoting prices on an f.o.b. basis

<sup>18</sup> Fifty-three of 84 responding importers reported quoting prices on a delivered basis.

<sup>19</sup> U.S. producers \*\*\* reported using more than one discount policy.

<sup>20</sup> U.S. producer \*\*\* did not respond to the questionnaire question and reported that it \*\*\*.

<sup>21</sup> Other types of discounts included: discounts for wholesalers and contractors, discounts for larger projects, clearance markdowns, seasonal discounts, program pricing to select fabricators and customers on a volume basis, and rebate programs.

## Price leadership

Many responding purchasers reported that Cambria is the high quality, high-price leader and that MSI is the mid-level to lower priced leader in the U.S. market. Seventeen purchasers reported the following firms as price leaders:<sup>22</sup>

- Cambria (8 firms)
- MS International (6 firms)
- Dal-Tile (3 firms)
- Cosentino (2 firms)
- LX Hausys (2 firms)
- America Venezia (1 firm)
- Arizona Tile (1 firm)
- OHM International (1 firm)
- Silestone (1 firm)

## Price data

The Commission requested U.S. producers to provide quarterly data for the total quantity and f.o.b. value of the following QSP products shipped to unrelated U.S. customers during January 2020 to September 2025. Importers were requested to provide quarterly data for the total quantity and landed duty-paid (“LDP”) value of the following QSP products imported from all sources during January 2020 to September 2025

**Product 1.**--Plain white quartz surface products in slab form, with a nominal thickness of 2 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Product 2.**-- Plain white quartz surface products in slab form, with a nominal thickness of 3 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Product 3.**--White quartz surface products with a “marble look” in slab form, a nominal thickness of 2 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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<sup>22</sup> Some purchasers listed more than one firm as a price leader.

**Product 4.**-- White quartz surface products with a “marble look” in slab form, a nominal thickness of 3 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Product 5.**-- Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 2 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Product 6.**-- Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 3 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

Four U.S. producers and 62 importers provided usable pricing data<sup>23 24</sup> for sales of the requested products, although not all firms reported pricing for all products for all quarters.<sup>25</sup> Pricing data reported by these firms accounted for approximately 66.9 percent of U.S. producers’ U.S. shipments of QSP, and 59.4 percent of U.S. shipments of imports in 2024.<sup>26</sup> Price data for products 1 to 6 are presented in tables 6.20 to 6.25 and figures 6.3 to 6.8. Select country price data are presented in Appendix K.

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<sup>23</sup> Prices with obvious data entry errors or values that were clearly outside a reasonable range were excluded from the analysis.

<sup>24</sup> Importer \*\*\* reported nine quarters of pricing data for products 1, 2, 3 and 6 of QSP imported from China in which reported prices were at or above \*\*\* stated that these relatively small shipments intended for specialized projects. \*\*\*. Staff removed these quarters of data as they were multiple times higher than other reported prices for products 1, 2, 3, and 6.

<sup>25</sup> Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

<sup>26</sup> Pricing coverage is based on U.S. shipments reported in questionnaires.

**Table 6.20 QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S. price | U.S. quantity | Import price | Import quantity | Import margin |
|---------|------------|---------------|--------------|-----------------|---------------|
| 2020 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2020 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2020 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2020 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2025 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2025 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2025 Q3 | ***        | ***           | ***          | ***             | ***           |

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

Note: Product 1: Plain white quartz surface products in slab form, with a nominal thickness of 2 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Figure 6.3 QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter**

**Price of product 1**

\* \* \* \* \*

**Volume of product 1**

\* \* \* \* \*

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

Note: Product 1: Plain white quartz surface products in slab form, with a nominal thickness of 2 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Table 6.21 QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S. price | U.S. quantity | Import price | Import quantity | Import margin |
|---------|------------|---------------|--------------|-----------------|---------------|
| 2020 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2020 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2020 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2020 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2025 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2025 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2025 Q3 | ***        | ***           | ***          | ***             | ***           |

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

Note: Product 2: Plain white quartz surface products in slab form, with a nominal thickness of 3 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Figure 6.4 QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter**

**Price of product 2**

\* \* \* \* \*

**Volume of product 2**

\* \* \* \* \*

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

Note: Product 2: Plain white quartz surface products in slab form, with a nominal thickness of 3 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Table 6.22 QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S. price | U.S. quantity | Import price | Import quantity | Import margin |
|---------|------------|---------------|--------------|-----------------|---------------|
| 2020 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2020 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2020 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2020 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2025 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2025 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2025 Q3 | ***        | ***           | ***          | ***             | ***           |

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

Note: Product 3: White quartz surface products with a “marble look” in slab form, a nominal thickness of 2 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.



**Figure 6.5 QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter**

**Price of product 3**

\* \* \* \* \*

**Volume of product 3**

\* \* \* \* \*

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

Note: Product 3: White quartz surface products with a “marble look” in slab form, a nominal thickness of 2 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Table 6.23 QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S. price | U.S. quantity | Import price | Import quantity | Import margin |
|---------|------------|---------------|--------------|-----------------|---------------|
| 2020 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2020 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2020 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2020 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2025 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2025 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2025 Q3 | ***        | ***           | ***          | ***             | ***           |

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

Note: Product 4: White quartz surface products with a “marble look” in slab form, a nominal thickness of 3 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Figure 6.6 QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by source and quarter**

**Price of product 4**

\* \* \* \* \*

**Volume of product 4**

\* \* \* \* \*

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

Note: Product 4: White quartz surface products with a “marble look” in slab form, a nominal thickness of 3 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Table 6.24 QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 5 and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S. price | U.S. quantity | Import price | Import quantity | Import margin |
|---------|------------|---------------|--------------|-----------------|---------------|
| 2020 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2020 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2020 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2020 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2025 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2025 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2025 Q3 | ***        | ***           | ***          | ***             | ***           |

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

Note: Product 5: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 2 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Figure 6.7 QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, by source and quarter**

**Price of product 5**

\* \* \* \* \*

**Volume of product 5**

\* \* \* \* \*

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

Note: Product 5: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 2 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Table 6.25 QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 6 and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S. price | U.S. quantity | Import price | Import quantity | Import margin |
|---------|------------|---------------|--------------|-----------------|---------------|
| 2020 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2020 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2020 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2020 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2021 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2022 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2023 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q3 | ***        | ***           | ***          | ***             | ***           |
| 2024 Q4 | ***        | ***           | ***          | ***             | ***           |
| 2025 Q1 | ***        | ***           | ***          | ***             | ***           |
| 2025 Q2 | ***        | ***           | ***          | ***             | ***           |
| 2025 Q3 | ***        | ***           | ***          | ***             | ***           |

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

Note: Product 6: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 3 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Figure 6.8 QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 6, by source and quarter**

**Price of product 6**

\* \* \* \* \*

**Volume of product 6**

\* \* \* \* \*

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

Note: Product 6: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 3 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

## Price trends

In general, domestic prices for all pricing products increased from January 2020 to September 2025, and importer prices for products 5, and 6 increased during this period. Table 6.26 summarizes the price trends, by product. As shown in the table, domestic price increases in the six products ranged from \*\*\* to \*\*\* percent during January 2020 to September 2025. Prices for imported QSP increased for products 5 and 6 with increases of \*\*\* to \*\*\* percent, respectively. Prices for imported QSP decreased for products 1, 2, 3, and 4 with decreases ranging from \*\*\* to \*\*\* percent.

Indexed U.S. producer and import prices show the change in price for each product since 2020 (tables 6.27 and 6.28 along with figures 6.9 and 6.10). U.S. prices of products generally saw a stable increase until all prices rose rapidly in 2022 and into 2023. From there prices for all products generally saw declines in the following years.

Import prices of all products also generally saw an increase in 2022 with prices in the following years either stabilizing at a slightly higher price (products 5 and 6) or seeing price declines to below the prices of 2020.



**Table 6.26 QSP: Summary of price data, by product and source, January 2020 to September 2025**

Prices in dollars per square foot; Quantity in 1,000 square feet; Change in percent

| Product   | Source             | Number of quarters | Quantity | Low price | High price | First quarter price | Last quarter price | Change over period |
|-----------|--------------------|--------------------|----------|-----------|------------|---------------------|--------------------|--------------------|
| Product 1 | United States      | 23                 | ***      | ***       | ***        | ***                 | ***                | ***                |
| Product 1 | All import sources | 23                 | ***      | ***       | ***        | ***                 | ***                | ***                |
| Product 2 | United States      | 23                 | ***      | ***       | ***        | ***                 | ***                | ***                |
| Product 2 | All import sources | 23                 | ***      | ***       | ***        | ***                 | ***                | ***                |
| Product 3 | United States      | 23                 | ***      | ***       | ***        | ***                 | ***                | ***                |
| Product 3 | All import sources | 23                 | ***      | ***       | ***        | ***                 | ***                | ***                |
| Product 4 | United States      | 23                 | ***      | ***       | ***        | ***                 | ***                | ***                |
| Product 4 | All import sources | 23                 | ***      | ***       | ***        | ***                 | ***                | ***                |
| Product 5 | United States      | 23                 | ***      | ***       | ***        | ***                 | ***                | ***                |
| Product 5 | All import sources | 23                 | ***      | ***       | ***        | ***                 | ***                | ***                |
| Product 6 | United States      | 23                 | ***      | ***       | ***        | ***                 | ***                | ***                |
| Product 6 | All import sources | 23                 | ***      | ***       | ***        | ***                 | ***                | ***                |

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

Note: Percent change over period column is percentage change from the first quarter 2020 to the third quarter in 2025.

**Table 6.27 QSP: Indexed U.S. producer prices, by quarter**

Index in percent, 2020 Q1= 100.0 percent

| Period  | Product 1 | Product 2 | Product 3 | Product 4 | Product 5 | Product 6 |
|---------|-----------|-----------|-----------|-----------|-----------|-----------|
| 2020 Q1 | 100.0     | 100.0     | 100.0     | 100.0     | 100.0     | 100.0     |
| 2020 Q2 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2020 Q3 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2020 Q4 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2021 Q1 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2021 Q2 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2021 Q3 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2021 Q4 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2022 Q1 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2022 Q2 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2022 Q3 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2022 Q4 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2023 Q1 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2023 Q2 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2023 Q3 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2023 Q4 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2024 Q1 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2024 Q2 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2024 Q3 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2024 Q4 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2025 Q1 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2025 Q2 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2025 Q3 | ***       | ***       | ***       | ***       | ***       | ***       |

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

**Figure 6.9 QSP: Indexed U.S. producer prices, by quarter**

\* \* \* \* \*

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

**Table 6.28 QSP: Indexed U.S. importer prices, by quarter**

Index in percent, 2020 Q1= 100.0 percent

| Period  | Product 1 | Product 2 | Product 3 | Product 4 | Product 5 | Product 6 |
|---------|-----------|-----------|-----------|-----------|-----------|-----------|
| 2020 Q1 | 100.0     | 100.0     | 100.0     | 100.0     | 100.0     | 100.0     |
| 2020 Q2 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2020 Q3 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2020 Q4 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2021 Q1 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2021 Q2 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2021 Q3 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2021 Q4 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2022 Q1 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2022 Q2 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2022 Q3 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2022 Q4 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2023 Q1 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2023 Q2 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2023 Q3 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2023 Q4 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2024 Q1 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2024 Q2 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2024 Q3 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2024 Q4 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2025 Q1 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2025 Q2 | ***       | ***       | ***       | ***       | ***       | ***       |
| 2025 Q3 | ***       | ***       | ***       | ***       | ***       | ***       |

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

**Figure 6.10 QSP: Indexed U.S. importer prices, by quarter**

\* \* \* \* \*

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

## Price comparisons

As shown in tables 6.29 and 6.30, prices for product imported from sources were below those for U.S.-produced product in all 138 instances (\*\* square feet); margins of underselling ranged from \*\* to \*\* percent.

**Table 6.29 QSP: Instances of underselling and overselling and the range and average of margins, by product**

Quantity in 1,000 square feet; Margins in percent

| Products     | Type         | Number of instances | Quantity | Average margin | Min margin | Max margin |
|--------------|--------------|---------------------|----------|----------------|------------|------------|
| Product 1    | Underselling | 23                  | **       | **             | **         | **         |
| Product 2    | Underselling | 23                  | **       | **             | **         | **         |
| Product 3    | Underselling | 23                  | **       | **             | **         | **         |
| Product 4    | Underselling | 23                  | **       | **             | **         | **         |
| Product 5    | Underselling | 23                  | **       | **             | **         | **         |
| Product 6    | Underselling | 23                  | **       | **             | **         | **         |
| All products | Underselling | 138                 | **       | **             | **         | **         |
| Product 1    | Overselling  | —                   | **       | **             | **         | **         |
| Product 2    | Overselling  | —                   | **       | **             | **         | **         |
| Product 3    | Overselling  | —                   | **       | **             | **         | **         |
| Product 4    | Overselling  | —                   | **       | **             | **         | **         |
| Product 5    | Overselling  | —                   | **       | **             | **         | **         |
| Product 6    | Overselling  | —                   | **       | **             | **         | **         |
| All products | Overselling  | —                   | **       | **             | **         | **         |

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

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

**Table 6.30 QSP: Instances and quantities of underselling/overselling and the range and average of margins, by period**

Quantity in 1,000 square feet; Margins in percent

| Period                         | Type         | Number of instances | Quantity | Average margin | Min margin | Max margin |
|--------------------------------|--------------|---------------------|----------|----------------|------------|------------|
| 2020                           | Underselling | 24                  | ***      | ***            | ***        | ***        |
| 2021                           | Underselling | 24                  | ***      | ***            | ***        | ***        |
| 2022                           | Underselling | 24                  | ***      | ***            | ***        | ***        |
| 2023                           | Underselling | 24                  | ***      | ***            | ***        | ***        |
| 2024                           | Underselling | 24                  | ***      | ***            | ***        | ***        |
| January through September 2025 | Underselling | 18                  | ***      | ***            | ***        | ***        |
| All periods                    | Underselling | 138                 | ***      | ***            | ***        | ***        |
| 2020                           | Overselling  | —                   | ***      | ***            | ***        | ***        |
| 2021                           | Overselling  | —                   | ***      | ***            | ***        | ***        |
| 2022                           | Overselling  | —                   | ***      | ***            | ***        | ***        |
| 2023                           | Overselling  | —                   | ***      | ***            | ***        | ***        |
| 2024                           | Overselling  | —                   | ***      | ***            | ***        | ***        |
| January through September 2025 | Overselling  | —                   | ***      | ***            | ***        | ***        |
| All periods                    | Overselling  | —                   | ***      | ***            | ***        | ***        |

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

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

## Lost sales and lost revenue

The Commission requested that U.S. producers of QSP report if they experienced instances of lost sales or revenue due to competition from imports of QSP from foreign sources during January 2020 to September 2025. Six U.S. producers submitted lost sales and lost revenue allegations, one consisting of a lost sales allegation, and five consisting of both types of allegations. Most U.S. producers, (four of seven responding firms) reported that they had to reduce prices, and three reported that they had to roll back announced price increases.

Staff contacted 91 purchasers and received responses from 27 purchasers. Responding purchasers reported purchasing 401 million square feet of QSP during January 2020 to September 2025 (table 6.31).

Of the 23 responding purchasers, 15 reported that, since 2020, they had purchased imported QSP from foreign sources instead of U.S.-produced product (table 6.32). Ten of these purchasers reported that subject import prices were lower than U.S.-produced product, and eight of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product. Five purchasers estimated the quantity of QSP from foreign sources purchased instead of domestic product; quantities ranged from \*\*\* square feet to \*\*\* square feet (table 6.33). Purchasers identified innovative and unique designs, a large variety of patterns available, quality, product consistency, availability, delivery lead times, delivery terms, technical support, brand name, supplier relationship, and better warranty as non-price reasons for purchasing imported rather than U.S.-produced product.

Of the 27 responding purchasers, 2 reported that U.S. producers had reduced prices in order to compete with lower-priced imports; 12 reported that they did not know (table 6.34). The reported estimated price reduction ranged from 10 to 15 percent. In describing the price reductions, purchasers indicated they were customer specific discounts which were given because of price discussions.



Quantity in 1,000 square feet; Change in shares in percentage points

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

6.51

**Table 6.32 QSP: U.S. purchasers' responses to purchasing imports instead of domestic product, by source**

Count in number of firms reporting; Quantity in 1,000 square feet

| Source            | Purchased imports instead of domestic | Imports priced lower | Choice based on price | Quantity |
|-------------------|---------------------------------------|----------------------|-----------------------|----------|
| Canada            | 3                                     | 0                    | 0                     | ***      |
| China             | 5                                     | 2                    | 2                     | ***      |
| Czechia           | 2                                     | 1                    | 2                     | ***      |
| India             | 11                                    | 6                    | 6                     | ***      |
| Israel            | 2                                     | 1                    | 1                     | ***      |
| Italy             | 3                                     | 2                    | 2                     | ***      |
| Malaysia          | 7                                     | 3                    | 3                     | ***      |
| Mexico            | 1                                     | 1                    | 1                     | ***      |
| Spain             | 6                                     | 2                    | 2                     | ***      |
| Taiwan            | 2                                     | 1                    | 1                     | ***      |
| Thailand          | 6                                     | 2                    | 1                     | ***      |
| Turkey            | 2                                     | 1                    | 1                     | ***      |
| Vietnam           | 12                                    | 8                    | 5                     | ***      |
| Other FTA sources | 2                                     | 1                    | 1                     | ***      |
| All other sources | 7                                     | 4                    | 4                     | ***      |
| All sources       | 15                                    | 10                   | 8                     | 46,067   |

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

**Table 6.33 QSP: Purchasers' responses to purchasing subject imports instead of domestic product, by firm**

Quantity in 1,000 square feet

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

Table continued.

Quantity in 1,000 square feet

Table continued.

**Table 6.33 (Continued) QSP: Purchasers' responses to purchasing subject imports instead of domestic product, by firm**

Quantity in 1,000 square feet

| Firm      | Purchased imports instead of domestic | Imports priced lower | Choice based on price | Quantity | Narrative on reasons for purchasing imports |
|-----------|---------------------------------------|----------------------|-----------------------|----------|---------------------------------------------|
| ***       | ***                                   | ***                  | ***                   | ***      | ***                                         |
| All firms | Yes: 15;<br>No: 8                     | Yes: 10;<br>No: 6    | Yes: 8;<br>No: 8      | ***      | NA                                          |

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

Table 6.34 QSP: Table 6.35 QSP: Purchasers' responses to U.S. producer price reductions, by firm

| Firm      | Producers lowered prices | Price reduction | Narrative on producer price reductions |
|-----------|--------------------------|-----------------|----------------------------------------|
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| ***       | ***                      | ***             | ***                                    |
| All firms | Yes: 2; No: 13           | ***             | NA                                     |

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

**APPENDIX A**

**FEDERAL REGISTER NOTICES**





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

| Citation                         | Title                                                                                                                                                         | Link                                                                                                                                                    |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| 90 FR 55165,<br>December 1, 2025 | Quartz Surface Products; Institution of Investigation, Scheduling of Public Hearings, and Determination That the Investigation Is Extraordinarily Complicated | <a href="https://www.govinfo.gov/content/pkg/FR-2025-12-01/pdf/2025-21715.pdf">https://www.govinfo.gov/content/pkg/FR-2025-12-01/pdf/2025-21715.pdf</a> |



## **APPENDIX B**

### **LIST OF HEARING WITNESSES**

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## CALENDAR OF PUBLIC HEARING

Those listed below appeared in the United States International Trade Commission's hearing:

**Subject:** Quartz Surface Products  
**Inv. No.:** TA-201-79 (Injury)  
**Date and Time:** February 24, 2026 – 9:30 a.m.

Sessions were held in connection with this investigation in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, D.C.

### **CONGRESSIONAL APPEARANCES:**

**The Honorable Amy Klobuchar, United States Senator, Minnesota**

**The Honorable Tom Emmer (*remote witness*), U.S. Representative, 6<sup>th</sup> District, Minnesota**

### **EMBASSY APPEARANCES:**

***Embassy of the People's Republic of China***  
**Washington, DC**

**ZHAO Zhao, Counselor, Economic and Commercial Office**

**ZHAO Mengying, First Secretary, Economic and Commercial Office**

***Embassy of Spain***  
**Washington, DC**

**Juan Francisco Martinez, Economic and Commercial Head Counselor**

**Maria Pilar de Carlos, Commercial Counselor**

***Embassy of India***  
**Washington, DC**

**Rajesh Khanna, Attache (Commerce)**

**Harshala Chandraiah, Marketing Executive**

**EMBASSY APPEARANCES (continued):**

***Embassy of Malaysia***

Washington, DC

Syed Mohd Faizal Syed Mohd Dardin, Minister (Economic Affairs) Economic Office

Hariharan Subramaniam, First Secretary (Economic Affairs) Economic Office

***Embassy of Korea***

Washington, DC

Wonhee Lee (**remote witness**), Director of Trade Legal Affairs and Planning Division Ministry of Trade, Industry and Resources

**FOREIGN GOVERNMENT APPEARANCES:**

***European Union Delegation to the United States of America***

Washington, DC

Nuno Sousa Counselor, Deputy Head of Section - Trade, Economic Security, and Agriculture  
Delegation of the European Union

***The Government of the Republic of Türkiye***

Ministry of Trade Directorate General for Imports of the Government of Turkey

Atilla Uğur BAŞIBUĞ (**remote witness**), Head of Department, Directorate General for Imports

**OPENING REMARKS:**

In Support of Safeguard (**Luke A. Meisner**, Schagrin Associates)

In Opposition to Safeguard (**Jonathan T. Stoel**, Hogan Lovells US LLP)

**IN SUPPORT OF SAFEGUARD:**

Schagrin Associates  
Washington, DC  
on behalf of

Quartz Manufacturing Alliance of America (“QMAA”)

**Marty Davis**, Chief Executive Officer, Cambria Company LLC

**Andrew Eich**, President, Cambria Company LLC

**Matt Kahny**, President, Dal-Tile LLC

**Roy Viana**, Director for Slab Products, Dal-Tile LLC

**Daniel Vaz De Melo Sa**, Business Development Manager / Secretary,  
Guidoni USA, Inc.

**Michael Morici**, Vice President of Surfaces, LX Hausys America, Inc.

|                                      |                |
|--------------------------------------|----------------|
| <b>Ambassador Jeffrey D. Gerrish</b> | )              |
| <b>Luke A. Meisner</b>               | ) – OF COUNSEL |
| <b>Saad Y. Chalchal</b>              | )              |

**OTHER REMARKS:**

Sidley Austin LLP  
Washington, DC  
on behalf of

C&C North America, Inc.

**Brandon Calvo**, Chief Operating Officer of C&C North America, Inc.

|                              |                |
|------------------------------|----------------|
| <b>Michael E. Murphy</b>     | )              |
| <b>John M. Foote</b>         | ) – OF COUNSEL |
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Washington, DC  
on behalf of

Hyundai L&C Canada, Inc.

**Saul Braga**, Production Manager of Hyundai L&C Canada

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**IN OPPOSITION TO SAFEGUARD:**

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on behalf of

Arizona Tile LLC (“Arizona Tile”)  
Elite Quartz Manufacturing (“Elite Quartz”)  
M S International, Inc. (“MSI”)

**John Omohundro**, Senior Director of Purchasing & Supply Chain, Arizona Tile LLC

**Kobi Brenner**, Chief Executive Officer, Caesarstone US

**Yos Shiran**, Chief Executive Officer, Caesarstone Ltd.

**Darrell Tuberville**, General Manager, Elite Quartz Manufacturing

**Rupesh Shah**, President, M S International, Inc.

**Ken Gear**, Chief Executive Officer, Leading Builders of America

**Travis Pope**, Principal, Capital Trade Inc

**Emma K. Peterson**, Director of Int’l Trade Analytics, Hogan Lovells US LLP

**Janelle Edmonds**, Chief Supply Officer, Wisenbaker Builder Services Inc.

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**IN OPPOSITION TO SAFEGUARD (continued):**

Steptoe LLP  
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on behalf of

Benea Surfaces, Vicostone JSC, Vicostone USA, Vietnam Quartz Joint Stock Company;  
Nhat Huy Stone Fabrication Manufacturer Joint Stock Company;  
Phu Son Joint Stock Company, Phu Tai Quartz Stone Company Limited;  
New Stone Technology Joint Stock Company, Grandhome Stone Vina Company Limited;  
and Century Stone Joint Stock Company  
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**IN OPPOSITION TO SAFEGUARD (continued):**

Taft Stettinius & Hollister LLP  
Washington, DC  
on behalf of

Federation of the Indian Quartz Surface Industry (“Federation”)

|                             |                |
|-----------------------------|----------------|
| <b>R. Will Planert</b>      | )              |
|                             | ) – OF COUNSEL |
| <b>Edward J. Thomas III</b> | )              |

**REBUTTAL/CLOSING REMARKS:**

In Support of Safeguard (**Luke A. Meisner**, Schagrin Associates)  
In Opposition to Safeguard (**Michael G. Jacobson**, Hogan Lovells US LLP)

**- END -**

## CALENDAR OF PUBLIC HEARING

Those listed below appeared in the United States International Trade Commission's hearing:

**Subject:** Quartz Surface Products  
**Inv. No.:** TA-201-79 (Remedy)  
**Date and Time:** April 14, 2026 – 9:30 a.m.

Sessions were held in connection with this investigation in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, D.C.

### **EMBASSY APPEARANCES:**

***Embassy of the People's Republic of China***  
Washington, DC

Sun Yu, First Secretary, Economic and Commercial Office

Zheng Mengsi, Second Secretary, Economic and Commercial Office

***Embassy of India***  
Washington, DC

Shreyans Gupta, First Secretary (Commerce)

Rajesh Khanna, Attache (Commerce)

***Embassy of Korea***  
Washington, DC

Joosil Han (**remote witness**), Director of Trade Legal Affairs and Planning Division Ministry of Trade, Industry and Resources

***Embassy of Spain***  
Washington, DC

Maria Pilar de Carlos, Commercial Counselor

**EMBASSY APPEARANCES (continued):**

*Embassy of Vietnam*  
Washington, DC

Do Ngoc Hung, Counsellor, Head of Trade Office

Luong Kim Thanh, First Secretary, Trade Office

**FOREIGN GOVERNMENT APPEARANCES:**

*European Union Delegation to the United States of America*  
Washington, DC

Michelangelo Margherita, Minister Counselor, Head of Section - Trade, Economic Security, and Agriculture

**OPENING REMARKS:**

In Support of Safeguard (**Luke A. Meisner**, Schagrin Associates)  
In Opposition to Safeguard (**Jonathan T. Stoel**, Hogan Lovells US LLP)

**INTERESTED NONPARTIES:**

American Countertop Manufactures Council

**Austin Maxwell**, President

California Surfaces, LLC

**Peter Dominguez**, President

GMD Surfaces

**Omar Chahin**, President

The George Washington University

**Professor David Michaels**, PhD, MPH

Stone Fabricators Alliance

**Tim Zeng**, Owner

**INTERESTED NONPARTIES (continued):**

The Artisan Group

**William Millar**, Member

McDermott Top Shop, LLC

**Travis McDermott**, President

FloForm Countertops

**E.J. (Ted) Sherritt**, Chief Executive Officer

**IN SUPPORT OF SAFEGUARD:**

Schagrin Associates  
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on behalf of

Quartz Manufacturing Alliance of America ("QMAA")

**Marty Davis**, Chief Executive Officer, Cambria Company LLC

**Andrew Eich**, President, Cambria Company LLC

**Matt Kahny**, President, Dal-Tile LLC

**Daniel Vaz De Melo Sa**, Business Development Manager/Secretary,  
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**Michael Morici**, Vice President of Surfaces, LX Hausys America, Inc.

**Russell Montgomery**, Executive Vice President and Chief Operating Officer, Covia  
Corp.

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| <b>Maliha Khan</b>     | )              |

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**Brandon Calvo**, Chief Operating Officer of C&C North America, Inc.

**John M. Foote**

) – OF COUNSEL

**IN OPPOSITION TO SAFEGUARD:**

Hogan Lovells US LLP  
Washington, DC  
on behalf of

Arizona Tile LLC (“Arizona Tile”)  
Elite Quartz Manufacturing (“Elite Quartz”)  
M S International, Inc. (“MSI”)

**Darrell Tuberville**, General Manager, Elite Quartz Manufacturing

**Rupesh Shah**, President, M S International, Inc.

**Brad Rush**, Executive Director, Granite South Inc.

**Ron Mosberg**, General Counsel & Corporate Secretary, Caesarstone Ltd.

**Tony Kilic**, President, Classic Granite & Marble

**Rich Katzmman**, Co-Founder and Chief Commercial Officer,  
Thryve AI (former Executive Director, The Rockheads Group)

**Ken Gear**, Chief Executive Officer, Leading Builders of America

**Emma K. Peterson**, Director of Int’l Trade Analytics, Hogan Lovells US LLP

**Travis Pope**, Principal, Capital Trade Inc.

**Jonathan T. Stoel**

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**Michael G. Jacobson**

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**IN OPPOSITION TO SAFEGUARD (continued):**

Steptoe LLP  
Washington, DC  
on behalf of

Benea Surfaces, Vicostone JSC, Vicostone USA, Vietnam Quartz Joint Stock Company;  
Nhat Huy Stone Fabrication Manufacturer Joint Stock Company;  
Phu Son Joint Stock Company, Phu Tai Quartz Stone Company Limited;  
New Stone Technology Joint Stock Company, Grandhome Stone Vina Company Limited;  
and Century Stone Joint Stock Company  
(collectively “the Alliance of Vietnamese Quartz Surface Products Manufacturers”)

**Eric C. Emerson** ) – OF COUNSEL

Crowell & Moring, LLP  
Washington, DC  
on behalf of

Global Surfaces FZE (“Global”)  
Madhav Surfaces FZC LLC (“Madhav”)

**Valerie Ellis** ) – OF COUNSEL

Fox Rothschild LLP  
Washington, DC  
on behalf of

Casablanca Vietnam Joint Stock Company (“Casablanca”)  
Wilsonart LLC (“Wilsonart”)

**Brittney R. Powell** ) – OF COUNSEL

Mayer Brown LLP  
Washington, DC  
on behalf of

Royal House Manufacture and Investment Joint Stock Company  
 (“Royal House”)

**Ryan R. Migeed** ) – OF COUNSEL



**IN OPPOSITION TO SAFEGUARD (continued):**

Taft Stettinius & Hollister LLP  
Washington, DC  
on behalf of

Federation of the Indian Quartz Surface Industry (“Federation”)

**R. Will Planert** )  
 ) – OF COUNSEL  
**Edward J. Thomas III** )

Sheppard, Mullin, Ritcher & Hampton LLP  
Washington, DC  
on behalf of

Lotte Chemical California, Inc. (“LCCA”)

**J. Scott Maberry** )  
 ) – OF COUNSEL  
**Henry K. Chen** )

**REBUTTAL/CLOSING REMARKS:**

In Support of Safeguard (**Luke A. Meisner**, Schagrin Associates)  
In Opposition to Safeguard (**Michael G. Jacobson** and **Emma Peterson**, Hogan Lovells US LLP)



**APPENDIX C**

**SUMMARY DATA**

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## U.S. producers only

**Table C.1**

**QSP: Summary data on the U.S. market, defining the domestic industry as U.S. producers, by item and period**

Quantity=1,000 square feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per square foot; Productivity=square feet per hour; Period changes=percent—exceptions noted; Interim period is January through September

| Item                        | Reported data |           |                       |           |           |           | Interim<br>2025 |
|-----------------------------|---------------|-----------|-----------------------|-----------|-----------|-----------|-----------------|
|                             | 2020          | 2021      | Calendar year<br>2022 | 2023      | 2024      | 2024      |                 |
| U.S. consumption quantity:  |               |           |                       |           |           |           |                 |
| Amount.....                 | 162,714       | 236,992   | 249,699               | 220,676   | 264,615   | 190,635   | 188,419         |
| Producers' share (fn1)..... | 19.4          | 17.1      | 15.5                  | 16.1      | 11.7      | 12.4      | 11.7            |
| Importers' share (fn1):     |               |           |                       |           |           |           |                 |
| Canada.....                 | 5.0           | 3.3       | 2.4                   | 2.2       | 1.8       | 1.9       | 1.4             |
| China.....                  | 0.6           | 0.4       | 1.1                   | 0.9       | 1.2       | 1.3       | 0.2             |
| Czechia.....                | 1.5           | 1.5       | 1.6                   | 1.1       | 1.1       | 1.1       | 1.0             |
| India.....                  | 16.5          | 22.9      | 27.4                  | 25.6      | 32.0      | 30.8      | 34.5            |
| Israel.....                 | 5.8           | 3.1       | 2.5                   | 1.1       | 0.6       | 0.6       | 0.3             |
| Italy.....                  | 2.5           | 2.2       | 1.3                   | 0.8       | 0.4       | 0.5       | 0.2             |
| Malaysia.....               | 7.6           | 6.8       | 2.3                   | 2.3       | 3.8       | 3.4       | 4.6             |
| Mexico.....                 | 0.1           | 0.0       | 0.0                   | 0.0       | 0.0       | 0.0       | 0.0             |
| Spain.....                  | 15.3          | 15.3      | 17.6                  | 14.2      | 12.9      | 12.9      | 12.4            |
| Taiwan.....                 | 2.6           | 2.2       | 1.7                   | 1.9       | 1.2       | 1.3       | 0.8             |
| Thailand.....               | 0.8           | 1.7       | 5.6                   | 9.3       | 10.6      | 10.0      | 10.5            |
| Turkey.....                 | 3.2           | 4.4       | 3.8                   | 3.0       | 2.3       | 2.5       | 2.0             |
| Vietnam.....                | 11.9          | 14.0      | 13.9                  | 17.5      | 16.5      | 17.1      | 15.8            |
| Other FTA sources.....      | 3.5           | 2.3       | 0.8                   | 0.7       | 0.5       | 0.5       | 0.4             |
| All other sources.....      | 3.5           | 2.8       | 2.6                   | 3.2       | 3.7       | 3.8       | 4.3             |
| All import sources.....     | 80.6          | 82.9      | 84.5                  | 83.9      | 88.3      | 87.6      | 88.3            |
| U.S. consumption value:     |               |           |                       |           |           |           |                 |
| Amount.....                 | 1,901,867     | 2,712,054 | 2,888,971             | 2,384,226 | 2,488,639 | 1,842,411 | 1,763,920       |
| Producers' share (fn1)..... | 34.9          | 31.5      | 32.2                  | 36.2      | 30.1      | 31.1      | 30.9            |
| Importers' share (fn1):     |               |           |                       |           |           |           |                 |
| Canada.....                 | 4.9           | 3.4       | 2.8                   | 2.7       | 2.4       | 2.5       | 1.8             |
| China.....                  | 0.4           | 0.4       | 0.5                   | 0.4       | 0.4       | 0.4       | 0.1             |
| Czechia.....                | 1.0           | 1.0       | 1.2                   | 0.9       | 0.9       | 0.8       | 0.9             |
| India.....                  | 9.4           | 13.8      | 19.4                  | 15.5      | 20.6      | 19.4      | 23.1            |
| Israel.....                 | 5.3           | 2.8       | 2.3                   | 1.1       | 0.6       | 0.6       | 0.3             |
| Italy.....                  | 2.0           | 1.8       | 1.1                   | 0.6       | 0.2       | 0.3       | 0.2             |
| Malaysia.....               | 5.4           | 5.5       | 2.0                   | 1.5       | 2.8       | 2.4       | 3.8             |
| Mexico.....                 | 0.1           | 0.0       | 0.0                   | 0.0       | 0.0       | 0.0       | 0.1             |
| Spain.....                  | 14.2          | 14.7      | 13.0                  | 11.0      | 9.3       | 10.0      | 8.4             |
| Taiwan.....                 | 2.4           | 2.2       | 1.7                   | 1.7       | 1.2       | 1.3       | 0.8             |
| Thailand.....               | 0.5           | 1.4       | 5.2                   | 8.6       | 11.1      | 10.3      | 9.9             |
| Turkey.....                 | 2.3           | 3.2       | 2.9                   | 2.3       | 1.9       | 2.0       | 1.7             |
| Vietnam.....                | 10.6          | 12.9      | 12.5                  | 14.2      | 14.9      | 15.1      | 14.6            |
| Other FTA sources.....      | 3.2           | 2.2       | 0.7                   | 0.7       | 0.5       | 0.6       | 0.4             |
| All other sources.....      | 3.2           | 3.0       | 2.6                   | 2.7       | 3.1       | 3.2       | 3.1             |
| All import sources.....     | 65.1          | 68.5      | 67.8                  | 63.8      | 69.9      | 68.9      | 69.1            |

Table continued.

