



GREENHOUSE GAS (GHG) EMISSIONS INTENSITIES QUESTIONNAIRE: COMPANY-LEVEL

U.S. INTERNATIONAL TRADE COMMISSION
sa.emissions@usitc.gov

You are receiving this questionnaire because the U.S. International Trade Commission (Commission or USITC) has identified your company as having one or more facilities that **produced covered steel and aluminum products** in the United States in 2022. Your response will be treated as confidential and information from your response will only be referenced in a way that ensures anonymity. If your company did not produce steel or aluminum products in 2022, contact the team at the email address above.

The U.S. Trade Representative (Trade Representative) has requested that the U.S. International Trade Commission (Commission or USITC) generate estimates of the highest and average GHG emissions intensities for steel and aluminum products produced in the United States, which the Trade Representative states will inform discussions regarding the proposed Global Arrangement on Sustainable Steel and Aluminum. The products covered in this request are the steel and aluminum products noted in attachment B of the Trade Representative's [request letter](#), a list that corresponds with the scope of imported goods listed in Presidential Proclamations 9704 and 9705 of March 8, 2018 ([83 Fed. Reg. 11619](#) and [83 Fed. Reg. 11625](#), respectively, both issued March 15, 2018).

In her request, the USTR has specified the Commission use a survey of firms with facilities producing these steel and aluminum products in the United States, as well as external public data sources, to develop these emissions intensity estimates. In response, the Commission has instituted this factfinding investigation (Inv. No. 332-598) and has issued this questionnaire to collect information directly from the facilities producing these covered products.

Your company is required by law to respond to this questionnaire.

Follow all instructions and submit your response to the web-based questionnaire no later than **April 22, 2024**.

OMB number: 3117-0234; Expiration date: 03/31/2027

No response is required if a currently valid OMB control number is not displayed.

The Commission is requesting this information under the authority of section 332(g) of the Tariff Act of 1930 (19 U.S.C. § 1332(g)). Completing the questionnaire is mandatory, and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your possession (19 U.S.C. § 1333(a)).

You can learn more about this investigation and the questionnaire at the following website: <https://www.usitc.gov/saemissions>. Contact the project team at sa.emissions@usitc.gov or at (202) 780-0230 with any additional questions.

Confidentiality

The Commission has designated the information you provide in response to this questionnaire as “confidential business information,” unless such information is otherwise available to the public. The Commission may aggregate the information you provide with information from other questionnaire responses. The Commission will not publish information obtained from your questionnaire or an aggregation of your and other questionnaire responses in a manner that would identify your company/facility or reveal the operations of your company/facility. Section 332(g) of the Tariff Act of 1930 (19 U.S.C. § 1332(g)) provides that the Commission may not release information that it considers to be confidential business information unless the party submitting such information had notice, at the time of submission, that such information would be released by the Commission, or such party subsequently consents to the release of the information. Note that, although the U.S. Environmental Protection Agency (EPA) treats GHG emissions data it collects under the Greenhouse Gas Reporting Program (GHGRP) as public, the various input and production data that are not reported by the EPA but are collected by the Commission in this investigation will be treated as confidential business information consistent with the explanation above.

Distinction between EPA Greenhouse Gas Reporting Program data collection and reporting thresholds and USITC data collection in this questionnaire

To fulfill the Trade Representative's request for GHG emissions intensity of steel and aluminum product categories as specified in her letter, the Commission is collecting three broad types of data in this questionnaire:

- 1) Data inputs needed to generate facility-level estimates of scope 1 and 2 emissions related to the production of steel and aluminum and scope 3 emissions associated with the material and resource inputs for the production of steel and aluminum,
- 2) Production quantities of products produced at the facility, and
- 3) Data needed to allocate the emissions to different products if multiple products are produced at the same facility.

