

Frequently Asked Questions – USITC Greenhouse Gas Emissions Intensities Questionnaire

I. General

1. What is the United States International Trade Commission (USITC or the Commission)?

The Commission is an independent federal government agency. Part of its work includes responding to requests from the Office of the U.S. Trade Representative, the Committee on Ways and Means of the U.S. House of Representatives, and the Committee on Finance of the U.S. Senate for factfinding investigations on various trade issues.

2. What is this survey related to?

This survey is related to a request the Commission received from the U.S. Trade Representative (“Trade Representative”) to conduct a factfinding investigation to generate estimates of the highest and average greenhouse gas emissions intensities for steel and aluminum products produced in the United States. As a part of this investigation, the Trade Representative has requested the Commission to conduct a survey to collect information from facilities. The Trade Representative stated that the results of this investigation will inform discussions regarding the proposed Global Arrangement on Sustainable Steel and Aluminum. For more information on this investigation, please consult the materials on our webpage here: <https://www.usitc.gov/saemissions>.

3. Why am I receiving this questionnaire?

The Commission has either identified your company as having one or more facilities in the United States that produced [covered steel or aluminum products](#) in 2022, or your company listed your facility as having produced covered steel or aluminum products in 2022 in its response to the company-level questionnaire.

4. Is my response confidential?

Yes. Your response will be combined with responses from other firms to develop national emissions intensities estimates at a product-category level. Combining responses in this way will prevent the operations of any one respondent from being revealed. The Commission regularly collects and protects confidential business information using this method, and your response will be treated as confidential as detailed in the questionnaire.

5. Who, in my organization, should fill out the questionnaire?

Ideally, someone who is familiar with your company’s operations will complete the company-level questionnaire, while someone who is familiar with your facilities’ operations will complete the facility-level questionnaire(s). In many cases, responding to the questionnaire requires a team of people across business units, and it is helpful if the respondent is someone who can coordinate the gathering of information.

6. My company/facility is a reporter to the U.S. Environmental Protection Agency (EPA) Greenhouse Gas Reporting Program (GHGRP). Do we have to provide a response to this survey as well?

Yes. The Commission is not duplicating collection of the scope 1 emissions data that the EPA collects. For GHGRP reporters, the Commission is asking for:

- Data that the Commission will use to generate scope 2 and scope 3 emissions estimates. Such data include information related to receipt of energy and materials from specific sources.
- Data that the Commission will use to allocate facility-level emissions (including those reported under the GHGRP) to product categories. Such data include production quantities and information related to usage of materials, energy, and fuels.

7. How long do I have to complete the questionnaire?

Company-level questionnaire: Responses are due by **April 22, 2024**. Facilities will only be able to complete the facility-level questionnaire once the company-level questionnaire has been submitted. Therefore, an early submission of the company-level questionnaire will allow facilities more time to complete facility-level questionnaires.

Facility-level questionnaire: Responses are due by **June 8, 2024**. If you discover that you will have problems meeting this deadline, please contact the project team at sa.emissions@usitc.gov or by phone at 202-780-0230 for more information.

8. Is this the start of a recurring collection of these data?

The Commission has no knowledge of whether similar data collections by this or other agencies will be undertaken in the future. This data collection is associated with the USITC's factfinding investigation 332-598, *Greenhouse Gas Emissions Intensities of the U.S. Steel and Aluminum Industries at the Product Level*. This investigation was initiated at the request of the U.S. Trade Representative—in this particular request, data collection was limited to the 2022 calendar year.

II. Understanding my company's obligation to provide a response

1. How is a response to this questionnaire legally required?

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\(a\)](#)).

2. How do I know if my company is required to provide a questionnaire response?

If your company has facilities that produced [covered steel and aluminum products](#) at any point in the 2022 calendar year, then you are required to respond to the questionnaire.

Note that “covered products” include those that match the description provided in the covered product list or that correspond to the U.S. Harmonized Tariff Schedule (HTSUS) subheadings that comprise the list. Importation or exportation of the covered product does not matter; only the description does. “Production” includes the production of covered products even if those products are entirely consumed as intermediate inputs at the same facility they are produced (in the case of facilities that primarily manufacture finished products). More detailed definitions of these concepts as they are expressed in the questionnaire are available in the questionnaire glossaries and under the FAQs in the “Obligations to provide a response by types of operations” section below.

3. My company received multiple notification letter/emails, each of which has a unique token. Do I need to provide a company-level questionnaire response for each token I receive?

Companies should provide only one response to the company-level questionnaire, inputted using one unique company-level token. If your company has received multiple tokens, please note this in your response to question 1.1.7 and/or notify project staff at sa.emissions@usitc.gov or by phone at 202-780-0230.

4. The notification letter/email was sent to my facility, but this location is not the headquarters for our U.S. parent company. Am I required to provide a response to the company-level questionnaire?

Your company must respond to the company-level questionnaire. To ensure that your company’s U.S. operations that produce covered products are reported fully and accurately in the company-level questionnaire response, please forward notification correspondence to your U.S. company headquarters to coordinate the submission of your company’s response. If you have any questions, please contact project staff at sa.emissions@usitc.gov or by phone at 202-780-0230.

In the company-level questionnaire, the pre-populated information in question 1.1.2 may be altered to reflect the correct name and address of your company’s U.S. headquarters, and questions 1.1.3 and 1.1.6 may be edited or added to in order to list your company’s facilities that produce covered products.

5. My company only has one facility. Do I still have to fill out both the company-level and facility-level questionnaires?

Yes, your company must respond to both the company-level and facility-level questionnaires, even if it only owns one facility that produces covered products. These questionnaires request different types of information.