Table C.1 Continued

**QSP: Summary data on the U.S. market, defining the domestic industry as U.S. producers, by item and period**

Quantity=1,000 square feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per square foot; Productivity=square feet per hour; Period changes=percent—exceptions noted; Interim period is January through September

| Item                        | Period change comparisons |         |                          |         |         | Interim<br>2024–25 |
|-----------------------------|---------------------------|---------|--------------------------|---------|---------|--------------------|
|                             | 2020–24                   | 2020–21 | Calendar year<br>2021–22 | 2022–23 | 2023–24 |                    |
| U.S. consumption quantity:  |                           |         |                          |         |         |                    |
| Amount.....                 | ▲62.6                     | ▲45.6   | ▲5.4                     | ▼(11.6) | ▲19.9   | ▼(1.2)             |
| Producers' share (fn1)..... | ▼(7.8)                    | ▼(2.3)  | ▼(1.6)                   | ▲0.6    | ▼(4.5)  | ▼(0.6)             |
| Importers' share (fn1):     |                           |         |                          |         |         |                    |
| Canada.....                 | ▼(3.2)                    | ▼(1.7)  | ▼(0.9)                   | ▼(0.1)  | ▼(0.5)  | ▼(0.6)             |
| China.....                  | ▲0.6                      | ▼(0.2)  | ▲0.6                     | ▼(0.1)  | ▲0.3    | ▼(1.1)             |
| Czechia.....                | ▼(0.4)                    | ▼(0.1)  | ▲0.1                     | ▼(0.4)  | ▼(0.0)  | ▼(0.1)             |
| India.....                  | ▲15.4                     | ▲6.4    | ▲4.5                     | ▼(1.8)  | ▲6.3    | ▲3.7               |
| Israel.....                 | ▼(5.2)                    | ▼(2.7)  | ▼(0.6)                   | ▼(1.4)  | ▼(0.6)  | ▼(0.3)             |
| Italy.....                  | ▼(2.1)                    | ▼(0.3)  | ▼(0.9)                   | ▼(0.5)  | ▼(0.3)  | ▼(0.3)             |
| Malaysia.....               | ▼(3.8)                    | ▼(0.8)  | ▼(4.5)                   | ▼(0.1)  | ▲1.5    | ▲1.2               |
| Mexico.....                 | ▼(0.1)                    | ▼(0.1)  | ▼(0.0)                   | ▲0.0    | ▲0.0    | ▲0.0               |
| Spain.....                  | ▼(2.5)                    | ▼(0.0)  | ▲2.3                     | ▼(3.4)  | ▼(1.3)  | ▼(0.5)             |
| Taiwan.....                 | ▼(1.4)                    | ▼(0.4)  | ▼(0.5)                   | ▲0.2    | ▼(0.7)  | ▼(0.5)             |
| Thailand.....               | ▲9.7                      | ▲0.9    | ▲3.9                     | ▲3.7    | ▲1.3    | ▲0.5               |
| Turkey.....                 | ▼(0.9)                    | ▲1.2    | ▼(0.6)                   | ▼(0.8)  | ▼(0.7)  | ▼(0.5)             |
| Vietnam.....                | ▲4.5                      | ▲2.0    | ▼(0.1)                   | ▲3.7    | ▼(1.1)  | ▼(1.3)             |
| Other FTA sources.....      | ▼(3.0)                    | ▼(1.2)  | ▼(1.6)                   | ▼(0.1)  | ▼(0.2)  | ▼(0.1)             |
| All other sources.....      | ▲0.2                      | ▼(0.7)  | ▼(0.2)                   | ▲0.6    | ▲0.5    | ▲0.5               |
| All import sources.....     | ▲7.8                      | ▲2.3    | ▲1.6                     | ▼(0.6)  | ▲4.5    | ▲0.6               |
| U.S. consumption value:     |                           |         |                          |         |         |                    |
| Amount.....                 | ▲30.9                     | ▲42.6   | ▲6.5                     | ▼(17.5) | ▲4.4    | ▼(4.3)             |
| Producers' share (fn1)..... | ▼(4.8)                    | ▼(3.4)  | ▲0.8                     | ▲3.9    | ▼(6.1)  | ▼(0.2)             |
| Importers' share (fn1):     |                           |         |                          |         |         |                    |
| Canada.....                 | ▼(2.5)                    | ▼(1.5)  | ▼(0.6)                   | ▼(0.1)  | ▼(0.4)  | ▼(0.7)             |
| China.....                  | ▼(0.0)                    | ▼(0.0)  | ▲0.1                     | ▼(0.2)  | ▲0.1    | ▼(0.4)             |
| Czechia.....                | ▼(0.1)                    | ▲0.1    | ▲0.2                     | ▼(0.4)  | ▲0.0    | ▲0.0               |
| India.....                  | ▲11.3                     | ▲4.5    | ▲5.5                     | ▼(3.9)  | ▲5.2    | ▲3.8               |
| Israel.....                 | ▼(4.8)                    | ▼(2.5)  | ▼(0.5)                   | ▼(1.2)  | ▼(0.5)  | ▼(0.3)             |
| Italy.....                  | ▼(1.8)                    | ▼(0.2)  | ▼(0.7)                   | ▼(0.5)  | ▼(0.4)  | ▼(0.1)             |
| Malaysia.....               | ▼(2.6)                    | ▲0.1    | ▼(3.5)                   | ▼(0.5)  | ▲1.3    | ▲1.3               |
| Mexico.....                 | ▼(0.1)                    | ▼(0.1)  | ▼(0.0)                   | ▲0.0    | ▲0.0    | ▲0.0               |
| Spain.....                  | ▼(4.9)                    | ▲0.5    | ▼(1.7)                   | ▼(1.9)  | ▼(1.7)  | ▼(1.6)             |
| Taiwan.....                 | ▼(1.2)                    | ▼(0.2)  | ▼(0.5)                   | ▼(0.1)  | ▼(0.5)  | ▼(0.4)             |
| Thailand.....               | ▲10.6                     | ▲0.9    | ▲3.8                     | ▲3.4    | ▲2.4    | ▼(0.4)             |
| Turkey.....                 | ▼(0.4)                    | ▲0.9    | ▼(0.3)                   | ▼(0.6)  | ▼(0.4)  | ▼(0.3)             |
| Vietnam.....                | ▲4.3                      | ▲2.2    | ▼(0.4)                   | ▲1.8    | ▲0.7    | ▼(0.5)             |
| Other FTA sources.....      | ▼(2.7)                    | ▼(1.0)  | ▼(1.6)                   | ▲0.0    | ▼(0.1)  | ▼(0.2)             |
| All other sources.....      | ▼(0.1)                    | ▼(0.3)  | ▼(0.4)                   | ▲0.1    | ▲0.4    | ▼(0.1)             |
| All import sources.....     | ▲4.8                      | ▲3.4    | ▼(0.8)                   | ▼(3.9)  | ▲6.1    | ▲0.2               |

Table continued.

Table C.1 Continued

**QSP: Summary data on the U.S. market, defining the domestic industry as U.S. producers, by item and period**

Quantity=1,000 square feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per square foot; Productivity=square feet per hour; Period changes=percent—exceptions noted; Interim period is January through September

| Item                           | Reported data |         |         |         |         |         |         |
|--------------------------------|---------------|---------|---------|---------|---------|---------|---------|
|                                | Calendar year |         |         |         |         | Interim |         |
|                                | 2020          | 2021    | 2022    | 2023    | 2024    | 2024    | 2025    |
| U.S. imports from:             |               |         |         |         |         |         |         |
| Canada:                        |               |         |         |         |         |         |         |
| Quantity.....                  | 8,142         | 7,760   | 5,896   | 4,945   | 4,714   | 3,688   | 2,584   |
| Value.....                     | 92,989        | 92,961  | 80,854  | 65,264  | 58,647  | 45,706  | 31,742  |
| Unit value.....                | \$11.42       | \$11.98 | \$13.71 | \$13.20 | \$12.44 | \$12.39 | \$12.28 |
| Ending inventory quantity..... | 965           | 842     | 1,523   | 1,558   | 1,660   | 1,658   | 1,509   |
| China:                         |               |         |         |         |         |         |         |
| Quantity.....                  | 976           | 1,024   | 2,654   | 2,017   | 3,151   | 2,570   | 405     |
| Value.....                     | 8,306         | 11,386  | 15,318  | 8,365   | 10,306  | 8,063   | 1,330   |
| Unit value.....                | \$8.51        | \$11.12 | \$5.77  | \$4.15  | \$3.27  | \$3.14  | \$3.28  |
| Ending inventory quantity..... | 1,800         | 1,568   | 1,427   | 1,236   | 1,126   | 1,131   | 1,038   |
| Czechia:                       |               |         |         |         |         |         |         |
| Quantity.....                  | 2,514         | 3,448   | 3,879   | 2,533   | 2,911   | 2,046   | 1,864   |
| Value.....                     | 18,712        | 28,403  | 35,683  | 20,722  | 22,292  | 15,438  | 15,249  |
| Unit value.....                | \$7.44        | \$8.24  | \$9.20  | \$8.18  | \$7.66  | \$7.55  | \$8.18  |
| Ending inventory quantity..... | 1,204         | 1,552   | 1,778   | 1,495   | 1,643   | 1,535   | 1,581   |
| India:                         |               |         |         |         |         |         |         |
| Quantity.....                  | 26,924        | 54,381  | 68,521  | 56,508  | 84,547  | 58,648  | 64,947  |
| Value.....                     | 178,190       | 374,932 | 559,355 | 368,604 | 513,591 | 356,641 | 407,631 |
| Unit value.....                | \$6.62        | \$6.89  | \$8.16  | \$6.52  | \$6.07  | \$6.08  | \$6.28  |
| Ending inventory quantity..... | 6,884         | 8,740   | 14,434  | 13,054  | 15,080  | 14,429  | 16,125  |
| Israel:                        |               |         |         |         |         |         |         |
| Quantity.....                  | 9,360         | 7,274   | 6,227   | 2,491   | 1,501   | 1,187   | 542     |
| Value.....                     | 101,463       | 76,669  | 66,271  | 25,361  | 13,702  | 10,997  | 4,878   |
| Unit value.....                | \$10.84       | \$10.54 | \$10.64 | \$10.18 | \$9.13  | \$9.26  | \$9.00  |
| Ending inventory quantity..... | 4,620         | 5,443   | 4,228   | 2,052   | 1,741   | 1,833   | 1,314   |
| Italy:                         |               |         |         |         |         |         |         |
| Quantity.....                  | 4,077         | 5,153   | 3,221   | 1,671   | 1,121   | 911     | 296     |
| Value.....                     | 38,758        | 48,559  | 30,905  | 13,709  | 5,147   | 5,015   | 3,517   |
| Unit value.....                | \$9.51        | \$9.42  | \$9.59  | \$8.20  | \$4.59  | \$5.51  | \$11.86 |
| Ending inventory quantity..... | 1,243         | 1,466   | 1,182   | 865     | 947     | 824     | 845     |
| Malaysia:                      |               |         |         |         |         |         |         |
| Quantity.....                  | 12,385        | 16,127  | 5,836   | 4,981   | 9,990   | 6,431   | 8,622   |
| Value.....                     | 103,227       | 149,671 | 56,968  | 36,140  | 69,901  | 44,959  | 66,590  |
| Unit value.....                | \$8.33        | \$9.28  | \$9.76  | \$7.26  | \$7.00  | \$6.99  | \$7.72  |
| Ending inventory quantity..... | 1,924         | 3,514   | 1,324   | 1,517   | 2,446   | 1,879   | 2,152   |
| Mexico:                        |               |         |         |         |         |         |         |
| Quantity.....                  | 189           | 35      | 17      | 36      | 54      | 30      | 65      |
| Value.....                     | 1,532         | 502     | 108     | 455     | 713     | 455     | 1,009   |
| Unit value.....                | \$8.11        | \$14.47 | \$6.28  | \$12.65 | \$13.20 | \$14.94 | \$15.64 |
| Ending inventory quantity..... | —             | 13      | —       | —       | —       | —       | —       |
| Spain:                         |               |         |         |         |         |         |         |
| Quantity.....                  | 24,948        | 36,304  | 44,067  | 31,348  | 34,052  | 24,579  | 23,414  |
| Value.....                     | 270,658       | 398,494 | 374,201 | 262,527 | 232,591 | 184,255 | 147,580 |
| Unit value.....                | \$10.85       | \$10.98 | \$8.49  | \$8.37  | \$6.83  | \$7.50  | \$6.30  |
| Ending inventory quantity..... | 10,508        | 11,612  | 15,286  | 12,029  | 15,714  | 12,347  | 16,916  |

Table continued.

Table C.1 Continued

QSP: Summary data on the U.S. market, defining the domestic industry as U.S. producers, by item and period

Quantity=1,000 square feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per square foot; Productivity=square feet per hour; Period changes=percent—exceptions noted; Interim period is January through September

| Item                           | Period change comparisons |         |                          |         |         | Interim<br>2024–25 |
|--------------------------------|---------------------------|---------|--------------------------|---------|---------|--------------------|
|                                | 2020–24                   | 2020–21 | Calendar year<br>2021–22 | 2022–23 | 2023–24 |                    |
| U.S. imports from:             |                           |         |                          |         |         |                    |
| Canada:                        |                           |         |                          |         |         |                    |
| Quantity.....                  | ▼(42.1)                   | ▼(4.7)  | ▼(24.0)                  | ▼(16.1) | ▼(4.7)  | ▼(29.9)            |
| Value.....                     | ▼(36.9)                   | ▼(0.0)  | ▼(13.0)                  | ▼(19.3) | ▼(10.1) | ▼(30.6)            |
| Unit value.....                | ▲8.9                      | ▲4.9    | ▲14.5                    | ▼(3.8)  | ▼(5.7)  | ▼(0.9)             |
| Ending inventory quantity..... | ▲72.0                     | ▼(12.8) | ▲80.8                    | ▲2.4    | ▲6.5    | ▼(9.0)             |
| China:                         |                           |         |                          |         |         |                    |
| Quantity.....                  | ▲222.9                    | ▲5.0    | ▲159.1                   | ▼(24.0) | ▲56.2   | ▼(84.2)            |
| Value.....                     | ▲24.1                     | ▲37.1   | ▲34.5                    | ▼(45.4) | ▲23.2   | ▼(83.5)            |
| Unit value.....                | ▼(61.6)                   | ▲30.5   | ▼(48.1)                  | ▼(28.1) | ▼(21.1) | ▲4.7               |
| Ending inventory quantity..... | ▼(37.4)                   | ▼(12.9) | ▼(9.0)                   | ▼(13.4) | ▼(8.9)  | ▼(8.2)             |
| Czechia:                       |                           |         |                          |         |         |                    |
| Quantity.....                  | ▲15.8                     | ▲37.2   | ▲12.5                    | ▼(34.7) | ▲14.9   | ▼(8.9)             |
| Value.....                     | ▲19.1                     | ▲51.8   | ▲25.6                    | ▼(41.9) | ▲7.6    | ▼(1.2)             |
| Unit value.....                | ▲2.9                      | ▲10.7   | ▲11.6                    | ▼(11.1) | ▼(6.4)  | ▲8.4               |
| Ending inventory quantity..... | ▲36.5                     | ▲28.9   | ▲14.6                    | ▼(15.9) | ▲9.9    | ▲3.0               |
| India:                         |                           |         |                          |         |         |                    |
| Quantity.....                  | ▲214.0                    | ▲102.0  | ▲26.0                    | ▼(17.5) | ▲49.6   | ▲10.7              |
| Value.....                     | ▲188.2                    | ▲110.4  | ▲49.2                    | ▼(34.1) | ▲39.3   | ▲14.3              |
| Unit value.....                | ▼(8.2)                    | ▲4.2    | ▲18.4                    | ▼(20.1) | ▼(6.9)  | ▲3.2               |
| Ending inventory quantity..... | ▲119.1                    | ▲27.0   | ▲65.2                    | ▼(9.6)  | ▲15.5   | ▲11.8              |
| Israel:                        |                           |         |                          |         |         |                    |
| Quantity.....                  | ▼(84.0)                   | ▼(22.3) | ▼(14.4)                  | ▼(60.0) | ▼(39.8) | ▼(54.4)            |
| Value.....                     | ▼(86.5)                   | ▼(24.4) | ▼(13.6)                  | ▼(61.7) | ▼(46.0) | ▼(55.6)            |
| Unit value.....                | ▼(15.8)                   | ▼(2.8)  | ▲1.0                     | ▼(4.3)  | ▼(10.3) | ▼(2.8)             |
| Ending inventory quantity..... | ▼(62.3)                   | ▲17.8   | ▼(22.3)                  | ▼(51.5) | ▼(15.1) | ▼(28.3)            |
| Italy:                         |                           |         |                          |         |         |                    |
| Quantity.....                  | ▼(72.5)                   | ▲26.4   | ▼(37.5)                  | ▼(48.1) | ▼(32.9) | ▼(67.5)            |
| Value.....                     | ▼(86.7)                   | ▲25.3   | ▼(36.4)                  | ▼(55.6) | ▼(62.5) | ▼(29.9)            |
| Unit value.....                | ▼(51.7)                   | ▼(0.9)  | ▲1.8                     | ▼(14.5) | ▼(44.0) | ▲115.5             |
| Ending inventory quantity..... | ▼(23.8)                   | ▲18.0   | ▼(19.4)                  | ▼(26.8) | ▲9.6    | ▲2.5               |
| Malaysia:                      |                           |         |                          |         |         |                    |
| Quantity.....                  | ▼(19.3)                   | ▲30.2   | ▼(63.8)                  | ▼(14.6) | ▲100.6  | ▲34.1              |
| Value.....                     | ▼(32.3)                   | ▲45.0   | ▼(61.9)                  | ▼(36.6) | ▲93.4   | ▲48.1              |
| Unit value.....                | ▼(16.1)                   | ▲11.4   | ▲5.2                     | ▼(25.7) | ▼(3.6)  | ▲10.5              |
| Ending inventory quantity..... | ▲27.2                     | ▲82.7   | ▼(62.3)                  | ▲14.6   | ▲61.3   | ▲14.5              |
| Mexico:                        |                           |         |                          |         |         |                    |
| Quantity.....                  | ▼(71.4)                   | ▼(81.6) | ▼(50.4)                  | ▲108.9  | ▲50.2   | ▲111.8             |
| Value.....                     | ▼(53.5)                   | ▼(67.2) | ▼(78.5)                  | ▲320.7  | ▲56.7   | ▲121.7             |
| Unit value.....                | ▲62.8                     | ▲78.4   | ▼(56.6)                  | ▲101.4  | ▲4.3    | ▲4.7               |
| Ending inventory quantity..... | —                         | ▲—      | ▼(100.0)                 | —       | —       | —                  |
| Spain:                         |                           |         |                          |         |         |                    |
| Quantity.....                  | ▲36.5                     | ▲45.5   | ▲21.4                    | ▼(28.9) | ▲8.6    | ▼(4.7)             |
| Value.....                     | ▼(14.1)                   | ▲47.2   | ▼(6.1)                   | ▼(29.8) | ▼(11.4) | ▼(19.9)            |
| Unit value.....                | ▼(37.0)                   | ▲1.2    | ▼(22.6)                  | ▼(1.4)  | ▼(18.4) | ▼(15.9)            |
| Ending inventory quantity..... | ▲49.6                     | ▲10.5   | ▲31.6                    | ▼(21.3) | ▲30.6   | ▲37.0              |

Table continued.



Table C.1 Continued

QSP: Summary data on the U.S. market, defining the domestic industry as U.S. producers, by item and period

Quantity=1,000 square feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per square foot; Productivity=square feet per hour; Period changes=percent—exceptions noted; Interim period is January through September

| Item                           | Reported data |           |               |           |           |           |           |
|--------------------------------|---------------|-----------|---------------|-----------|-----------|-----------|-----------|
|                                | 2020          | 2021      | Calendar year |           | 2024      | Interim   |           |
|                                |               |           | 2022          | 2023      |           | 2024      | 2025      |
| U.S. imports from:—Continued   |               |           |               |           |           |           |           |
| Taiwan:                        |               |           |               |           |           |           |           |
| Quantity.....                  | 4,175         | 5,245     | 4,169         | 4,197     | 3,112     | 2,402     | 1,517     |
| Value.....                     | 45,683        | 59,424    | 49,580        | 39,505    | 29,560    | 23,072    | 14,469    |
| Unit value.....                | \$10.94       | \$11.33   | \$11.89       | \$9.41    | \$9.50    | \$9.61    | \$9.54    |
| Ending inventory quantity..... | 1,104         | 1,449     | 1,445         | 268       | 121       | 127       | 359       |
| Thailand:                      |               |           |               |           |           |           |           |
| Quantity.....                  | 1,382         | 4,053     | 13,994        | 20,518    | 27,931    | 18,982    | 19,727    |
| Value.....                     | 10,181        | 38,787    | 150,860       | 206,175   | 275,905   | 190,681   | 175,318   |
| Unit value.....                | \$7.37        | \$9.57    | \$10.78       | \$10.05   | \$9.88    | \$10.05   | \$8.89    |
| Ending inventory quantity..... | 585           | 720       | 3,037         | 3,226     | 6,046     | 5,851     | 11,374    |
| Turkey:                        |               |           |               |           |           |           |           |
| Quantity.....                  | 5,242         | 10,388    | 9,460         | 6,589     | 6,055     | 4,744     | 3,709     |
| Value.....                     | 43,647        | 87,717    | 83,647        | 55,489    | 46,774    | 36,428    | 30,355    |
| Unit value.....                | \$8.33        | \$8.44    | \$8.84        | \$8.42    | \$7.72    | \$7.68    | \$8.18    |
| Ending inventory quantity..... | 1,195         | 548       | 400           | 322       | 292       | 301       | 266       |
| Vietnam:                       |               |           |               |           |           |           |           |
| Quantity.....                  | 19,437        | 33,103    | 34,587        | 38,664    | 43,562    | 32,629    | 29,766    |
| Value.....                     | 202,315       | 349,342   | 360,581       | 339,561   | 370,790   | 278,177   | 258,052   |
| Unit value.....                | \$10.41       | \$10.55   | \$10.43       | \$8.78    | \$8.51    | \$8.53    | \$8.67    |
| Ending inventory quantity..... | 4,048         | 3,969     | 4,912         | 4,719     | 8,220     | 6,961     | 8,258     |
| Other FTA sources:             |               |           |               |           |           |           |           |
| Quantity.....                  | 5,658         | 5,512     | 1,875         | 1,464     | 1,284     | 975       | 747       |
| Value.....                     | 61,788        | 60,898    | 19,155        | 15,819    | 12,878    | 10,217    | 6,601     |
| Unit value.....                | \$10.92       | \$11.05   | \$10.22       | \$10.81   | \$10.03   | \$10.48   | \$8.84    |
| Ending inventory quantity..... | 1,677         | 1,946     | 2,235         | 2,102     | 1,909     | 1,963     | 2,118     |
| All other sources:             |               |           |               |           |           |           |           |
| Quantity.....                  | 5,660         | 6,660     | 6,595         | 7,096     | 9,729     | 7,235     | 8,101     |
| Value.....                     | 61,615        | 80,448    | 73,804        | 64,221    | 77,138    | 59,543    | 54,950    |
| Unit value.....                | \$10.89       | \$12.08   | \$11.19       | \$9.05    | \$7.93    | \$8.23    | \$6.78    |
| Ending inventory quantity..... | 2,179         | 1,997     | 1,672         | 1,382     | 1,708     | 1,445     | 2,661     |
| All import sources:            |               |           |               |           |           |           |           |
| Quantity.....                  | 131,069       | 196,467   | 210,999       | 185,058   | 233,715   | 167,057   | 166,305   |
| Value.....                     | 1,239,063     | 1,858,193 | 1,957,290     | 1,521,918 | 1,739,935 | 1,269,648 | 1,219,270 |
| Unit value.....                | \$9.45        | \$9.46    | \$9.28        | \$8.22    | \$7.44    | \$7.60    | \$7.33    |
| Ending inventory quantity..... | 39,935        | 45,379    | 54,883        | 45,824    | 58,654    | 52,286    | 66,517    |

Table continued.

Table C.1 Continued

QSP: Summary data on the U.S. market, defining the domestic industry as U.S. producers, by item and period

Quantity=1,000 square feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per square foot; Productivity=square feet per hour; Period changes=percent—exceptions noted; Interim period is January through September

| Item                           | Period change comparisons |         |               |         |         | Interim<br>2024–25 |
|--------------------------------|---------------------------|---------|---------------|---------|---------|--------------------|
|                                | 2020–24                   | 2020–21 | Calendar year |         | 2023–24 |                    |
|                                |                           |         | 2021–22       | 2022–23 |         |                    |
| U.S. imports from:—Continued   |                           |         |               |         |         |                    |
| Taiwan:                        |                           |         |               |         |         |                    |
| Quantity.....                  | ▼(25.5)                   | ▲25.6   | ▼(20.5)       | ▲0.7    | ▼(25.8) | ▼(36.8)            |
| Value.....                     | ▼(35.3)                   | ▲30.1   | ▼(16.6)       | ▼(20.3) | ▼(25.2) | ▼(37.3)            |
| Unit value.....                | ▼(13.2)                   | ▲3.6    | ▲5.0          | ▼(20.8) | ▲0.9    | ▼(0.7)             |
| Ending inventory quantity..... | ▼(89.1)                   | ▲31.3   | ▼(0.3)        | ▼(81.5) | ▼(54.9) | ▲182.8             |
| Thailand:                      |                           |         |               |         |         |                    |
| Quantity.....                  | ▲1,920.7                  | ▲193.2  | ▲245.3        | ▲46.6   | ▲36.1   | ▲3.9               |
| Value.....                     | ▲2,610.0                  | ▲281.0  | ▲288.9        | ▲36.7   | ▲33.8   | ▼(8.1)             |
| Unit value.....                | ▲34.1                     | ▲29.9   | ▲12.6         | ▼(6.8)  | ▼(1.7)  | ▼(11.5)            |
| Ending inventory quantity..... | ▲934.1                    | ▲23.2   | ▲321.7        | ▲6.2    | ▲87.4   | ▲94.4              |
| Turkey:                        |                           |         |               |         |         |                    |
| Quantity.....                  | ▲15.5                     | ▲98.2   | ▼(8.9)        | ▼(30.4) | ▼(8.1)  | ▼(21.8)            |
| Value.....                     | ▲7.2                      | ▲101.0  | ▼(4.6)        | ▼(33.7) | ▼(15.7) | ▼(16.7)            |
| Unit value.....                | ▼(7.2)                    | ▲1.4    | ▲4.7          | ▼(4.8)  | ▼(8.3)  | ▲6.6               |
| Ending inventory quantity..... | ▼(75.5)                   | ▼(54.2) | ▼(26.9)       | ▼(19.7) | ▼(9.0)  | ▼(11.6)            |
| Vietnam:                       |                           |         |               |         |         |                    |
| Quantity.....                  | ▲124.1                    | ▲70.3   | ▲4.5          | ▲11.8   | ▲12.7   | ▼(8.8)             |
| Value.....                     | ▲83.3                     | ▲72.7   | ▲3.2          | ▼(5.8)  | ▲9.2    | ▼(7.2)             |
| Unit value.....                | ▼(18.2)                   | ▲1.4    | ▼(1.2)        | ▼(15.8) | ▼(3.1)  | ▲1.7               |
| Ending inventory quantity..... | ▲103.1                    | ▼(1.9)  | ▲23.7         | ▼(3.9)  | ▲74.2   | ▲18.6              |
| Other FTA sources:             |                           |         |               |         |         |                    |
| Quantity.....                  | ▼(77.3)                   | ▼(2.6)  | ▼(66.0)       | ▼(21.9) | ▼(12.3) | ▼(23.4)            |
| Value.....                     | ▼(79.2)                   | ▼(1.4)  | ▼(68.5)       | ▼(17.4) | ▼(18.6) | ▼(35.4)            |
| Unit value.....                | ▼(8.2)                    | ▲1.2    | ▼(7.5)        | ▲5.8    | ▼(7.2)  | ▼(15.7)            |
| Ending inventory quantity..... | ▲13.8                     | ▲16.0   | ▲14.8         | ▼(6.0)  | ▼(9.2)  | ▲7.9               |
| All other sources:             |                           |         |               |         |         |                    |
| Quantity.....                  | ▲71.9                     | ▲17.7   | ▼(1.0)        | ▲7.6    | ▲37.1   | ▲12.0              |
| Value.....                     | ▲25.2                     | ▲30.6   | ▼(8.3)        | ▼(13.0) | ▲20.1   | ▼(7.7)             |
| Unit value.....                | ▼(27.2)                   | ▲11.0   | ▼(7.4)        | ▼(19.1) | ▼(12.4) | ▼(17.6)            |
| Ending inventory quantity..... | ▼(21.6)                   | ▼(8.4)  | ▼(16.3)       | ▼(17.3) | ▲23.6   | ▲84.2              |
| All import sources:            |                           |         |               |         |         |                    |
| Quantity.....                  | ▲78.3                     | ▲49.9   | ▲7.4          | ▼(12.3) | ▲26.3   | ▼(0.4)             |
| Value.....                     | ▲40.4                     | ▲50.0   | ▲5.3          | ▼(22.2) | ▲14.3   | ▼(4.0)             |
| Unit value.....                | ▼(21.2)                   | ▲0.0    | ▼(1.9)        | ▼(11.3) | ▼(9.5)  | ▼(3.5)             |
| Ending inventory quantity..... | ▲46.9                     | ▲13.6   | ▲20.9         | ▼(16.5) | ▲28.0   | ▲27.2              |

Table continued.

Table C.1 Continued

**QSP: Summary data on the U.S. market, defining the domestic industry as U.S. producers, by item and period**

Quantity=1,000 square feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per square foot; Productivity=square feet per hour; Period changes=percent—exceptions noted; Interim period is January through September

| Item                                        | Reported data |         |           |          |          |         |          |
|---------------------------------------------|---------------|---------|-----------|----------|----------|---------|----------|
|                                             | Calendar year |         |           |          |          | Interim |          |
|                                             | 2020          | 2021    | 2022      | 2023     | 2024     | 2024    | 2025     |
| U.S. producers':                            |               |         |           |          |          |         |          |
| Practical capacity quantity.....            | 50,178        | 52,990  | 52,340    | 51,590   | 45,650   | 34,999  | 38,919   |
| Production quantity.....                    | 39,445        | 43,530  | 44,579    | 39,638   | 32,656   | 24,712  | 24,544   |
| Capacity utilization (fn1).....             | 78.6          | 82.1    | 85.2      | 76.8     | 71.5     | 70.6    | 63.1     |
| U.S. shipments:                             |               |         |           |          |          |         |          |
| Quantity.....                               | 31,645        | 40,525  | 38,700    | 35,618   | 30,900   | 23,579  | 22,114   |
| Value.....                                  | 662,804       | 853,861 | 931,682   | 862,308  | 748,704  | 572,764 | 544,649  |
| Unit value.....                             | \$20.94       | \$21.07 | \$24.07   | \$24.21  | \$24.23  | \$24.29 | \$24.63  |
| Export shipments:                           |               |         |           |          |          |         |          |
| Quantity.....                               | 3,294         | 4,180   | 4,182     | 3,099    | 1,566    | 1,289   | 1,402    |
| Value.....                                  | 43,185        | 60,865  | 63,574    | 52,357   | 25,305   | 20,148  | 16,269   |
| Unit value.....                             | \$13.11       | \$14.56 | \$15.20   | \$16.90  | \$16.16  | \$15.63 | \$11.60  |
| Ending inventory quantity.....              | 19,006        | 17,806  | 19,411    | 20,256   | 20,423   | 20,085  | 21,401   |
| Inventories/total shipments (fn1).....      | 54.4          | 39.8    | 45.3      | 52.3     | 62.9     | 60.6    | 68.3     |
| Production workers.....                     | 1,592         | 1,685   | 1,669     | 1,601    | 1,446    | 1,410   | 1,455    |
| Hours worked (1,000s).....                  | 3,314         | 3,634   | 3,652     | 3,438    | 3,153    | 2,342   | 2,375    |
| Wages paid (\$1,000).....                   | 91,956        | 105,802 | 111,429   | 107,011  | 103,843  | 76,996  | 79,023   |
| Hourly wages (dollars per hour).....        | \$27.75       | \$29.11 | \$30.51   | \$31.13  | \$32.93  | \$32.88 | \$33.27  |
| Productivity.....                           | 11.9          | 12.0    | 12.2      | 11.5     | 10.4     | 10.6    | 10.3     |
| Unit labor costs.....                       | \$2.33        | \$2.43  | \$2.50    | \$2.70   | \$3.18   | \$3.12  | \$3.22   |
| Net sales:                                  |               |         |           |          |          |         |          |
| Quantity.....                               | 34,940        | 44,705  | 42,882    | 38,717   | 32,465   | 24,868  | 23,515   |
| Value.....                                  | 705,989       | 914,726 | 995,256   | 914,665  | 774,005  | 592,909 | 560,911  |
| Unit value.....                             | \$20.21       | \$20.46 | \$23.21   | \$23.62  | \$23.84  | \$23.84 | \$23.85  |
| Cost of goods sold (COGS).....              | 446,779       | 593,259 | 658,862   | 596,276  | 478,402  | 361,327 | 349,709  |
| Gross profit or (loss) (fn2).....           | 259,209       | 321,467 | 336,394   | 318,389  | 295,603  | 231,582 | 211,202  |
| SG&A expenses.....                          | 195,473       | 239,836 | 279,575   | 260,970  | 245,051  | 184,838 | 189,332  |
| Operating income or (loss) (fn2).....       | 63,737        | 81,631  | 56,819    | 57,420   | 50,552   | 46,744  | 21,870   |
| Net income or (loss) (fn2).....             | 30,936        | 54,220  | 12,138    | (63,086) | (2,398)  | 8,963   | (21,470) |
| Unit COGS.....                              | \$12.79       | \$13.27 | \$15.36   | \$15.40  | \$14.74  | \$14.53 | \$14.87  |
| Unit SG&A expenses.....                     | \$5.59        | \$5.36  | \$6.52    | \$6.74   | \$7.55   | \$7.43  | \$8.05   |
| Unit operating income or (loss) (fn2).....  | \$1.82        | \$1.83  | \$1.32    | \$1.48   | \$1.56   | \$1.88  | \$0.93   |
| Unit net income or (loss) (fn2).....        | \$0.89        | \$1.21  | \$0.28    | \$(1.63) | \$(0.07) | \$0.36  | \$(0.91) |
| COGS/sales (fn1).....                       | 63.3          | 64.9    | 66.2      | 65.2     | 61.8     | 60.9    | 62.3     |
| Operating income or (loss)/sales (fn1)..... | 9.0           | 8.9     | 5.7       | 6.3      | 6.5      | 7.9     | 3.9      |
| Net income or (loss)/sales (fn1).....       | 4.4           | 5.9     | 1.2       | (6.9)    | (0.3)    | 1.5     | (3.8)    |
| Capital expenditures.....                   | 49,316        | 89,569  | 95,676    | 80,527   | 31,044   | 22,692  | 44,389   |
| Research and development expenses.....      | 3,957         | 5,166   | 5,613     | 5,934    | 6,310    | 4,676   | 4,701    |
| Total assets.....                           | 895,256       | 973,679 | 1,064,017 | 950,534  | 929,463  | NA      | NA       |

Table continued.

Table C.1 Continued

QSP: Summary data on the U.S. market, defining the domestic industry as U.S. producers, by item and period

Quantity=1,000 square feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per square foot; Productivity=square feet per hour; Period changes=percent—exceptions noted; Interim period is January through September

| Item                                        | Period change comparisons |         |                          |         |         | Interim<br>2024–25 |
|---------------------------------------------|---------------------------|---------|--------------------------|---------|---------|--------------------|
|                                             | 2020–24                   | 2020–21 | Calendar year<br>2021–22 | 2022–23 | 2023–24 |                    |
| U.S. producers':                            |                           |         |                          |         |         |                    |
| Practical capacity quantity.....            | ▼(9.0)                    | ▲5.6    | ▼(1.2)                   | ▼(1.4)  | ▼(11.5) | ▲11.2              |
| Production quantity.....                    | ▼(17.2)                   | ▲10.4   | ▲2.4                     | ▼(11.1) | ▼(17.6) | ▼(0.7)             |
| Capacity utilization (fn1).....             | ▼(7.1)                    | ▲3.5    | ▲3.0                     | ▼(8.3)  | ▼(5.3)  | ▼(7.5)             |
| U.S. shipments:                             |                           |         |                          |         |         |                    |
| Quantity.....                               | ▼(2.4)                    | ▲28.1   | ▼(4.5)                   | ▼(8.0)  | ▼(13.2) | ▼(6.2)             |
| Value.....                                  | ▲13.0                     | ▲28.8   | ▲9.1                     | ▼(7.4)  | ▼(13.2) | ▼(4.9)             |
| Unit value.....                             | ▲15.7                     | ▲0.6    | ▲14.3                    | ▲0.6    | ▲0.1    | ▲1.4               |
| Export shipments:                           |                           |         |                          |         |         |                    |
| Quantity.....                               | ▼(52.5)                   | ▲26.9   | ▲0.0                     | ▼(25.9) | ▼(49.5) | ▲8.8               |
| Value.....                                  | ▼(41.4)                   | ▲40.9   | ▲4.5                     | ▼(17.6) | ▼(51.7) | ▼(19.3)            |
| Unit value.....                             | ▲23.3                     | ▲11.1   | ▲4.4                     | ▲11.1   | ▼(4.3)  | ▼(25.8)            |
| Ending inventory quantity.....              | ▲7.5                      | ▼(6.3)  | ▲9.0                     | ▲4.4    | ▲0.8    | ▲6.6               |
| Inventories/total shipments (fn1).....      | ▲8.5                      | ▼(14.6) | ▲5.4                     | ▲7.1    | ▲10.6   | ▲7.7               |
| Production workers.....                     | ▼(9.2)                    | ▲5.8    | ▼(0.9)                   | ▼(4.1)  | ▼(9.7)  | ▲3.2               |
| Hours worked (1,000s).....                  | ▼(4.8)                    | ▲9.7    | ▲0.5                     | ▼(5.9)  | ▼(8.3)  | ▲1.4               |
| Wages paid (\$1,000).....                   | ▲12.9                     | ▲15.1   | ▲5.3                     | ▼(4.0)  | ▼(3.0)  | ▲2.6               |
| Hourly wages (dollars per hour).....        | ▲18.7                     | ▲4.9    | ▲4.8                     | ▲2.0    | ▲5.8    | ▲1.2               |
| Productivity.....                           | ▼(13.0)                   | ▲0.6    | ▲1.9                     | ▼(5.5)  | ▼(10.2) | ▼(2.1)             |
| Unit labor costs.....                       | ▲36.4                     | ▲4.3    | ▲2.8                     | ▲8.0    | ▲17.8   | ▲3.3               |
| Net sales:                                  |                           |         |                          |         |         |                    |
| Quantity.....                               | ▼(7.1)                    | ▲27.9   | ▼(4.1)                   | ▼(9.7)  | ▼(16.1) | ▼(5.4)             |
| Value.....                                  | ▲9.6                      | ▲29.6   | ▲8.8                     | ▼(8.1)  | ▼(15.4) | ▼(5.4)             |
| Unit value.....                             | ▲18.0                     | ▲1.3    | ▲13.4                    | ▲1.8    | ▲0.9    | ▲0.0               |
| Cost of goods sold (COGS).....              | ▲7.1                      | ▲32.8   | ▲11.1                    | ▼(9.5)  | ▼(19.8) | ▼(3.2)             |
| Gross profit or (loss) (fn2).....           | ▲14.0                     | ▲24.0   | ▲4.6                     | ▼(5.4)  | ▼(7.2)  | ▼(8.8)             |
| SG&A expenses.....                          | ▲25.4                     | ▲22.7   | ▲16.6                    | ▼(6.7)  | ▼(6.1)  | ▲2.4               |
| Operating income or (loss) (fn2).....       | ▼(20.7)                   | ▲28.1   | ▼(30.4)                  | ▲1.1    | ▼(12.0) | ▼(53.2)            |
| Net income or (loss) (fn2).....             | ▼—                        | ▲75.3   | ▼(77.6)                  | ▼—      | ▲—      | ▼—                 |
| Unit COGS.....                              | ▲15.2                     | ▲3.8    | ▲15.8                    | ▲0.2    | ▼(4.3)  | ▲2.4               |
| Unit SG&A expenses.....                     | ▲34.9                     | ▼(4.1)  | ▲21.5                    | ▲3.4    | ▲12.0   | ▲8.3               |
| Unit operating income or (loss) (fn2).....  | ▼(14.6)                   | ▲0.1    | ▼(27.4)                  | ▲11.9   | ▲5.0    | ▼(50.5)            |
| Unit net income or (loss) (fn2).....        | ▼—                        | ▲37.0   | ▼(76.7)                  | ▼—      | ▲—      | ▼—                 |
| COGS/sales (fn1).....                       | ▼(1.5)                    | ▲1.6    | ▲1.3                     | ▼(1.0)  | ▼(3.4)  | ▲1.4               |
| Operating income or (loss)/sales (fn1)..... | ▼(2.5)                    | ▼(0.1)  | ▼(3.2)                   | ▲0.6    | ▲0.3    | ▼(4.0)             |
| Net income or (loss)/sales (fn1).....       | ▼(4.7)                    | ▲1.5    | ▼(4.7)                   | ▼(8.1)  | ▲6.6    | ▼(5.3)             |
| Capital expenditures.....                   | ▼(37.0)                   | ▲81.6   | ▲6.8                     | ▼(15.8) | ▼(61.4) | ▲95.6              |
| Research and development expenses.....      | ▲59.5                     | ▲30.6   | ▲8.6                     | ▲5.7    | ▲6.3    | ▲0.5               |
| Total assets.....                           | ▲3.8                      | ▲8.8    | ▲9.3                     | ▼(10.7) | ▼(2.2)  | NA                 |

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics from the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, accessed on December 15, 2025. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values. Official U.S. import statistics were adjusted to remove out-of-scope imports under the primary HTS numbers and add in-scope imports under other HTS numbers according to questionnaire data. 508-compliant tables for these data are in parts 2, 3, 4, and 5 of this report.