U.S. facilities from covered sources emitting 25,000 metric tons or more of carbon dioxide equivalent (CO₂e) of GHG emissions annually are required to report their scope 1 emissions to the EPA under the GHGRP on a yearly basis (40 C.F.R. §§ 98.2(a), 98.3(b)). To avoid redundant data collection, the Commission will not duplicate the data collection of the scope 1 emissions totals of GHGRP reporting facilities that have already provided these data to the EPA. The Commission will be collecting data inputs needed to generate scope 2 and scope 3 emissions, production quantity of various steel and aluminum products at the facility, and any information needed to allocate the scope 1 emissions data reported under the GHGRP.

For facilities with emissions falling beneath the EPA's 25,000 metric ton CO₂e annual GHG emissions GHGRP reporting threshold, the Commission has designed this questionnaire to gather data inputs relevant to the calculation of scope 1, 2, and 3 emissions. The Commission has endeavored to collect these data inputs to allow for the calculation of scope 1 emissions totals that are consistent with totals that would be generated under the GHGRP reporting methodologies, to the extent practicable.

Instructions for Completing the Questionnaire

1. **Accessing the questionnaire.** To provide your company's or facility's response to this questionnaire, use the secure interactive website version, accessible at this link:

<https://www.usitc.gov/saemissions>

You received a notification letter or email that includes a 10-character questionnaire token. Type the website link above into an internet browser (or click the link above) and access the questionnaire for online completion using your 10-character questionnaire token. If you have issues with your token or accessing the questionnaire, please email sa.emissions@usitc.gov for assistance.

Note that **orange** text indicates the word or phrase as defined in the glossary. **[Blue bracketed]** text indicates skip logic associated with a question or a sub-question.

2. **Entering information.** Answer each question as it applies to your company or facility. Some questions require you to answer by using the provided checkboxes; others require a response to be typed into entry areas. The questionnaire automatically saves your response as you navigate through, and you can leave and return at any time (using the same questionnaire access procedures noted above) until you submit your response. You will have an opportunity to review your answers, edit them, and download a copy of your questionnaire response before submitting it. You must contact the project team to make any changes after you have submitted your questionnaire response.

3. **Entering numeric data.** Enter numeric data in actual units (as indicated within the question text)—not in thousands, millions, or other multiples of units. Do not add commas between digits or shorten the figure with a decimal point. For example, for 123.4 million short tons, enter "123400000" (do not enter "123400" or "123.4" or "123,400,000").

4. **Questionnaire structure.** This questionnaire collects data for calendar year 2022, is composed of eight sections, and will be completed in two parts as follows:

- 1) Your company representative will fill out, certify, and submit your company's response to the company-level questionnaire, identifying your facilities that produce covered steel or aluminum products. You will be asked to provide a point of contact—including name and email—for each facility. This point of contact can be the same person for all facilities or vary by facility.
- 2) Contacts for each facility in your response to the company-level questionnaire will receive an email from the Commission with a questionnaire token specific to that facility, a link to the questionnaire, and instructions on completing the facility-level questionnaire. If the point of contact is the same for multiple facilities, they will receive an email and questionnaire token for each facility.

Read and answer section 1 questions carefully because these responses will determine which questions you must complete in every section that follows. Much of the questionnaire contains material-specific or product-specific questions that will not be displayed to facilities that do not indicate they use those materials or produce specific products in section 1.

5. **Submitting the questionnaire.** After you have completed and reviewed all applicable sections, you may download a copy before submitting. Select the “submit” button to securely send your final response.

How to report information about your company (section 1.1)

1. **Company-level questionnaire.** Each company will receive one questionnaire token to complete section 1.1. In this section, companies will be asked to report contact information for each facility owned by the company that produced covered steel and/or aluminum products in 2022. If your company only has one production facility, please complete section 1.1 and list your company as a facility. Company-level questionnaire tokens are not valid to complete a facility-level response. *Note that the forthcoming facility level questionnaire is not intended for facilities that are only processors of steel or aluminum. As an exception to the definition above, facilities that solely produce secondary unwrought aluminum from other forms of secondary unwrought aluminum and facilities that solely heat treat steel products are not considered processors and should provide a response to the questionnaire.*

If your company is a holding company without operations, please contact the project team at sa.emissions@usitc.gov or at (202) 780-0230 for further instruction.