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

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

Note.—Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "—". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease. This table presents data defining the domestic industry as slab producers only, inclusive of slab producers with internal fabrication operations. In other words, \*\*\* in the reported data.

## U.S. producers and independent fabricators

**Table C.2**

**QSP: Summary data on the U.S. market, defining the domestic industry as U.S. producers and independent fabricators, by item and period**  
Quantity=1,000 square feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per square foot; Productivity=square feet per hour; Period changes=percent—exceptions noted; Interim period is January through September

| Item                                    | Reported data |           |               |           |           |           | Interim<br>2025 |
|-----------------------------------------|---------------|-----------|---------------|-----------|-----------|-----------|-----------------|
|                                         | 2020          | 2021      | Calendar year |           | 2024      | 2024      |                 |
|                                         |               |           | 2022          | 2023      |           |           |                 |
| U.S. consumption quantity:              |               |           |               |           |           |           |                 |
| Amount.....                             | 162,714       | 236,992   | 249,699       | 220,676   | 264,615   | 190,635   | 188,419         |
| Producers' share (fn1).....             | 19.4          | 17.1      | 15.5          | 16.1      | 11.7      | 12.4      | 11.7            |
| Importers' share (fn1):                 |               |           |               |           |           |           |                 |
| Canada.....                             | 5.0           | 3.3       | 2.4           | 2.2       | 1.8       | 1.9       | 1.4             |
| China.....                              | 0.6           | 0.4       | 1.1           | 0.9       | 1.2       | 1.3       | 0.2             |
| Czechia.....                            | 1.5           | 1.5       | 1.6           | 1.1       | 1.1       | 1.1       | 1.0             |
| India.....                              | 16.5          | 22.9      | 27.4          | 25.6      | 32.0      | 30.8      | 34.5            |
| Israel.....                             | 5.8           | 3.1       | 2.5           | 1.1       | 0.6       | 0.6       | 0.3             |
| Italy.....                              | 2.5           | 2.2       | 1.3           | 0.8       | 0.4       | 0.5       | 0.2             |
| Malaysia.....                           | 7.6           | 6.8       | 2.3           | 2.3       | 3.8       | 3.4       | 4.6             |
| Mexico.....                             | 0.1           | 0.0       | 0.0           | 0.0       | 0.0       | 0.0       | 0.0             |
| Spain.....                              | 15.3          | 15.3      | 17.6          | 14.2      | 12.9      | 12.9      | 12.4            |
| Taiwan.....                             | 2.6           | 2.2       | 1.7           | 1.9       | 1.2       | 1.3       | 0.8             |
| Thailand.....                           | 0.8           | 1.7       | 5.6           | 9.3       | 10.6      | 10.0      | 10.5            |
| Turkey.....                             | 3.2           | 4.4       | 3.8           | 3.0       | 2.3       | 2.5       | 2.0             |
| Vietnam.....                            | 11.9          | 14.0      | 13.9          | 17.5      | 16.5      | 17.1      | 15.8            |
| Other FTA sources.....                  | 3.5           | 2.3       | 0.8           | 0.7       | 0.5       | 0.5       | 0.4             |
| All other sources.....                  | 3.5           | 2.8       | 2.6           | 3.2       | 3.7       | 3.8       | 4.3             |
| All import sources.....                 | 80.6          | 82.9      | 84.5          | 83.9      | 88.3      | 87.6      | 88.3            |
| U.S. consumption value:                 |               |           |               |           |           |           |                 |
| Amount.....                             | 2,037,394     | 2,892,843 | 3,085,557     | 2,577,254 | 2,686,859 | 1,989,706 | 1,915,785       |
| Producers' share (fn1)                  |               |           |               |           |           |           |                 |
| Fully domestic value.....               | ***           | ***       | ***           | ***       | ***       | ***       | ***             |
| Incremental value added to imports..... | ***           | ***       | ***           | ***       | ***       | ***       | ***             |
| Total value.....                        | 39.2          | 35.8      | 36.6          | 40.9      | 35.2      | 36.2      | 36.4            |
| Importers' share (fn1):                 |               |           |               |           |           |           |                 |
| Canada.....                             | 4.6           | 3.2       | 2.6           | 2.5       | 2.2       | 2.3       | 1.7             |
| China.....                              | 0.4           | 0.4       | 0.5           | 0.3       | 0.4       | 0.4       | 0.1             |
| Czechia.....                            | 0.9           | 1.0       | 1.2           | 0.8       | 0.8       | 0.8       | 0.8             |
| India.....                              | 8.7           | 13.0      | 18.1          | 14.3      | 19.1      | 17.9      | 21.3            |
| Israel.....                             | 5.0           | 2.7       | 2.1           | 1.0       | 0.5       | 0.6       | 0.3             |
| Italy.....                              | 1.9           | 1.7       | 1.0           | 0.5       | 0.2       | 0.3       | 0.2             |
| Malaysia.....                           | 5.1           | 5.2       | 1.8           | 1.4       | 2.6       | 2.3       | 3.5             |
| Mexico.....                             | 0.1           | 0.0       | 0.0           | 0.0       | 0.0       | 0.0       | 0.1             |
| Spain.....                              | 13.3          | 13.8      | 12.1          | 10.2      | 8.7       | 9.3       | 7.7             |
| Taiwan.....                             | 2.2           | 2.1       | 1.6           | 1.5       | 1.1       | 1.2       | 0.8             |
| Thailand.....                           | 0.5           | 1.3       | 4.9           | 8.0       | 10.3      | 9.6       | 9.2             |
| Turkey.....                             | 2.1           | 3.0       | 2.7           | 2.2       | 1.7       | 1.8       | 1.6             |
| Vietnam.....                            | 9.9           | 12.1      | 11.7          | 13.2      | 13.8      | 14.0      | 13.5            |
| Other FTA sources.....                  | 3.0           | 2.1       | 0.6           | 0.6       | 0.5       | 0.5       | 0.3             |
| All other sources.....                  | 3.0           | 2.8       | 2.4           | 2.5       | 2.9       | 3.0       | 2.9             |
| All import sources.....                 | 60.8          | 64.2      | 63.4          | 59.1      | 64.8      | 63.8      | 63.6            |

Table continued.

Table C.2 Continued

**QSP: Summary data on the U.S. market, defining the domestic industry as U.S. producers and independent fabricators, by item and period**  
 Quantity=1,000 square feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per square foot; Productivity=square feet per hour; Period changes=percent—exceptions noted; Interim period is January through September

| Item                                    | Period change comparisons |         |         |         |         | Interim<br>2024–25 |
|-----------------------------------------|---------------------------|---------|---------|---------|---------|--------------------|
|                                         | 2020–24                   | 2020–21 | 2021–22 | 2022–23 | 2023–24 |                    |
| U.S. consumption quantity:              |                           |         |         |         |         |                    |
| Amount.....                             | ▲62.6                     | ▲45.6   | ▲5.4    | ▼(11.6) | ▲19.9   | ▼(1.2)             |
| Producers' share (fn1).....             | ▼(7.8)                    | ▼(2.3)  | ▼(1.6)  | ▲0.6    | ▼(4.5)  | ▼(0.6)             |
| Importers' share (fn1):                 |                           |         |         |         |         |                    |
| Canada.....                             | ▼(3.2)                    | ▼(1.7)  | ▼(0.9)  | ▼(0.1)  | ▼(0.5)  | ▼(0.6)             |
| China.....                              | ▲0.6                      | ▼(0.2)  | ▲0.6    | ▼(0.1)  | ▲0.3    | ▼(1.1)             |
| Czechia.....                            | ▼(0.4)                    | ▼(0.1)  | ▲0.1    | ▼(0.4)  | ▼(0.0)  | ▼(0.1)             |
| India.....                              | ▲15.4                     | ▲6.4    | ▲4.5    | ▼(1.8)  | ▲6.3    | ▲3.7               |
| Israel.....                             | ▼(5.2)                    | ▼(2.7)  | ▼(0.6)  | ▼(1.4)  | ▼(0.6)  | ▼(0.3)             |
| Italy.....                              | ▼(2.1)                    | ▼(0.3)  | ▼(0.9)  | ▼(0.5)  | ▼(0.3)  | ▼(0.3)             |
| Malaysia.....                           | ▼(3.8)                    | ▼(0.8)  | ▼(4.5)  | ▼(0.1)  | ▲1.5    | ▲1.2               |
| Mexico.....                             | ▼(0.1)                    | ▼(0.1)  | ▼(0.0)  | ▲0.0    | ▲0.0    | ▲0.0               |
| Spain.....                              | ▼(2.5)                    | ▼(0.0)  | ▲2.3    | ▼(3.4)  | ▼(1.3)  | ▼(0.5)             |
| Taiwan.....                             | ▼(1.4)                    | ▼(0.4)  | ▼(0.5)  | ▲0.2    | ▼(0.7)  | ▼(0.5)             |
| Thailand.....                           | ▲9.7                      | ▲0.9    | ▲3.9    | ▲3.7    | ▲1.3    | ▲0.5               |
| Turkey.....                             | ▼(0.9)                    | ▲1.2    | ▼(0.6)  | ▼(0.8)  | ▼(0.7)  | ▼(0.5)             |
| Vietnam.....                            | ▲4.5                      | ▲2.0    | ▼(0.1)  | ▲3.7    | ▼(1.1)  | ▼(1.3)             |
| Other FTA sources.....                  | ▼(3.0)                    | ▼(1.2)  | ▼(1.6)  | ▼(0.1)  | ▼(0.2)  | ▼(0.1)             |
| All other sources.....                  | ▲0.2                      | ▼(0.7)  | ▼(0.2)  | ▲0.6    | ▲0.5    | ▲0.5               |
| All import sources.....                 | ▲7.8                      | ▲2.3    | ▲1.6    | ▼(0.6)  | ▲4.5    | ▲0.6               |
| U.S. consumption value:                 |                           |         |         |         |         |                    |
| Amount.....                             | ▲31.9                     | ▲42.0   | ▲6.7    | ▼(16.5) | ▲4.3    | ▼(3.7)             |
| Producers' share (fn1)                  |                           |         |         |         |         |                    |
| Fully domestic value.....               | ▼***                      | ▼***    | ▲***    | ▲***    | ▼***    | ▼***               |
| Incremental value added to imports..... | ▲***                      | ▼***    | ▼***    | ▲***    | ▼***    | ▲***               |
| Total value.....                        | ▼(3.9)                    | ▼(3.4)  | ▲0.8    | ▲4.4    | ▼(5.7)  | ▲0.2               |
| Importers' share (fn1):                 |                           |         |         |         |         |                    |
| Canada.....                             | ▼(2.4)                    | ▼(1.4)  | ▼(0.6)  | ▼(0.1)  | ▼(0.3)  | ▼(0.6)             |
| China.....                              | ▼(0.0)                    | ▼(0.0)  | ▲0.1    | ▼(0.2)  | ▲0.1    | ▼(0.3)             |
| Czechia.....                            | ▼(0.1)                    | ▲0.1    | ▲0.2    | ▼(0.4)  | ▲0.0    | ▲0.0               |
| India.....                              | ▲10.4                     | ▲4.2    | ▲5.2    | ▼(3.8)  | ▲4.8    | ▲3.4               |
| Israel.....                             | ▼(4.5)                    | ▼(2.3)  | ▼(0.5)  | ▼(1.2)  | ▼(0.5)  | ▼(0.3)             |
| Italy.....                              | ▼(1.7)                    | ▼(0.2)  | ▼(0.7)  | ▼(0.5)  | ▼(0.3)  | ▼(0.1)             |
| Malaysia.....                           | ▼(2.5)                    | ▲0.1    | ▼(3.3)  | ▼(0.4)  | ▲1.2    | ▲1.2               |
| Mexico.....                             | ▼(0.0)                    | ▼(0.1)  | ▼(0.0)  | ▲0.0    | ▲0.0    | ▲0.0               |
| Spain.....                              | ▼(4.6)                    | ▲0.5    | ▼(1.6)  | ▼(1.9)  | ▼(1.5)  | ▼(1.6)             |
| Taiwan.....                             | ▼(1.1)                    | ▼(0.2)  | ▼(0.4)  | ▼(0.1)  | ▼(0.4)  | ▼(0.4)             |
| Thailand.....                           | ▲9.8                      | ▲0.8    | ▲3.5    | ▲3.1    | ▲2.3    | ▼(0.4)             |
| Turkey.....                             | ▼(0.4)                    | ▲0.9    | ▼(0.3)  | ▼(0.6)  | ▼(0.4)  | ▼(0.2)             |
| Vietnam.....                            | ▲3.9                      | ▲2.1    | ▼(0.4)  | ▲1.5    | ▲0.6    | ▼(0.5)             |
| Other FTA sources.....                  | ▼(2.6)                    | ▼(0.9)  | ▼(1.5)  | ▼(0.0)  | ▼(0.1)  | ▼(0.2)             |
| All other sources.....                  | ▼(0.2)                    | ▼(0.2)  | ▼(0.4)  | ▲0.1    | ▲0.4    | ▼(0.1)             |
| All import sources.....                 | ▲3.9                      | ▲3.4    | ▼(0.8)  | ▼(4.4)  | ▲5.7    | ▼(0.2)             |

Table continued.

Table C.2 Continued

**QSP: Summary data on the U.S. market, defining the domestic industry as U.S. producers and independent fabricators, by item and period**  
Quantity=1,000 square feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per square foot; Productivity=square feet per hour; Period changes=percent—exceptions noted; Interim period is January through September

| Item                                               | Reported data |           |               |           |           |         |         |
|----------------------------------------------------|---------------|-----------|---------------|-----------|-----------|---------|---------|
|                                                    | 2020          | 2021      | Calendar year |           | 2024      | Interim |         |
|                                                    |               |           | 2022          | 2023      | 2024      | 2024    | 2025    |
| U.S. producers' and fabricators':                  |               |           |               |           |           |         |         |
| Producers: Practical capacity quantity.....        | 50,178        | 52,990    | 52,340        | 51,590    | 45,650    | 34,999  | 38,919  |
| Producers: Production quantity.....                | 39,445        | 43,530    | 44,579        | 39,638    | 32,656    | 24,712  | 24,544  |
| Producers: Capacity utilization (fn1).....         | 78.6          | 82.1      | 85.2          | 76.8      | 71.5      | 70.6    | 63.1    |
| Fabricators: Practical capacity quantity.....      | 6,223         | 7,220     | 8,284         | 8,754     | 8,689     | 6,614   | 7,214   |
| Fabricators: Production quantity.....              | 4,998         | 6,342     | 7,268         | 6,581     | 7,014     | 5,067   | 5,170   |
| Fabricators: Capacity utilization (fn1).....       | 80.3          | 87.8      | 87.7          | 75.2      | 80.7      | 76.6    | 71.7    |
| U.S. shipments (fn3):                              |               |           |               |           |           |         |         |
| Quantity.....                                      | 31,645        | 40,525    | 38,700        | 35,618    | 30,900    | 23,579  | 22,114  |
| Value:                                             |               |           |               |           |           |         |         |
| Fully domestic value.....                          | ***           | ***       | ***           | ***       | ***       | ***     | ***     |
| Incremental value added to imports.....            | ***           | ***       | ***           | ***       | ***       | ***     | ***     |
| Total value.....                                   | 798,330       | 1,034,649 | 1,128,268     | 1,055,336 | 946,923   | 720,058 | 696,515 |
| Unit value.....                                    | ***           | ***       | ***           | ***       | ***       | ***     | ***     |
| Producers: Ending inventory quantity.....          | 19,006        | 17,806    | 19,411        | 20,256    | 20,423    | 20,085  | 21,401  |
| Producers: Inventories/U.S. shipments (fn1).....   | 60.1          | 43.9      | 50.2          | 56.9      | 66.1      | 63.9    | 72.6    |
| Fabricators: Ending inventory quantity.....        | 1,853         | 2,255     | 2,584         | 1,936     | 2,109     | 1,941   | 1,900   |
| Fabricators: Inventories/U.S. shipments (fn1)..... | 37.0          | 38.6      | 36.5          | 28.2      | 29.8      | 28.1    | 26.4    |
| Production workers.....                            | 2,421         | 2,600     | 2,565         | 2,401     | 2,230     | 2,147   | 2,186   |
| Hours worked (1,000s).....                         | 5,126         | 5,748     | 5,804         | 5,269     | 4,903     | 3,634   | 3,652   |
| Wages paid (\$1,000).....                          | 137,053       | 159,190   | 169,988       | 161,294   | 160,180   | 117,983 | 119,286 |
| Hourly wages (dollars per hour).....               | \$26.74       | \$27.70   | \$29.29       | \$30.61   | \$32.67   | \$32.47 | \$32.66 |
| Producers: Productivity.....                       | 11.9          | 12.0      | 12.2          | 11.5      | 10.4      | 10.6    | 10.3    |
| Producers: Unit labor costs.....                   | \$2.33        | \$2.43    | \$2.50        | \$2.70    | \$3.18    | \$3.12  | \$3.22  |
| Fabricators: Productivity.....                     | 2.8           | 3.0       | 3.4           | 3.6       | 4.0       | 3.9     | 4.0     |
| Fabricators: Unit labor costs.....                 | \$9.02        | \$8.42    | \$8.06        | \$8.25    | \$8.03    | \$8.09  | \$7.79  |
| U.S. producers' and fabricators':                  |               |           |               |           |           |         |         |
| Net sales:                                         |               |           |               |           |           |         |         |
| Quantity.....                                      | 39,209        | 49,778    | 49,174        | 44,680    | 38,771    | 29,478  | 28,156  |
| Value.....                                         | 905,380       | 1,168,704 | 1,298,124     | 1,205,535 | 1,063,246 | 809,301 | 784,606 |
| Unit value.....                                    | \$23.09       | \$23.48   | \$26.40       | \$26.98   | \$27.42   | \$27.45 | \$27.87 |
| Cost of goods sold (COGS).....                     | 568,157       | 747,588   | 850,774       | 772,160   | 647,213   | 487,647 | 482,747 |
| Gross profit or (loss) (fn2).....                  | 337,223       | 421,116   | 447,350       | 433,375   | 416,033   | 321,654 | 301,860 |
| SG&A expenses.....                                 | 251,736       | 314,840   | 360,073       | 347,390   | 329,469   | 248,548 | 254,208 |
| Operating income or (loss) (fn2).....              | 85,486        | 106,277   | 87,277        | 85,985    | 86,564    | 73,106  | 47,651  |
| Unit COGS.....                                     | \$14.49       | \$15.02   | \$17.30       | \$17.28   | \$16.69   | \$16.54 | \$17.15 |
| Unit SG&A expenses.....                            | \$6.42        | \$6.32    | \$7.32        | \$7.78    | \$8.50    | \$8.43  | \$9.03  |
| Unit operating income or (loss) (fn2).....         | \$2.18        | \$2.13    | \$1.77        | \$1.92    | \$2.23    | \$2.48  | \$1.69  |
| COGS/sales (fn1).....                              | 62.8          | 64.0      | 65.5          | 64.1      | 60.9      | 60.3    | 61.5    |
| Operating income or (loss)/sales (fn1).....        | 9.4           | 9.1       | 6.7           | 7.1       | 8.1       | 9.0     | 6.1     |

Table continued.

Table C.2 Continued

**QSP: Summary data on the U.S. market, defining the domestic industry as U.S. producers and independent fabricators, by item and period**  
Quantity=1,000 square feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per square foot; Productivity=square feet per hour; Period changes=percent—exceptions noted; Interim period is January through September

| Item                                               | Period change comparisons |         |                          |         |         | Interim<br>2024–25 |
|----------------------------------------------------|---------------------------|---------|--------------------------|---------|---------|--------------------|
|                                                    | 2020–24                   | 2020–21 | Calendar year<br>2021–22 | 2022–23 | 2023–24 |                    |
| U.S. producers' and fabricators':                  |                           |         |                          |         |         |                    |
| Producers: Practical capacity quantity.....        | ▼(9.0)                    | ▲5.6    | ▼(1.2)                   | ▼(1.4)  | ▼(11.5) | ▲11.2              |
| Producers: Production quantity.....                | ▼(17.2)                   | ▲10.4   | ▲2.4                     | ▼(11.1) | ▼(17.6) | ▼(0.7)             |
| Producers: Capacity utilization (fn1).....         | ▼(7.1)                    | ▲3.5    | ▲3.0                     | ▼(8.3)  | ▼(5.3)  | ▼(7.5)             |
| Fabricators: Practical capacity quantity.....      | ▲39.6                     | ▲16.0   | ▲14.7                    | ▲5.7    | ▼(0.7)  | ▲9.1               |
| Fabricators: Production quantity.....              | ▲40.3                     | ▲26.9   | ▲14.6                    | ▼(9.4)  | ▲6.6    | ▲2.0               |
| Fabricators: Capacity utilization (fn1).....       | ▲0.4                      | ▲7.5    | ▼(0.1)                   | ▼(12.6) | ▲5.5    | ▼(4.9)             |
| U.S. shipments (fn3):                              |                           |         |                          |         |         |                    |
| Quantity.....                                      | ▼(2.4)                    | ▲28.1   | ▼(4.5)                   | ▼(8.0)  | ▼(13.2) | ▼(6.2)             |
| Value:                                             |                           |         |                          |         |         |                    |
| Fully domestic value.....                          | ▲***                      | ▲***    | ▲***                     | ▼***    | ▼***    | ▼***               |
| Incremental value added to imports.....            | ▲***                      | ▲***    | ▲***                     | ▲***    | ▼***    | ▲***               |
| Total value.....                                   | ▲18.6                     | ▲29.6   | ▲9.0                     | ▼(6.5)  | ▼(10.3) | ▼(3.3)             |
| Unit value.....                                    | ▲***                      | ▲***    | ▲***                     | ▲***    | ▲***    | ▲***               |
| Producers: Ending inventory quantity.....          | ▲7.5                      | ▼(6.3)  | ▲9.0                     | ▲4.4    | ▲0.8    | ▲6.6               |
| Producers: Inventories/U.S. shipments (fn1).....   | ▲6.0                      | ▼(16.1) | ▲6.2                     | ▲6.7    | ▲9.2    | ▲8.7               |
| Fabricators: Ending inventory quantity.....        | ▲13.8                     | ▲21.7   | ▲14.6                    | ▼(25.1) | ▲8.9    | ▼(2.1)             |
| Fabricators: Inventories/U.S. shipments (fn1)..... | ▼(7.3)                    | ▲1.6    | ▼(2.1)                   | ▼(8.3)  | ▲1.5    | ▼(1.7)             |
| Production workers.....                            | ▼(7.9)                    | ▲7.4    | ▼(1.3)                   | ▼(6.4)  | ▼(7.1)  | ▲1.8               |
| Hours worked (1,000s).....                         | ▼(4.3)                    | ▲12.1   | ▲1.0                     | ▼(9.2)  | ▼(6.9)  | ▲0.5               |
| Wages paid (\$1,000).....                          | ▲16.9                     | ▲16.2   | ▲6.8                     | ▼(5.1)  | ▼(0.7)  | ▲1.1               |
| Hourly wages (dollars per hour).....               | ▲22.2                     | ▲3.6    | ▲5.8                     | ▲4.5    | ▲6.7    | ▲0.6               |
| Producers: Productivity.....                       | ▼(13.0)                   | ▲0.6    | ▲1.9                     | ▼(5.5)  | ▼(10.2) | ▼(2.1)             |
| Producers: Unit labor costs.....                   | ▲36.4                     | ▲4.3    | ▲2.8                     | ▲8.0    | ▲17.8   | ▲3.3               |
| Fabricators: Productivity.....                     | ▲45.3                     | ▲8.8    | ▲12.6                    | ▲6.4    | ▲11.5   | ▲3.3               |
| Fabricators: Unit labor costs.....                 | ▼(11.0)                   | ▼(6.7)  | ▼(4.3)                   | ▲2.4    | ▼(2.6)  | ▼(3.7)             |
| U.S. producers' and fabricators':                  |                           |         |                          |         |         |                    |
| Net sales:                                         |                           |         |                          |         |         |                    |
| Quantity.....                                      | ▼(1.1)                    | ▲27.0   | ▼(1.2)                   | ▼(9.1)  | ▼(13.2) | ▼(4.5)             |
| Value.....                                         | ▲17.4                     | ▲29.1   | ▲11.1                    | ▼(7.1)  | ▼(11.8) | ▼(3.1)             |
| Unit value.....                                    | ▲18.8                     | ▲1.7    | ▲12.4                    | ▲2.2    | ▲1.6    | ▲1.5               |
| Cost of goods sold (COGS).....                     | ▲13.9                     | ▲31.6   | ▲13.8                    | ▼(9.2)  | ▼(16.2) | ▼(1.0)             |
| Gross profit or (loss) (fn2).....                  | ▲23.4                     | ▲24.9   | ▲6.2                     | ▼(3.1)  | ▼(4.0)  | ▼(6.2)             |
| SG&A expenses.....                                 | ▲30.9                     | ▲25.1   | ▲14.4                    | ▼(3.5)  | ▼(5.2)  | ▲2.3               |
| Operating income or (loss) (fn2).....              | ▲1.3                      | ▲24.3   | ▼(17.9)                  | ▼(1.5)  | ▲0.7    | ▼(34.8)            |
| Unit COGS.....                                     | ▲15.2                     | ▲3.6    | ▲15.2                    | ▼(0.1)  | ▼(3.4)  | ▲3.6               |
| Unit SG&A expenses.....                            | ▲32.4                     | ▼(1.5)  | ▲15.8                    | ▲6.2    | ▲9.3    | ▲7.1               |
| Unit operating income or (loss) (fn2).....         | ▲2.4                      | ▼(2.1)  | ▼(16.9)                  | ▲8.4    | ▲16.0   | ▼(31.8)            |
| COGS/sales (fn1).....                              | ▼(1.9)                    | ▲1.2    | ▲1.6                     | ▼(1.5)  | ▼(3.2)  | ▲1.3               |
| Operating income or (loss)/sales (fn1).....        | ▼(1.3)                    | ▼(0.3)  | ▼(2.4)                   | ▲0.4    | ▲1.0    | ▼(3.0)             |

Table continued.



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Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics from the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, accessed on December 15, 2025. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values. Official U.S. import statistics were adjusted to remove out-of-scope imports under the primary HTS numbers and add in-scope imports under other HTS numbers according to questionnaire data. 508-compliant tables for these data are in parts 2, 3, 4, 5, and appendix I and J of this report.

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

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

fn3.—Quantity for U.S. shipments reflects only producers' U.S. shipment quantities. Value for U.S. shipments reflects fabricated slab sold in the U.S. from domestically manufactured slabs (including the value added by U.S. independent fabricators to domestic slab), as well as the incremental value added by U.S. independent fabricators to imported slabs. Unit value reflects the fully domestic value. In measuring consumption and market share, this methodology avoids reclassifying and/or double counting merchandise already reported as an import or a domestic sale by slab producers.

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



## **APPENDIX D**

### **NARRATIVES ON SEMI-FINISHED PRODUCT FACTORS**



**Table D.1 QSP: U.S. producers' narrative responses regarding the semi-finished product analysis comparing slab to fabricated slab, since January 1, 2020**

| <b>Item</b>                    | <b>Firm name and narrative regarding semi-finished product analysis</b>                                                                                                  |
|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Other uses                     | ***: Tiles.                                                                                                                                                              |
| Other uses                     | ***: Just different step in the process between manufacturer and end user.                                                                                               |
| Separate market                | ***: Commercial rather than residential.                                                                                                                                 |
| Separate market                | ***: Slabs are unfinished products for the end user, fabs are the finished products for the end customer.                                                                |
| Separate market                | ***: Fabs are cut into job requirement while slabs are generic sized.                                                                                                    |
| Differences in characteristics | ***: Different size.                                                                                                                                                     |
| Differences in characteristics | ***: Fabs including the measurement and fabrication activities.                                                                                                          |
| Differences in characteristics | ***: Labor cost to fabricate and yield loss in fabricating.                                                                                                              |
| Differences in characteristics | ***: Fabrication adds the costs of cut to size of each slab.                                                                                                             |
| Differences in costs           | ***: Compared to manufacturing slabs, creating fabs is a simple process with a very small number of people and with a relatively limited amount of capital investment.   |
| Differences in costs           | ***: Requires additional labor and equipment.                                                                                                                            |
| Differences in costs           | ***: The slabs are cut to size with a waterjet saw after that a detailed template has been drawn. Once the different parts have been cut there is the installation part. |

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

**Table D.2 QSP: U.S. importers' narrative responses regarding the semi-finished product analysis comparing slab to fabricated slab, since January 1, 2020**

| Item            | Firm name and narrative regarding semi-finished product analysis                                                                                                                                                                                                                                             |
|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Other uses      | ***: Wall and floor installation.                                                                                                                                                                                                                                                                            |
| Other uses      | ***: >99 percent of QSP purchased are fabricated in some fashion. Quartz slabs can be used for interior cladding or flooring, but this is incredible rare. This is much more common with natural stone or porcelain slabs.                                                                                   |
| Other uses      | ***: Slabs are used to make fabricated quartz products.                                                                                                                                                                                                                                                      |
| Other uses      | ***: Quartz slabs are not end-use products. They require further fabrication, including cutting, edging, polishing, and finishing, before they can be installed or used in any application.                                                                                                                  |
| Other uses      | ***: No Knowledge.                                                                                                                                                                                                                                                                                           |
| Other uses      | ***: We make fabs.                                                                                                                                                                                                                                                                                           |
| Other uses      | ***: Quartz slabs may be sold directly to customers such as fabricators, contractors and designers for use in customized architectural applications. Slabs can also be held as inventory, resold to fabricators, or used for large-format installations where fabrication decisions are made after purchase. |
| Other uses      | ***: Unknown.                                                                                                                                                                                                                                                                                                |
| Other uses      | ***: It's usually installed on an island, which results in fewer connections.                                                                                                                                                                                                                                |
| Other uses      | ***: Slabs are available for multiple applications, fabs are for specific projects.                                                                                                                                                                                                                          |
| Other uses      | ***: We sell only slabs, hence not aware of these answers.                                                                                                                                                                                                                                                   |
| Other uses      | ***: Maybe some but very little. You would have to ask a fabricator.                                                                                                                                                                                                                                         |
| Separate market | ***: Custom homes customers typically do not use prefabricated materials.                                                                                                                                                                                                                                    |
| Separate market | ***: See above.                                                                                                                                                                                                                                                                                              |
| Separate market | ***: Fabricators are the main users of slabs. Most slabs are fabricated in the USA, not abroad.                                                                                                                                                                                                              |
| Separate market | ***: Slabs are sold to fabricators as an input material, while fabricated products are sold as finished or semi-finished goods for installation.                                                                                                                                                             |
| Separate market | ***: No Knowledge.                                                                                                                                                                                                                                                                                           |
| Separate market | ***: Separate sales channel, materials fabricated locally in a timely matter.                                                                                                                                                                                                                                |
| Separate market | ***: Slabs are for any house or commercial office or any purpose but fabs are brought in for a specific house or project and cannot be used elsewhere.                                                                                                                                                       |
| Separate market | ***: Slabs are for any house or commercial office or any purpose but fabs are brought in for a specific house or project and cannot be used elsewhere.                                                                                                                                                       |
| Separate market | ***: Slabs are for any house or commercial office or any purpose but fabs are brought in for a specific house or project and cannot be used elsewhere.                                                                                                                                                       |
| Separate market | ***: Slabs are for any house or commercial office or any purpose but fabs are brought in for a specific house or project and cannot be used elsewhere.                                                                                                                                                       |
| Separate market | ***: Slabs are for any house or commercial office or any purpose but fabs are brought in for a specific house or project and cannot be used elsewhere.                                                                                                                                                       |

| Item            | Firm name and narrative regarding semi-finished product analysis                                                                                                                                                                                                                                                        |
|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Separate market | ***: Slabs are for any house or commercial office or any purpose but fabs are brought in for a specific house or project and cannot be used elsewhere.                                                                                                                                                                  |
| Separate market | ***: Just different step in the process between manufacturer and end user.                                                                                                                                                                                                                                              |
| Separate market | ***: For our business, fabs involve finished tops for items such as vanities, nightstands, and desks.                                                                                                                                                                                                                   |
| Separate market | ***: Slabs are sold as raw materials to fabricators, while fabricated products are finished, customized items sold to contractors or end users. They serve different customers and purposes.                                                                                                                            |
| Separate market | ***: Fabricators purchase slabs Homeowners, builders, contractors, developers, etc purchase fabs.                                                                                                                                                                                                                       |
| Separate market | ***: Slabs are sold as an upstream raw material, while fabrication is a downstream service that adds labor and installation value, resulting in different customers, pricing, and cost structures.                                                                                                                      |
| Separate market | ***: Fabs are typically used for larger commercial and repetitive end uses, not custom work.                                                                                                                                                                                                                            |
| Separate market | ***: Slabs are sold to fabricators as an input material, while fabricated products are sold to builders and end users as finished countertops.                                                                                                                                                                          |
| Separate market | ***: Two varying supply bases.                                                                                                                                                                                                                                                                                          |
| Separate market | ***: The Market for slabs is distinct from the market for fabricated products. slabs are sold to fabricators and trade customers, while fabricated products are sold to end users. Pricing, customers, distribution channels, and purchasing decision differ between the slab market and the fabricated product market. |
| Separate market | ***: Slabs can be sold to any customers while fabs are designed for 1 particular customer only.                                                                                                                                                                                                                         |
| Separate market | ***: The firm sells its product in form of quartz slabs to distributors and then distributors sell it further either to a fabricator or they themselves can fabricate and sell to end user for installation.                                                                                                            |
| Separate market | ***: Unknown.                                                                                                                                                                                                                                                                                                           |
| Separate market | ***: Slabs are for any house or commercial office or any purpose but fabs are brought in for a specific house or project and cannot be used elsewhere.                                                                                                                                                                  |
| Separate market | ***: In our particular case, we are generally supplying a finished product to an end customer. We do not supply slabs but our understanding is that slabs generally go through an intermediary to be processed prior to its end use.                                                                                    |
| Separate market | ***: Slabs are mainly purchased by fabricators and distributors for resale, while fabs are sold as finished or nearly finished products for installation. Customers, pricing structures, and buying decisions differ between the two markets.                                                                           |
| Separate market | ***: Higher-end clients typically have slabs.                                                                                                                                                                                                                                                                           |
| Separate market | ***: Slabs are purchased by fabricators to make the end product countertops. Fabs are purchased by the end customer like a homeowner or builder.                                                                                                                                                                        |
| Separate market | ***: A slab supplier sells the slabs to countertop fabricators. Fabricators transform the slabs into countertops. They are different markets.                                                                                                                                                                           |
| Separate market | ***: Slabs are primarily supplied to distributors, while fabs are sold to contractors.                                                                                                                                                                                                                                  |

| Item                           | Firm name and narrative regarding semi-finished product analysis                                                                                                                                                                                                                        |
|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Separate market                | ***: Slabs are sold primarily to a distributor; Fabs are sold for project ready for installation customers.                                                                                                                                                                             |
| Separate market                | ***: Cut to size - fabs - are more of a commercial segment for hotels, apartments, hospitals etc. We are primarily servicing the residential kitchen industry. However the slabs we sell are also fabricated before being installed.                                                    |
| Separate market                | ***: Yes, for slabs there will be additional cost to have them turned into fabs.                                                                                                                                                                                                        |
| Separate market                | ***: Fabs are used for multifamily or hospitality projects only.                                                                                                                                                                                                                        |
| Separate market                | ***: Slabs are purchased by fabricators and installers whereas fabs are purchased by end users such as commercial projects such as multi-family.                                                                                                                                        |
| Separate market                | ***: Markets are divided into distributors and fabricators depending on the geography.                                                                                                                                                                                                  |
| Separate market                | ***: Slabs are primarily purchased by fabricators and distributors for resale, whereas fabs are sold as finished or near-finished products ready for installation. As a result, the customer base, pricing models, and purchasing decisions vary significantly between the two markets. |
| Separate market                | ***: Pre-fabricated QSP is used for larger volume orders and construction projects. slabs are brought into inventory for homeowners and single residential jobs by distributors.                                                                                                        |
| Separate market                | ***: The market for slabs is fabricators. The market for fabs is end users.                                                                                                                                                                                                             |
| Separate market                | ***: We service customers that require custom templates by job.                                                                                                                                                                                                                         |
| Differences in characteristics | ***: Fabs are considered ready for installation.                                                                                                                                                                                                                                        |
| Differences in characteristics | ***: Fabs are specific to a job, i.e. size.                                                                                                                                                                                                                                             |
| Differences in characteristics | ***: Other than changes to shape, edge profiles, etc. The physical characteristic of slabs/fabs are identical.                                                                                                                                                                          |
| Differences in characteristics | ***: Fabs are further manufactured quartz products.                                                                                                                                                                                                                                     |
| Differences in characteristics | ***: Slabs are unfinished quartz products requiring further fabrication, whereas fabricated products are finished for final use.                                                                                                                                                        |
| Differences in characteristics | ***: Slabs are unfinished products for the end user, fabs are the finished products for the end customer.                                                                                                                                                                               |
| Differences in characteristics | ***: No Knowledge.                                                                                                                                                                                                                                                                      |
| Differences in characteristics | ***: Slabs are fixed dimension and fabs are made to size.                                                                                                                                                                                                                               |
| Differences in characteristics | ***: Fabs are brought in for a specific purpose and to specific design, whereas slabs can be cut and fabricated to.                                                                                                                                                                     |
| Differences in characteristics | ***: Fabs are brought in for a specific purpose and to specific design, whereas slabs can be cut and fabricated to.                                                                                                                                                                     |
| Differences in characteristics | ***: Fabs are brought in for a specific purpose and to specific design, whereas slabs can be cut and fabricated to.                                                                                                                                                                     |
| Differences in characteristics | ***: Fabs are brought in for a specific purpose and to specific design, whereas slabs can be cut and fabricated to.                                                                                                                                                                     |
| Differences in characteristics | ***: Fabs are brought in for a specific purpose and to specific design, whereas slabs can be cut and fabricated to.                                                                                                                                                                     |
| Differences in characteristics | ***: Fabs are brought in for a specific purpose and to specific design, whereas slabs can be cut and fabricated to.                                                                                                                                                                     |



| Item                           | Firm name and narrative regarding semi-finished product analysis                                                                                                                                                                                                                                                                           |
|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Differences in characteristics | ***: Fabs are cut into job requirement while slabs are generic sized.                                                                                                                                                                                                                                                                      |
| Differences in characteristics | ***: For our business, fabs involve finished tops for items such as vanities, nightstands, and desks.                                                                                                                                                                                                                                      |
| Differences in characteristics | ***: Slabs are unfinished raw materials, while fabricated products are cut, edged, finished, and sized for installation.                                                                                                                                                                                                                   |
| Differences in characteristics | ***: Fabs have seams and epoxies.                                                                                                                                                                                                                                                                                                          |
| Differences in characteristics | ***: Quartz slabs are unfinished, large-format materials with no edge treatments, cut outs or polishing beyond factory finishing. Fabricated products are customized to final dimensions, include edge profiles, cutouts, and finishing, and are ready for installation. As such, slabs and fabricated products serve different functions. |
| Differences in characteristics | ***: Slabs need to be converted in fabs depending on size etc. and then installed for end use. Slabs generally come in standard sizes and Fabs can be any desired size depending on end-consumer's usage.                                                                                                                                  |
| Differences in characteristics | ***: Unknown.                                                                                                                                                                                                                                                                                                                              |
| Differences in characteristics | ***: Slabs are full-size unprocessed stone, while fabs are cut, shaped, and finished products intended for installation.                                                                                                                                                                                                                   |
| Differences in characteristics | ***: Fabs are brought in for a specific purpose and to specific design, whereas slabs can be cut and fabricated to.                                                                                                                                                                                                                        |
| Differences in characteristics | ***: Slabs are unfinished sheets that require cutting, edging, and finishing before installation. Fabs have been processed to specific dimensions and often include finished edges, cut-outs, and polishing, making them ready or nearly ready for installation.                                                                           |
| Differences in characteristics | ***: Slabs are the raw materials. When you cut them, router, and polish, they turn into countertops for consumer's use.                                                                                                                                                                                                                    |
| Differences in characteristics | ***: Fabs physically have more processing done to them and include, at a minimum, polished and eased edges, and sometimes sink cut outs.                                                                                                                                                                                                   |
| Differences in characteristics | ***: Fabs include one more component of value added processing/fabrication - including edging, polishing, sink cutouts.                                                                                                                                                                                                                    |
| Differences in characteristics | ***: Slabs come in uniform sizes while fabrication sizes are unique to the project.                                                                                                                                                                                                                                                        |
| Differences in characteristics | ***: Slabs are raw, unfinished sheets that need to be cut, edged, and finished before installation. In contrast, fabs are manufactured to specific dimensions and typically come with finished edges, cut-outs, and polishing, making them ready or almost ready for installation.                                                         |
| Differences in characteristics | ***: Can be. You would have to ask a fabricator.                                                                                                                                                                                                                                                                                           |
| Differences in characteristics | ***: Size limitations.                                                                                                                                                                                                                                                                                                                     |
| Differences in characteristics | ***: Size.                                                                                                                                                                                                                                                                                                                                 |
| Differences in costs           | ***: Fabs are more valuable due to being custom fitted.                                                                                                                                                                                                                                                                                    |
| Differences in costs           | ***: Likely there is, but we do not purchase fabs.                                                                                                                                                                                                                                                                                         |
| Differences in costs           | ***: Fabricated products are smaller units and require minimal customization prior to installation. Full slabs, on the other hand, require more extensive work by U.S. contractors, which ultimately results in higher costs for the end user.                                                                                             |
| Differences in costs           | ***: Most fabricators will estimate that cost of quartz slabs make ups 35 percent of the cost of the finished installed fab projects.                                                                                                                                                                                                      |

| Item                 | Firm name and narrative regarding semi-finished product analysis                                                                                                                                                                                                                                                                                                                                                  |
|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Differences in costs | ***: Fabrication is a major value-added production step.                                                                                                                                                                                                                                                                                                                                                          |
| Differences in costs | ***: The installation cost will be much higher for slabs.                                                                                                                                                                                                                                                                                                                                                         |
| Differences in costs | ***: Fabricated products have a significantly higher cost and value than slabs due to the additional labor, capital equipment, processing time, material loss, and overhead required to transform slabs into installation-ready products.                                                                                                                                                                         |
| Differences in costs | ***: Fabs including the measurement and fabrication activities.                                                                                                                                                                                                                                                                                                                                                   |
| Differences in costs | ***: No knowledge.                                                                                                                                                                                                                                                                                                                                                                                                |
| Differences in costs | ***: Fab cost tends to have greater value based on labor associated.                                                                                                                                                                                                                                                                                                                                              |
| Differences in costs | ***: They add part of fabrication work, and should be more expensive but when the fabs come from low cost countries of origin, fabs price is not very different from slabs price, increasing the gap of prices between low cost countries of origin products and US or non low cost countries of origin.                                                                                                          |
| Differences in costs | ***: Fabs are much cheaper made overseas because of labor costs compared to fabrication made in US.                                                                                                                                                                                                                                                                                                               |
| Differences in costs | ***: Fabs are much cheaper made overseas because of labor costs compared to fabrication made in US.                                                                                                                                                                                                                                                                                                               |
| Differences in costs | ***: Fabs are much cheaper made overseas because of labor costs compared to fabrication made in US.                                                                                                                                                                                                                                                                                                               |
| Differences in costs | ***: Fabs are much cheaper made overseas because of labor costs compared to fabrication made in US.                                                                                                                                                                                                                                                                                                               |
| Differences in costs | ***: Fabs are much cheaper made overseas because of labor costs compared to fabrication made in US.                                                                                                                                                                                                                                                                                                               |
| Differences in costs | ***: Fabs are much cheaper made overseas because of labor costs compared to fabrication made in US.                                                                                                                                                                                                                                                                                                               |
| Differences in costs | ***: Fabricated products for items such as vanities, nightstands, and desks would be more expensive than slabs.                                                                                                                                                                                                                                                                                                   |
| Differences in costs | ***: Fabricated products have higher value because they include added labor, machinery, customization, finishing, and quality control beyond the slab cost.                                                                                                                                                                                                                                                       |
| Differences in costs | ***: There is a significant difference in cost and value between slabs and fabs. Slabs have very limited use until after fabrication. They require cutting, edging, and finishing before they can be installed. The value of the fabrication step transforms raw slabs into a usable product. Fabrication requires skilled labor, CNC machinery, polishing tools, and logistics to operate their business models. |
| Differences in costs | ***: Fabs require extensive labor to cut, process, finish and install, therefore have a higher cost and value to the end-consumer.                                                                                                                                                                                                                                                                                |
| Differences in costs | ***: Slabs are a high-value input and typically account for the largest share of the total cost, while fabrication adds labor and processing cost.                                                                                                                                                                                                                                                                |
| Differences in costs | ***: Yes, but there are too many factors involved to answer this question with any degree of specificity.                                                                                                                                                                                                                                                                                                         |
| Differences in costs | ***: Fabricated products include additional labor, processing, and installation-related costs and therefore have a higher value than raw slabs.                                                                                                                                                                                                                                                                   |
| Differences in costs | ***: Labor and capital costs. fabs are value-added product.                                                                                                                                                                                                                                                                                                                                                       |
| Differences in costs | ***: Fabs are meant for commercial projects - apartments, hotels, multi-unit, etc. Whers use of QSP is price sensitive.                                                                                                                                                                                                                                                                                           |

| Item                 | Firm name and narrative regarding semi-finished product analysis                                                                                                                                                                     |
|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Differences in costs | ***: Fabrication and packing cost will be involved in FAB.                                                                                                                                                                           |
| Differences in costs | ***: The fabrication cost increased the actual slab cost including other works like cutting, polishing, edge work etc.                                                                                                               |
| Differences in costs | ***: Fabs reduce my local fabrication cost                                                                                                                                                                                           |
| Differences in costs | ***: The fabs are expensive.                                                                                                                                                                                                         |
| Differences in costs | ***: Since slabs are semi-finished, the only difference between slabs and fabs is the price. Fabrication accounts for the majority of the price.                                                                                     |
| Differences in costs | ***: Unknown.                                                                                                                                                                                                                        |
| Differences in costs | ***: Fabs are much cheaper made overseas because of labor costs compared to fabrication made in US.                                                                                                                                  |
| Differences in costs | ***: Fab costs are approx. 25 percent higher than slab costs.                                                                                                                                                                        |
| Differences in costs | ***: Fabrication adds extra layers of costs to the goods.                                                                                                                                                                            |
| Differences in costs | ***: Fabs have higher value than slabs because fabrication adds labor, processing, waste, and finishing costs. The price difference primarily reflects fabrication and installation preparation.                                     |
| Differences in costs | ***: Fabs countertops are generally more expensive because the edging requires additional processing costs.                                                                                                                          |
| Differences in costs | ***: Fabricators use slabs to make fabs. Fabs are more expensive on a \$/sqft basis because they are the pieces cut out of the slabs.                                                                                                |
| Differences in costs | ***: The materials count for approximately 30 percent of the total cost of the countertops.                                                                                                                                          |
| Differences in costs | ***: The price of fabs is affected by fabrication costs.                                                                                                                                                                             |
| Differences in costs | ***: Fabricated products have a significantly higher cost and value than slabs due to additional processing steps, including cutting, edge profiling, polishing, quality inspection, packaging, and higher labor and overhead costs. |
| Differences in costs | ***: Fabs are meant for commercial projects - apartments, hotels, multi-unit, etc. Where use of QSP is price sensitive.                                                                                                              |
| Differences in costs | ***: Fabs are more expensive based on how much more they have been processed.                                                                                                                                                        |
| Differences in costs | ***: Fab is about 30 percent ~ 50 percent higher than slabs.                                                                                                                                                                         |
| Differences in costs | ***: I am guessing that the reduction of waste and transportation cost are savings.                                                                                                                                                  |
| Differences in costs | ***: Fabs have labor included in the cost and are cut to the specific size needed.                                                                                                                                                   |
| Differences in costs | ***: Labor cost for fabrication.                                                                                                                                                                                                     |
| Differences in costs | ***: Average cost of the slab is only 20 percent to 30 percent of the total project cost of final product installed after fabrication.                                                                                               |
| Differences in costs | ***: Fabs will be significantly higher in cost, because they include labor costs.                                                                                                                                                    |
| Differences in costs | ***: Fab cost includes fabrication costs, while slabs cost does not.                                                                                                                                                                 |
| Differences in costs | ***: Slabs are predominantly the material costs and upstream manufacturing costs whereas fabs include additional labor, handling, usage, and fabrication costs.                                                                      |
| Differences in costs | ***: Around 30-50 percent difference.                                                                                                                                                                                                |
| Differences in costs | ***: To convert the slabs to FAB additional human hrs required.                                                                                                                                                                      |

| Item                     | Firm name and narrative regarding semi-finished product analysis                                                                                                                                                                                                                                                                                                                      |
|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Differences in costs     | ***: Fabs will cost more with edge detail, sink cutouts etc.                                                                                                                                                                                                                                                                                                                          |
| Differences in costs     | ***: Fabs carry a higher value than slabs since fabrication involves additional labor, processing, material wastage, and finishing costs. The price difference mainly represents the cost of fabrication and preparation for installation.                                                                                                                                            |
| Differences in costs     | ***: slabs are cheaper. once slabs are processed into the final product there is an added value and the cost is higher. When fabricated into the final product in America the cost is much higher than via import.                                                                                                                                                                    |
| Differences in costs     | ***: The fabricator has to charge for his work.                                                                                                                                                                                                                                                                                                                                       |
| Differences in costs     | ***: We view slabs as 1/3 of the cost of an installed countertop. We view fabrication as 1/3 of the cost and we view installation as the final 1/3.                                                                                                                                                                                                                                   |
| Differences in costs     | ***: Fabs include fabrication costs.                                                                                                                                                                                                                                                                                                                                                  |
| Transformation intensive | ***: Precise measurements and specialty equipment is needed.                                                                                                                                                                                                                                                                                                                          |
| Transformation intensive | ***: There is more labor involved in cutting fabs than slabs.                                                                                                                                                                                                                                                                                                                         |
| Transformation intensive | ***: I have limited knowledge on this topic.                                                                                                                                                                                                                                                                                                                                          |
| Transformation intensive | ***: The production of slabs is labor and capital intensive. Production is growing increasingly automated with regards to cutting and polishing, but it still requires significant manual input to move, design, and program all aspects of production. Fab production, unlike slab production, is a very sequenced process that requires manual intervention at step of the process. |
| Transformation intensive | ***: Cutting, laminating, installing.                                                                                                                                                                                                                                                                                                                                                 |
| Transformation intensive | ***: The conversion of slabs into fabricated products is significant and both labor- and capital-intensive. It requires skilled labor and specialized equipment such as CNC machines and waterjet cutters, along with multiple processing steps including cutting, edging, polishing, and finishing prior to installation.                                                            |
| Transformation intensive | ***: Need to cut slab and polish all edges more labor.                                                                                                                                                                                                                                                                                                                                |
| Transformation intensive | ***: No knowledge.                                                                                                                                                                                                                                                                                                                                                                    |
| Transformation intensive | ***: Requires equipment, facility and U.S workers to cut and finish the product to be installed.                                                                                                                                                                                                                                                                                      |
| Transformation intensive | ***: It includes a significant part of the fabrication process for basic designs (edges, holes...) and in some cases a fabricator is not needed and less qualified professionals install the jobs.                                                                                                                                                                                    |
| Transformation intensive | ***: It is very labor intensive as cutting, polishing etc are involved.                                                                                                                                                                                                                                                                                                               |
| Transformation intensive | ***: It is very labor intensive as cutting, polishing etc are involved.                                                                                                                                                                                                                                                                                                               |
| Transformation intensive | ***: It is very labor intensive as cutting, polishing etc are involved.                                                                                                                                                                                                                                                                                                               |
| Transformation intensive | ***: It is very labor intensive as cutting, polishing etc are involved.                                                                                                                                                                                                                                                                                                               |
| Transformation intensive | ***: It is very labor intensive as cutting, polishing etc are involved.                                                                                                                                                                                                                                                                                                               |
| Transformation intensive | ***: Compared to manufacturing slabs, creating fabs is a simple process with a very small number of people and with a relatively limited amount of capital investment.                                                                                                                                                                                                                |

| Item                     | Firm name and narrative regarding semi-finished product analysis                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| Transformation intensive | ***: Capital equipment for machining and polishing, and the labor for this machining and polishing as well as cutting, final assembly, and packing is required to fabricate the products from the original poured slabs into fabs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Transformation intensive | ***: The conversion requires specialized equipment and skilled labor for cutting, finishing, and customization, making it both labor- and capital-intensive.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Transformation intensive | ***: Slab fabrication for engineered quartz is both labor- and capital-intensive. It requires skilled technicians to operate CNC routers, saws, polishing equipment, and other machinery. As well as manual finishing for custom details such as edge profiles and sink cutouts. Significant capital investment is needed for advanced machinery, water recycling systems, and material handling equipment, in addition to other necessary equipment. In addition, fabrication shops must maintain safe work environments that comply with OSHA standards, including but not limited to, proper lifting practices, dust control, and water management systems to protect workers from hazards. These requirements make slab fabrication a complex process demanding both technical expertise and substantial infrastructure. |
| Transformation intensive | ***: Employees, fabrication equipment, handling equipment, warehouse space, vehicle fleets, etc.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Transformation intensive | ***: The conversion process requires either extensively trained craftsmen or a significant investment in computer technology and automation which is usually in excess of \$500,000.00.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Transformation intensive | ***: The fabrication process requires specialized equipment, skilled labor, cutting, polishing, edging, and quality control, making it labor and capital intensive.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Transformation intensive | ***: Yes it relies on skilled people and expensive stone process machinery.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Transformation intensive | ***: Material wastage, shortage of labor, high cost of labor, cost of compliance in accordance to OSHA guidelines for production of QSP.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Transformation intensive | ***: As a reseller, Fabrication involves cutting and finishing activities performed downstream and does not constitute a significant or capital-intensive transformation of the product.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Transformation intensive | ***: Both Labor and Capital is involved in the conversion process.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Transformation intensive | ***: The fabrication process requires skilled labor, machinery and substantial capital investment. Multiple processing steps are involved, including cutting, shaping, polishing, making the transformation from slabs to fabricated products significant and resource - intensive.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Transformation intensive | ***: It takes a lot of labor and machinery to turn slabs into fabs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Transformation intensive | ***: Labor cost is involved to fabricate the slabs before insulation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Transformation intensive | ***: It is not labor intensive for quartz, it is the easiest product to fabricate, however, it ends up accounting for the majority of the price for the end-user.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Transformation intensive | ***: Unknown.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Transformation intensive | ***: It is very labor intensive as cutting, polishing etc are involved.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Transformation intensive | ***: Labor intensive.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

| Item                     | Firm name and narrative regarding semi-finished product analysis                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Transformation intensive | ***: Fabrication adds both labor and machining costs to the final cost of the goods.                                                                                                                                                                                                                                                                                                                                                   |
| Transformation intensive | ***: Converting slabs into fabs requires CNC cutting, polishing, edging equipment, dust-control systems, and trained labor. It is moderately capital intensive and labor intensive, and also involves yield losses from trimming and cut-outs.                                                                                                                                                                                         |
| Transformation intensive | ***: It requires a lot of cutting and edge grinding.                                                                                                                                                                                                                                                                                                                                                                                   |
| Transformation intensive | ***: Cutting, routing, and polishing the slabs to turn them into countertops requires specific labor which is very expensive. There is also measuring and installing which require another layer of capital and labor involved.                                                                                                                                                                                                        |
| Transformation intensive | ***: Fabs involves cutting, edging, polishing, packing costs.                                                                                                                                                                                                                                                                                                                                                                          |
| Transformation intensive | ***: The conversion of slabs into fabricated products is a significant and labor- and capital-intensive process, requiring skilled labor, specialized fabrication machinery, precision cutting and finishing equipment, quality control, and additional handling and logistics.                                                                                                                                                        |
| Transformation intensive | ***: Material wastage, shortage of labor, high cost of labor, cost of compliance in accordance to OSHA guidelines for production of QSP.                                                                                                                                                                                                                                                                                               |
| Transformation intensive | ***: There is more labor and capital added per square foot in the value of a fully fabricated slab than the value added in slab production.                                                                                                                                                                                                                                                                                            |
| Transformation intensive | ***: Requires substantial specialized machines and well trained workers to perform cutting , edge polishing, sink hole cuts, shaping and quality control, labeling.                                                                                                                                                                                                                                                                    |
| Transformation intensive | ***: All fab is labor intensive, requiring precision cutting and polishing.                                                                                                                                                                                                                                                                                                                                                            |
| Transformation intensive | ***: Intensive capital investments would need to be made in order to be competitive in our Market even if slabs were not tariffs and fabs were tariffed. If all Quartz is tariffed the price to the end user could double in matter of weeks causing significant delays in purchasing decisions and Market Growth. The capital expenditure needed to produce slabs in the US would be unreachable for small/medium business like ours. |
| Transformation intensive | ***: Labor.                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Transformation intensive | ***: It's Labor and Capital Intensive which requires a lot of working capital to be blocked in inventory and needs large infrastructure, machinery with a large workforce with continuous manual supervision.                                                                                                                                                                                                                          |
| Transformation intensive | ***: To make fabs need to have significant investment on: fabrications equipment, safety protective equipment, specialty designed buildings with air filtration/ventilation, skilled labors to name a few.                                                                                                                                                                                                                             |
| Transformation intensive | ***: As an importer, fabrication involves cutting and finishing activities performed downstream and does not constitute a significant or capital-intensive transformation of the product.                                                                                                                                                                                                                                              |
| Transformation intensive | ***: The conversion of slabs into fabs is significant and labor/capital intensive, involving manual and automated labor, skilled labor, and specialized equipment.                                                                                                                                                                                                                                                                     |
| Transformation intensive | ***: Certain machinery investments are required, skilled labors are required, especially material is heavy, not everybody can handle.                                                                                                                                                                                                                                                                                                  |
| Transformation intensive | ***: Specialized machinery and Man power required.                                                                                                                                                                                                                                                                                                                                                                                     |

| Item                     | Firm name and narrative regarding semi-finished product analysis                                                                                                                                                                                                |
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| Transformation intensive | ***: Fabs need skilled labor, extensive amounts of time. Some fabrication requires waterfalls, laminated edges.                                                                                                                                                 |
| Transformation intensive | ***: Converting slabs into fabs requires CNC cutting machines, polishing and edging equipment, dust-control systems, and skilled labor. The process is moderately capital- and labor-intensive, and it also involves yield losses due to trimming and cut-outs. |
| Transformation intensive | ***: The slabs are cut and polished by hand or by machine.                                                                                                                                                                                                      |
| Transformation intensive | ***: Fabricators are trained skilled craftsmen. Their overall overhead to turn a slab into tops takes a lot of work and cost.                                                                                                                                   |
| Transformation intensive | ***: If you visit a fabrication shop you will easily see that any product that is like stone takes intense labor and capital equipment to transform it into a finished good.                                                                                    |
| Transformation intensive | ***: The cost of running a fabrication shop including all forms of labor.                                                                                                                                                                                       |
| Transformation intensive | ***: Increases labor and tool costs.                                                                                                                                                                                                                            |

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

**Table D.3 QSP: U.S. purchasers' narrative responses regarding the semi-finished product analysis comparing slab to fabricated slab, since January 1, 2020**

| Item                           | Firm name and narrative regarding semi-finished product analysis                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Other uses                     | ***: In some cases, slabs may be sold directly to fabricators or contractors for custom fabrication, inventory stocking, or specific project requirements.                                                                                                                                                                                                                                                                               |
| Other uses                     | ***: Wet walls, wall cladding, backsplash, inlays.                                                                                                                                                                                                                                                                                                                                                                                       |
| Other uses                     | ***: Unknown.                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Separate market                | ***: While related, the markets are distinct. Slabs are primarily purchased by fabricators for further processing, whereas fabricated products are purchased by end users or contractors for installation.                                                                                                                                                                                                                               |
| Separate market                | ***: Fabs are usually for large commercial jobs, slabs are for smaller, retail-based jobs.                                                                                                                                                                                                                                                                                                                                               |
| Separate market                | ***: Reduction of labor costs.                                                                                                                                                                                                                                                                                                                                                                                                           |
| Separate market                | ***: Slab producers sell to fabricators, fabricators sell to end users.                                                                                                                                                                                                                                                                                                                                                                  |
| Separate market                | ***: Fabs are ready to sell without further fabrication.                                                                                                                                                                                                                                                                                                                                                                                 |
| Separate market                | ***: Just different step in the process between manufacturer and end user.                                                                                                                                                                                                                                                                                                                                                               |
| Separate market                | ***: Slabs are used for custom projects and fabs are used for larger commercial project because of cost efficiency.                                                                                                                                                                                                                                                                                                                      |
| Separate market                | ***: We don't sell fabs.                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Separate market                | ***: Slabs are sold as raw material to fabricators while finished fabricators are sold to end users.                                                                                                                                                                                                                                                                                                                                     |
| Separate market                | ***: No edge treatments or cutouts.                                                                                                                                                                                                                                                                                                                                                                                                      |
| Separate market                | ***: Unknown.                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Separate market                | ***: Fabricators purchase slabs while the end consumer purchases fabs.                                                                                                                                                                                                                                                                                                                                                                   |
| Separate market                | ***: Fabs are typically used for commercial projects where there is redundancy in the same sized pieces needed or one offs for small projects.                                                                                                                                                                                                                                                                                           |
| Separate market                | ***: They compete with each other.                                                                                                                                                                                                                                                                                                                                                                                                       |
| Separate market                | ***: Retailers sell and install finished fab products.                                                                                                                                                                                                                                                                                                                                                                                   |
| Separate market                | ***: Slabs are typically requested by fabricators so that they can control doing the custom fabrication themselves. On large, cookie cutter projects where the FABS are the same dimensions but require many of them, fabricators might entertain the idea of importing FABS instead of SLABS. FABS are usually multi-family housing, hotel, office building, etc type projects where multi units of the same exact FAB would be needed. |
| Differences in characteristics | ***: Slabs differ from fabricated products in that they lack final dimensions, edge treatments, cutouts, and finishing required for installation. Fabricated products are processed to meet specific installation requirements.                                                                                                                                                                                                          |
| Differences in characteristics | ***: Fabs can only be used for special jobs, slabs can be used for anything.                                                                                                                                                                                                                                                                                                                                                             |
| Differences in characteristics | ***: Only the shape and some detailed finishes.                                                                                                                                                                                                                                                                                                                                                                                          |
| Differences in characteristics | ***: Fabs are cut into job requirement while slabs are generic sized.                                                                                                                                                                                                                                                                                                                                                                    |
| Differences in characteristics | ***: Slabs are large raw sheets & fabricators complete pieces for install.                                                                                                                                                                                                                                                                                                                                                               |



| Item                           | Firm name and narrative regarding semi-finished product analysis                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Differences in characteristics | ***: Fabs are ready to be installed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Differences in characteristics | ***: Unknown.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Differences in characteristics | ***: Fabs typically have a wider tolerance in shading variation.                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Differences in characteristics | ***: Quality mostly depending upon the manufacturer.                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Differences in characteristics | ***: Fabs physically have more processing done to them and include at a minimum polished and eased edges and sometimes sink cut outs.                                                                                                                                                                                                                                                                                                                                                                         |
| Differences in characteristics | ***: Slabs are unfinished, and Fab is finished, cut, polished, and installed.                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Differences in characteristics | ***: Fabs have limit on the sizes and shapes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Differences in characteristics | ***: Slabs are typically requested by fabricators so that they can control doing the custom fabrication themselves. On large, cookie cutter projects where the FABS are the same dimensions but require many of them, fabricators might entertain the idea of importing FABS instead of SLABS. FABS are usually multi-family housing, hotel, office building, etc type projects where multi units of the same exact FAB would be needed. This could help eliminate yield loss and shop time when fabricating. |
| Differences in costs           | ***: Fabricated products generally have higher value due to additional labor, processing, equipment use, and customization required beyond the slab stage.                                                                                                                                                                                                                                                                                                                                                    |
| Differences in costs           | ***: Fabs most likely includes the cost to fab them, slabs are just raw product, so do not incur other costs.                                                                                                                                                                                                                                                                                                                                                                                                 |
| Differences in costs           | ***: Product is similar but the fact that we do not need to fabricate reduces our costs which allows us to be competitive in the multi- family markets.                                                                                                                                                                                                                                                                                                                                                       |
| Differences in costs           | ***: Price of fabs includes the labor needed to create it.                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Differences in costs           | ***: Fabs are done in countries where labor and other overhead costs are cheaper than in the US., that's why it is the cheaper option.                                                                                                                                                                                                                                                                                                                                                                        |
| Differences in costs           | ***: Fab would be higher labor, higher price.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Differences in costs           | ***: Fabricators include labor edging cutouts etc. Us raw material.                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Differences in costs           | ***: Fabricated pieces will cost more due to labor & tooling.                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Differences in costs           | ***: Unknown.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Differences in costs           | ***: Fabs have been cut and polished.                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Differences in costs           | ***: You only pay for the square footage of the fabs, where with slabs you have a waste factor included in the overall cost. Overall overseas fab finished product is less expensive due to all factors involved in the total fabrication cost, such as labor cost, insurance, workers comp, utilities & general overhead.                                                                                                                                                                                    |
| Differences in costs           | ***: Low costs fabs from overseas undercut the costs to our direct stone countertop fabricators / contractors.                                                                                                                                                                                                                                                                                                                                                                                                |
| Differences in costs           | ***: Fabs are more expensive based on how much more they have been processed.                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Differences in costs           | ***: You have to pay for time, labor, and storage.                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Differences in costs           | ***: Unknown.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Differences in costs           | ***: Fabs are high in price.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Differences in costs           | ***: FABS are typically more expensive because they have gone through extra steps of labor/production than SLABS.                                                                                                                                                                                                                                                                                                                                                                                             |

| Item                     | Firm name and narrative regarding semi-finished product analysis                                                                                                                                                                                                                                               |
|--------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Transformation intensive | ***: The conversion of slabs into fabricated products involves significant labor and capital investment, including cutting, edging, polishing, equipment operation, and skilled labor.                                                                                                                         |
| Transformation intensive | ***: If we were to fabricate ourselves for large multi family projects we would incur not only US labor costs, but would also realize significant material waste factors. This also ties up our production facility that can be used for our single family business.                                           |
| Transformation intensive | ***: Complex and costly machines are used alongside highly skilled labor to create fabs.                                                                                                                                                                                                                       |
| Transformation intensive | ***: Must Fab.                                                                                                                                                                                                                                                                                                 |
| Transformation intensive | ***: Compared to manufacturing slabs, creating fabs is a simple process with a very small number of people and with a relatively limited amount of capital investment.                                                                                                                                         |
| Transformation intensive | ***: It's a combination of both. CNC machines are used and skilled labor is needed to run these machines.                                                                                                                                                                                                      |
| Transformation intensive | ***: There is labor required to cut the slabs to size, smooth the edges and install.                                                                                                                                                                                                                           |
| Transformation intensive | ***: We only sell slabs.                                                                                                                                                                                                                                                                                       |
| Transformation intensive | ***: Specialized machinery & skilled labor.                                                                                                                                                                                                                                                                    |
| Transformation intensive | ***: Customize by application which adds time and complexity.                                                                                                                                                                                                                                                  |
| Transformation intensive | ***: Unknown.                                                                                                                                                                                                                                                                                                  |
| Transformation intensive | ***: Need employees and equipment to process the slabs into Fabs.                                                                                                                                                                                                                                              |
| Transformation intensive | ***: We are in a 2cm market which requires us to not only cut the slabs to size but also provide a laminated edge. With slabs you are adding the handling, cutting, gluing & polishing. Plus the difference in general overhead costs, especially in CA, vs overseas. More specifics noted in answer (V-2 iv). |
| Transformation intensive | ***: Oversea fabs can quote products below our slabs costs.                                                                                                                                                                                                                                                    |
| Transformation intensive | ***: There is more labor and capital added per square foot in the value of a fully fabricated slab than the value added in slab production.                                                                                                                                                                    |
| Transformation intensive | ***: 70 percent of the finished price is labor related.                                                                                                                                                                                                                                                        |
| Transformation intensive | ***: We identified that 60 percent of our cost is fabrication, install, and overhead.                                                                                                                                                                                                                          |
| Transformation intensive | ***: Need labor to cut and polishing the fabs and equipment.                                                                                                                                                                                                                                                   |
| Transformation intensive | ***: Several steps in the process from converting a SLAB to a FAB. Additional handling (forklifts and/or cranes are needed), machining (CNC or other cutting machines), hand tooling and finishing (tools and laborers), yield loss (waste), etc.                                                              |

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

**Table D.4 QSP: Reporting U.S. fabricators' narrative responses regarding the semi-finished product analysis comparing slab to fabricated slab, since January 1, 2020**

| Item                           | Firm name and narrative regarding semi-finished product analysis                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Other uses                     | ***: Slabs are principally used as inputs for fabrication into finished or semi-finished quartz surface products.                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Other uses                     | ***: Slabs are exclusively a semi-finished input dedicated 100 percent to the production of fabricated quartz products. A raw slab cannot be installed in a home; it has no independent utility until processed by a fabricator.                                                                                                                                                                                                                                                                                                                                      |
| Separate market                | ***: Yes. Slabs are generally sold to fabricators as input material, while fabs are sold as processed products to builders, contractors, retailers, and end users.                                                                                                                                                                                                                                                                                                                                                                                                    |
| Separate market                | ***: Slab Market: This is a B2B (Business-to-Business) market. The purchasers are fabricators. The sellers are slab manufacturers or distributors. Transactions are wholesale. Decisions are based on technical specifications, wholesale price, and supply reliability. Fab Market: This is a B2C (Business-to-Consumer) or B2B2C market. The purchasers are homeowners, builders, and developers. The sellers are fabricators. Transactions are retail or contract. Decisions are based on installed cost, design aesthetics, turnaround time, and service quality. |
| Separate market                | ***: Fabs do not work for our markets as well as slabs do, ours are cut custom by address. We would be open to doing some of this business if possible though.                                                                                                                                                                                                                                                                                                                                                                                                        |
| Differences in characteristics | ***: Yes. Fabs differ from slabs because they have been templated, cut, edged, polished, and otherwise processed for specific applications and installation requirements.                                                                                                                                                                                                                                                                                                                                                                                             |
| Differences in characteristics | ***: Slabs: Rectangular, unfinished edges, rough surface texture on edges, standardized size (e.g., 126" x 63"), sharp/dangerous to handle. They are essentially raw material blocks. Fabs: Custom shapes (L-shapes, islands, peninsulas), finished/polished edges (bullnose, eased, mitered), cutouts for sinks/faucets, seams prepared for adhesion. The physical transformation gives the product its utility and safety for consumer use.                                                                                                                         |
| Differences in characteristics | ***: Slabs are cut to size for the homes, fabs are for repeat installs that stay consistent.                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Differences in costs           | ***: Yes. Fabricated products command higher value than slabs because they incorporate labor, equipment usage, processing, quality control, and project specific customization.                                                                                                                                                                                                                                                                                                                                                                                       |
| Differences in costs           | ***: The difference of fabs in our value added of transforming the product, so we need the investment in machinery, the shop and the labor to produce it. When low cost countries introduce the fabs, they compete at too low prices that make very difficult for a US fabricator to compete.                                                                                                                                                                                                                                                                         |
| Differences in costs           | ***: As detailed in Part III, the slab represents only 30 percent of the value of the finished fabricated product. Example: A typical kitchen might use 2 slabs costing \$2,000 total. The final contract price to the homeowner is often \$5,000-\$7,000. The \$3,000-\$5,000 difference represents the value added by the U.S. fabricator through labor, technology, and service. This confirms that the majority of the economic value of QSP is generated inside the United States by fabricators, regardless of the slab's origin.                               |
| Differences in costs           | ***: Production of slabs is a high cost, repeat pieces have a higher efficiency due to higher yields and faster production time.                                                                                                                                                                                                                                                                                                                                                                                                                                      |

| Item                     | Firm name and narrative regarding semi-finished product analysis                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Transformation intensive | ***: Yes. Converting slabs into fabs requires specialized equipment, skilled labor, digital templating, cutting, edge work, polishing, quality control, logistics coordination, and other value-added fabrication steps.                                                                                                                                                                                                                                                                                                                                                        |
| Transformation intensive | ***: Yes, cost of material is usually 35 percent of total cost.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Transformation intensive | ***: Labor Intensity: Fabrication is labor-intensive despite automation. Every piece requires manual inspection, hand-finishing of complex edges, and skilled installation teams (typically 2-4 men per job) to transport and secure heavy stone without breakage. Installing a quartz countertop is a skilled trade. Capital Intensity: As noted in III-3, the machinery required is heavy industrial equipment. The shift to waterjet technology and digital integration has raised the capital bar significantly, making fabrication a sophisticated manufacturing activity. |
| Transformation intensive | ***: Yes, staff has become smaller over the years with advancements in machinery, but running the fab shop has a cost per man hour, machinery costs, and the buildings etc.                                                                                                                                                                                                                                                                                                                                                                                                     |

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

**APPENDIX E**

**COMPETITIVE EFFORTS AND PROPOSED ADJUSTMENTS**



**Table E.1 QSP: U.S. producers' efforts to compete since 2020**

| Firm        | Have taken or planned efforts to compete | Narrative response on efforts to compete |
|-------------|------------------------------------------|------------------------------------------|
| Caesarstone | ***                                      | ***                                      |
| Cambria     | ***                                      | ***                                      |
| Dal-Tile    | ***                                      | ***                                      |
| Elite       | ***                                      | ***                                      |
| Estone      | ***                                      | ***                                      |

| Firm    | Have taken or planned efforts to compete | Narrative response on efforts to compete |
|---------|------------------------------------------|------------------------------------------|
| Guidoni | ***                                      | ***                                      |



| Firm      | Have taken or planned efforts to compete | Narrative response on efforts to compete |
|-----------|------------------------------------------|------------------------------------------|
| Hendrix   | ***                                      | ***                                      |
| LX Hausys | ***                                      | ***                                      |
| All firms | Yes: 7; No: 1                            | NA                                       |

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

**Table E.2 QSP: Responding U.S. fabricators' efforts to compete since 2020**

| <b>Firm</b>      | <b>Have taken or planned efforts to compete</b> | <b>Narrative response on efforts to compete</b> |
|------------------|-------------------------------------------------|-------------------------------------------------|
| Artelye          | ***                                             | ***                                             |
| Artistic Granite | ***                                             | ***                                             |
| A's Tile         | ***                                             | ***                                             |
| Assured Flooring | ***                                             | ***                                             |
| Bad Lizard       | ***                                             | ***                                             |
| Block Tops       | ***                                             | ***                                             |
| Classic          | ***                                             | ***                                             |
| CompletedTops    | ***                                             | ***                                             |
| Eugene's         | ***                                             | ***                                             |

| <b>Firm</b>     | <b>Have taken or planned efforts to compete</b> | <b>Narrative response on efforts to compete</b> |
|-----------------|-------------------------------------------------|-------------------------------------------------|
| FloForm         | ***                                             | ***                                             |
| Granite Direct  | ***                                             | ***                                             |
| Granite Guys    | ***                                             | ***                                             |
| Keystone Solid  | ***                                             | ***                                             |
| Majestic        | ***                                             | ***                                             |
| Marble City     | ***                                             | ***                                             |
| Multistone      | ***                                             | ***                                             |
| Petrafab        | ***                                             | ***                                             |
| Plymouth        | ***                                             | ***                                             |
| Premier Granite | ***                                             | ***                                             |
| Skyline         | ***                                             | ***                                             |
| Spaulding Stone | ***                                             | ***                                             |
| Stone Suppliers | ***                                             | ***                                             |

| Firm       | Have taken or planned efforts to compete | Narrative response on efforts to compete |
|------------|------------------------------------------|------------------------------------------|
| Summit     | ***                                      | ***                                      |
| Trind      | ***                                      | ***                                      |
| Wisenbaker | ***                                      | ***                                      |
| All firms  | Yes: 11; No: 14                          | NA                                       |

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

**Table E.3 QSP: U.S. producers' anticipated efforts to compete under a safeguard**

| <b>Firm</b> | <b>Anticipated action</b> | <b>Narrative response on anticipated efforts to compete</b> |
|-------------|---------------------------|-------------------------------------------------------------|
| ***         | ***                       | ***                                                         |
| ***         | ***                       | ***                                                         |
| ***         | ***                       | ***                                                         |
| ***         | ***                       | ***                                                         |
| ***         | ***                       | ***                                                         |
| ***         | ***                       | ***                                                         |
| ***         | ***                       | ***                                                         |
| ***         | ***                       | ***                                                         |
| ***         | ***                       | ***                                                         |
| ***         | ***                       | ***                                                         |
| ***         | ***                       | ***                                                         |
| ***         | ***                       | ***                                                         |
| ***         | ***                       | ***                                                         |
| ***         | ***                       | ***                                                         |
| ***         | ***                       | ***                                                         |
| ***         | ***                       | ***                                                         |
| ***         | ***                       | ***                                                         |

| Firm | Anticipated action | Narrative response on anticipated efforts to compete |
|------|--------------------|------------------------------------------------------|
| ***  | ***                | ***                                                  |
| ***  | ***                | ***                                                  |
| ***  | ***                | ***                                                  |
| ***  | ***                | ***                                                  |
| ***  | ***                | ***                                                  |
| ***  | ***                | ***                                                  |
| ***  | ***                | ***                                                  |
| ***  | ***                | ***                                                  |
| ***  | ***                | ***                                                  |
| ***  | ***                | ***                                                  |
| ***  | ***                | ***                                                  |
| ***  | ***                | ***                                                  |
| ***  | ***                | ***                                                  |

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

**Table E.4 QSP: Responding U.S. fabricators' anticipated efforts to compete under a safeguard**

[illegible]

| Firm | Anticipated action | Narrative response on anticipated efforts to compete |
|------|--------------------|------------------------------------------------------|
| ***  | ***                | ***                                                  |

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



**APPENDIX F**

**EFFECTS OF IMPORTS ON THE U.S. INDUSTRY**



**Table F.1 QSP: U.S. producers' responses regarding the impact of imports**

| <b>Firm</b> | <b>Impacted by imports</b> | <b>Narrative response on impact of imports</b> |
|-------------|----------------------------|------------------------------------------------|
| Caesarstone | ***                        | ***                                            |
| Cambria     | ***                        | ***                                            |
| Dal-Tile    | ***                        | ***                                            |
| Elite       | ***                        | ***                                            |
| Estone      | ***                        | ***                                            |
| Guidoni     | ***                        | ***                                            |

| Firm      | Impacted by imports | Narrative response on impact of imports |
|-----------|---------------------|-----------------------------------------|
| Hendrix   | ***                 | ***                                     |
| LX Hausys | ***                 | ***                                     |
| All firms | Yes: 5; No: 3       | NA                                      |

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

**Table F.2 QSP: U.S. fabricators' responses regarding the impact of imports**

| <b>Firm</b>      | <b>Impacted by imports</b> | <b>Narrative response on impact of imports</b> |
|------------------|----------------------------|------------------------------------------------|
| Artelye          | ***                        | ***                                            |
| Artistic Granite | ***                        | ***                                            |
| A's Tile         | ***                        | ***                                            |
| Assured Flooring | ***                        | ***                                            |
| Bad Lizard       | ***                        | ***                                            |
| Block Tops       | ***                        | ***                                            |
| Classic          | ***                        | ***                                            |
| CompletedTops    | ***                        | ***                                            |
| Eugene's         | ***                        | ***                                            |
| FloForm          | ***                        | ***                                            |

| Firm            | Impacted by imports | Narrative response on impact of imports |
|-----------------|---------------------|-----------------------------------------|
| Granite Direct  | ***                 | ***                                     |
| Granite Guys    | ***                 | ***                                     |
| Keystone Solid  | ***                 | ***                                     |
| Majestic        | ***                 | ***                                     |
| Marble City     | ***                 | ***                                     |
| Multistone      | ***                 | ***                                     |
| Petrafab        | ***                 | ***                                     |
| Plymouth        | ***                 | ***                                     |
| Premier Granite | ***                 | ***                                     |
| Skyline         | ***                 | ***                                     |
| Spaulding Stone | ***                 | ***                                     |
| Stone Suppliers | ***                 | ***                                     |
| Summit          | ***                 | ***                                     |

| Firm       | Impacted by imports | Narrative response on impact of imports |
|------------|---------------------|-----------------------------------------|
| Trind      | ***                 | ***                                     |
| Wisenbaker | ***                 | ***                                     |
| All firms  | Yes: 5; No: 20      | NA                                      |

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

**Table F.3 QSP: U.S. producers' importance of factors on ability to compete**

| <b>Factor</b>                          | <b>Average rating of importance (1 to 5)</b> | <b>Number of firms responding</b> |
|----------------------------------------|----------------------------------------------|-----------------------------------|
| Import competition                     | 3.6                                          | 8                                 |
| COVID-19 Pandemic                      | 2.6                                          | 8                                 |
| Labor problems or shortages            | 2.1                                          | 8                                 |
| Production problems                    | 2.1                                          | 8                                 |
| U.S. demand for QSP                    | 2.1                                          | 8                                 |
| Competition from other U.S. producers  | 2.0                                          | 8                                 |
| Supply chain bottlenecks               | 1.8                                          | 8                                 |
| Changes in U.S. tariff policy          | 2.1                                          | 8                                 |
| Change in raw material costs           | 1.9                                          | 8                                 |
| Inability to obtain adequate financing | 1.9                                          | 8                                 |
| Change in composition in U.S. industry | 1.4                                          | 8                                 |
| Change in Federal regulations for QSP  | 1.4                                          | 8                                 |
| Inflation                              | 1.4                                          | 8                                 |
| Exchange rates                         | 1.4                                          | 8                                 |
| Other factors                          | 1.5                                          | 6                                 |

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

Note: A rating of 1 was the lowest rating (least importance), while a rating of 5 was the highest rating (most importance). Factors were sorted by average importance rating, except for the miscellaneous other factors.