U.S. affiliates of foreign companies. Please respond as if the affiliate were an independent company operating in the United States. Please note that this questionnaire is intended for U.S.-located facilities only.

Definitions/Glossary

Aluminum—aluminum products covered under this investigation, include unwrought aluminum, whether alloyed or unalloyed, and wrought aluminum bars, rods, profiles, wire, plates, sheets, strip, foil, tubes, pipes, pipe and tube fittings, and forgings, and castings. Note: for a full list of products covered in this investigation, see attachment B to the Trade Representative’s letter requesting this investigation, which you can download [here](#).

Aluminum, primary unwrought—aluminum, whether in cast or liquid form but not further machined or processed, (either pure or alloyed) produced directly from the electrolytic smelting of alumina, typically at a primary smelter. For the purposes of this questionnaire, primary unwrought aluminum production includes all activities related to production occurring at the smelter, as well as on-site anode baking, casting (if applicable) and any sort of finishing steps, e.g., heat treatment, that occurs after casting, such as homogenizing (if applicable). It also includes heating of any other inputs such as alloys or aluminum scrap into the production process.

Aluminum, secondary unwrought—aluminum, whether in cast or liquid form but not further machined or processed, produced by melting down aluminum scrap, usually along with some primary aluminum and alloying metals. Includes secondary unwrought aluminum produced from dross. For the purposes of this questionnaire, secondary unwrought aluminum production includes any preheating or delacquering of aluminum scrap, heating of inputs such as primary unwrought aluminum or alloys, melting, casting (if applicable), and any sort of finishing steps, e.g., heat treatment, that occurs after casting, such as homogenizing (if applicable).

Aluminum, unwrought—ingots, slabs, blocks, billets, sows, etc., produced by casting molten aluminum of either primary or secondary origin, but not further machined or processed, other than by simple trimming, scalping, or descaling. Unwrought aluminum products are defined in this investigation as those corresponding to HTS heading 7601.

Aluminum, wrought—rolled, drawn, extruded, forged, or otherwise mechanically worked (formed) aluminum products. For the purposes of this questionnaire, this includes aluminum bars, rods, profiles, plates, sheets, strip, foil, wire, pipe, tube, pipe and tube fittings, castings (such as die castings or sand castings), and forgings. Wrought aluminum products are defined in this investigation as those corresponding to HTS headings 7604, 7605, 7606, 7607, 7608, 7609, and HTS statistical reporting numbers 7616.99.5160 and 7616.99.5170. For the purposes of this questionnaire, wrought aluminum production includes the rolling, drawing, extruding, forging, die-casting or foundry casting of any unwrought aluminum product into one or more of the product groups included in this definition. It includes the transformation of a wrought product into another wrought product (e.g., sheet to foil). Wrought aluminum production includes any preheating of unwrought aluminum inputs that are required before the rolling, drawing, extruding, forging, die-casting, or foundry casting processes. It also includes any finishing steps, e.g., heat treatment, that occurs after the wrought product is shaped such as precipitation heat-treating, or aging (if applicable).

Carbon and other alloy steel—all steels other than stainless steel (including nonalloy steel, low-alloy steel, silicon electrical steel, high-speed steel, silico-manganese steel, tool steel, chipper-knife steel, heat-resisting steel, ball bearing steel, etc.).

Covered steel and aluminum products—products that fall under the Harmonized Tariff Schedule of the United States (HTS) tariff lines and statistical annotations listed in attachment B of the letter from the Trade Representative requesting this investigation. See her request letter [here](#).

Facility—a manufacturing site located on one or more contiguous or adjacent properties under common operational control. Note: if you are reporting under the GHGRP, your facility in this questionnaire response should map to a facility registered in your company’s Electronic Greenhouse Gas Reporting Tool (e-GGRT) user account.

Greenhouse gas (GHG)—gases, both naturally occurring and generated from human-related activities such as household, commercial, and industrial applications and processes, that trap heat in the atmosphere. This questionnaire uses the definition of GHG as defined by the GHGRP in 40 C.F.R. § 98.6, which is carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and other fluorinated greenhouse gases.