Note: Factors were sorted by average importance rating, except for the miscellaneous other factors.



**Table F.4 QSP: Responding U.S. fabricators' importance of factors on ability to compete**

| <b>Factor</b>                          | <b>Average rating of importance (1 to 5)</b> | <b>Number of firms responding</b> |
|----------------------------------------|----------------------------------------------|-----------------------------------|
| Changes in U.S. tariff policy          | 4.2                                          | 21                                |
| Inflation                              | 3.9                                          | 21                                |
| Change in raw material costs           | 4.2                                          | 20                                |
| Supply chain bottlenecks               | 3.3                                          | 19                                |
| U.S. demand for QSP                    | 3.6                                          | 20                                |
| Change in Federal regulations for QSP  | 3.7                                          | 16                                |
| Labor problems or shortages            | 3.6                                          | 20                                |
| COVID-19 Pandemic                      | 3.2                                          | 17                                |
| Competition from other U.S. producers  | 3.1                                          | 15                                |
| Change in composition in U.S. industry | 2.6                                          | 16                                |
| Production problems                    | 2.6                                          | 16                                |
| Exchange rates                         | 1.9                                          | 14                                |
| Import competition                     | 2.3                                          | 16                                |
| Inability to obtain adequate financing | 2.1                                          | 16                                |
| Other factors                          | 3.0                                          | 5                                 |

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

Note: A rating of 1 was the lowest rating (least importance), while a rating of 5 was the highest rating (most importance). Factors were sorted by average importance rating, except for the miscellaneous other factors.

Note: Factors were sorted by average importance rating, except for the miscellaneous other factors.



## **APPENDIX G**

### **EFFECTS OF EXISTING U.S. ORDERS ON THE MARKET**



**Table G.1 QSP: U.S. producers' responses to the impact of existing AD/CVD orders on the market**

| Firm        | Narrative response on impact of existing AD/CVD orders |
|-------------|--------------------------------------------------------|
| Caesarstone | ***                                                    |
| Cambria     | ***                                                    |
| Dal-Tile    | ***                                                    |
| Elite       | ***                                                    |
| Estone      | ***                                                    |

| Firm      | Narrative response on impact of existing AD/CVD orders |
|-----------|--------------------------------------------------------|
| Guidoni   | ***                                                    |
| Hendrix   | ***                                                    |
| LX Hausys | ***                                                    |

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

**Table G.2 QSP: U.S. importers' responses to the impact of existing AD/CVD orders on the market**

| <b>Firm</b> | <b>Narrative response on impact of existing AD/CVD orders</b> |
|-------------|---------------------------------------------------------------|
| ***         | ***                                                           |
| ***         | ***                                                           |
| ***         | ***                                                           |
| ***         | ***                                                           |
| ***         | ***                                                           |
| ***         | ***                                                           |
| ***         | ***                                                           |
| ***         | ***                                                           |
| ***         | ***                                                           |
| ***         | ***                                                           |

| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |



| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |

| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |

| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |

| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |

| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |

| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |

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

**Table G.3 QSP: Count of U.S. purchasers' changes in purchasing patterns since the imposition of AD/CVD orders on the market, by source**

Count in number of firms reporting

| <b>Source</b> | <b>No change</b> | <b>Yes,<br/>discontinued</b> | <b>Yes, reduced<br/>purchases</b> | <b>Yes, but for<br/>reasons<br/>other than<br/>the order</b> |
|---------------|------------------|------------------------------|-----------------------------------|--------------------------------------------------------------|
| China         | 5                | 10                           | 3                                 | 2                                                            |
| India         | 16               | 1                            | 2                                 | 2                                                            |
| Turkey        | 14               | 1                            | 0                                 | 3                                                            |

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

**Table G.4 QSP: Foreign producers' responses to the impact of existing AD/CVD orders on the market**

| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |



| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |
| ***  | ***                                                    |

| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |

| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |

| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |

| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |

| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |
| ***  | ***                                                    |

| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |

| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |

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



**Table G.5 QSP: U.S. fabricators' responses to the impact of existing AD/CVD orders on the market**

| <b>Firm</b> | <b>Narrative response on impact of existing AD/CVD orders</b> |
|-------------|---------------------------------------------------------------|
| ***         | ***                                                           |
| ***         | ***                                                           |
| ***         | ***                                                           |
| ***         | ***                                                           |
| ***         | ***                                                           |
| ***         | ***                                                           |
| ***         | ***                                                           |
| ***         | ***                                                           |
| ***         | ***                                                           |
| ***         | ***                                                           |
| ***         | ***                                                           |

| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |
| ***  | ***                                                    |

| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |

| Firm | Narrative response on impact of existing AD/CVD orders |
|------|--------------------------------------------------------|
| ***  | ***                                                    |
| ***  | ***                                                    |

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

**APPENDIX H**

**NARRATIVES ON THE IMPACT OF THE COVID-19 PANDEMIC**



**Table H.1 QSP: U.S. producers' responses regarding the impact of the COVID-19 pandemic**

| <b>Firm</b> | <b>Impacted by COVID-19</b> | <b>Narrative response on impact of COVID-19</b> |
|-------------|-----------------------------|-------------------------------------------------|
| Caesarstone | ***                         | ***                                             |
| Cambria     | ***                         | ***                                             |
| Dal-Tile    | ***                         | ***                                             |
| Elite       | ***                         | ***                                             |
| Estone      | ***                         | ***                                             |
| Guidoni     | ***                         | ***                                             |
| Hendrix     | ***                         | ***                                             |

| Firm      | Impacted by COVID-19 | Narrative response on impact of COVID-19 |
|-----------|----------------------|------------------------------------------|
| LX Hausys | ***                  | ***                                      |
| All firms | Yes: 6; No: 2        | NA                                       |

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



**Table H.2 QSP: U.S. producers' responses regarding the impact of the COVID-19 pandemic on financial performance**

| <b>Firm</b> | <b>Impacted by COVID-19</b> | <b>Narrative response on impact of COVID-19 on financial performance</b> |
|-------------|-----------------------------|--------------------------------------------------------------------------|
| Caesarstone | ***                         | ***                                                                      |
| Cambria     | ***                         | ***                                                                      |
| Dal-Tile    | ***                         | ***                                                                      |
| Elite       | ***                         | ***                                                                      |
| Estone      | ***                         | ***                                                                      |
| Guidoni     | ***                         | ***                                                                      |
| Hendrix     | ***                         | ***                                                                      |
| LX Hausys   | ***                         | ***                                                                      |
| All firms   | Yes: 5; No: 3               | NA                                                                       |

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

**Table H.3 QSP: U.S. importers' responses regarding the impact of the COVID-19 pandemic**

| <b>Firm name</b>       | <b>Impacted by COVID-19</b> | <b>Narrative response on impact of COVID-19</b> |
|------------------------|-----------------------------|-------------------------------------------------|
| Absolute Stone         | ***                         | ***                                             |
| AGM                    | ***                         | ***                                             |
| AK Stones              | ***                         | ***                                             |
| Amsum & Ash            | ***                         | ***                                             |
| Aracruz                | ***                         | ***                                             |
| Architectural Surfaces | ***                         | ***                                             |
| Arizona Tile           | ***                         | ***                                             |
| Avani                  | ***                         | ***                                             |
| Benaa                  | ***                         | ***                                             |
| Best Remodeling Home   | ***                         | ***                                             |
| Best Tile              | ***                         | ***                                             |
| Blue Planet            | ***                         | ***                                             |
| Bow Trade              | ***                         | ***                                             |
| C&C                    | ***                         | ***                                             |
| Caesarstone            | ***                         | ***                                             |
| Classic Marble         | ***                         | ***                                             |
| Construction Resources | ***                         | ***                                             |
| Cosentino              | ***                         | ***                                             |

| <b>Firm name</b>        | <b>Impacted by COVID-19</b> | <b>Narrative response on impact of COVID-19</b> |
|-------------------------|-----------------------------|-------------------------------------------------|
| Cosmos Charleston       | ***                         | ***                                             |
| Cosmos Charlotte        | ***                         | ***                                             |
| Cosmos Dallas           | ***                         | ***                                             |
| Cosmos DC               | ***                         | ***                                             |
| Cosmos East             | ***                         | ***                                             |
| Cosmos Northeast        | ***                         | ***                                             |
| Crown America           | ***                         | ***                                             |
| Cumar                   | ***                         | ***                                             |
| Dal-Tile                | ***                         | ***                                             |
| Distinction Hospitality | ***                         | ***                                             |
| Door Kraft              | ***                         | ***                                             |
| DuPont Specialty        | ***                         | ***                                             |
| Dwyer                   | ***                         | ***                                             |
| East Star               | ***                         | ***                                             |
| EOS                     | ***                         | ***                                             |
| Express Contractors     | ***                         | ***                                             |
| Forms & Surfaces        | ***                         | ***                                             |
| Genuine Materials       | ***                         | ***                                             |
| GFO                     | ***                         | ***                                             |
| Global Stone            | ***                         | ***                                             |
| Global Surfaces         | ***                         | ***                                             |
| GlobalFair              | ***                         | ***                                             |
| Gran Trade              | ***                         | ***                                             |

| <b>Firm name</b>     | <b>Impacted by COVID-19</b> | <b>Narrative response on impact of COVID-19</b> |
|----------------------|-----------------------------|-------------------------------------------------|
| Granite and Cabinet  | ***                         | ***                                             |
| Grantop              | ***                         | ***                                             |
| GS Granite           | ***                         | ***                                             |
| Guidoni              | ***                         | ***                                             |
| Haique               | ***                         | ***                                             |
| Hilltop              | ***                         | ***                                             |
| Home Depot           | ***                         | ***                                             |
| HRA                  | ***                         | ***                                             |
| Hyundai              | ***                         | ***                                             |
| IGM                  | ***                         | ***                                             |
| Integrated Resources | ***                         | ***                                             |
| Jessie-Kan           | ***                         | ***                                             |
| JG Edelen            | ***                         | ***                                             |
| Jyothi               | ***                         | ***                                             |
| Kapotah              | ***                         | ***                                             |
| Kinzini              | ***                         | ***                                             |
| Kz Kitchen           | ***                         | ***                                             |
| Leedo Cabinets       | ***                         | ***                                             |
| Legacy Granite       | ***                         | ***                                             |
| Lotte Chemical       | ***                         | ***                                             |

| Firm name         | Impacted by COVID-19 | Narrative response on impact of COVID-19 |
|-------------------|----------------------|------------------------------------------|
| LX Hausys         | ***                  | ***                                      |
| Modern Surfaces   | ***                  | ***                                      |
| Mont Granite      | ***                  | ***                                      |
| MSI               | ***                  | ***                                      |
| MXM               | ***                  | ***                                      |
| OHM               | ***                  | ***                                      |
| Pacific Surfaces  | ***                  | ***                                      |
| Pentwater         | ***                  | ***                                      |
| Piedrafina        | ***                  | ***                                      |
| Prime Hospitality | ***                  | ***                                      |
| Primus            | ***                  | ***                                      |
| Qortstone         | ***                  | ***                                      |
| Quartz Trend      | ***                  | ***                                      |
| Richelieu         | ***                  | ***                                      |
| Stone Gallery     | ***                  | ***                                      |
| Stone Selection   | ***                  | ***                                      |
| Stone Showcase    | ***                  | ***                                      |

| Firm name         | Impacted by COVID-19                 | Narrative response on impact of COVID-19 |
|-------------------|--------------------------------------|------------------------------------------|
| Stylenquaza       | ***                                  | ***                                      |
| Superior Surfaces | ***                                  | ***                                      |
| Surface Warehouse | ***                                  | ***                                      |
| TJ Cabinetry      | ***                                  | ***                                      |
| Universal Quartz  | ***                                  | ***                                      |
| Universal Tile    | ***                                  | ***                                      |
| Vector Stone      | ***                                  | ***                                      |
| Venezia           | ***                                  | ***                                      |
| Venkata           | ***                                  | ***                                      |
| Venture Stone     | ***                                  | ***                                      |
| Verona            | ***                                  | ***                                      |
| Wilsonart         | ***                                  | ***                                      |
| Wisenbaker        | ***                                  | ***                                      |
| World Stone       | ***                                  | ***                                      |
| All firms         | Yes: 26;<br>No: 66<br>No response: 2 | NA                                       |

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

**Table H.4 QSP: Foreign producers' responses regarding the impact of the COVID-19 pandemic**

| <b>Firm</b>              | <b>Impacted by COVID-19</b> | <b>Narrative response on impact of COVID-19</b> |
|--------------------------|-----------------------------|-------------------------------------------------|
| Canada: El Dupont        | ***                         | ***                                             |
| Canada: Hyundai          | ***                         | ***                                             |
| Czechia: Technistone     | ***                         | ***                                             |
| India: Antique Granito   | ***                         | ***                                             |
| India: Argil             | ***                         | ***                                             |
| India: Aro Granite       | ***                         | ***                                             |
| India: Beyond Rocks      | ***                         | ***                                             |
| India: Classic Marble    | ***                         | ***                                             |
| India: Colors of Rainbow | ***                         | ***                                             |
| India: Creative Quartz   | ***                         | ***                                             |
| India: Cuarzo            | ***                         | ***                                             |
| India: Espirit           | ***                         | ***                                             |
| India: Global Surfaces   | ***                         | ***                                             |
| India: Glowstone         | ***                         | ***                                             |
| India: Inani             | ***                         | ***                                             |
| India: JBB               | ***                         | ***                                             |
| India: Jessie-Kan        | ***                         | ***                                             |
| India: Jyothi            | ***                         | ***                                             |
| India: Keros Stone       | ***                         | ***                                             |
| India: Krishna Sai       | ***                         | ***                                             |
| India: Mahi Granites     | ***                         | ***                                             |
| India: Marudhar Quartz   | ***                         | ***                                             |
| India: Marudhar Rocks    | ***                         | ***                                             |

| <b>Firm</b>               | <b>Impacted by COVID-19</b> | <b>Narrative response on impact of COVID-19</b> |
|---------------------------|-----------------------------|-------------------------------------------------|
| India: MQ Surface         | ***                         | ***                                             |
| India: Nice Quartz        | ***                         | ***                                             |
| India: Pacific Engineered | ***                         | ***                                             |
| India: Pacific Industries | ***                         | ***                                             |
| India: Pacific Quartz     | ***                         | ***                                             |
| India: Pokarna            | ***                         | ***                                             |
| India: Pristine Quartz    | ***                         | ***                                             |
| India: Raj Kesari         | ***                         | ***                                             |
| India: Renshou            | ***                         | ***                                             |
| India: Rocks Forever      | ***                         | ***                                             |
| India: Safayar            | ***                         | ***                                             |
| India: Satya              | ***                         | ***                                             |
| India: Shivam             | ***                         | ***                                             |
| India: Sketch Quartz      | ***                         | ***                                             |
| India: Tab Granites       | ***                         | ***                                             |
| India: Tripura            | ***                         | ***                                             |
| India: Universal Quartz   | ***                         | ***                                             |
| India: Venkata            | ***                         | ***                                             |
| Israel: Caesarstone       | ***                         | ***                                             |
| Italy: Santa Margherita   | ***                         | ***                                             |
| Malaysia: iQuartz         | ***                         | ***                                             |
| Malaysia: MXM             | ***                         | ***                                             |



| <b>Firm</b>            | <b>Impacted by COVID-19</b> | <b>Narrative response on impact of COVID-19</b> |
|------------------------|-----------------------------|-------------------------------------------------|
| Malaysia: Opalus       | ***                         | ***                                             |
| Malaysia: RHF          | ***                         | ***                                             |
| Spain: Cosentino       | ***                         | ***                                             |
| Taiwan: Vickers        | ***                         | ***                                             |
| Thailand: Grand Quartz | ***                         | ***                                             |
| Thailand: Leta         | ***                         | ***                                             |
| Turkey: Çimstone       | ***                         | ***                                             |
| Turkey: Ermas          | ***                         | ***                                             |
| Vietnam: Casablanca    | ***                         | ***                                             |
| Vietnam: Century Stone | ***                         | ***                                             |
| Vietnam: Grandhome     | ***                         | ***                                             |
| Vietnam: New Stone     | ***                         | ***                                             |
| Vietnam: Nhat Huy      | ***                         | ***                                             |
| Vietnam: Nova Stone    | ***                         | ***                                             |

| Firm             | Impacted by COVID-19 | Narrative response on impact of COVID-19 |
|------------------|----------------------|------------------------------------------|
| Vietnam: Phu Son | ***                  | ***                                      |
| Vietnam: Phu Tai | ***                  | ***                                      |

| Firm                 | Impacted by COVID-19 | Narrative response on impact of COVID-19 |
|----------------------|----------------------|------------------------------------------|
| Vietnam: Royal House | ***                  | ***                                      |

| Firm                               | Impacted by COVID-19 | Narrative response on impact of COVID-19 |
|------------------------------------|----------------------|------------------------------------------|
| Vietnam: Vicostone                 | ***                  | ***                                      |
| Vietnam: Vietnam Quartz            | ***                  | ***                                      |
| Other FTA sources: Hyundai         | ***                  | ***                                      |
| Other FTA sources: JFC             | ***                  | ***                                      |
| Other FTA sources: Madhav          | ***                  | ***                                      |
| All other sources: Compac          | ***                  | ***                                      |
| All other sources: Global Surfaces | ***                  | ***                                      |
| All other sources: Huading         | ***                  | ***                                      |

| Firm                         | Impacted by COVID-19 | Narrative response on impact of COVID-19 |
|------------------------------|----------------------|------------------------------------------|
| All other sources:<br>Zulite | ***                  | ***                                      |
| All firms                    | Yes: 26;<br>No: 45   | NA                                       |

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



**APPENDIX I**

**INDEPENDENT U.S. FABRICATORS' OPERATIONS DATA**





The Commission issued a U.S. fabricators' questionnaire to approximately 500 independent U.S. fabricators of QSP.<sup>1</sup> Twenty-five firms provided usable data on their domestic QSP fabricating operations.<sup>2 3</sup>

Firms' responding to the U.S. fabricators questionnaire were asked to identify themselves as either a small-sized fabricator<sup>4</sup> or a medium- to large-sized fabricator.<sup>5</sup> Medium- to large-sized fabricators were requested to complete the entire questionnaire, where applicable. Small-sized fabricators, however, were asked to complete a shortened version of the questionnaire but were also given the option to complete parts or the entire questionnaire if they preferred.

Three fabricators (Majestic, Stone Suppliers, and Wisenbaker) identified as medium- to large-sized fabricators, while the other 22 firms identified as small-sized fabricators. However, Majestic provided data only in the shortened version of the questionnaire; while one small-sized fabricator, Trind, opted to complete the full questionnaire as a medium- to large-sized fabricator. Consequently, tables in appendix I and appendix J that present information specific to medium- to large-size fabricators include data only for Stone Suppliers, Trind, and Wisenbaker.

Tables I.1 through I.5 presents U.S. producers' and responding U.S. fabricators' reported data on domestic production operations, by factor, from 2020 through 2024. Generally, U.S. producers' metrics were many times larger than those for U.S. fabricators. Table I.6 presents U.S. producers' and responding fabricators' narratives on their domestic production operations, while table I.7 presents firms' narratives by factor.

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<sup>1</sup> According to parties, there are approximately 10,000 independent fabricators of QSP in the United States. Hearing transcript, pp. 216 (Jacobson) and 220 to 221 (Katzmann). At the time of issuing the Commission's questionnaires, staff had identified approximately 750 independent fabricators based on industry research and information provided to the Commission by U.S. producer Elite. However, staff could only find contact information for approximately 500 of these independent fabricator firms.

<sup>2</sup> Based on firms' reported fabrication production as a ratio to adjusted total slabs available for fabrication in the U.S. market, staff estimate that these 25 firms accounted for approximately 3.8 percent of U.S. production of fabricated slabs during 2024.

<sup>3</sup> In addition, the Commission received late questionnaire responses from 26, predominantly, small-sized U.S. fabricators. Due to the late receipt, over two months after the submission deadline, and the significant data and reconciliation issues contained within them, these questionnaires were not incorporated into this report.

<sup>4</sup> The Commission defined small-sized fabricator as a firm that fabricated less than 300,000 square feet of QSP in each year over the period of investigation.

<sup>5</sup> The Commission defined a medium- to large-sized fabricator as a firm that fabricated 300,000 square feet or more of QSP in any year over the period of investigation.

**Table I.1 QSP: U.S. producers' and responding U.S. medium-to-large-sized fabricators' reported data on domestic production operations, by factor, 2020 through 2024**

| Item                                                    | U.S. producers                                 | All responding U.S. medium-to-large-sized fabricators                          | All responding U.S. small-sized fabricators  | All responding U.S. fabricators                |
|---------------------------------------------------------|------------------------------------------------|--------------------------------------------------------------------------------|----------------------------------------------|------------------------------------------------|
| Capital investments: Greenfield                         | \$1,740.3 million                              | *** million                                                                    | —                                            | —                                              |
| Capital investments: Assets                             | \$895.3 to \$1,064.0 million                   | *** million                                                                    | —                                            | —                                              |
| Capital investments: Capital expenditures               | \$31.0 to \$95.7 million                       | *** million                                                                    | —                                            | —                                              |
| Technical expertise: R&D expenses                       | \$4.0 to \$6.3 million                         | *** million                                                                    | —                                            | —                                              |
| Value added (relative to firm's cost of production)     | 46.0 to 52.7 percent                           | 33.9 to 41.8 percent                                                           | —                                            | —                                              |
| Value added (absolute amounts)                          | \$1,350.2 million                              | \$150.9 million                                                                | —                                            | —                                              |
| Value added (relative to industry's cost of production) | 89.9 percent                                   | 10.1 percent                                                                   | —                                            | —                                              |
| Employment                                              | 1,446 to 1,685 PRWs                            | *** PRWs                                                                       | *** PRWs                                     | 784 to 915 PRWs                                |
| Quantity, type, and source of parts                     | Domestic: 61.5 percent; Imported: 38.5 percent | Domestic: *** percent; Imported: *** percent; Other raw materials: *** percent | Domestic: *** percent; Imported: *** percent | Domestic: 44.2 percent; Imported: 55.8 percent |

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

Note: Value added is calculated as the share conversion costs (direct labor and other factory costs for U.S. producers and raw materials other than QSP, direct labor and other factory costs for U.S. fabricators) out of cost of goods sold (COGS). Ranges cover full calendar years. Quantity, type and source of parts reflect 2024 data collected on raw materials by source. One U.S. producer \*\*\* failed to provide usable data for the majority of these factors. Quantity, type, and source of parts is based on reported raw material value for U.S. producers and responding medium-to-large-sized fabricators, while it is based on share of production for U.S. responding small-sized fabricators. The largest responding U.S. medium-to-large-sized fabricator \*\*\* initially reported fabrication of 100 percent domestic slabs; however, based on follow-up with the firm as noted in Part 4 of this report, this company purchased most of its slab used as inputs in its fabrication from \*\*\*, a major importer of quartz surface products. Based on those communications, the data for \*\*\* was adjusted to account for the use of these imported inputs. Zeroes, null values, and undefined calculations are suppressed and shown as "—". In the small-sized and all responding fabricators columns, "—" indicates that the data was not gathered.

**Table I.2 QSP: U.S. producers' reported data addressing sufficient production-related activities covering the period 2020 through 2024, by factor and firm**

| Factor                                                  | U.S.<br>producer:<br>Caesarstone                | U.S.<br>producer:<br>Cambria                    | U.S.<br>producer:<br>Dal-Tile                   | U.S.<br>producer:<br>Elite                      |
|---------------------------------------------------------|-------------------------------------------------|-------------------------------------------------|-------------------------------------------------|-------------------------------------------------|
| Capital investments: Greenfield                         | ***                                             | ***                                             | ***                                             | ***                                             |
| Capital investments: Assets                             | ***                                             | ***                                             | ***                                             | ***                                             |
| Capital investments: Capital expenditures               | ***                                             | ***                                             | ***                                             | ***                                             |
| Technical expertise: R&D expenses                       | ***                                             | ***                                             | ***                                             | ***                                             |
| Value added (relative to firm's cost of production)     | *** percent                                     | *** percent                                     | *** percent                                     | *** percent                                     |
| Value added (absolute amounts)                          | ***                                             | ***                                             | ***                                             | ***                                             |
| Value added (relative to industry's cost of production) | *** percent                                     | *** percent                                     | *** percent                                     | *** percent                                     |
| Employment                                              | *** PRWs                                        | *** PRWs                                        | *** PRWs                                        | *** PRWs                                        |
| Quantity, type, and source of parts                     | Domestic: *** percent;<br>Imported: *** percent | Domestic: *** percent;<br>Imported: *** percent | Domestic: *** percent;<br>Imported: *** percent | Domestic: *** percent;<br>Imported: *** percent |

Table continued.

**Table I.2 (Continued) QSP: U.S. producers' reported data addressing sufficient production-related activities covering the period 2020 through 2024, by factor and firm**

| Factor                                                  | U.S.<br>producer:<br>Estone                              | U.S.<br>producer:<br>Guidoni                             | U.S.<br>producer:<br>Hendrix                             | U.S.<br>producer:<br>LX<br>Hausys                        | All U.S.<br>producers                                         |
|---------------------------------------------------------|----------------------------------------------------------|----------------------------------------------------------|----------------------------------------------------------|----------------------------------------------------------|---------------------------------------------------------------|
| Capital investments: Greenfield                         | *** million                                              | *** million                                              | *** million                                              | *** million                                              | \$1,740.3<br>million                                          |
| Capital investments: Assets                             | *** million                                              | *** million                                              | *** million                                              | *** million                                              | \$895.3 to<br>\$1,064.0<br>million                            |
| Capital investments: Capital expenditures               | *** million                                              | *** million                                              | *** million                                              | *** million                                              | \$31.0 to<br>\$95.7<br>million                                |
| Technical expertise: R&D expenses                       | *** million                                              | *** million                                              | *** million                                              | *** million                                              | \$4.0 to<br>\$6.3<br>million                                  |
| Value added (relative to firm's cost of production)     | *** percent                                              | *** percent                                              | *** percent                                              | *** percent                                              | 46.0 to<br>52.7<br>percent                                    |
| Value added (absolute amounts)                          | *** million                                              | *** million                                              | *** million                                              | *** million                                              | \$1,350.2<br>million                                          |
| Value added (relative to industry's cost of production) | *** percent                                              | *** percent                                              | *** percent                                              | *** percent                                              | 89.9<br>percent                                               |
| Employment                                              | *** PRWs                                                 | *** PRWs                                                 | *** PRWs                                                 | *** PRWs                                                 | 1,446 to<br>1,685<br>PRWs                                     |
| Quantity, type, and source of parts                     | Domestic:<br>***<br>percent;<br>Imported:<br>*** percent | Domestic:<br>***<br>percent;<br>Imported:<br>*** percent | Domestic:<br>***<br>percent;<br>Imported:<br>*** percent | Domestic:<br>***<br>percent;<br>Imported:<br>*** percent | Domestic:<br>61.5<br>percent;<br>Imported:<br>38.5<br>percent |

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

Note: Ranges reported in table reflect minimum and maximum data for applicable factors across the full calendar years included in the data collection period. Greenfield investment refers to the investment that would be required to replicate a firm's current operations if the plant(s) were constructed from scratch on greenfield land. Value added relative to firm's cost of production is calculated as the share of conversion costs (direct labor and other factory costs) out of total cost of goods sold (COGS). Absolute value added and value added relative to the industry's cost of production are the aggregated 2020 to 2024 full year period data. Quantity, type, and source of parts data are for terminal year 2024. One U.S. producer \*\*\* failed to provide usable data for the majority of these factors. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

**Table I.3 QSP: U.S. medium-to-large-sized fabricators' reported data addressing sufficient production-related activities covering the period 2020 through 2024, by factor and firm**

| <b>Factor</b>                                           | <b>U.S. fabricator: Stone Suppliers</b>                                        | <b>U.S. fabricator: Trind</b>                                                  | <b>U.S. fabricator: Wisenbaker</b>                                             | <b>All responding U.S. medium-to-large-sized fabricators</b>                   |
|---------------------------------------------------------|--------------------------------------------------------------------------------|--------------------------------------------------------------------------------|--------------------------------------------------------------------------------|--------------------------------------------------------------------------------|
| Capital investments: Greenfield                         | *** million                                                                    | *** million                                                                    | *** million                                                                    | *** million                                                                    |
| Capital investments: Assets                             | *** million                                                                    | *** million                                                                    | *** million                                                                    | *** million                                                                    |
| Capital investments: Capital expenditures               | *** million                                                                    | *** million                                                                    | *** million                                                                    | *** million                                                                    |
| Technical expertise: R&D expenses                       | *** million                                                                    | *** million                                                                    | *** million                                                                    | *** million                                                                    |
| Value added (relative to firm's cost of production)     | *** percent                                                                    | *** percent                                                                    | *** percent                                                                    | 33.9 to 41.8 percent                                                           |
| Value added (absolute amounts)                          | *** million                                                                    | *** million                                                                    | *** million                                                                    | \$150.9 million                                                                |
| Value added (relative to industry's cost of production) | *** percent                                                                    | *** percent                                                                    | *** percent                                                                    | 10.1 percent                                                                   |
| Employment                                              | *** PRWs                                                                       | *** PRWs                                                                       | *** PRWs                                                                       | *** PRWs                                                                       |
| Quantity, type, and source of parts                     | Domestic: *** percent; Imported: *** percent; Other raw materials: *** percent | Domestic: *** percent; Imported: *** percent; Other raw materials: *** percent | Domestic: *** percent; Imported: *** percent; Other raw materials: *** percent | Domestic: *** percent; Imported: *** percent; Other raw materials: *** percent |

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

Note: Ranges reported in table reflect minimum and maximum data for applicable factors across the full calendar years included in the data collection period. Greenfield investment refers to the investment that would be required to replicate a firm's current operations if the plant(s) were constructed from scratch on greenfield land. Value added relative to firm's cost of production is calculated as the share of conversion costs (direct labor and other factory costs) out of total cost of goods sold (COGS). Absolute value added and value added relative to the industry's cost of production are for the aggregated 2020 to 2024 full year period data. Quantity, type, and source of parts data are for terminal year 2024. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Note: The largest responding U.S. medium-to-large-sized fabricator \*\*\* initially reported fabrication of 100 percent domestic slabs; however, based on follow-up with the firm as noted in Part 4 of this report, this company purchased most of its slab used as inputs in its fabrication from \*\*\*, a major importer of quartz surface products. Based on those communications, the data for \*\*\* was adjusted to account for the use of these imported inputs.

**Table I.4 QSP: U.S. producers' conversion costs and the share of those costs to overall COGS (also known as value added), by firm and period**

Value in 1,000 dollars; Share in percent

| Firm                                 | Measure | 2020    | 2021    | 2022    | 2023    | 2024    | Minimum | Maximum |
|--------------------------------------|---------|---------|---------|---------|---------|---------|---------|---------|
| Conversion costs: Caesarstone        | Value   | ***     | ***     | ***     | ***     | ***     | ***     | ***     |
| Conversion costs: Cambria            | Value   | ***     | ***     | ***     | ***     | ***     | ***     | ***     |
| Conversion costs: Dal-Tile           | Value   | ***     | ***     | ***     | ***     | ***     | ***     | ***     |
| Conversion costs: Elite              | Value   | ***     | ***     | ***     | ***     | ***     | ***     | ***     |
| Conversion costs: Estone             | Value   | ***     | ***     | ***     | ***     | ***     | ***     | ***     |
| Conversion costs: Guidoni            | Value   | ***     | ***     | ***     | ***     | ***     | ***     | ***     |
| Conversion costs: Hendrix            | Value   | ***     | ***     | ***     | ***     | ***     | ***     | ***     |
| Conversion costs: LX Hausys          | Value   | ***     | ***     | ***     | ***     | ***     | ***     | ***     |
| Conversion costs: All U.S. producers | Value   | 235,482 | 279,786 | 303,067 | 294,526 | 237,291 | 235,482 | 303,067 |
| Value added: Caesarstone             | Share   | ***     | ***     | ***     | ***     | ***     | ***     | ***     |
| Value added: Cambria                 | Share   | ***     | ***     | ***     | ***     | ***     | ***     | ***     |
| Value added: Dal-Tile                | Share   | ***     | ***     | ***     | ***     | ***     | ***     | ***     |
| Value added: Elite                   | Share   | ***     | ***     | ***     | ***     | ***     | ***     | ***     |
| Value added: Estone                  | Share   | ***     | ***     | ***     | ***     | ***     | ***     | ***     |
| Value added: Guidoni                 | Share   | ***     | ***     | ***     | ***     | ***     | ***     | ***     |
| Value added: Hendrix                 | Share   | ***     | ***     | ***     | ***     | ***     | ***     | ***     |
| Value added: LX Hausys               | Share   | ***     | ***     | ***     | ***     | ***     | ***     | ***     |
| Value added: All U.S. producers      | Share   | 52.7    | 47.2    | 46.0    | 49.4    | 49.6    | 46.0    | 52.7    |

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

Note: Conversion costs are the costs of direct labor and other factory costs for U.S. producers. Value added is the share of conversion costs to the total cost of goods sold (COGS) which includes the cost of raw materials. One U.S. producer \*\*\* failed to provide usable data for this factor. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

**Table I.5 QSP: U.S. medium-to-large-sized fabricators' conversion costs and the share of those costs to overall COGS (also known as value added), by firm and period**

Value in 1,000 dollars; Share in percent

| Firm                                              | Measure | 2020   | 2021   | 2022   | 2023   | 2024   | Minimum | Maximum |
|---------------------------------------------------|---------|--------|--------|--------|--------|--------|---------|---------|
| Conversion costs: Stone Suppliers                 | Value   | ***    | ***    | ***    | ***    | ***    | ***     | ***     |
| Conversion costs: Trind                           | Value   | ***    | ***    | ***    | ***    | ***    | ***     | ***     |
| Conversion costs: Wisenbaker                      | Value   | ***    | ***    | ***    | ***    | ***    | ***     | ***     |
| Conversion costs: All responding U.S. fabricators | Value   | 21,925 | 30,313 | 34,172 | 33,205 | 31,241 | 21,925  | 34,172  |
| Value added: Stone Suppliers                      | Share   | ***    | ***    | ***    | ***    | ***    | ***     | ***     |
| Value added: Trind                                | Share   | ***    | ***    | ***    | ***    | ***    | ***     | ***     |
| Value added: Wisenbaker                           | Share   | ***    | ***    | ***    | ***    | ***    | ***     | ***     |
| Value added: All responding U.S. fabricators      | Share   | 37.0   | 41.8   | 33.9   | 36.7   | 38.1   | 33.9    | 41.8    |

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

Note: Conversion costs are the costs of direct labor and other factory costs for U.S. fabricators. Value added is the share of conversion costs to the total cost of goods sold (COGS) which includes the cost of raw materials. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

**Table I.6 QSP: U.S. producers' and responding fabricators' reported domestic production operations**

| Firm                  | Narrative response on domestic production operations |
|-----------------------|------------------------------------------------------|
| Producer: Caesarstone | ***                                                  |
| Producer: Cambria     | ***                                                  |
| Producer: Dal-Tile    | ***                                                  |
| Producer: Elite       | ***                                                  |
| Producer: Estone      | ***                                                  |



| Firm              | Narrative response on domestic production operations |
|-------------------|------------------------------------------------------|
| Producer: Guidoni | ***                                                  |

| Firm                         | Narrative response on domestic production operations |
|------------------------------|------------------------------------------------------|
| Producer: Hendrix            | ***                                                  |
| Producer: LX Hausys          | ***                                                  |
| Fabricator: Assured Flooring | ***                                                  |
| Fabricator: Multistone       | ***                                                  |
| Fabricator: Stone Suppliers  | ***                                                  |
| Fabricator: Trind            | ***                                                  |
| Fabricator: Wisenbaker       | ***                                                  |

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

**Table I.7 QSP: U.S. producers' and responding fabricators' reported domestic production operations, by factor**

| Factor              | Firm name and narrative response on domestic production operations |
|---------------------|--------------------------------------------------------------------|
| Capital investments | ***                                                                |
| Capital investments | ***                                                                |
| Capital investments | ***                                                                |
| Capital investments | ***                                                                |
| Capital investments | ***                                                                |

| Factor              | Firm name and narrative response on domestic production operations |
|---------------------|--------------------------------------------------------------------|
| Capital investments | ***                                                                |
| Capital investments | ***                                                                |
| Capital investments | ***                                                                |
| Capital investments | ***                                                                |
| Capital investments | ***                                                                |
| Capital investments | ***                                                                |

| Factor              | Firm name and narrative response on domestic production operations |
|---------------------|--------------------------------------------------------------------|
| Capital investments | ***                                                                |
| Capital investments | ***                                                                |
| Technical expertise | ***                                                                |
| Technical expertise | ***                                                                |
| Technical expertise | ***                                                                |
| Technical expertise | ***                                                                |
| Technical expertise | ***                                                                |

| Factor              | Firm name and narrative response on domestic production operations |
|---------------------|--------------------------------------------------------------------|
| Technical expertise | ***                                                                |
| Technical expertise | ***                                                                |
| Technical expertise | ***                                                                |
| Technical expertise | ***                                                                |
| Technical expertise | ***                                                                |
| Technical expertise | ***                                                                |
| Technical expertise | ***                                                                |
| Technical expertise | ***                                                                |

| Factor      | Firm name and narrative response on domestic production operations |
|-------------|--------------------------------------------------------------------|
| Value added | ***                                                                |
| Value added | ***                                                                |
| Value added | ***                                                                |
| Value added | ***                                                                |
| Value added | ***                                                                |
| Value added | ***                                                                |
| Value added | ***                                                                |
| Value added | ***                                                                |
| Value added | ***                                                                |
| Value added | ***                                                                |
| Value added | ***                                                                |

| Factor      | Firm name and narrative response on domestic production operations |
|-------------|--------------------------------------------------------------------|
| Value added | ***                                                                |
| Value added | ***                                                                |
| Employment  | ***                                                                |
| Employment  | ***                                                                |
| Employment  | ***                                                                |
| Employment  | ***                                                                |
| Employment  | ***                                                                |
| Employment  | ***                                                                |
| Employment  | ***                                                                |
| Employment  | ***                                                                |
| Employment  | ***                                                                |



| Factor                              | Firm name and narrative response on domestic production operations |
|-------------------------------------|--------------------------------------------------------------------|
| Employment                          | ***                                                                |
| Employment                          | ***                                                                |
| Employment                          | ***                                                                |
| Employment                          | ***                                                                |
| Quantity, type, and source of parts | ***                                                                |
| Quantity, type, and source of parts | ***                                                                |
| Quantity, type, and source of parts | ***                                                                |
| Quantity, type, and source of parts | ***                                                                |
| Quantity, type, and source of parts | ***                                                                |
| Quantity, type, and source of parts | ***                                                                |
| Quantity, type, and source of parts | ***                                                                |
| Quantity, type, and source of parts | ***                                                                |
| Quantity, type, and source of parts | ***                                                                |
| Quantity, type, and source of parts | ***                                                                |
| Quantity, type, and source of parts | ***                                                                |
| Quantity, type, and source of parts | ***                                                                |

| Factor                              | Firm name and narrative response on domestic production operations |
|-------------------------------------|--------------------------------------------------------------------|
| Quantity, type, and source of parts | ***                                                                |
| Quantity, type, and source of parts | ***                                                                |
| Costs and activities                | ***                                                                |
| Costs and activities                | ***                                                                |
| Costs and activities                | ***                                                                |
| Costs and activities                | ***                                                                |
| Costs and activities                | ***                                                                |
| Costs and activities                | ***                                                                |
| Costs and activities                | ***                                                                |
| Costs and activities                | ***                                                                |
| Costs and activities                | ***                                                                |
| Costs and activities                | ***                                                                |
| Costs and activities                | ***                                                                |
| Costs and activities                | ***                                                                |

| Factor               | Firm name and narrative response on domestic production operations |
|----------------------|--------------------------------------------------------------------|
| Costs and activities | ***                                                                |
| Costs and activities | ***                                                                |

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

Table I.8 presents U.S. producers' and responding fabricators' reported ratings as to the complexity of domestic QSP production operations.

**Table I.8 QSP: U.S. producers' and responding fabricators' reported domestic production operations**

Ratings of 1 are minimally complex, intense, or important; Ratings of 5 are extremely complex, intense, or important

| Firm                     | Rating | Narrative response on complexity and importance rating |
|--------------------------|--------|--------------------------------------------------------|
| Producer:<br>Caesarstone | ***    | ***                                                    |
| Producer:<br>Cambria     | ***    | ***                                                    |
| Producer: Dal-<br>Tile   | ***    | ***                                                    |
| Producer: Elite          | ***    | ***                                                    |
| Producer:<br>Estone      | ***    | ***                                                    |

| Firm                               | Rating | Narrative response on complexity and importance rating |
|------------------------------------|--------|--------------------------------------------------------|
| Producer:<br>Guidoni               | ***    | ***                                                    |
| Producer:<br>Hendrix               | ***    | ***                                                    |
| Producer: LX<br>Hausys             | ***    | ***                                                    |
| Fabricator:<br>Assured<br>Flooring | ***    | ***                                                    |
| Fabricator:<br>Multistone          | ***    | ***                                                    |
| Fabricator:<br>Stone<br>Suppliers  | ***    | ***                                                    |
| Fabricator:<br>Trind               | ***    | ***                                                    |
| Fabricator:<br>Wisenbaker          | ***    | ***                                                    |
| All U.S.<br>producers              | 4.6    | NA                                                     |
| All responding<br>U.S. fabricators | 3.8    | NA                                                     |
| All firms                          | 4.3    | NA                                                     |

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

Table I.9 and figure I.1 present responding U.S. fabricators' capacity and production. Table I.10 presents responding U.S. fabricators' production by source of slab.

**Table I.9 QSP: Responding U.S. fabricators' output: Practical capacity, by firm type and period**

Capacity in 1,000 square feet; Interim period is January through September

| <b>Firm type</b>                             | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim<br/>2024</b> | <b>Interim<br/>2025</b> |
|----------------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------------------|-------------------------|
| Responding small-sized fabricators           | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Responding medium-to-large-sized fabricators | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| All responding fabricators                   | 6,223       | 7,220       | 8,284       | 8,754       | 8,689       | 6,614                   | 7,214                   |

Table continued.

**Table I.9 (Continued) QSP: Responding U.S. fabricators' output: Production, by firm type and period**

Production in 1,000 square feet; Interim period is January through September

| <b>Firm type</b>                             | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim<br/>2024</b> | <b>Interim<br/>2025</b> |
|----------------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------------------|-------------------------|
| Responding small-sized fabricators           | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| Responding medium-to-large-sized fabricators | ***         | ***         | ***         | ***         | ***         | ***                     | ***                     |
| All responding fabricators                   | 4,998       | 6,342       | 7,268       | 6,581       | 7,014       | 5,067                   | 5,170                   |

Table continued.

**Table I.9 (Continued) QSP: Responding U.S. fabricators' output: Capacity utilization, by firm type and period**

Capacity utilization in ratios in percent; Interim period is January through September

| <b>Firm type</b>                             | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim 2024</b> | <b>Interim 2025</b> |
|----------------------------------------------|-------------|-------------|-------------|-------------|-------------|---------------------|---------------------|
| Responding small-sized fabricators           | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Responding medium-to-large-sized fabricators | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| All responding fabricators                   | 80.3        | 87.8        | 87.7        | 75.2        | 80.7        | 76.6                | 71.7                |

Table continued.

**Table I.9 (Continued) QSP: Responding U.S. fabricators' output: Share of production, by firm type and period**

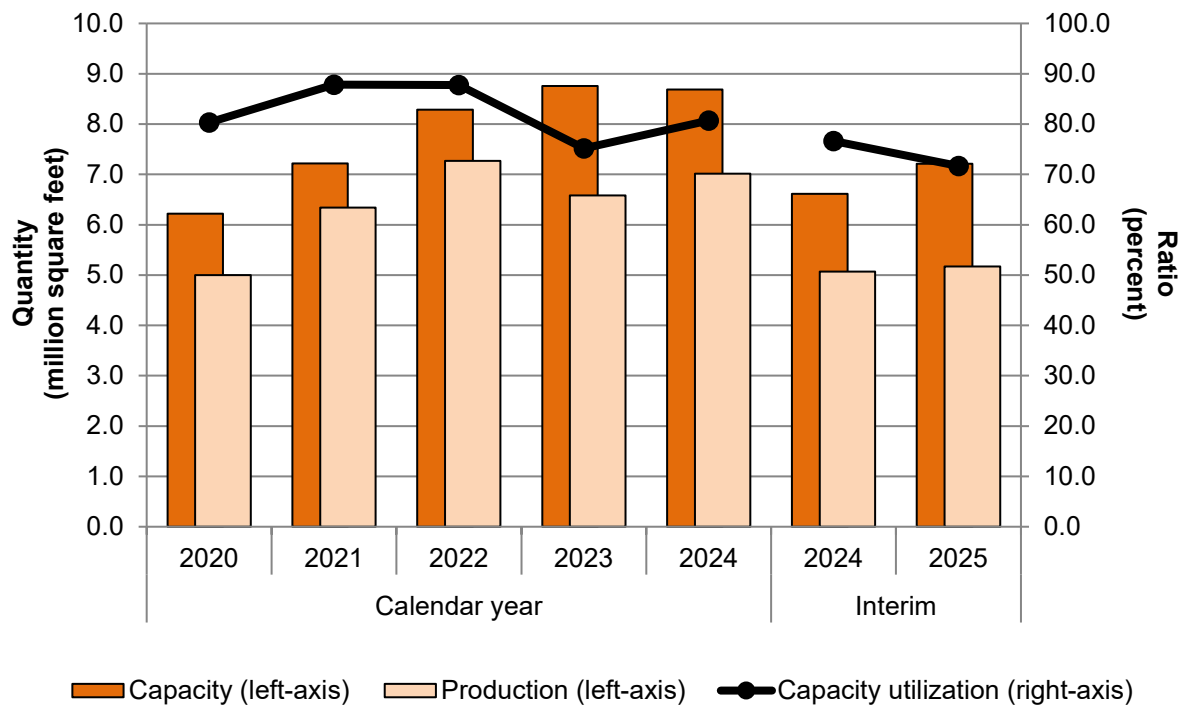
Share of production in percent; Interim period is January through September

| <b>Firm type</b>                             | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>Interim 2024</b> | <b>Interim 2025</b> |
|----------------------------------------------|-------------|-------------|-------------|-------------|-------------|---------------------|---------------------|
| Responding small-sized fabricators           | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| Responding medium-to-large-sized fabricators | ***         | ***         | ***         | ***         | ***         | ***                 | ***                 |
| All responding fabricators                   | 100.0       | 100.0       | 100.0       | 100.0       | 100.0       | 100.0               | 100.0               |

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

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

Figure I.1 QSP: Responding U.S. fabricators' capacity and production, by period



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



**Table I.10 QSP: Responding U.S. fabricators' production, by source of slab and period**

Quantity in 1,000 square feet; Share in percent; Interim period is January through September

| Source      | Measure           | 2020  | 2021  | 2022  | 2023  | 2024  | Interim<br>2024 | Interim<br>2025 |
|-------------|-------------------|-------|-------|-------|-------|-------|-----------------|-----------------|
| Domestic    | Quantity          | 1,933 | 2,774 | 2,777 | 2,531 | 3,099 | 2,259           | 2,075           |
| Foreign     | Quantity          | 3,065 | 3,568 | 4,490 | 4,050 | 3,916 | 2,808           | 3,095           |
| All sources | Quantity          | 4,998 | 6,342 | 7,268 | 6,581 | 7,014 | 5,067           | 5,170           |
| Domestic    | Share of quantity | 38.7  | 43.7  | 38.2  | 38.5  | 44.2  | 44.6            | 40.1            |
| Foreign     | Share of quantity | 61.3  | 56.3  | 61.8  | 61.5  | 55.8  | 55.4            | 59.9            |
| All sources | Share of quantity | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 | 100.0           | 100.0           |

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

Table I.11 presents responding U.S. medium- to large-sized fabricators' U.S. shipments by type, and also the combined U.S. shipments of both small-sized fabricators and medium- to large-sized fabricators.

**Table I.11 QSP: Responding U.S. medium-to-large-sized fabricators' U.S. shipments, by type and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares in percent

| Item                       | Measure           | 2020  | 2021  | 2022  | 2023  | 2024  |
|----------------------------|-------------------|-------|-------|-------|-------|-------|
| Commercial U.S. shipments  | Quantity          | ***   | ***   | ***   | ***   | ***   |
| Internal consumption       | Quantity          | ***   | ***   | ***   | ***   | ***   |
| Transfers to related firms | Quantity          | ***   | ***   | ***   | ***   | ***   |
| U.S. shipments             | Quantity          | ***   | ***   | ***   | ***   | ***   |
| Commercial U.S. shipments  | Value             | ***   | ***   | ***   | ***   | ***   |
| Internal consumption       | Value             | ***   | ***   | ***   | ***   | ***   |
| Transfers to related firms | Value             | ***   | ***   | ***   | ***   | ***   |
| U.S. shipments             | Value             | ***   | ***   | ***   | ***   | ***   |
| Commercial U.S. shipments  | Unit value        | ***   | ***   | ***   | ***   | ***   |
| Internal consumption       | Unit value        | ***   | ***   | ***   | ***   | ***   |
| Transfers to related firms | Unit value        | ***   | ***   | ***   | ***   | ***   |
| U.S. shipments             | Unit value        | ***   | ***   | ***   | ***   | ***   |
| Commercial U.S. shipments  | Share of quantity | ***   | ***   | ***   | ***   | ***   |
| Internal consumption       | Share of quantity | ***   | ***   | ***   | ***   | ***   |
| Transfers to related firms | Share of quantity | ***   | ***   | ***   | ***   | ***   |
| U.S. shipments             | Share of quantity | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |
| Commercial U.S. shipments  | Share of value    | ***   | ***   | ***   | ***   | ***   |
| Internal consumption       | Share of value    | ***   | ***   | ***   | ***   | ***   |
| Transfers to related firms | Share of value    | ***   | ***   | ***   | ***   | ***   |
| U.S. shipments             | Share of value    | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Table continued.

**Table I.11 (Continued) QSP: Responding U.S. medium-to-large-sized fabricators' U.S. shipments, by type and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares in percent; Interim period is January through September

| Item                       | Measure           | Interim 2024 | Interim 2025 |
|----------------------------|-------------------|--------------|--------------|
| Commercial U.S. shipments  | Quantity          | ***          | ***          |
| Internal consumption       | Quantity          | ***          | ***          |
| Transfers to related firms | Quantity          | ***          | ***          |
| U.S. shipments             | Quantity          | ***          | ***          |
| Commercial U.S. shipments  | Value             | ***          | ***          |
| Internal consumption       | Value             | ***          | ***          |
| Transfers to related firms | Value             | ***          | ***          |
| U.S. shipments             | Value             | ***          | ***          |
| Commercial U.S. shipments  | Unit value        | ***          | ***          |
| Internal consumption       | Unit value        | ***          | ***          |
| Transfers to related firms | Unit value        | ***          | ***          |
| U.S. shipments             | Unit value        | ***          | ***          |
| Commercial U.S. shipments  | Share of quantity | ***          | ***          |
| Internal consumption       | Share of quantity | ***          | ***          |
| Transfers to related firms | Share of quantity | ***          | ***          |
| U.S. shipments             | Share of quantity | 100.0        | 100.0        |
| Commercial U.S. shipments  | Share of value    | ***          | ***          |
| Internal consumption       | Share of value    | ***          | ***          |
| Transfers to related firms | Share of value    | ***          | ***          |
| U.S. shipments             | Share of value    | 100.0        | 100.0        |

Source: Table continued.

**Table I.11 (Continued) QSP: Responding U.S. fabricators' U.S. shipments, by firm type and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares in percent

| <b>Firm type</b>                             | <b>Measure</b>    | <b>2020</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> |
|----------------------------------------------|-------------------|-------------|-------------|-------------|-------------|-------------|
| Responding small-sized fabricators           | Quantity          | ***         | ***         | ***         | ***         | ***         |
| Responding medium-to-large-sized fabricators | Quantity          | ***         | ***         | ***         | ***         | ***         |
| All responding fabricators                   | Quantity          | 5,003       | 5,842       | 7,072       | 6,854       | 7,086       |
| Responding small-sized fabricators           | Value             | ***         | ***         | ***         | ***         | ***         |
| Responding medium-to-large-sized fabricators | Value             | ***         | ***         | ***         | ***         | ***         |
| All responding fabricators                   | Value             | 203,957     | 259,025     | 309,079     | 297,072     | 293,062     |
| Responding small-sized fabricators           | Unit value        | ***         | ***         | ***         | ***         | ***         |
| Responding medium-to-large-sized fabricators | Unit value        | ***         | ***         | ***         | ***         | ***         |
| All responding fabricators                   | Unit value        | 40.77       | 44.34       | 43.71       | 43.35       | 41.36       |
| Responding small-sized fabricators           | Share of quantity | ***         | ***         | ***         | ***         | ***         |
| Responding medium-to-large-sized fabricators | Share of quantity | ***         | ***         | ***         | ***         | ***         |
| All responding fabricators                   | Share of quantity | 100.0       | 100.0       | 100.0       | 100.0       | 100.0       |
| Responding small-sized fabricators           | Share of value    | ***         | ***         | ***         | ***         | ***         |
| Responding medium-to-large-sized fabricators | Share of value    | ***         | ***         | ***         | ***         | ***         |
| All responding fabricators                   | Share of value    | 100.0       | 100.0       | 100.0       | 100.0       | 100.0       |

Table continued.

**Table I.11 (Continued) QSP: Responding U.S. fabricators' U.S. shipments, by firm type and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares in percent; Interim period is January through September

| <b>Firm type</b>                             | <b>Measure</b>    | <b>Interim 2024</b> | <b>Interim 2025</b> |
|----------------------------------------------|-------------------|---------------------|---------------------|
| Responding small-sized fabricators           | Quantity          | ***                 | ***                 |
| Responding medium-to-large-sized fabricators | Quantity          | ***                 | ***                 |
| All responding fabricators                   | Quantity          | 5,190               | 5,398               |
| Responding small-sized fabricators           | Value             | ***                 | ***                 |
| Responding medium-to-large-sized fabricators | Value             | ***                 | ***                 |
| All responding fabricators                   | Value             | 218,505             | 227,352             |
| Responding small-sized fabricators           | Unit value        | ***                 | ***                 |
| Responding medium-to-large-sized fabricators | Unit value        | ***                 | ***                 |
| All responding fabricators                   | Unit value        | 42.10               | 42.11               |
| Responding small-sized fabricators           | Share of quantity | ***                 | ***                 |
| Responding medium-to-large-sized fabricators | Share of quantity | ***                 | ***                 |
| All responding fabricators                   | Share of quantity | 100.0               | 100.0               |
| Responding small-sized fabricators           | Share of value    | ***                 | ***                 |
| Responding medium-to-large-sized fabricators | Share of value    | ***                 | ***                 |
| All responding fabricators                   | Share of value    | 100.0               | 100.0               |

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

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

Table I.12 presents data on channels of distribution for U.S. fabricators. The data shows that responding medium- to large-size fabricators' U.S. shipments to fabricators, contractors, and other end users were mostly evenly divided.

**Table I.12 QSP: Share of responding U.S. medium-to-large-sized fabricators' U.S. shipments, by channel of distribution and period**

Share in percent; Interim period is January through September

| Channel                   | 2020 | 2021 | 2022 | 2023 | 2024 | Interim 2024 | Interim 2025 |
|---------------------------|------|------|------|------|------|--------------|--------------|
| Distributors              | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Fabricators and retailers | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Contractors and builders  | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Other end users           | ***  | ***  | ***  | ***  | ***  | ***          | ***          |

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

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

Independent U.S. fabricators were asked to report their U.S. shipments of QSP by caliber type: premium brands versus mass market brands (as defined by the responding firms themselves). Table I.13 presents data on U.S. shipments by caliber for U.S. fabricators. The table shows that the majority of the responding medium- to large-size fabricators' U.S. shipments were of premium quality products.

**Table I.13 QSP: Responding U.S. medium-to-large-sized fabricators' U.S. shipments, by caliber and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares in percent

| Caliber            | Measure           | 2020  | 2021  | 2022  | 2023  | 2024  |
|--------------------|-------------------|-------|-------|-------|-------|-------|
| Premium brands     | Quantity          | ***   | ***   | ***   | ***   | ***   |
| Mass market brands | Quantity          | ***   | ***   | ***   | ***   | ***   |
| All calibers       | Quantity          | ***   | ***   | ***   | ***   | ***   |
| Premium brands     | Value             | ***   | ***   | ***   | ***   | ***   |
| Mass market brands | Value             | ***   | ***   | ***   | ***   | ***   |
| All calibers       | Value             | ***   | ***   | ***   | ***   | ***   |
| Premium brands     | Unit value        | ***   | ***   | ***   | ***   | ***   |
| Mass market brands | Unit value        | ***   | ***   | ***   | ***   | ***   |
| All calibers       | Unit value        | ***   | ***   | ***   | ***   | ***   |
| Premium brands     | Share of quantity | ***   | ***   | ***   | ***   | ***   |
| Mass market brands | Share of quantity | ***   | ***   | ***   | ***   | ***   |
| All calibers       | Share of quantity | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |
| Premium brands     | Share of value    | ***   | ***   | ***   | ***   | ***   |
| Mass market brands | Share of value    | ***   | ***   | ***   | ***   | ***   |
| All calibers       | Share of value    | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Table continued.

**Table I.13 (Continued) QSP: Responding U.S. medium-to-large-sized fabricators' U.S. shipments, by caliber and period**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot; Shares in percent; Interim period is January through September

| Caliber            | Measure           | Interim 2024 | Interim 2025 |
|--------------------|-------------------|--------------|--------------|
| Premium brands     | Quantity          | ***          | ***          |
| Mass market brands | Quantity          | ***          | ***          |
| All calibers       | Quantity          | ***          | ***          |
| Premium brands     | Value             | ***          | ***          |
| Mass market brands | Value             | ***          | ***          |
| All calibers       | Value             | ***          | ***          |
| Premium brands     | Unit value        | ***          | ***          |
| Mass market brands | Unit value        | ***          | ***          |
| All calibers       | Unit value        | ***          | ***          |
| Premium brands     | Share of quantity | ***          | ***          |
| Mass market brands | Share of quantity | ***          | ***          |
| All calibers       | Share of quantity | 100.0        | 100.0        |
| Premium brands     | Share of value    | ***          | ***          |
| Mass market brands | Share of value    | ***          | ***          |
| All calibers       | Share of value    | 100.0        | 100.0        |

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

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



Table I.14 and figures I.2 and I.3 present data on U.S. shipments by attribute and thickness for U.S. fabricators. The table shows that the responding medium- to large-size fabricators' U.S. shipments (like the data shown in the body for U.S. producers and U.S. importers) were concentrated in the 2 centimeter and the 3 centimeter slab categories. Additionally, these firms indicated that the most common product attribute types of slab were the solid white stone and marbled stone with short and/or long veining categories (like the data shown in the body for U.S. producers and U.S. importers).

**Table I.14 QSP: Responding U.S. medium-to-large-sized fabricators' U.S. shipments in 2024, by attribute and thickness**

Quantity in 1,000 square feet; Value in 1,000 dollars; Unit values in dollars per square foot

| Attribute                                   | Measure    | 1 cm thickness | 2 cm thickness | 3 cm thickness | All thicknesses |
|---------------------------------------------|------------|----------------|----------------|----------------|-----------------|
| Granite design                              | Quantity   | ***            | ***            | ***            | ***             |
| Marble design with short veining            | Quantity   | ***            | ***            | ***            | ***             |
| Marble design with long veining             | Quantity   | ***            | ***            | ***            | ***             |
| Uniform with white color design             | Quantity   | ***            | ***            | ***            | ***             |
| Uniform with neutral and light color design | Quantity   | ***            | ***            | ***            | ***             |
| Uniform with dark and black color design    | Quantity   | ***            | ***            | ***            | ***             |
| Crushed glass design                        | Quantity   | ***            | ***            | ***            | ***             |
| All other designs                           | Quantity   | ***            | ***            | ***            | ***             |
| All designs                                 | Quantity   | ***            | ***            | ***            | ***             |
| Granite design                              | Value      | ***            | ***            | ***            | ***             |
| Marble design with short veining            | Value      | ***            | ***            | ***            | ***             |
| Marble design with long veining             | Value      | ***            | ***            | ***            | ***             |
| Uniform with white color design             | Value      | ***            | ***            | ***            | ***             |
| Uniform with neutral and light color design | Value      | ***            | ***            | ***            | ***             |
| Uniform with dark and black color design    | Value      | ***            | ***            | ***            | ***             |
| Crushed glass design                        | Value      | ***            | ***            | ***            | ***             |
| All other designs                           | Value      | ***            | ***            | ***            | ***             |
| All designs                                 | Value      | ***            | ***            | ***            | ***             |
| Granite design                              | Unit value | ***            | ***            | ***            | ***             |
| Marble design with short veining            | Unit value | ***            | ***            | ***            | ***             |
| Marble design with long veining             | Unit value | ***            | ***            | ***            | ***             |
| Uniform with white color design             | Unit value | ***            | ***            | ***            | ***             |
| Uniform with neutral and light color design | Unit value | ***            | ***            | ***            | ***             |
| Uniform with dark and black color design    | Unit value | ***            | ***            | ***            | ***             |
| Crushed glass design                        | Unit value | ***            | ***            | ***            | ***             |
| All other designs                           | Unit value | ***            | ***            | ***            | ***             |
| All designs                                 | Unit value | ***            | ***            | ***            | ***             |

Table continued.

**Table I.14 (Continued) QSP: Responding U.S. medium-to-large-sized fabricators' U.S. shipments in 2024, by attribute and thickness**

Shares of quantity down and across in percent

| Attribute                                   | Share of quantity      | 1 cm thickness | 2 cm thickness | 3 cm thickness | All thicknesses |
|---------------------------------------------|------------------------|----------------|----------------|----------------|-----------------|
| Granite design                              | Shares down            | ***            | ***            | ***            | ***             |
| Marble design with short veining            | Shares down            | ***            | ***            | ***            | ***             |
| Marble design with long veining             | Shares down            | ***            | ***            | ***            | ***             |
| Uniform with white color design             | Shares down            | ***            | ***            | ***            | ***             |
| Uniform with neutral and light color design | Shares down            | ***            | ***            | ***            | ***             |
| Uniform with dark and black color design    | Shares down            | ***            | ***            | ***            | ***             |
| Crushed glass design                        | Shares down            | ***            | ***            | ***            | ***             |
| All other designs                           | Shares down            | ***            | ***            | ***            | ***             |
| All designs                                 | Shares down            | 100.0          | 100.0          | 100.0          | 100.0           |
| Granite design                              | Shares across          | ***            | ***            | ***            | 100.0           |
| Marble design with short veining            | Shares across          | ***            | ***            | ***            | 100.0           |
| Marble design with long veining             | Shares across          | ***            | ***            | ***            | 100.0           |
| Uniform with white color design             | Shares across          | ***            | ***            | ***            | 100.0           |
| Uniform with neutral and light color design | Shares across          | ***            | ***            | ***            | 100.0           |
| Uniform with dark and black color design    | Shares across          | ***            | ***            | ***            | 100.0           |
| Crushed glass design                        | Shares across          | ***            | ***            | ***            | 100.0           |
| All other designs                           | Shares across          | ***            | ***            | ***            | —               |
| All designs                                 | Shares across          | ***            | ***            | ***            | 100.0           |
| Granite design                              | Shares down and across | ***            | ***            | ***            | ***             |
| Marble design with short veining            | Shares down and across | ***            | ***            | ***            | ***             |
| Marble design with long veining             | Shares down and across | ***            | ***            | ***            | ***             |
| Uniform with white color design             | Shares down and across | ***            | ***            | ***            | ***             |
| Uniform with neutral and light color design | Shares down and across | ***            | ***            | ***            | ***             |
| Uniform with dark and black color design    | Shares down and across | ***            | ***            | ***            | ***             |
| Crushed glass design                        | Shares down and across | ***            | ***            | ***            | ***             |
| All other designs                           | Shares down and across | ***            | ***            | ***            | ***             |
| All designs                                 | Shares down and across | ***            | ***            | ***            | 100.0           |

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

Note: Quantity shown as "0" represent values greater than zero, but less than "500". Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

**Figure I.2 QSP: Responding U.S. medium-to-large-sized fabricators' average unit values and share of U.S. shipments in 2024, by attribute**

\* \* \* \* \*

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

Note: Unit values are presented in dollars per square foot.

**Figure I.3 QSP: Responding U.S. medium-to-large-sized fabricators' average unit values and share of U.S. shipments in 2024, by thickness**

\* \* \* \* \*

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

Note: Unit values are presented in dollars per square foot.

Table I.15 presents data used in calculating apparent U.S. consumption inclusive of integrated U.S. producers and independent fabricators.

**Table I.15 QSP: U.S. shipments combining U.S. producers' and responding fabricators' data for apparent consumption**

Quantity in 1,000 square feet; Value in 1,000 dollars

| Item                                                      | Measure  | 2020    | 2021      | 2022      | 2023      | 2024    |
|-----------------------------------------------------------|----------|---------|-----------|-----------|-----------|---------|
| U.S. producers                                            | Quantity | 31,645  | 40,525    | 38,700    | 35,618    | 30,900  |
| U.S. producers                                            | Value    | 662,804 | 853,861   | 931,682   | 862,308   | 748,704 |
| Responding U.S. fabricators: Value added to domestic      | Value    | ***     | ***       | ***       | ***       | ***     |
| U.S. producers and responding fabricators: Fully domestic | Value    | ***     | ***       | ***       | ***       | ***     |
| Responding U.S. fabricators: Value added to imports       | Value    | ***     | ***       | ***       | ***       | ***     |
| U.S. producers and responding fabricators: Total          | Value    | 798,330 | 1,034,649 | 1,128,268 | 1,055,336 | 946,923 |

Table continued.

**Table I.15 (Continued) QSP: U.S. shipments combining U.S. producers' and responding fabricators' data for apparent consumption**

Quantity in 1,000 square feet; Value in 1,000 dollars; Interim period is January through September

| Item                                                      | Measure  | Interim 2024 | Interim 2025 |
|-----------------------------------------------------------|----------|--------------|--------------|
| U.S. producers                                            | Quantity | 23,579       | 22,114       |
| U.S. producers                                            | Value    | 572,764      | 544,649      |
| Responding U.S. fabricators: Value added to domestic      | Value    | ***          | ***          |
| U.S. producers and responding fabricators: Fully domestic | Value    | ***          | ***          |
| Responding U.S. fabricators: Value added to imports       | Value    | ***          | ***          |
| U.S. producers and responding fabricators: Total          | Value    | 720,058      | 696,515      |

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

Note: Quantity for U.S. shipments reflects only producers' U.S. shipment quantities. Value for U.S. shipments reflects fabricated slab sold in the United States from domestically manufactured slabs (including the value added by responding U.S. fabricators to domestic slab), as well as the incremental value added by responding U.S. fabricators to imported slabs. In measuring consumption and market share, this methodology avoids reclassifying and/or double counting merchandise already reported as an import. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Table I.16 presents data on ending inventories for responding U.S. fabricators.

**Table I.16 QSP: Responding U.S. fabricators' inventories and their ratio to select items, by firm type and period**

Quantity in 1,000 square feet; Ratios in percent

| Item                               | Firm type                                    | 2020  | 2021  | 2022  | 2023  | 2024  |
|------------------------------------|----------------------------------------------|-------|-------|-------|-------|-------|
| End-of-period inventory quantity   | Responding small-sized fabricators           | ***   | ***   | ***   | ***   | ***   |
| End-of-period inventory quantity   | Responding medium-to-large-sized fabricators | ***   | ***   | ***   | ***   | ***   |
| End-of-period inventory quantity   | All responding fabricators                   | 1,853 | 2,255 | 2,584 | 1,936 | 2,109 |
| Inventory ratio to U.S. production | All responding fabricators                   | 37.1  | 35.6  | 35.6  | 29.4  | 30.1  |
| Inventory ratio to U.S. shipments  | All responding fabricators                   | 37.0  | 38.6  | 36.5  | 28.2  | 29.8  |

Table continued.

**Table I.16 (Continued) QSP: Responding U.S. fabricators' inventories and their ratio to select items, by firm type and period**

Quantity in 1,000 square feet; Ratios in percent; Interim period is January through September

| Item                               | Firm type                                    | Interim 2024 | Interim 2025 |
|------------------------------------|----------------------------------------------|--------------|--------------|
| End-of-period inventory quantity   | Responding small-sized fabricators           | ***          | ***          |
| End-of-period inventory quantity   | Responding medium-to-large-sized fabricators | ***          | ***          |
| End-of-period inventory quantity   | All responding fabricators                   | 1,941        | 1,900        |
| Inventory ratio to U.S. production | All responding fabricators                   | 28.7         | 27.6         |
| Inventory ratio to U.S. shipments  | All responding fabricators                   | 28.1         | 26.4         |

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

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

Tables I.17 and I.18 present employment related data for responding U.S. fabricators.

**Table I.17 QSP: Responding U.S. fabricators' employment related information, by item, firm type, and period**

| Item                                           | Firm type                                    | 2020    | 2021    | 2022    | 2023    | 2024    |
|------------------------------------------------|----------------------------------------------|---------|---------|---------|---------|---------|
| Production and related workers (PRWs) (number) | Responding small-sized fabricators           | ***     | ***     | ***     | ***     | ***     |
| Production and related workers (PRWs) (number) | Responding medium-to-large-sized fabricators | ***     | ***     | ***     | ***     | ***     |
| Production and related workers (PRWs) (number) | All responding fabricators                   | 829     | 915     | 896     | 800     | 784     |
| Total hours worked (1,000 hours)               | All responding fabricators                   | 1,812   | 2,114   | 2,152   | 1,831   | 1,750   |
| Hours worked per PRW (hours)                   | All responding fabricators                   | 2,186   | 2,310   | 2,401   | 2,289   | 2,232   |
| Wages paid (\$1,000)                           | All responding fabricators                   | 45,097  | 53,388  | 58,559  | 54,283  | 56,337  |
| Hourly wages (dollars per hour)                | All responding fabricators                   | \$24.89 | \$25.26 | \$27.21 | \$29.64 | \$32.19 |
| Productivity (square feet per hour)            | All responding fabricators                   | 2.8     | 3.0     | 3.4     | 3.6     | 4.0     |
| Unit labor costs (dollars per square foot)     | All responding fabricators                   | \$9.02  | \$8.42  | \$8.06  | \$8.25  | \$8.03  |

Table continued

**Table I.17 (Continued) QSP: Responding U.S. fabricators' employment related information, by item, firm type, and period**

Interim period is January through September

| Item                                           | Firm type                                    | Interim 2024 | Interim 2025 |
|------------------------------------------------|----------------------------------------------|--------------|--------------|
| Production and related workers (PRWs) (number) | Responding small-sized fabricators           | ***          | ***          |
| Production and related workers (PRWs) (number) | Responding medium-to-large-sized fabricators | ***          | ***          |
| Production and related workers (PRWs) (number) | All responding fabricators                   | 737          | 731          |
| Total hours worked (1,000 hours)               | All responding fabricators                   | 1,292        | 1,277        |
| Hours worked per PRW (hours)                   | All responding fabricators                   | 1,754        | 1,747        |
| Wages paid (\$1,000)                           | All responding fabricators                   | 40,988       | 40,263       |
| Hourly wages (dollars per hour)                | All responding fabricators                   | \$31.71      | \$31.53      |
| Productivity (square feet per hour)            | All responding fabricators                   | 3.9          | 4.0          |
| Unit labor costs (dollars per square foot)     | All responding fabricators                   | \$8.09       | \$7.79       |

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

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

**Table I.18 QSP: U.S. producers' and responding fabricators' employment related information, by item and period**

| Item                                           | 2020    | 2021    | 2022    | 2023    | 2024    |
|------------------------------------------------|---------|---------|---------|---------|---------|
| Production and related workers (PRWs) (number) | 2,000   | 2,138   | 2,158   | 2,022   | 1,859   |
| Total hours worked (1,000 hours)               | 5,126   | 5,748   | 5,804   | 5,269   | 4,903   |
| Hours worked per PRW (hours)                   | 2,563   | 2,688   | 2,689   | 2,606   | 2,638   |
| Wages paid (\$1,000)                           | 137,053 | 159,190 | 169,988 | 161,294 | 160,180 |
| Hourly wages (dollars per hour)                | \$26.74 | \$27.70 | \$29.29 | \$30.61 | \$32.67 |

Table continued.

**Table I.18 (Continued) QSP: U.S. producers' and responding fabricators' employment related information, by item and period**

Interim period is January through September

| Item                                           | Interim 2024 | Interim 2025 |
|------------------------------------------------|--------------|--------------|
| Production and related workers (PRWs) (number) | 2,147        | 2,186        |
| Total hours worked (1,000 hours)               | 3,634        | 3,652        |
| Hours worked per PRW (hours)                   | 1,693        | 1,671        |
| Wages paid (\$1,000)                           | 117,983      | 119,286      |
| Hourly wages (dollars per hour)                | \$32.47      | \$32.66      |

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

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



Table I.19 and figure I.4 present data on apparent U.S. consumption and U.S. market shares by quantity for QSP, inclusive of integrated U.S. producers and independent fabricators.