Greenhouse Gas Reporting Program (GHGRP)—the EPA’s mandatory program established under 40 C.F.R. § 98. This program requires annual reporting of greenhouse gas (GHG) data and other relevant information from large GHG-emitting facilities, fuel and industrial gas suppliers, and CO₂ injection sites in the United States. Emissions data collected under this program from facilities are limited to select scope 1 emissions as defined in the regulation. Only U.S. facilities annually emitting over 25,000 metric tons (mt) of these emissions are required to report their emissions to the EPA under the GHGRP (40 C.F.R. §§ 98.2(a), 98.3(b)).

Operational control/operated—a company has operational control over a facility or process (it “operates” the facility/process) if the company or one of its subsidiaries has the full authority to introduce and implement its operating policies to the facility/process. A toll producer has operational control of a facility if it controls production, even if it does not own the inputs or outputs of that production.

Parent company—a single company that has a controlling interest in another company or joint venture. A parent company can also be the ultimate owner.

Processor—a facility that solely engages in light manufacturing processes that do not result in the transformation of covered products into different categories of covered products. Product categories for covered steel and aluminum products are listed in question 1.2.3. Examples of processors are service centers that solely cut or slit steel or aluminum, facilities that solely thread tubular products, or facilities that lightly manufacture steel or aluminum prior to use in the production of downstream goods.

Produce/production—Production includes manufacturing processes that transform inputs and covered products into different categories of inputs and covered products. In addition, it includes certain specific manufacturing processes that do not result in transformation of covered products into different categories: these are (1) the manufacturing of secondary unwrought aluminum from other forms of secondary unwrought aluminum and (2) heat treatment of steel products in a standalone facility. Other light manufacturing processes that occur in facilities where the above transformations occur are also considered production.

Scope 1 emissions—direct GHG emissions that occur from sources that are controlled or owned by an organization, including process emissions and combustion emissions. Note: the Trade Representative’s request specifies that this investigation will collect information to calculate scope 1 emissions that are associated with the production of covered steel and aluminum products in the United States.

Scope 2 emissions—indirect GHG emissions associated with the purchase of electricity, steam, heat, or cooling. Although scope 2 emissions physically occur at the facility where they are generated, they are accounted for in an organization’s GHG inventory because they are a result of the organization’s energy use. Note: the Trade Representative’s request specifies that this investigation will collect information to

calculate scope 2 emissions that are associated with the production of covered steel and aluminum products in the United States.

Scope 3 emissions—indirect GHG emissions are the result of activities from assets not controlled by the reporting facility, but that the facility indirectly affects in its value chain. Scope 3 emissions include all sources not within an organization’s scope 1 and 2 boundary. The scope 3 emissions for one facility are the scope 1 and 2 emissions of another facility. Note: the Trade Representative’s request specifies that this investigation will collect information to calculate a specific subset scope 3 emissions that are associated with the upstream intermediate steel and aluminum inputs purchased from other sources and used in the production of covered steel and aluminum products in the United States.

Semifinished/crude steel—includes ingots, blooms, slabs, billets, and beam blanks (whether batch or continuously cast), as well as liquid steel not cast into a form on-site. Stainless semifinished/crude steel includes products corresponding to HTS heading 7218. Carbon and other alloy semifinished/crude steel include products corresponding to HTS headings 7206, 7207, and 7224.

Stainless steel—alloy steels containing, by weight, 1.2 percent or less of carbon and 10.5 percent or more of chromium, with or without other elements.

Steel—steel products that are covered under this investigation. Includes carbon, stainless, and other alloy semifinished/crude steel and downstream steel products, including flat and long steel products and steel tubular products. Note: for a full list of products covered in this investigation, see attachment B to the Trade Representative’s letter requesting this investigation, which you can download [here](#).

SECTION 1. Company Information

Enter the 10-digit questionnaire token in the notification letter sent to your company. This will allow our project team to track your response. If you do not have this token, contact our project team at sa.emissions@usitc.gov.

Company's questionnaire token: _____

Section 1.1 Company Information

Section 1.1 will be answered and submitted at the company level. Each individual facility you identify in questions 1.1.3 and 1.1.6 will receive tokens to respond to the facility-level questionnaire. Most of the required data will be collected at the facility-level; therefore, you must complete this questionnaire promptly to allow time for each **facility** to complete the facility-level questionnaire.

Complete section 1.1, certify, and submit your response by **April 22, 2024**.

1.1.1. Did any of your company's facilities in the United States **produce** any **covered steel or aluminum products** in 2022?

- Respond "yes" if you owned the producing facility or facilities at any time between 2022 and the present.
 - For information on what is considered "covered" for this investigation, see the list of [covered products on investigation website](#).
 - This questionnaire is not intended for facilities that are only **processors** of steel or aluminum, other than those facilities that solely produce **secondary unwrought aluminum** from other forms of secondary unwrought aluminum and facilities that solely heat treat steel products.
- Yes
 No

1.1.2. Enter your company's address and the name of a person whom we may contact if we have any questions regarding your company-level response. This person will be your company's representative for the questionnaire and may or may not differ from your facility-level contacts.

Company name			
Address			
City	State	Zip code	Website address
Contact person's name			Contact person's job title

Contact person's telephone number	Contact person's email

NOT FOR SUBMISSION

1.1.3. Our records indicate that your company owns—or is part of a joint venture (JV) that owns—the following facilities that produced covered steel and/or aluminum products in 2022. Provide the following information for each of these facilities, even if they are not currently operating or operated for only part of 2022.

- The contact person you provide for each facility in question 1.1.3b will receive the facility-level token to access the facility’s questionnaire and should be the person tasked with completing the questionnaire for the facility. You can specify the same contact person for multiple facilities, who can also be the same person as your company-level contact. *(If the facility is owned by a joint venture, you should coordinate with other joint venture owners if necessary to determine the best contact person for that facility.)*
 - If you identified a facility as a distributor, fabricator of downstream products, or processor (as defined in the glossary), then indicate that the facility did not produce any of the covered steel or aluminum products. *(Exception: facilities that solely produced secondary unwrought aluminum from other forms of secondary unwrought aluminum and facilities that solely heat treated steel products should be listed below and fill out the questionnaire).*
- a. Confirm that your company owns and will provide information for the following facilities. Facility name, address, and zip code can be edited or updated, but do not remove it completely. If a facility has been incorrectly attributed to your company, check the box in this column (“This facility is not owned in any part by my company”).

Facility name	Full address (street, city, state)	Zip code	This facility is owned by, and information can be provided by, my company (check if true)	This facility did not produce covered steel or aluminum products in 2022 (check if true)	This facility is not owned in any part by my company (check if true)	A different company (e.g., JV partner or current owner) will provide information regarding this facility (check if true)	If you selected “a different company will provide information regarding this facility”, provide the name of the company
{data populated by Commission contact records}	{data populated by Commission contact records}	{data populated by Commission contact records}					

Facility name	Full address (street, city, state)	Zip code	This facility is owned by, and information can be provided by, my company (check if true)	This facility did not produce covered steel or aluminum products in 2022 (check if true)	This facility is not owned in any part by my company (check if true)	A different company (e.g., JV partner or current owner) will provide information regarding this facility (check if true)	If you selected “a different company will provide information regarding this facility”, provide the name of the company

b. Provide contact information and [GHGRP](#) ID (if applicable) for the facilities you identified in 1.1.3a as being owned by your company. (If you noted that a different company will provide information for a facility you own, please complete the contact fields for the person at that company with whom the USITC should correspond). Also check the box for those facilities operating under a lease agreement (i.e., your company is leasing part of a facility owned by another company).