**Table I.19 QSP: Apparent U.S. consumption and market shares based on quantity data, defining the domestic industry as integrated U.S. producers and independent fabricators, by source and period**

Quantity in 1,000 square feet; Shares in percent

| Source             | Measure  | 2020    | 2021    | 2022    | 2023    | 2024    |
|--------------------|----------|---------|---------|---------|---------|---------|
| U.S. producers     | Quantity | 31,645  | 40,525  | 38,700  | 35,618  | 30,900  |
| Canada             | Quantity | 8,142   | 7,760   | 5,896   | 4,945   | 4,714   |
| China              | Quantity | 976     | 1,024   | 2,654   | 2,017   | 3,151   |
| Czechia            | Quantity | 2,514   | 3,448   | 3,879   | 2,533   | 2,911   |
| India              | Quantity | 26,924  | 54,381  | 68,521  | 56,508  | 84,547  |
| Israel             | Quantity | 9,360   | 7,274   | 6,227   | 2,491   | 1,501   |
| Italy              | Quantity | 4,077   | 5,153   | 3,221   | 1,671   | 1,121   |
| Malaysia           | Quantity | 12,385  | 16,127  | 5,836   | 4,981   | 9,990   |
| Mexico             | Quantity | 189     | 35      | 17      | 36      | 54      |
| Spain              | Quantity | 24,948  | 36,304  | 44,067  | 31,348  | 34,052  |
| Taiwan             | Quantity | 4,175   | 5,245   | 4,169   | 4,197   | 3,112   |
| Thailand           | Quantity | 1,382   | 4,053   | 13,994  | 20,518  | 27,931  |
| Turkey             | Quantity | 5,242   | 10,388  | 9,460   | 6,589   | 6,055   |
| Vietnam            | Quantity | 19,437  | 33,103  | 34,587  | 38,664  | 43,562  |
| Other FTA sources  | Quantity | 5,658   | 5,512   | 1,875   | 1,464   | 1,284   |
| All other sources  | Quantity | 5,660   | 6,660   | 6,595   | 7,096   | 9,729   |
| All import sources | Quantity | 131,069 | 196,467 | 210,999 | 185,058 | 233,715 |
| All sources        | Quantity | 162,714 | 236,992 | 249,699 | 220,676 | 264,615 |
| U.S. producers     | Share    | 19.4    | 17.1    | 15.5    | 16.1    | 11.7    |
| Canada             | Share    | 5.0     | 3.3     | 2.4     | 2.2     | 1.8     |
| China              | Share    | 0.6     | 0.4     | 1.1     | 0.9     | 1.2     |
| Czechia            | Share    | 1.5     | 1.5     | 1.6     | 1.1     | 1.1     |
| India              | Share    | 16.5    | 22.9    | 27.4    | 25.6    | 32.0    |
| Israel             | Share    | 5.8     | 3.1     | 2.5     | 1.1     | 0.6     |
| Italy              | Share    | 2.5     | 2.2     | 1.3     | 0.8     | 0.4     |
| Malaysia           | Share    | 7.6     | 6.8     | 2.3     | 2.3     | 3.8     |
| Mexico             | Share    | 0.1     | 0.0     | 0.0     | 0.0     | 0.0     |
| Spain              | Share    | 15.3    | 15.3    | 17.6    | 14.2    | 12.9    |
| Taiwan             | Share    | 2.6     | 2.2     | 1.7     | 1.9     | 1.2     |
| Thailand           | Share    | 0.8     | 1.7     | 5.6     | 9.3     | 10.6    |
| Turkey             | Share    | 3.2     | 4.4     | 3.8     | 3.0     | 2.3     |
| Vietnam            | Share    | 11.9    | 14.0    | 13.9    | 17.5    | 16.5    |
| Other FTA sources  | Share    | 3.5     | 2.3     | 0.8     | 0.7     | 0.5     |
| All other sources  | Share    | 3.5     | 2.8     | 2.6     | 3.2     | 3.7     |
| All import sources | Share    | 80.6    | 82.9    | 84.5    | 83.9    | 88.3    |
| All sources        | Share    | 100.0   | 100.0   | 100.0   | 100.0   | 100.0   |

Table continued.

**Table I.19 (Continued) QSP: Apparent U.S. consumption and market shares based on quantity data, defining the domestic industry as integrated U.S. producers and independent fabricators, by source and period**

Quantity in 1,000 square feet; Shares in percent; Interim period is January through September

| Source             | Measure  | Interim 2024 | Interim 2025 |
|--------------------|----------|--------------|--------------|
| U.S. producers     | Quantity | 23,579       | 22,114       |
| Canada             | Quantity | 3,688        | 2,584        |
| China              | Quantity | 2,570        | 405          |
| Czechia            | Quantity | 2,046        | 1,864        |
| India              | Quantity | 58,648       | 64,947       |
| Israel             | Quantity | 1,187        | 542          |
| Italy              | Quantity | 911          | 296          |
| Malaysia           | Quantity | 6,431        | 8,622        |
| Mexico             | Quantity | 30           | 65           |
| Spain              | Quantity | 24,579       | 23,414       |
| Taiwan             | Quantity | 2,402        | 1,517        |
| Thailand           | Quantity | 18,982       | 19,727       |
| Turkey             | Quantity | 4,744        | 3,709        |
| Vietnam            | Quantity | 32,629       | 29,766       |
| Other FTA sources  | Quantity | 975          | 747          |
| All other sources  | Quantity | 7,235        | 8,101        |
| All import sources | Quantity | 167,057      | 166,305      |
| All sources        | Quantity | 190,635      | 188,419      |
| U.S. producers     | Share    | 12.4         | 11.7         |
| Canada             | Share    | 1.9          | 1.4          |
| China              | Share    | 1.3          | 0.2          |
| Czechia            | Share    | 1.1          | 1.0          |
| India              | Share    | 30.8         | 34.5         |
| Israel             | Share    | 0.6          | 0.3          |
| Italy              | Share    | 0.5          | 0.2          |
| Malaysia           | Share    | 3.4          | 4.6          |
| Mexico             | Share    | 0.0          | 0.0          |
| Spain              | Share    | 12.9         | 12.4         |
| Taiwan             | Share    | 1.3          | 0.8          |
| Thailand           | Share    | 10.0         | 10.5         |
| Turkey             | Share    | 2.5          | 2.0          |
| Vietnam            | Share    | 17.1         | 15.8         |
| Other FTA sources  | Share    | 0.5          | 0.4          |
| All other sources  | Share    | 3.8          | 4.3          |
| All import sources | Share    | 87.6         | 88.3         |
| All sources        | Share    | 100.0        | 100.0        |

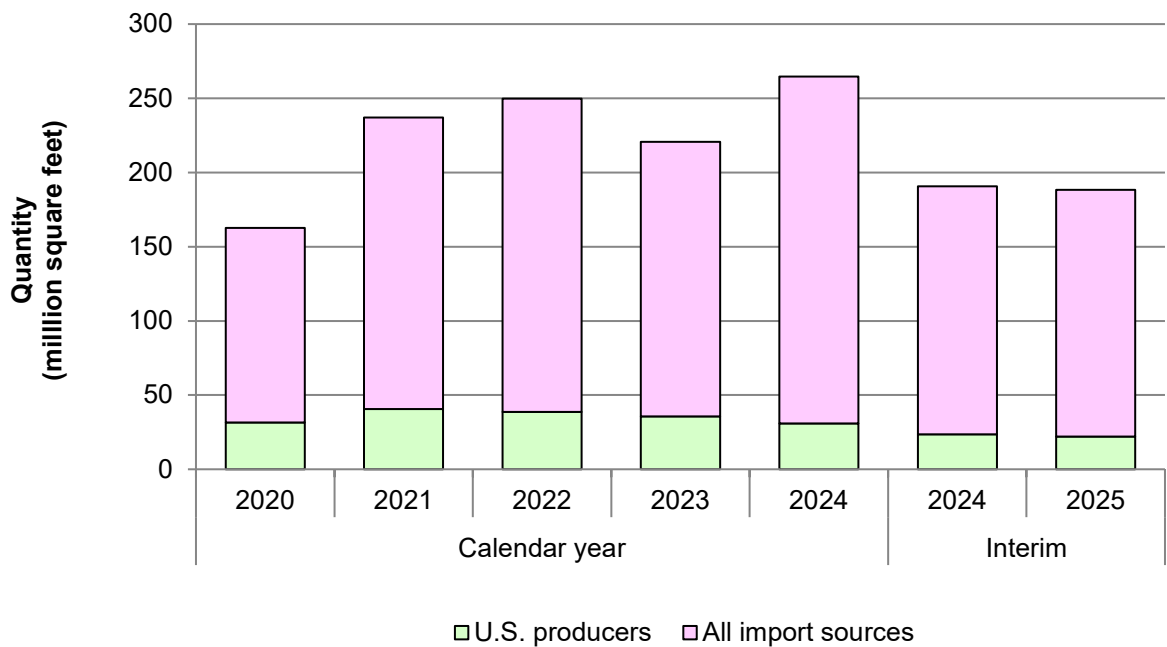
Table continued.

**Table I.19 (Continued) QSP: Apparent U.S. consumption and market shares based on quantity data, defining the domestic industry as integrated U.S. producers and independent fabricators, by source and period**

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics from the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, accessed on December 15, 2025. Imports are based on the imports for consumption data series. Official U.S. import statistics were adjusted to remove out-of-scope imports under the primary HTS numbers and add in-scope imports under other HTS numbers according to data submitted in the questionnaires.

Note: Quantity for U.S. shipments reflects only U.S. producers' U.S. shipment quantities. In measuring consumption and market share, this methodology avoids reclassifying and/or double counting merchandise already reported as an import. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

**Figure I.4 QSP: Apparent U.S. consumption based on quantity data, defining the domestic industry as integrated U.S. producers and independent fabricators, by source and period**



Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics from the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, accessed on December 15, 2025. Imports are based on the imports for consumption data series. Official U.S. import statistics were adjusted to remove out-of-scope imports under the primary HTS numbers and add in-scope imports under other HTS numbers according to data submitted in the questionnaires.

Table I.20 and figure I.5 present data on apparent U.S. consumption and U.S. market shares by value for QSP, inclusive of integrated U.S. producers and independent fabricators.

**Table I.20 QSP: Apparent U.S. consumption and market shares based on value data, defining the domestic industry as integrated U.S. producers and independent fabricators, by source and period**

Value in 1,000 dollars

| Source                                                          | Measure | 2020      | 2021      | 2022      | 2023      | 2024      |
|-----------------------------------------------------------------|---------|-----------|-----------|-----------|-----------|-----------|
| U.S. producers                                                  | Value   | 662,804   | 853,861   | 931,682   | 862,308   | 748,704   |
| Responding U.S. fabricators:<br>Value added to domestic         | Value   | ***       | ***       | ***       | ***       | ***       |
| U.S. producers and<br>responding fabricators: Fully<br>domestic | Value   | ***       | ***       | ***       | ***       | ***       |
| Responding U.S. fabricators:<br>Value added to imports          | Value   | ***       | ***       | ***       | ***       | ***       |
| U.S. producers and<br>responding fabricators: Total             | Value   | 798,330   | 1,034,649 | 1,128,268 | 1,055,336 | 946,923   |
| Canada                                                          | Value   | 92,989    | 92,961    | 80,854    | 65,264    | 58,647    |
| China                                                           | Value   | 8,306     | 11,386    | 15,318    | 8,365     | 10,306    |
| Czechia                                                         | Value   | 18,712    | 28,403    | 35,683    | 20,722    | 22,292    |
| India                                                           | Value   | 178,190   | 374,932   | 559,355   | 368,604   | 513,591   |
| Israel                                                          | Value   | 101,463   | 76,669    | 66,271    | 25,361    | 13,702    |
| Italy                                                           | Value   | 38,758    | 48,559    | 30,905    | 13,709    | 5,147     |
| Malaysia                                                        | Value   | 103,227   | 149,671   | 56,968    | 36,140    | 69,901    |
| Mexico                                                          | Value   | 1,532     | 502       | 108       | 455       | 713       |
| Spain                                                           | Value   | 270,658   | 398,494   | 374,201   | 262,527   | 232,591   |
| Taiwan                                                          | Value   | 45,683    | 59,424    | 49,580    | 39,505    | 29,560    |
| Thailand                                                        | Value   | 10,181    | 38,787    | 150,860   | 206,175   | 275,905   |
| Turkey                                                          | Value   | 43,647    | 87,717    | 83,647    | 55,489    | 46,774    |
| Vietnam                                                         | Value   | 202,315   | 349,342   | 360,581   | 339,561   | 370,790   |
| Other FTA sources                                               | Value   | 61,788    | 60,898    | 19,155    | 15,819    | 12,878    |
| All other sources                                               | Value   | 61,615    | 80,448    | 73,804    | 64,221    | 77,138    |
| All import sources                                              | Value   | 1,239,063 | 1,858,193 | 1,957,290 | 1,521,918 | 1,739,935 |
| All sources                                                     | Value   | 2,037,394 | 2,892,843 | 3,085,557 | 2,577,254 | 2,686,859 |

Table continued.

**Table I.20 (Continued) QSP: Apparent U.S. consumption and market shares based on value data, defining the domestic industry as integrated U.S. producers and independent fabricators, by source and period**

Value in 1,000 dollars; Interim period is January through September

| Source                                                    | Measure | Interim 2024 | Interim 2025 |
|-----------------------------------------------------------|---------|--------------|--------------|
| U.S. producers                                            | Value   | 572,764      | 544,649      |
| Responding U.S. fabricators: Value added to domestic      | Value   | ***          | ***          |
| U.S. producers and responding fabricators: Fully domestic | Value   | ***          | ***          |
| Responding U.S. fabricators: Value added to imports       | Value   | ***          | ***          |
| U.S. producers and responding fabricators: Total          | Value   | 720,058      | 696,515      |
| Canada                                                    | Value   | 45,706       | 31,742       |
| China                                                     | Value   | 8,063        | 1,330        |
| Czechia                                                   | Value   | 15,438       | 15,249       |
| India                                                     | Value   | 356,641      | 407,631      |
| Israel                                                    | Value   | 10,997       | 4,878        |
| Italy                                                     | Value   | 5,015        | 3,517        |
| Malaysia                                                  | Value   | 44,959       | 66,590       |
| Mexico                                                    | Value   | 455          | 1,009        |
| Spain                                                     | Value   | 184,255      | 147,580      |
| Taiwan                                                    | Value   | 23,072       | 14,469       |
| Thailand                                                  | Value   | 190,681      | 175,318      |
| Turkey                                                    | Value   | 36,428       | 30,355       |
| Vietnam                                                   | Value   | 278,177      | 258,052      |
| Other FTA sources                                         | Value   | 10,217       | 6,601        |
| All other sources                                         | Value   | 59,543       | 54,950       |
| All import sources                                        | Value   | 1,269,648    | 1,219,270    |
| All sources                                               | Value   | 1,989,706    | 1,915,785    |

Table continued.

**Table I.20 (Continued) QSP: Apparent U.S. consumption and market shares based on value data, defining the domestic industry as integrated U.S. producers and independent fabricators, by source and period**

Shares in percent

| Source                                                    | Measure | 2020  | 2021  | 2022  | 2023  | 2024  |
|-----------------------------------------------------------|---------|-------|-------|-------|-------|-------|
| U.S. producers                                            | Share   | 32.5  | 29.5  | 30.2  | 33.5  | 27.9  |
| Responding U.S. fabricators: Value added to domestic      | Share   | ***   | ***   | ***   | ***   | ***   |
| U.S. producers and responding fabricators: Fully domestic | Share   | ***   | ***   | ***   | ***   | ***   |
| Responding U.S. fabricators: Value added to imports       | Share   | ***   | ***   | ***   | ***   | ***   |
| U.S. producers and responding fabricators: Total          | Share   | 39.2  | 35.8  | 36.6  | 40.9  | 35.2  |
| Canada                                                    | Share   | 4.6   | 3.2   | 2.6   | 2.5   | 2.2   |
| China                                                     | Share   | 0.4   | 0.4   | 0.5   | 0.3   | 0.4   |
| Czechia                                                   | Share   | 0.9   | 1.0   | 1.2   | 0.8   | 0.8   |
| India                                                     | Share   | 8.7   | 13.0  | 18.1  | 14.3  | 19.1  |
| Israel                                                    | Share   | 5.0   | 2.7   | 2.1   | 1.0   | 0.5   |
| Italy                                                     | Share   | 1.9   | 1.7   | 1.0   | 0.5   | 0.2   |
| Malaysia                                                  | Share   | 5.1   | 5.2   | 1.8   | 1.4   | 2.6   |
| Mexico                                                    | Share   | 0.1   | 0.0   | 0.0   | 0.0   | 0.0   |
| Spain                                                     | Share   | 13.3  | 13.8  | 12.1  | 10.2  | 8.7   |
| Taiwan                                                    | Share   | 2.2   | 2.1   | 1.6   | 1.5   | 1.1   |
| Thailand                                                  | Share   | 0.5   | 1.3   | 4.9   | 8.0   | 10.3  |
| Turkey                                                    | Share   | 2.1   | 3.0   | 2.7   | 2.2   | 1.7   |
| Vietnam                                                   | Share   | 9.9   | 12.1  | 11.7  | 13.2  | 13.8  |
| Other FTA sources                                         | Share   | 3.0   | 2.1   | 0.6   | 0.6   | 0.5   |
| All other sources                                         | Share   | 3.0   | 2.8   | 2.4   | 2.5   | 2.9   |
| All import sources                                        | Share   | 60.8  | 64.2  | 63.4  | 59.1  | 64.8  |
| All sources                                               | Share   | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Table continued.

**Table I.20 (Continued) QSP: Apparent U.S. consumption and market shares based on value data, defining the domestic industry as integrated U.S. producers and independent fabricators, by source and period**

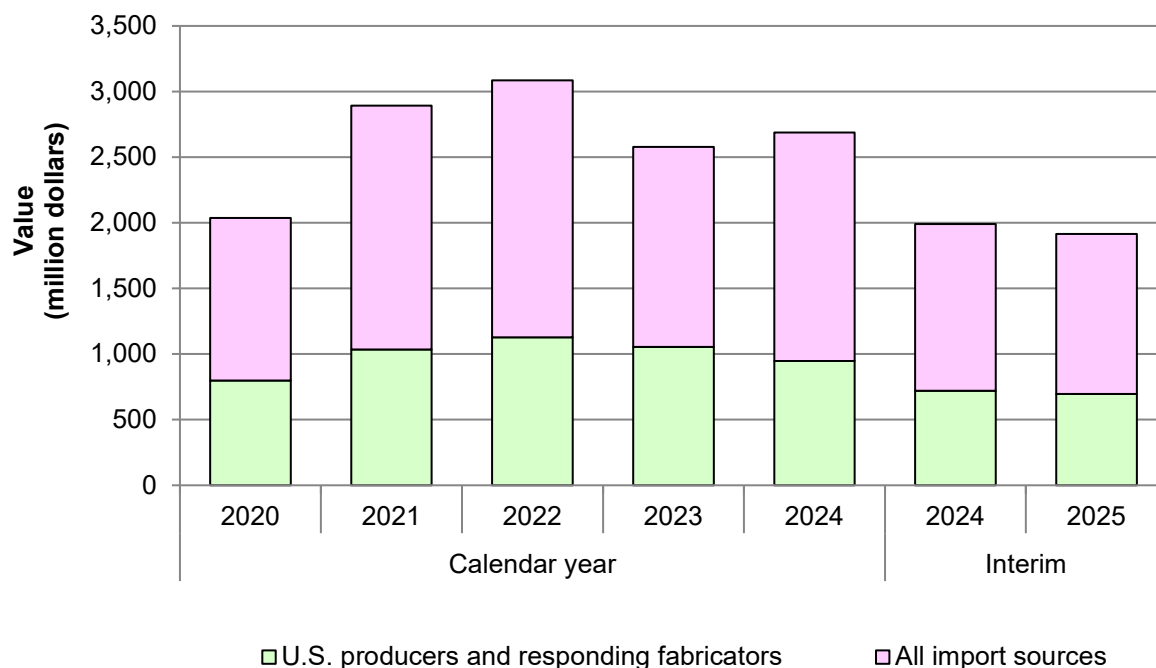
Shares in percent; Interim period is January through September

| Source                                                    | Measure | Interim 2024 | Interim 2025 |
|-----------------------------------------------------------|---------|--------------|--------------|
| U.S. producers                                            | Share   | 28.8         | 28.4         |
| Responding U.S. fabricators: Value added to domestic      | Share   | ***          | ***          |
| U.S. producers and responding fabricators: Fully domestic | Share   | ***          | ***          |
| Responding U.S. fabricators: Value added to imports       | Share   | ***          | ***          |
| U.S. producers and responding fabricators: Total          | Share   | 36.2         | 36.4         |
| Canada                                                    | Share   | 2.3          | 1.7          |
| China                                                     | Share   | 0.4          | 0.1          |
| Czechia                                                   | Share   | 0.8          | 0.8          |
| India                                                     | Share   | 17.9         | 21.3         |
| Israel                                                    | Share   | 0.6          | 0.3          |
| Italy                                                     | Share   | 0.3          | 0.2          |
| Malaysia                                                  | Share   | 2.3          | 3.5          |
| Mexico                                                    | Share   | 0.0          | 0.1          |
| Spain                                                     | Share   | 9.3          | 7.7          |
| Taiwan                                                    | Share   | 1.2          | 0.8          |
| Thailand                                                  | Share   | 9.6          | 9.2          |
| Turkey                                                    | Share   | 1.8          | 1.6          |
| Vietnam                                                   | Share   | 14.0         | 13.5         |
| Other FTA sources                                         | Share   | 0.5          | 0.3          |
| All other sources                                         | Share   | 3.0          | 2.9          |
| All import sources                                        | Share   | 63.8         | 63.6         |
| All sources                                               | Share   | 100.0        | 100.0        |

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics from the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, accessed on December 15, 2025. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values. Official U.S. import statistics were adjusted to remove out-of-scope imports under the primary HTS numbers and add in-scope imports under other HTS numbers according to data submitted in the questionnaires.

Note: Value for U.S. shipments reflects fabricated slab sold in the United States from domestically manufactured slabs (including the value added by responding U.S. fabricators to domestic slab), as well as the incremental value added by responding U.S. fabricators to imported slabs. In measuring consumption and market share, this methodology avoids reclassifying and/or double counting merchandise already reported as an import. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

**Figure I.5 QSP: Apparent U.S. consumption based on value data, defining the domestic industry as integrated U.S. producers and independent fabricators, by source and period**



Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics from the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 6810.99.0010, 6810.99.0020, and 6810.99.0040, accessed on December 15, 2025. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values. Official U.S. import statistics were adjusted to remove out-of-scope imports under the primary HTS numbers and add in-scope imports under other HTS numbers according to data submitted in the questionnaires.



**APPENDIX J**

**INDEPENDENT U.S. FABRICATORS' FINANCIAL DATA**



Table J.1 presents the financial results for firms that provided usable financial results in the medium-to-large-sized independent fabricator section of the Commission’s U.S. fabricator questionnaire.<sup>1</sup> The table shows that net sales for these firms, by both quantity and value, fluctuated but increased overall from 2020 to 2024. Net sales quantity and value in interim 2025 were lower than in interim 2024.

Raw material costs accounted for the largest share of COGS throughout the period examined, direct labor accounted for the second-highest share, and other factory costs accounted for the smallest share. The ratio of COGS to net sales decreased from 2020 to 2021, increased in 2022, and then decreased from 2022 to 2024, for an overall decrease from 2020 to 2024; it was unchanged between interim 2024 and interim 2025 when rounded to the nearest tenth of a percent.

The aggregate operating income for responding medium-to-large-sized fabricators increased from 2020 to 2022, decreased from 2022 to 2023, and then increased again from 2023 to 2024, for an overall increase from 2020 to 2024; it was lower in interim 2025 than in interim 2024.

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<sup>1</sup> Table J.1 includes the financial results of Stone Suppliers, Trind, and Wisenbaker. While \*\*\* did not meet the U.S. fabricator questionnaire’s definition of a “medium-to-large-sized” fabricator, the questionnaire gave “small-sized” fabricators the option to provide the more detailed data collected for “medium-to-large-sized” fabricators. \*\*\* will be included in all discussions of “medium-to-large-sized” fabricators in this section.

**Table J.1 QSP: U.S. medium-to-large-sized independent fabricators' results of operations, by item and period**

Quantity in 1,000 square feet; value in 1,000 dollars; ratios and shares in percent; unit values in dollars per square foot; count in number of firms reporting; interim is January through September

| Item                       | Measure       | 2020  | 2021  | 2022  | 2023  | 2024  |
|----------------------------|---------------|-------|-------|-------|-------|-------|
| Total net sales            | Quantity      | ***   | ***   | ***   | ***   | ***   |
| Total net sales            | Value         | ***   | ***   | ***   | ***   | ***   |
| COGS: Raw materials        | Value         | ***   | ***   | ***   | ***   | ***   |
| COGS: Direct labor         | Value         | ***   | ***   | ***   | ***   | ***   |
| COGS: Other factory        | Value         | ***   | ***   | ***   | ***   | ***   |
| COGS: Total                | Value         | ***   | ***   | ***   | ***   | ***   |
| Gross profit or (loss)     | Value         | ***   | ***   | ***   | ***   | ***   |
| SG&A expenses              | Value         | ***   | ***   | ***   | ***   | ***   |
| Operating income or (loss) | Value         | ***   | ***   | ***   | ***   | ***   |
| Interest expense           | Value         | ***   | ***   | ***   | ***   | ***   |
| All other expenses         | Value         | ***   | ***   | ***   | ***   | ***   |
| All other income           | Value         | ***   | ***   | ***   | ***   | ***   |
| Net income or (loss)       | Value         | ***   | ***   | ***   | ***   | ***   |
| COGS: Raw materials        | Ratio to NS   | ***   | ***   | ***   | ***   | ***   |
| COGS: Direct labor         | Ratio to NS   | ***   | ***   | ***   | ***   | ***   |
| COGS: Other factory        | Ratio to NS   | ***   | ***   | ***   | ***   | ***   |
| COGS: Total                | Ratio to NS   | ***   | ***   | ***   | ***   | ***   |
| Gross profit               | Ratio to NS   | ***   | ***   | ***   | ***   | ***   |
| SG&A expense               | Ratio to NS   | ***   | ***   | ***   | ***   | ***   |
| Operating income or (loss) | Ratio to NS   | ***   | ***   | ***   | ***   | ***   |
| Net income or (loss)       | Ratio to NS   | ***   | ***   | ***   | ***   | ***   |
| COGS: Raw materials        | Share of COGS | ***   | ***   | ***   | ***   | ***   |
| COGS: Direct labor         | Share of COGS | ***   | ***   | ***   | ***   | ***   |
| COGS: Other factory        | Share of COGS | ***   | ***   | ***   | ***   | ***   |
| COGS: Total                | Share of COGS | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |
| Total net sales            | Unit value    | ***   | ***   | ***   | ***   | ***   |
| COGS: Raw materials        | Unit value    | ***   | ***   | ***   | ***   | ***   |
| COGS: Direct labor         | Unit value    | ***   | ***   | ***   | ***   | ***   |
| COGS: Other factory        | Unit value    | ***   | ***   | ***   | ***   | ***   |
| COGS: Total                | Unit value    | ***   | ***   | ***   | ***   | ***   |
| Gross profit or (loss)     | Unit value    | ***   | ***   | ***   | ***   | ***   |
| SG&A expenses              | Unit value    | ***   | ***   | ***   | ***   | ***   |
| Operating income or (loss) | Unit value    | ***   | ***   | ***   | ***   | ***   |
| Net income or (loss)       | Unit value    | ***   | ***   | ***   | ***   | ***   |
| Operating losses           | Count         | ***   | ***   | ***   | ***   | ***   |
| Net losses                 | Count         | ***   | ***   | ***   | ***   | ***   |
| Data                       | Count         | 3     | 3     | 3     | 3     | 3     |

Table continued.

**Table J.1 (Continued) QSP: U.S. medium-to-large-sized independent fabricators' results of operations, by item and period**

Quantity in 1,000 square feet; value in 1,000 dollars; ratios and shares in percent; unit values in dollars per square foot; count in number of firms reporting; interim is January through September

| Item                       | Measure       | Interim 2024 | Interim 2025 |
|----------------------------|---------------|--------------|--------------|
| Total net sales            | Quantity      | ***          | ***          |
| Total net sales            | Value         | ***          | ***          |
| COGS: Raw materials        | Value         | ***          | ***          |
| COGS: Direct labor         | Value         | ***          | ***          |
| COGS: Other factory        | Value         | ***          | ***          |
| COGS: Total                | Value         | ***          | ***          |
| Gross profit or (loss)     | Value         | ***          | ***          |
| SG&A expenses              | Value         | ***          | ***          |
| Operating income or (loss) | Value         | ***          | ***          |
| Interest expense           | Value         | ***          | ***          |
| All other expenses         | Value         | ***          | ***          |
| All other income           | Value         | ***          | ***          |
| Net income or (loss)       | Value         | ***          | ***          |
| COGS: Raw materials        | Ratio to NS   | ***          | ***          |
| COGS: Direct labor         | Ratio to NS   | ***          | ***          |
| COGS: Other factory        | Ratio to NS   | ***          | ***          |
| COGS: Total                | Ratio to NS   | ***          | ***          |
| Gross profit               | Ratio to NS   | ***          | ***          |
| SG&A expense               | Ratio to NS   | ***          | ***          |
| Operating income or (loss) | Ratio to NS   | ***          | ***          |
| Net income or (loss)       | Ratio to NS   | ***          | ***          |
| COGS: Raw materials        | Share of COGS | ***          | ***          |
| COGS: Direct labor         | Share of COGS | ***          | ***          |
| COGS: Other factory        | Share of COGS | ***          | ***          |
| COGS: Total                | Share of COGS | 100.0        | 100.0        |
| Total net sales            | Unit value    | ***          | ***          |
| COGS: Raw materials        | Unit value    | ***          | ***          |
| COGS: Direct labor         | Unit value    | ***          | ***          |
| COGS: Other factory        | Unit value    | ***          | ***          |
| COGS: Total                | Unit value    | ***          | ***          |
| Gross profit or (loss)     | Unit value    | ***          | ***          |
| SG&A expenses              | Unit value    | ***          | ***          |
| Operating income or (loss) | Unit value    | ***          | ***          |
| Net income or (loss)       | Unit value    | ***          | ***          |
| Operating losses           | Count         | ***          | ***          |
| Net losses                 | Count         | ***          | ***          |
| Data                       | Count         | 3            | 3            |

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

**Table J.2 QSP: Changes in AUVs between comparison periods for responding U.S. medium-to-large-sized independent fabricators**

Changes in percent; interim is January through September

| Item                | 2020–24 | 2020–21 | 2021–22 | 2022–23 | 2023–24 | Interim<br>2024–25 |
|---------------------|---------|---------|---------|---------|---------|--------------------|
| Total net sales     | ▲ ***   | ▲ ***   | ▼ ***   | ▲ ***   | ▼ ***   | ▲ ***              |
| COGS: Raw materials | ▼ ***   | ▼ ***   | ▲ ***   | ▼ ***   | ▼ ***   | ▲ ***              |
| COGS: Direct labor  | ▼ ***   | ▲ ***   | ▼ ***   | ▲ ***   | ▼ ***   | ▲ ***              |
| COGS: Other factory | ▲ ***   | ▲ ***   | ▼ ***   | ▲ ***   | ▼ ***   | ▲ ***              |
| COGS: Total         | ▼ ***   | ▲ ***   | ▲ ***   | ▼ ***   | ▼ ***   | ▲ ***              |

Table continued.

**Table J.2 (Continued) QSP: Changes in AUVs between comparison periods for responding U.S. medium-to-large-sized independent fabricators**

Changes in dollars per square foot; interim is January through September

| Item                       | 2020–24 | 2020–21 | 2021–22 | 2022–23 | 2023–24 | Interim<br>2024–25 |
|----------------------------|---------|---------|---------|---------|---------|--------------------|
| Total net sales            | ▲ ***   | ▲ ***   | ▼ ***   | ▲ ***   | ▼ ***   | ▲ ***              |
| COGS: Raw materials        | ▼ ***   | ▼ ***   | ▲ ***   | ▼ ***   | ▼ ***   | ▲ ***              |
| COGS: Direct labor         | ▼ ***   | ▲ ***   | ▼ ***   | ▲ ***   | ▼ ***   | ▲ ***              |
| COGS: Other factory        | ▲ ***   | ▲ ***   | ▼ ***   | ▲ ***   | ▼ ***   | ▲ ***              |
| COGS: Total                | ▼ ***   | ▲ ***   | ▲ ***   | ▼ ***   | ▼ ***   | ▲ ***              |
| Gross profit or (loss)     | ▲ ***   | ▲ ***   | ▼ ***   | ▲ ***   | ▼ ***   | ▲ ***              |
| SG&A expense               | ▲ ***   | ▲ ***   | ▼ ***   | ▲ ***   | ▼ ***   | ▲ ***              |
| Operating income or (loss) | ▲ ***   | ▲ ***   | ▲ ***   | ▼ ***   | ▲ ***   | ▼ ***              |
| Net income or (loss)       | ▲ ***   | ▲ ***   | ▲ ***   | ▼ ***   | ▲ ***   | ▼ ***              |

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

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

Table J.3 presents the financial results of 20 independent fabricators that provided usable financial data in the small-sized fabricator section of the U.S. producer questionnaire.<sup>2</sup> The table shows that net sales for small fabricators, by both quantity and value, increased overall from 2020 to 2024 and were higher in interim 2025 than in interim 2024.<sup>3</sup>

The ratio of COGS to net sales value for the small-sized fabricators increased from 2020 to 2022 and then decreased from 2022 to 2024, for an overall decrease from 2020 to 2024; it was higher in interim 2025 than in interim 2024. The aggregate operating income increased overall from 2020 to 2024 but was lower in interim 2025 than in interim 2024.

**Table J.3 QSP: U.S. small-sized independent fabricators' results of operations, by item and period**

Quantity in 1,000 square feet; value in 1,000 dollars; ratios in percent; unit values in dollars per square foot; count in number of firms reporting; interim is January through September

| Item                       | Measure     | 2020 | 2021 | 2022 | 2023 | 2024 |
|----------------------------|-------------|------|------|------|------|------|
| Total net sales            | Quantity    | ***  | ***  | ***  | ***  | ***  |
| Total net sales            | Value       | ***  | ***  | ***  | ***  | ***  |
| COGS: Total                | Value       | ***  | ***  | ***  | ***  | ***  |
| Gross profit or (loss)     | Value       | ***  | ***  | ***  | ***  | ***  |
| SG&A expenses              | Value       | ***  | ***  | ***  | ***  | ***  |
| Operating income or (loss) | Value       | ***  | ***  | ***  | ***  | ***  |
| COGS: Total                | Ratio to NS | ***  | ***  | ***  | ***  | ***  |
| Gross profit               | Ratio to NS | ***  | ***  | ***  | ***  | ***  |
| SG&A expense               | Ratio to NS | ***  | ***  | ***  | ***  | ***  |
| Operating income or (loss) | Ratio to NS | ***  | ***  | ***  | ***  | ***  |
| Total net sales            | Unit value  | ***  | ***  | ***  | ***  | ***  |
| COGS: Total                | Unit value  | ***  | ***  | ***  | ***  | ***  |
| Gross profit or (loss)     | Unit value  | ***  | ***  | ***  | ***  | ***  |
| SG&A expenses              | Unit value  | ***  | ***  | ***  | ***  | ***  |
| Operating income or (loss) | Unit value  | ***  | ***  | ***  | ***  | ***  |
| Operating losses           | Count       | ***  | ***  | ***  | ***  | ***  |
| Data                       | Count       | 19   | 20   | 20   | 20   | 20   |

Table continued.

<sup>2</sup> The small-sized independent fabricators included are: \*\*\*. An additional firm, \*\*\*.

<sup>3</sup> Interim period data were not provided by \*\*\*. These companies accounted for \*\*\* percent, respectively, of the small-sized independent fabricators' aggregate net sales quantity in 2024.

**Table J.3 (Continued) QSP: U.S. small-sized independent fabricators' results of operations, by item and period**

Quantity in 1,000 square feet; value in 1,000 dollars; ratios in percent; unit values in dollars per square foot; count in number of firms reporting; interim is January through September

| Item                       | Measure     | Interim 2024 | Interim 2025 |
|----------------------------|-------------|--------------|--------------|
| Total net sales            | Quantity    | ***          | ***          |
| Total net sales            | Value       | ***          | ***          |
| COGS: Total                | Value       | ***          | ***          |
| Gross profit or (loss)     | Value       | ***          | ***          |
| SG&A expenses              | Value       | ***          | ***          |
| Operating income or (loss) | Value       | ***          | ***          |
| COGS: Total                | Ratio to NS | ***          | ***          |
| Gross profit               | Ratio to NS | ***          | ***          |
| SG&A expense               | Ratio to NS | ***          | ***          |
| Operating income or (loss) | Ratio to NS | ***          | ***          |
| Total net sales            | Unit value  | ***          | ***          |
| COGS: Total                | Unit value  | ***          | ***          |
| Gross profit or (loss)     | Unit value  | ***          | ***          |
| SG&A expenses              | Unit value  | ***          | ***          |
| Operating income or (loss) | Unit value  | ***          | ***          |
| Operating losses           | Count       | ***          | ***          |
| Data                       | Count       | 18           | 18           |

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

**Table J.4 QSP: Changes in AUVs between comparison periods for responding U.S. small-sized independent fabricators**

Percent change (%Δ) in percent; changes (Δ) in dollars per square foot; interim period is January through September

| Item                       | Measure       | 2020–24 | 2020–21 | 2021–22 | 2022–23 | 2023–24 | Interim 2024–25 |
|----------------------------|---------------|---------|---------|---------|---------|---------|-----------------|
| Total net sales            | %Δ Unit value | ▼***    | ▲***    | ▼***    | ▼***    | ▼***    | ▼***            |
| COGS: Total                | %Δ Unit value | ▼***    | ▲***    | ▲***    | ▼***    | ▼***    | ▲***            |
| Total net sales            | Δ Unit value  | ▼***    | ▲***    | ▼***    | ▼***    | ▼***    | ▼***            |
| COGS: Total                | Δ Unit value  | ▼***    | ▲***    | ▲***    | ▼***    | ▼***    | ▲***            |
| Gross profit or (loss)     | Δ Unit value  | ▼***    | ▼***    | ▼***    | ▲***    | ▼***    | ▼***            |
| SG&A expense               | Δ Unit value  | ▼***    | ▲***    | ▲***    | ▲***    | ▼***    | ▼***            |
| Operating income or (loss) | Δ Unit value  | ▼***    | ▼***    | ▼***    | ▲***    | ▲***    | ▼***            |

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

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



**Table J.5 QSP: Independent U.S. fabricators' (all sizes) results of operations, by item and period**

Quantity in 1,000 square feet; value in 1,000 dollars; ratios in percent; unit values in dollars per square foot; count in number of firms reporting; interim is January through September

| Item                       | Measure     | 2020    | 2021    | 2022    | 2023    | 2024    |
|----------------------------|-------------|---------|---------|---------|---------|---------|
| Total net sales            | Quantity    | 4,269   | 5,074   | 6,292   | 5,963   | 6,306   |
| Total net sales            | Value       | 199,391 | 253,978 | 302,869 | 290,870 | 289,241 |
| COGS: Total                | Value       | 121,378 | 154,328 | 191,912 | 175,885 | 168,811 |
| Gross profit or (loss)     | Value       | 78,014  | 99,650  | 110,956 | 114,986 | 120,430 |
| SG&A expenses              | Value       | 56,264  | 75,004  | 80,498  | 86,421  | 84,418  |
| Operating income or (loss) | Value       | 21,750  | 24,646  | 30,458  | 28,565  | 36,012  |
| COGS: Total                | Ratio to NS | 60.9    | 60.8    | 63.4    | 60.5    | 58.4    |
| Gross profit               | Ratio to NS | 39.1    | 39.2    | 36.6    | 39.5    | 41.6    |
| SG&A expense               | Ratio to NS | 28.2    | 29.5    | 26.6    | 29.7    | 29.2    |
| Operating income or (loss) | Ratio to NS | 10.9    | 9.7     | 10.1    | 9.8     | 12.5    |
| Total net sales            | Unit value  | 46.71   | 50.06   | 48.14   | 48.78   | 45.87   |
| COGS: Total                | Unit value  | 28.43   | 30.42   | 30.50   | 29.50   | 26.77   |
| Gross profit or (loss)     | Unit value  | 18.27   | 19.64   | 17.64   | 19.28   | 19.10   |
| SG&A expenses              | Unit value  | 13.18   | 14.78   | 12.79   | 14.49   | 13.39   |
| Operating income or (loss) | Unit value  | 5.09    | 4.86    | 4.84    | 4.79    | 5.71    |
| Operating losses           | Count       | 1       | 2       | 1       | 3       | 1       |
| Data                       | Count       | 22      | 23      | 23      | 23      | 23      |

Table continued.