Facility name	Full address (street, city, state)	Zip code	Contact person's name	Contact person's email	Contact person's phone number	GHGRP ID (if facility did not report to the GHGRP in 2022, enter n/a)	Facility operated under a lease agreement in 2022 (check if true)
{data populated Q1.1.3a}	{data populated by Q1.1.3a}	{data populated by Q1.1.3a}				{data populated by Commission contact records}	

- 1.1.4. Does your company own (wholly, majority, or as part of a joint venture) U.S. facilities other than those listed in 1.1.3 that produced covered steel or aluminum in 2022?
- Yes
 - No

1.1.5. *[If Yes to 1.1.4]* How many additional U.S. facilities do you have?

1.1.6. *[If Yes to 1.1.4, number of rows shown determined by 1.1.5]* Provide the following information for each U.S. facility owned by your company that produced covered steel or aluminum products in 2022 that is not listed in question 1.1.3. Do not include any distributors, fabricators of downstream products, and processors (as defined in the glossary). (Exception: facilities that solely produce secondary unwrought aluminum from other forms of secondary unwrought aluminum and facilities that solely heat treat steel products should be listed below). If the facility is a joint venture, coordinate with other joint venture owners if necessary to determine the best contact person for that facility and ensure that the facility is reported in response to this question by only one company. Indicate if a facility was operating under a lease agreement (i.e., leasing part of a facility owned by another company).

Facility name	Full address (street, city, state)	Zip code	Contact person's name	Contact person's email	Contact person's phone number	GHGRP ID (if facility did not report to the GHGRP in 2022, enter n/a)	Facility operated under a lease agreement in 2022 (check if true)

1.1.7. If you would like to explain any of your responses about your company and the facilities you provided information about in this questionnaire, use the space below. In particular, if any of your facilities experienced changes in ownership in 2022, or if you are only able to provide facility-level questionnaire responses for certain facilities covering only part of 2022, please let us know that information. As with all answers to this questionnaire, your explanation will be confidential.

[The NEXT button will take you to the Certification, where you will be able to download a copy of your response before submitting it. After you submit, each facility's contact person you listed in tables 1.1.3b and 1.1.6 (if applicable) will receive an email with a facility-level token and instructions for completing the rest of the questionnaire. If you listed the same contact person for multiple facilities, that person will receive an email for each facility. Emails for facilities in 1.1.3b should be received within 10 minutes of submitting this questionnaire; emails for facilities in 1.1.6 may take up to 24 hours, or the next business day, to be received.]

Certification

The undersigned certifies that the information supplied herein in response to this questionnaire is complete and accurate to the best of the certifier's knowledge and belief. Section 332(g) of the Tariff Act of 1930 (19 U.S.C. § 1332(g)) provides that the Commission may not release information that it considers to be confidential business information unless the party submitting such information had notice, at the time of submission, that such information would be released by the Commission, or such party subsequently consents to the release of the information.

The undersigned acknowledges that all information, including confidential business information, submitted in this questionnaire response and throughout this investigation may be disclosed to and used by:

- (i) the Commission, its employees and offices, and contract personnel
 - (a) for developing or maintaining the records of this or a related proceeding, or
 - (b) in internal investigations, audits, reviews, and evaluations relating to the programs, personnel, and operations of the Commission, including under 5 U.S.C. Appendix 3; or
- (ii) U.S. government employees and contract personnel
 - (a) for cybersecurity and other security purposes, or
 - (b) in monitoring user activity on U.S. government classified networks.

The undersigned understands that all contract personnel will sign appropriate nondisclosure agreements. The Commission will not disclose any confidential business information, unless such information is otherwise available to the public. The Trade Representative has asked that the Commission not include any confidential business information in the report it transmits to the Trade Representative. The Commission may aggregate the information you provide with information from other questionnaire responses, but the Commission will not publish information obtained from your questionnaire or an aggregation of your and other questionnaire responses in a manner that would identify your company/facility or reveal the operations of your company/facility.

Certifier's name and title	Date of certification

Check the box below in place of a written signature to indicate that the authorized official listed above has certified the information provided.

Certified

Before submitting your company's completed questionnaire, report the actual number of hours required and the cost to your company of completing this questionnaire, including all preparatory activities.

Number of hours: _____

Cost (\$): _____