**Table J.5 (Continued) QSP: Independent U.S. fabricators' (all sizes) results of operations, by item and period**

Quantity in 1,000 square feet; value in 1,000 dollars; ratios in percent; unit values in dollars per square foot; count in number of firms reporting; interim is January through September

| Item                       | Measure     | Interim 2024 | Interim 2025 |
|----------------------------|-------------|--------------|--------------|
| Total net sales            | Quantity    | 4,611        | 4,641        |
| Total net sales            | Value       | 216,392      | 223,695      |
| COGS: Total                | Value       | 126,320      | 133,038      |
| Gross profit or (loss)     | Value       | 90,072       | 90,658       |
| SG&A expenses              | Value       | 63,710       | 64,876       |
| Operating income or (loss) | Value       | 26,362       | 25,781       |
| COGS: Total                | Ratio to NS | 58.4         | 59.5         |
| Gross profit               | Ratio to NS | 41.6         | 40.5         |
| SG&A expense               | Ratio to NS | 29.4         | 29.0         |
| Operating income or (loss) | Ratio to NS | 12.2         | 11.5         |
| Total net sales            | Unit value  | 46.93        | 48.20        |
| COGS: Total                | Unit value  | 27.40        | 28.67        |
| Gross profit or (loss)     | Unit value  | 19.53        | 19.54        |
| SG&A expenses              | Unit value  | 13.82        | 13.98        |
| Operating income or (loss) | Unit value  | 5.72         | 5.56         |
| Operating losses           | Count       | 0            | 0            |
| Data                       | Count       | 21           | 21           |

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

Note: For the small-sized fabricators, approximately four-tenths of their combined fabrication relied on domestically produced slab \*\*\*. U.S. fabricator questionnaires, sections 2.2, 3.6, and 5.5.

Note: \*\*\*. Emails from \*\*\*, on January 21, February 3, February 26, March 9, and March 10, 2026. However, in its fabricator questionnaire response, \*\*\*. Based on this information, staff estimates that imported slab accounted for more than half of the medium-to-large-sized fabricators' purchased slab during the period examined (\*\*\* percent in 2024). \*\*\* U.S. fabricator questionnaire, sections 5.3 and 5.5; email from \*\*\*, March 10, 2026.

**Table J.6 QSP: Changes in AUVs between comparison periods for independent U.S. fabricators (all sizes)**

Percent change (%Δ) in percent; changes (Δ) in dollars per square foot; interim period is January through September

| Item                       | Measure       | 2020–24 | 2020–21 | 2021–22 | 2022–23 | 2023–24 | Interim 2024–25 |
|----------------------------|---------------|---------|---------|---------|---------|---------|-----------------|
| Total net sales            | %Δ Unit value | ▼(1.8)  | ▲7.2    | ▼(3.8)  | ▲1.3    | ▼(6.0)  | ▲2.7            |
| COGS: Total                | %Δ Unit value | ▼(5.8)  | ▲7.0    | ▲0.3    | ▼(3.3)  | ▼(9.2)  | ▲4.6            |
| Total net sales            | Δ Unit value  | ▼(0.84) | ▲3.35   | ▼(1.92) | ▲0.64   | ▼(2.91) | ▲1.27           |
| COGS: Total                | Δ Unit value  | ▼(1.66) | ▲1.98   | ▲0.09   | ▼(1.01) | ▼(2.73) | ▲1.27           |
| Gross profit or (loss)     | Δ Unit value  | ▲0.82   | ▲1.37   | ▼(2.01) | ▲1.65   | ▼(0.18) | ▲0.00           |
| SG&A expense               | Δ Unit value  | ▲0.21   | ▲1.60   | ▼(1.99) | ▲1.70   | ▼(1.11) | ▲0.16           |
| Operating income or (loss) | Δ Unit value  | ▲0.62   | ▼(0.24) | ▼(0.02) | ▼(0.05) | ▲0.92   | ▼(0.16)         |

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

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

**Table J.7 QSP: U.S. producers’ and independent fabricators’ combined results of operations, by item and period**

Quantity in 1,000 square feet; value in 1,000 dollars; ratios in percent; unit values in dollars per square foot; count in number of firms reporting; interim is January through September

| Item                       | Measure     | 2020    | 2021      | 2022      | 2023      | 2024      |
|----------------------------|-------------|---------|-----------|-----------|-----------|-----------|
| Total net sales            | Quantity    | 39,209  | 49,778    | 49,174    | 44,680    | 38,771    |
| Total net sales            | Value       | 905,380 | 1,168,704 | 1,298,124 | 1,205,535 | 1,063,246 |
| COGS: Total                | Value       | 568,157 | 747,588   | 850,774   | 772,160   | 647,213   |
| Gross profit or (loss)     | Value       | 337,223 | 421,116   | 447,350   | 433,375   | 416,033   |
| SG&A expenses              | Value       | 251,736 | 314,840   | 360,073   | 347,390   | 329,469   |
| Operating income or (loss) | Value       | 85,486  | 106,277   | 87,277    | 85,985    | 86,564    |
| COGS: Total                | Ratio to NS | 62.8    | 64.0      | 65.5      | 64.1      | 60.9      |
| Gross profit               | Ratio to NS | 37.2    | 36.0      | 34.5      | 35.9      | 39.1      |
| SG&A expense               | Ratio to NS | 27.8    | 26.9      | 27.7      | 28.8      | 31.0      |
| Operating income or (loss) | Ratio to NS | 9.4     | 9.1       | 6.7       | 7.1       | 8.1       |
| Total net sales            | Unit value  | 23.09   | 23.48     | 26.40     | 26.98     | 27.42     |
| COGS: Total                | Unit value  | 14.49   | 15.02     | 17.30     | 17.28     | 16.69     |
| Gross profit or (loss)     | Unit value  | 8.60    | 8.46      | 9.10      | 9.70      | 10.73     |
| SG&A expenses              | Unit value  | 6.42    | 6.32      | 7.32      | 7.78      | 8.50      |
| Operating income or (loss) | Unit value  | 2.18    | 2.13      | 1.77      | 1.92      | 2.23      |
| Operating losses           | Count       | 4       | 5         | 3         | 6         | 4         |
| Data                       | Count       | 28      | 29        | 29        | 30        | 30        |

Table continued.

**Table J.7 (Continued) QSP: U.S. producers' and independent fabricators' combined results of operations, by item and period**

Quantity in 1,000 square feet; value in 1,000 dollars; ratios in percent; unit values in dollars per square foot; count in number of firms reporting; interim is January through September

| Item                       | Measure     | Interim 2024 | Interim 2025 |
|----------------------------|-------------|--------------|--------------|
| Total net sales            | Quantity    | 29,478       | 28,156       |
| Total net sales            | Value       | 809,301      | 784,606      |
| COGS: Total                | Value       | 487,647      | 482,747      |
| Gross profit or (loss)     | Value       | 321,654      | 301,860      |
| SG&A expenses              | Value       | 248,548      | 254,208      |
| Operating income or (loss) | Value       | 73,106       | 47,651       |
| COGS: Total                | Ratio to NS | 60.3         | 61.5         |
| Gross profit               | Ratio to NS | 39.7         | 38.5         |
| SG&A expense               | Ratio to NS | 30.7         | 32.4         |
| Operating income or (loss) | Ratio to NS | 9.0          | 6.1          |
| Total net sales            | Unit value  | 27.45        | 27.87        |
| COGS: Total                | Unit value  | 16.54        | 17.15        |
| Gross profit or (loss)     | Unit value  | 10.91        | 10.72        |
| SG&A expenses              | Unit value  | 8.43         | 9.03         |
| Operating income or (loss) | Unit value  | 2.48         | 1.69         |
| Operating losses           | Count       | 4            | 4            |
| Data                       | Count       | 28           | 28           |

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

Note: In tables that have combined financial results for U.S. producers and fabricators, there will be double counting of net sales and raw material costs to the extent that fabricators used U.S.-produced QSP slabs. While there can be some small differences in timing, the double counting essentially cancels out in the calculation of combined profits since the net sale reported by the slab producer in these transactions is also recorded as a raw material cost by the fabricator.

**Table J.8 QSP: Changes in AUVs between comparison periods for U.S. producers and independent fabricators**

Percent change (%Δ) in percent; changes (Δ) in dollars per square foot; interim period is January through September

| Item                       | Measure       | 2020–24 | 2020–21 | 2021–22 | 2022–23 | 2023–24 | Interim 2024–25 |
|----------------------------|---------------|---------|---------|---------|---------|---------|-----------------|
| Total net sales            | %Δ Unit value | ▲18.8   | ▲1.7    | ▲12.4   | ▲2.2    | ▲1.6    | ▲1.5            |
| COGS: Total                | %Δ Unit value | ▲15.2   | ▲3.6    | ▲15.2   | ▼(0.1)  | ▼(3.4)  | ▲3.6            |
| Total net sales            | Δ Unit value  | ▲4.33   | ▲0.39   | ▲2.92   | ▲0.58   | ▲0.44   | ▲0.41           |
| COGS: Total                | Δ Unit value  | ▲2.20   | ▲0.53   | ▲2.28   | ▼(0.02) | ▼(0.59) | ▲0.60           |
| Gross profit or (loss)     | Δ Unit value  | ▲2.13   | ▼(0.14) | ▲0.64   | ▲0.60   | ▲1.03   | ▼(0.19)         |
| SG&A expense               | Δ Unit value  | ▲2.08   | ▼(0.10) | ▲1.00   | ▲0.45   | ▲0.72   | ▲0.60           |
| Operating income or (loss) | Δ Unit value  | ▲0.05   | ▼(0.05) | ▼(0.36) | ▲0.15   | ▲0.31   | ▼(0.79)         |

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

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

Table J.9 presents the fixed and variable costs for U.S. medium-to-large-sized independent fabricators, while table J.10 presents the combined fixed and variable costs for U.S. producers and medium-to-large-sized independent fabricators. Table J.9 shows that over three-quarters of the medium-to-large-sized fabricators’ COGS are classified as variable costs, whereas the vast majority of their SG&A expenses are classified as fixed costs. For operating expenses combined, a little less than two-thirds are classified as variable costs. Table J.10 shows a similar pattern for U.S. producers and medium-to-large-sized fabricators combined costs, but when compared with table J.9, it shows higher shares of variable costs for COGS and SG&A expenses, and a lower share for total operating expenses.

**Table J.9 QSP: U.S. medium-to-large-sized independent fabricators’ fixed and variable costs in 2024, by type and classification**

Value in 1,000 dollars; shares in percent

| Item                     | Measure | COGS  | SG&A expenses | Operating expenses |
|--------------------------|---------|-------|---------------|--------------------|
| Variable costs           | Value   | ***   | ***           | ***                |
| Fixed costs              | Value   | ***   | ***           | ***                |
| Variable and fixed costs | Value   | ***   | ***           | ***                |
| Variable costs           | Share   | ***   | ***           | ***                |
| Fixed costs              | Share   | ***   | ***           | ***                |
| Variable and fixed costs | Share   | 100.0 | 100.0         | 100.0              |

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

**Table J.10 QSP: U.S. producers' and medium-to-large-sized independent fabricators' combined fixed and variable costs in 2024, by type and classification**

Value in 1,000 dollars; shares in percent

| Item                     | Measure | COGS  | SG&A expenses | Operating expenses |
|--------------------------|---------|-------|---------------|--------------------|
| Variable costs           | Value   | ***   | ***           | ***                |
| Fixed costs              | Value   | ***   | ***           | ***                |
| Variable and fixed costs | Value   | ***   | ***           | ***                |
| Variable costs           | Share   | ***   | ***           | ***                |
| Fixed costs              | Share   | ***   | ***           | ***                |
| Variable and fixed costs | Share   | 100.0 | 100.0         | 100.0              |

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

Table J.11 shows capital expenditures, R&D expenses, and total assets for medium-to-large-sized fabricators. The table shows that these firms' capital expenditures increased from 2020 to 2021 and then decreased from 2021 to 2024, for an overall decrease between 2020 and 2024; they were higher in interim 2025 than in interim 2024. R&D expenses remained unchanged (\*\*\*) throughout the period examined. Total assets increased each year from 2020 to 2024, whereas the operating ROA increased from 2020 to 2022, decreased from 2022 to 2023, and then increased again from 2023 to 2024, for an overall increase from 2020 to 2024.

**Table J.11 QSP: U.S. medium-to-large-sized independent fabricators' capital expenditures, R&D expenses, total assets, and operating ROA, by period**

Values in 1,000 dollars; interim period is January through September

| Item                 | 2020 | 2021 | 2022 | 2023 | 2024 | Interim 2024 | Interim 2025 |
|----------------------|------|------|------|------|------|--------------|--------------|
| Capital expenditures | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| R&D expenses         | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Total assets         | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Operating ROA        | ***  | ***  | ***  | ***  | ***  | ***          | ***          |

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

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

**Table J.12 QSP: U.S. medium-to-large-sized fabricators' narrative descriptions of their capital expenditures, R&D expenses, and total assets**

| Firm            | Item                 | Narrative on items |
|-----------------|----------------------|--------------------|
| Stone Suppliers | Capital expenditures | ***                |
| Trind           | Capital expenditures | ***                |
| Wisenbaker      | Capital expenditures | ***                |
| Stone Suppliers | Total assets         | ***                |
| Trind           | Total assets         | ***                |
| Wisenbaker      | Total assets         | ***                |

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

Table J.13 shows capital expenditures, R&D expenses, and total assets for medium-to-large-sized fabricators and U.S. producers, combined. The table shows that capital expenditures increased from 2020 to 2022 and then decreased from 2022 to 2024, for an overall decrease between 2020 and 2024; they were higher in interim 2025 than in interim 2024. R&D expenses increased from 2020 to 2024 and were higher in interim 2025 than in interim 2024. Total assets increased from 2020 to 2022 and then decreased from 2022 to 2024, for an overall increase from 2020 to 2024. Operating ROA fluctuated but decreased overall from 2020 to 2024.

**Table J.13 QSP: U.S. producers and medium-to-large-sized independent fabricators' combined capital expenditures, R&D expenses, total assets, and operating ROA, by period**

Values in 1,000 dollars; interim period is January through September

| Item                 | 2020 | 2021 | 2022 | 2023 | 2024 | Interim 2024 | Interim 2025 |
|----------------------|------|------|------|------|------|--------------|--------------|
| Capital expenditures | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| R&D expenses         | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Total assets         | ***  | ***  | ***  | ***  | ***  | ***          | ***          |
| Operating ROA        | ***  | ***  | ***  | ***  | ***  | ***          | ***          |

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





**APPENDIX K**

**IMPORT PRICE DATA BY SOURCE**



**Table K.1 QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Canada<br>price | Canada<br>quantity | Canada<br>margin | China<br>price | China<br>quantity | China<br>margin |
|---------|---------------|------------------|-----------------|--------------------|------------------|----------------|-------------------|-----------------|
| 2020 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |

Table continued.

Note: Product 1: Plain white quartz surface products in slab form, with a nominal thickness of 2 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Czechia<br>price | Czechia<br>quantity | Czechia<br>margin | India<br>price | India<br>quantity | India<br>margin |
|---------|---------------|------------------|------------------|---------------------|-------------------|----------------|-------------------|-----------------|
| 2020 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2020 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2020 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2020 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2025 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2025 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2025 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |

Table continued.

Note: Product 1: Plain white quartz surface products in slab form, with a nominal thickness of 2 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Israel<br>price | Israel<br>quantity | Israel<br>margin | Italy<br>price | Italy<br>quantity | Italy<br>margin |
|---------|---------------|------------------|-----------------|--------------------|------------------|----------------|-------------------|-----------------|
| 2020 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |

Table continued.

Note: Product 1: Plain white quartz surface products in slab form, with a nominal thickness of 2 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Malaysia<br>price | Malaysia<br>quantity | Malaysia<br>margin | Mexico<br>price | Mexico<br>quantity | Mexico<br>margin |
|---------|---------------|------------------|-------------------|----------------------|--------------------|-----------------|--------------------|------------------|
| 2020 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |

Table continued.

Note: Product 1: Plain white quartz surface products in slab form, with a nominal thickness of 2 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Spain<br>price | Spain<br>quantity | Spain<br>margin | Taiwan<br>price | Taiwan<br>quantity | Taiwan<br>margin |
|---------|---------------|------------------|----------------|-------------------|-----------------|-----------------|--------------------|------------------|
| 2020 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2020 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2020 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2020 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2025 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2025 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2025 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |

Table continued.

Note: Product 1: Plain white quartz surface products in slab form, with a nominal thickness of 2 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Thailand<br>price | Thailand<br>quantity | Thailand<br>margin | Turkey<br>price | Turkey<br>quantity | Turkey<br>margin |
|---------|---------------|------------------|-------------------|----------------------|--------------------|-----------------|--------------------|------------------|
| 2020 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |

Table continued.

Note: Product 1: Plain white quartz surface products in slab form, with a nominal thickness of 2 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.



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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Vietnam<br>price | Vietnam<br>quantity | Vietnam<br>margin | Other<br>FTA<br>partners<br>price | Other<br>FTA<br>partners<br>quantity | Other<br>FTA<br>partners<br>margin |
|---------|---------------|------------------|------------------|---------------------|-------------------|-----------------------------------|--------------------------------------|------------------------------------|
| 2020 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2020 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2020 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2020 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2025 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2025 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2025 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |

Table continued.

Note: Product 1: Plain white quartz surface products in slab form, with a nominal thickness of 2 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | All other<br>sources<br>price | All other<br>sources<br>quantity | All other<br>sources<br>margin | All<br>import<br>sources<br>price | All<br>import<br>sources<br>quantity | All<br>import<br>sources<br>margin |
|---------|---------------|------------------|-------------------------------|----------------------------------|--------------------------------|-----------------------------------|--------------------------------------|------------------------------------|
| 2020 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2020 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2020 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2020 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2025 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2025 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2025 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |

Table continued.

Note: Product 1: Plain white quartz surface products in slab form, with a nominal thickness of 2 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

Note: Quantity shown as "0" represent values greater than zero, but less than "500". Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

**Table K.2 QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Canada<br>price | Canada<br>quantity | Canada<br>margin | China<br>price | China<br>quantity | China<br>margin |
|---------|---------------|------------------|-----------------|--------------------|------------------|----------------|-------------------|-----------------|
| 2020 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |

Table continued.

Note: Product 2: Plain white quartz surface products in slab form, with a nominal thickness of 3 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Czechia<br>price | Czechia<br>quantity | Czechia<br>margin | India<br>price | India<br>quantity | India<br>margin |
|---------|---------------|------------------|------------------|---------------------|-------------------|----------------|-------------------|-----------------|
| 2020 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2020 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2020 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2020 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2025 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2025 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2025 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |

Table continued.

Note: Product 2: Plain white quartz surface products in slab form, with a nominal thickness of 3 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Israel<br>price | Israel<br>quantity | Israel<br>margin | Italy<br>price | Italy<br>quantity | Italy<br>margin |
|---------|---------------|------------------|-----------------|--------------------|------------------|----------------|-------------------|-----------------|
| 2020 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |

Table continued.

Note: Product 2: Plain white quartz surface products in slab form, with a nominal thickness of 3 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Malaysia<br>price | Malaysia<br>quantity | Malaysia<br>margin | Mexico<br>price | Mexico<br>quantity | Mexico<br>margin |
|---------|---------------|------------------|-------------------|----------------------|--------------------|-----------------|--------------------|------------------|
| 2020 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |

Table continued.

Note: Product 2: Plain white quartz surface products in slab form, with a nominal thickness of 3 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Spain<br>price | Spain<br>quantity | Spain<br>margin | Taiwan<br>price | Taiwan<br>quantity | Taiwan<br>margin |
|---------|---------------|------------------|----------------|-------------------|-----------------|-----------------|--------------------|------------------|
| 2020 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2020 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2020 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2020 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2025 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2025 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2025 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |

Table continued.

Note: Product 2: Plain white quartz surface products in slab form, with a nominal thickness of 3 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Thailand<br>price | Thailand<br>quantity | Thailand<br>margin | Turkey<br>price | Turkey<br>quantity | Turkey<br>margin |
|---------|---------------|------------------|-------------------|----------------------|--------------------|-----------------|--------------------|------------------|
| 2020 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |

Table continued.

Note: Product 2: Plain white quartz surface products in slab form, with a nominal thickness of 3 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.



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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Vietnam<br>price | Vietnam<br>quantity | Vietnam<br>margin | Other<br>FTA<br>partners<br>price | Other<br>FTA<br>partners<br>quantity | Other<br>FTA<br>partners<br>margin |
|---------|---------------|------------------|------------------|---------------------|-------------------|-----------------------------------|--------------------------------------|------------------------------------|
| 2020 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2020 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2020 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2020 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2025 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2025 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2025 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |

Table continued.

Note: Product 2: Plain white quartz surface products in slab form, with a nominal thickness of 3 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | All other<br>sources<br>price | All other<br>sources<br>quantity | All other<br>sources<br>margin | All<br>import<br>sources<br>price | All<br>import<br>sources<br>quantity | All<br>import<br>sources<br>margin |
|---------|---------------|------------------|-------------------------------|----------------------------------|--------------------------------|-----------------------------------|--------------------------------------|------------------------------------|
| 2020 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2020 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2020 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2020 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2025 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2025 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2025 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |

Table continued.

Note: Product 2: Plain white quartz surface products in slab form, with a nominal thickness of 3 cm, no veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

Note: Quantity shown as "0" represent values greater than zero, but less than "500". Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

**Table K.3 QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Canada<br>price | Canada<br>quantity | Canada<br>margin | China<br>price | China<br>quantity | China<br>margin |
|---------|---------------|------------------|-----------------|--------------------|------------------|----------------|-------------------|-----------------|
| 2020 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |

Table continued.

Note: Product 3: White quartz surface products with a “marble look” in slab form, a nominal thickness of 2 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Czechia<br>price | Czechia<br>quantity | Czechia<br>margin | India<br>price | India<br>quantity | India<br>margin |
|---------|---------------|------------------|------------------|---------------------|-------------------|----------------|-------------------|-----------------|
| 2020 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2020 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2020 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2020 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2025 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2025 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2025 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |

Table continued.

Note: Product 3: White quartz surface products with a “marble look” in slab form, a nominal thickness of 2 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Israel<br>price | Israel<br>quantity | Israel<br>margin | Italy<br>price | Italy<br>quantity | Italy<br>margin |
|---------|---------------|------------------|-----------------|--------------------|------------------|----------------|-------------------|-----------------|
| 2020 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |

Table continued.

Note: Product 3: White quartz surface products with a “marble look” in slab form, a nominal thickness of 2 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Malaysia<br>price | Malaysia<br>quantity | Malaysia<br>margin | Mexico<br>price | Mexico<br>quantity | Mexico<br>margin |
|---------|---------------|------------------|-------------------|----------------------|--------------------|-----------------|--------------------|------------------|
| 2020 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |

Table continued.

Note: Product 3: White quartz surface products with a “marble look” in slab form, a nominal thickness of 2 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Spain<br>price | Spain<br>quantity | Spain<br>margin | Taiwan<br>price | Taiwan<br>quantity | Taiwan<br>margin |
|---------|---------------|------------------|----------------|-------------------|-----------------|-----------------|--------------------|------------------|
| 2020 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2020 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2020 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2020 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2025 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2025 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2025 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |

Table continued.

Note: Product 3: White quartz surface products with a “marble look” in slab form, a nominal thickness of 2 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Thailand<br>price | Thailand<br>quantity | Thailand<br>margin | Turkey<br>price | Turkey<br>quantity | Turkey<br>margin |
|---------|---------------|------------------|-------------------|----------------------|--------------------|-----------------|--------------------|------------------|
| 2020 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |

Table continued.

Note: Product 3: White quartz surface products with a “marble look” in slab form, a nominal thickness of 2 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.



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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Vietnam<br>price | Vietnam<br>quantity | Vietnam<br>margin | Other<br>FTA<br>partners<br>price | Other<br>FTA<br>partners<br>quantity | Other<br>FTA<br>partners<br>margin |
|---------|---------------|------------------|------------------|---------------------|-------------------|-----------------------------------|--------------------------------------|------------------------------------|
| 2020 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2020 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2020 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2020 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2025 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2025 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2025 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |

Table continued.

Note: Product 3: White quartz surface products with a “marble look” in slab form, a nominal thickness of 2 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | All other<br>sources<br>price | All other<br>sources<br>quantity | All other<br>sources<br>margin | All<br>import<br>sources<br>price | All<br>import<br>sources<br>quantity | All<br>import<br>sources<br>margin |
|---------|---------------|------------------|-------------------------------|----------------------------------|--------------------------------|-----------------------------------|--------------------------------------|------------------------------------|
| 2020 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2020 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2020 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2020 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2025 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2025 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2025 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |

Table continued.

Note: Product 3: White quartz surface products with a “marble look” in slab form, a nominal thickness of 2 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

Note: Quantity shown as "0" represent values greater than zero, but less than "500". Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

**Table K.4 QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Canada<br>price | Canada<br>quantity | Canada<br>margin | China<br>price | China<br>quantity | China<br>margin |
|---------|---------------|------------------|-----------------|--------------------|------------------|----------------|-------------------|-----------------|
| 2020 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |

Table continued.

Note: Product 4: White quartz surface products with a “marble look” in slab form, a nominal thickness of 3 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Czechia<br>price | Czechia<br>quantity | Czechia<br>margin | India<br>price | India<br>quantity | India<br>margin |
|---------|---------------|------------------|------------------|---------------------|-------------------|----------------|-------------------|-----------------|
| 2020 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2020 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2020 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2020 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2025 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2025 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2025 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |

Table continued.

Note: Product 4: White quartz surface products with a “marble look” in slab form, a nominal thickness of 3 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Israel<br>price | Israel<br>quantity | Israel<br>margin | Italy<br>price | Italy<br>quantity | Italy<br>margin |
|---------|---------------|------------------|-----------------|--------------------|------------------|----------------|-------------------|-----------------|
| 2020 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |

Table continued.

Note: Product 4: White quartz surface products with a “marble look” in slab form, a nominal thickness of 3 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Malaysia<br>price | Malaysia<br>quantity | Malaysia<br>margin | Mexico<br>price | Mexico<br>quantity | Mexico<br>margin |
|---------|---------------|------------------|-------------------|----------------------|--------------------|-----------------|--------------------|------------------|
| 2020 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |

Table continued.

Note: Product 4: White quartz surface products with a “marble look” in slab form, a nominal thickness of 3 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Spain<br>price | Spain<br>quantity | Spain<br>margin | Taiwan<br>price | Taiwan<br>quantity | Taiwan<br>margin |
|---------|---------------|------------------|----------------|-------------------|-----------------|-----------------|--------------------|------------------|
| 2020 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2020 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2020 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2020 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2025 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2025 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2025 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |

Table continued.

Note: Product 4: White quartz surface products with a “marble look” in slab form, a nominal thickness of 3 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Thailand<br>price | Thailand<br>quantity | Thailand<br>margin | Turkey<br>price | Turkey<br>quantity | Turkey<br>margin |
|---------|---------------|------------------|-------------------|----------------------|--------------------|-----------------|--------------------|------------------|
| 2020 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |

Table continued.

Note: Product 4: White quartz surface products with a “marble look” in slab form, a nominal thickness of 3 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.



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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Vietnam<br>price | Vietnam<br>quantity | Vietnam<br>margin | Other<br>FTA<br>partners<br>price | Other<br>FTA<br>partners<br>quantity | Other<br>FTA<br>partners<br>margin |
|---------|---------------|------------------|------------------|---------------------|-------------------|-----------------------------------|--------------------------------------|------------------------------------|
| 2020 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2020 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2020 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2020 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2025 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2025 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2025 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |

Table continued.

Note: Product 4: White quartz surface products with a “marble look” in slab form, a nominal thickness of 3 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

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

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | All other<br>sources<br>price | All other<br>sources<br>quantity | All other<br>sources<br>margin | All<br>import<br>sources<br>price | All<br>import<br>sources<br>quantity | All<br>import<br>sources<br>margin |
|---------|---------------|------------------|-------------------------------|----------------------------------|--------------------------------|-----------------------------------|--------------------------------------|------------------------------------|
| 2020 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2020 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2020 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2020 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2025 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2025 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2025 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |

Table continued.

Note: Product 4: White quartz surface products with a “marble look” in slab form, a nominal thickness of 3 cm, with veining or movement, and with minimal to no visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

Note: Quantity shown as "0" represent values greater than zero, but less than "500". Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

**Table K.5 QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Canada<br>price | Canada<br>quantity | Canada<br>margin | China<br>price | China<br>quantity | China<br>margin |
|---------|---------------|------------------|-----------------|--------------------|------------------|----------------|-------------------|-----------------|
| 2020 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |

Table continued.

Note: Product 5: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 2 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Table K.5 (Continued) QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Czechia<br>price | Czechia<br>quantity | Czechia<br>margin | India<br>price | India<br>quantity | India<br>margin |
|---------|---------------|------------------|------------------|---------------------|-------------------|----------------|-------------------|-----------------|
| 2020 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2020 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2020 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2020 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2025 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2025 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2025 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |

Table continued.

Note: Product 5: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 2 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Table K.5 (Continued) QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Israel<br>price | Israel<br>quantity | Israel<br>margin | Italy<br>price | Italy<br>quantity | Italy<br>margin |
|---------|---------------|------------------|-----------------|--------------------|------------------|----------------|-------------------|-----------------|
| 2020 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |

Table continued.

Note: Product 5: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 2 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Table K.5 (Continued) QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Malaysia<br>price | Malaysia<br>quantity | Malaysia<br>margin | Mexico<br>price | Mexico<br>quantity | Mexico<br>margin |
|---------|---------------|------------------|-------------------|----------------------|--------------------|-----------------|--------------------|------------------|
| 2020 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |

Table continued.

Note: Product 5: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 2 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Table K.5 (Continued) QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Spain<br>price | Spain<br>quantity | Spain<br>margin | Taiwan<br>price | Taiwan<br>quantity | Taiwan<br>margin |
|---------|---------------|------------------|----------------|-------------------|-----------------|-----------------|--------------------|------------------|
| 2020 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2020 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2020 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2020 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2025 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2025 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2025 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |

Table continued.

Note: Product 5: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 2 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Table K.5 (Continued) QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Thailand<br>price | Thailand<br>quantity | Thailand<br>margin | Turkey<br>price | Turkey<br>quantity | Turkey<br>margin |
|---------|---------------|------------------|-------------------|----------------------|--------------------|-----------------|--------------------|------------------|
| 2020 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |

Table continued.

Note: Product 5: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 2 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.



**Table K.5 (Continued) QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Vietnam<br>price | Vietnam<br>quantity | Vietnam<br>margin | Other<br>FTA<br>partners<br>price | Other<br>FTA<br>partners<br>quantity | Other<br>FTA<br>partners<br>margin |
|---------|---------------|------------------|------------------|---------------------|-------------------|-----------------------------------|--------------------------------------|------------------------------------|
| 2020 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2020 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2020 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2020 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2025 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2025 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2025 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |

Table continued.

Note: Product 5: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 2 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Table K.5 (Continued) QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | All other<br>sources<br>price | All other<br>sources<br>quantity | All other<br>sources<br>margin | All<br>import<br>sources<br>price | All<br>import<br>sources<br>quantity | All<br>import<br>sources<br>margin |
|---------|---------------|------------------|-------------------------------|----------------------------------|--------------------------------|-----------------------------------|--------------------------------------|------------------------------------|
| 2020 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2020 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2020 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2020 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2025 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2025 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2025 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |

Table continued.

Note: Product 5: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 2 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

Note: Quantity shown as "0" represent values greater than zero, but less than "500". Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

**Table K.6 QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 6, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Canada<br>price | Canada<br>quantity | Canada<br>margin | China<br>price | China<br>quantity | China<br>margin |
|---------|---------------|------------------|-----------------|--------------------|------------------|----------------|-------------------|-----------------|
| 2020 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |

Table continued.

Note: Product 6: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 3 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Table K.6 (Continued) QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 6, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Czechia<br>price | Czechia<br>quantity | Czechia<br>margin | India<br>price | India<br>quantity | India<br>margin |
|---------|---------------|------------------|------------------|---------------------|-------------------|----------------|-------------------|-----------------|
| 2020 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2020 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2020 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2020 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2021 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2022 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2023 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2024 Q4 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2025 Q1 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2025 Q2 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |
| 2025 Q3 | ***           | ***              | ***              | ***                 | ***               | ***            | ***               | ***             |

Table continued.

Note: Product 6: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 3 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Table K.6 (Continued) QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 6, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Israel<br>price | Israel<br>quantity | Israel<br>margin | Italy<br>price | Italy<br>quantity | Italy<br>margin |
|---------|---------------|------------------|-----------------|--------------------|------------------|----------------|-------------------|-----------------|
| 2020 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2020 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2021 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2022 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2023 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2024 Q4 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q1 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q2 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |
| 2025 Q3 | ***           | ***              | ***             | ***                | ***              | ***            | ***               | ***             |

Table continued.

Note: Product 6: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 3 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Table K.6 (Continued) QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 6, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Malaysia<br>price | Malaysia<br>quantity | Malaysia<br>margin | Mexico<br>price | Mexico<br>quantity | Mexico<br>margin |
|---------|---------------|------------------|-------------------|----------------------|--------------------|-----------------|--------------------|------------------|
| 2020 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |

Table continued.

Note: Product 6: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 3 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Table K.6 (Continued) QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 6, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Spain<br>price | Spain<br>quantity | Spain<br>margin | Taiwan<br>price | Taiwan<br>quantity | Taiwan<br>margin |
|---------|---------------|------------------|----------------|-------------------|-----------------|-----------------|--------------------|------------------|
| 2020 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2020 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2020 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2020 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2021 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2022 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2023 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2024 Q4 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2025 Q1 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2025 Q2 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |
| 2025 Q3 | ***           | ***              | ***            | ***               | ***             | ***             | ***                | ***              |

Table continued.

Note: Product 6: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 3 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Table K.6 (Continued) QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 6, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Thailand<br>price | Thailand<br>quantity | Thailand<br>margin | Turkey<br>price | Turkey<br>quantity | Turkey<br>margin |
|---------|---------------|------------------|-------------------|----------------------|--------------------|-----------------|--------------------|------------------|
| 2020 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2020 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2021 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2022 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2023 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2024 Q4 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q1 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q2 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |
| 2025 Q3 | ***           | ***              | ***               | ***                  | ***                | ***             | ***                | ***              |

Table continued.

Note: Product 6: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 3 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.



**Table K.6 (Continued) QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 6, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | Vietnam<br>price | Vietnam<br>quantity | Vietnam<br>margin | Other<br>FTA<br>partners<br>price | Other<br>FTA<br>partners<br>quantity | Other<br>FTA<br>partners<br>margin |
|---------|---------------|------------------|------------------|---------------------|-------------------|-----------------------------------|--------------------------------------|------------------------------------|
| 2020 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2020 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2020 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2020 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2021 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2022 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2023 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2024 Q4 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2025 Q1 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2025 Q2 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |
| 2025 Q3 | ***           | ***              | ***              | ***                 | ***               | ***                               | ***                                  | ***                                |

Table continued.

Note: Product 6: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 3 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

**Table K.6 (Continued) QSP: Weighted-average f.o.b. prices and quantities of domestic and imported product 6, and margins of underselling/(overselling), by source and quarter**

Quantity in 1,000 square feet; Prices in dollars per square foot; Margins in percent

| Period  | U.S.<br>price | U.S.<br>quantity | All other<br>sources<br>price | All other<br>sources<br>quantity | All other<br>sources<br>margin | All<br>import<br>sources<br>price | All<br>import<br>sources<br>quantity | All<br>import<br>sources<br>margin |
|---------|---------------|------------------|-------------------------------|----------------------------------|--------------------------------|-----------------------------------|--------------------------------------|------------------------------------|
| 2020 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2020 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2020 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2020 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2021 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2022 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2023 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2024 Q4 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2025 Q1 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2025 Q2 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |
| 2025 Q3 | ***           | ***              | ***                           | ***                              | ***                            | ***                               | ***                                  | ***                                |

Table continued.

Note: Product 6: Neutral colored quartz surface products with a “natural stone look” in slab form, a nominal thickness of 3 cm, with movement and visible particulates, specks, chips, or crystals that are sold to firms other than distributors.

Note: Quantity shown as "0" represent values greater than zero, but less than "500". Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

**Table K.7 QSP: Instances and quantities of underselling/overselling and the range and average of margins, by source**

Quantity in 1,000 square feet; Margins in percent

| Sources            | Type         | Number of instances | Quantity | Average margin | Min margin | Max margin |
|--------------------|--------------|---------------------|----------|----------------|------------|------------|
| Canada             | Underselling | 118                 | ***      | ***            | ***        | ***        |
| China              | Underselling | 114                 | ***      | ***            | ***        | ***        |
| Czechia            | Underselling | 133                 | ***      | ***            | ***        | ***        |
| India              | Underselling | 136                 | ***      | ***            | ***        | ***        |
| Israel             | Underselling | 130                 | ***      | ***            | ***        | ***        |
| Italy              | Underselling | 115                 | ***      | ***            | ***        | ***        |
| Malaysia           | Underselling | 136                 | ***      | ***            | ***        | ***        |
| Mexico             | Underselling | —                   | ***      | ***            | ***        | ***        |
| Spain              | Underselling | 138                 | ***      | ***            | ***        | ***        |
| Taiwan             | Underselling | 49                  | ***      | ***            | ***        | ***        |
| Thailand           | Underselling | 91                  | ***      | ***            | ***        | ***        |
| Turkey             | Underselling | 137                 | ***      | ***            | ***        | ***        |
| Vietnam            | Underselling | 132                 | ***      | ***            | ***        | ***        |
| Other FTA partners | Underselling | 125                 | ***      | ***            | ***        | ***        |
| All other sources  | Underselling | 133                 | ***      | ***            | ***        | ***        |
| Canada             | Overselling  | —                   | ***      | ***            | ***        | ***        |
| China              | Overselling  | 10                  | ***      | ***            | ***        | ***        |
| Czechia            | Overselling  | 5                   | ***      | ***            | ***        | ***        |
| India              | Overselling  | 2                   | ***      | ***            | ***        | ***        |
| Israel             | Overselling  | 7                   | ***      | ***            | ***        | ***        |
| Italy              | Overselling  | 23                  | ***      | ***            | ***        | ***        |
| Malaysia           | Overselling  | 1                   | ***      | ***            | ***        | ***        |
| Mexico             | Overselling  | —                   | ***      | ***            | ***        | ***        |
| Spain              | Overselling  | —                   | ***      | ***            | ***        | ***        |
| Taiwan             | Overselling  | 2                   | ***      | ***            | ***        | ***        |
| Thailand           | Overselling  | 20                  | ***      | ***            | ***        | ***        |
| Turkey             | Overselling  | 1                   | ***      | ***            | ***        | ***        |
| Vietnam            | Overselling  | 6                   | ***      | ***            | ***        | ***        |
| Other FTA partners | Overselling  | 13                  | ***      | ***            | ***        | ***        |
| All other sources  | Overselling  | 5                   | ***      | ***            | ***        | ***        |

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

Note: Instances represent the number of valid comparisons included where there was both a domestic price and import price comparison reported by the specified criteria. Quantity represents the imported quantity for the pricing data included in the specified comparisons. Margins present the price differences between imported product and domestic product, with positive margins indicating imports pricing was below domestic pricing and negative margins indicating imports pricing was above domestic pricing in the specified comparisons. Margins shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive, underselling) and greater than "(0.05)" percent (if negative, overselling). Zeroes, null values, and undefined calculations are suppressed and shown as "—".