III. Obligation to provide a response if changes in production occur/have occurred

1. My company had facilities that produced covered steel and aluminum products in 2022, but those facilities no longer produce those products. Am I required to complete a questionnaire for these facilities?

If your company's facility produced covered steel and aluminum products at any point in 2022, then you are required to respond to both the company-level questionnaire and the facility-level questionnaires for that facility, regardless of whether the facility still produces those products or not.

2. My company has facilities that currently produce covered steel and aluminum products, but they did not produce those goods in 2022. Am I required to complete a questionnaire?

If your company's facility did not produce covered steel and aluminum products at any point in 2022, then you are not required to respond to the facility-level questionnaire for that facility. You can indicate this within the company-level questionnaire.

IV. Obligation to provide a response if changes in ownership occur/have occurred

1. My company owns a facility that produced covered steel and aluminum products in 2022, but I was not the owner of the facility at that time. Am I required to complete a questionnaire?

The current owner of a facility that produced covered steel or aluminum products in 2022 is required to respond to the company-level questionnaire and complete the facility-level questionnaire for that facility.

2. In 2022, my company owned a facility that produced covered steel and aluminum products. However, my company has since sold that facility. Am I required to complete a questionnaire?

If your company owned a facility that produced any covered steel and aluminum products at any point in 2022, then you are required to respond to the company-level questionnaire, regardless of whether you still own the facility. Generally, it is the responsibility of the current owner to provide a facility-level questionnaire response for that facility, as long as the current owner has the information necessary to respond to the questionnaire. In this case, your response would be limited to filling in the sections of the company-level questionnaire that will indicate that you no longer own the facility.

3. My company owned facilities that produced covered steel and aluminum products in 2022. However, our ownership of the facilities ended before 2022. Am I required to complete a questionnaire?

If your company did not own the facility in 2022 or afterward, then you are not required to respond to the questionnaire. However, we would appreciate you providing us with the name of the company that currently owns the facility.

4. My company owned facilities that produced covered steel and aluminum products in 2022. However, our ownership only lasted for part of 2022. Am I required to complete a questionnaire?

If your company owned a facility that produced any covered steel and aluminum products at any point in 2022, but no longer owns it, your company-level questionnaire response would be required but limited to filling in the sections of the questionnaire that will indicate that you no longer own the facility. Generally, it is the responsibility of the current owner to provide a

facility-level questionnaire response for that facility, as long as the current owner has the information necessary to respond to the questionnaire.

5. I am providing a facility-level questionnaire response, but I have data only for part of the 2022 calendar year. How do I respond to the questionnaire?

If you can provide a facility-level questionnaire response covering only part of 2022, and production occurred during other parts of 2022, please contact sa.emissions@usitc.gov or by phone at 202-780-0230 before submitting a response. You may be asked to provide contact information for others who can provide full-year 2022 data or data for the remainder of 2022 if available.

V. Obligation to provide a response by type of operations

1. My facilities just processed or finished steel or aluminum products in 2022, without producing a product in the list of covered products. Am I required to complete a questionnaire?

The Commission seeks responses to the questionnaire from facilities that produced covered steel and aluminum, where “production” may also include certain processing/finishing steps such as those provided below:

- Cold rolling (i.e., cold reducing) of steel or aluminum
- Cold drawing (e.g., wire drawing, drawing of other long products) of steel or aluminum
- Cold forming or cold finishing of long steel products
- Metallic coating, cladding, or plating of carbon and other alloy flat steel (e.g., flat steel products that have been hot-dipped or electrolytically galvanized; or those coated with Galvalume, tin, or chromium (tin-free), or other metals).
- Heat treating steel (including heat treating using annealing, normalizing, or carburizing. Heat treating for this survey includes heat treating that permanently changes the properties of the steel. Heat could be applied to steel products in a way that would not be considered heat treatment for purposes of the questionnaire. For example, simply heating a product to be forged or otherwise worked would not be considered heat treating for purposes of the questionnaire because the heat applied in that scenario does not change the properties of the steel)
- Transformation of one form of secondary unwrought aluminum into another form of secondary unwrought aluminum

If your facility undertook any of the above processes or other processes that constitute production, you are required to provide a questionnaire response. If you have additional questions about other processes/finishing steps that transform steel products and whether a questionnaire response is required, please contact sa.emissions@usitc.gov or by phone at 202-780-0230.

2. My facilities reworked steel and aluminum into more-finished products, like certain automotive parts, door frames, boat hulls, etc. Am I required to complete a questionnaire?

The more-finished products listed in the question above are generally not covered steel and aluminum products. Please consult the [list of covered products](#) to determine if you produced the covered steel and aluminum products at any point in the production process at your facility, even if all production of these products was internally consumed (i.e., used in the same facility's production of other products). For example, if you produced your own steel ingots and subsequently made car parts from those ingots, you produced a covered steel product (ingots). If covered products are produced at your facility, then you are required to complete the questionnaire.

You may also consult the HTSUS to determine under which tariff lines your products fall. Some more-finished products such as steel and aluminum pipes and tubes, steel and aluminum wire, and aluminum castings, forgings, and tube and pipe fittings are covered products—if you produce these, you are required to complete a questionnaire. Other products, such as certain cast aluminum automotive parts or steel door frames, have separate tariff lines—if these are the **only** products your facility is producing (i.e., you do not produce any covered products at your facility during the production of these finished products), then you are not required to complete a questionnaire.

3. I do not make or produce steel or aluminum, I am just a distributor. Am I required to complete a questionnaire?

If you **only** supply or distribute steel and aluminum, then you are not required to complete a questionnaire.

4. My company produces castings (my company is a foundry or die caster). Am I required to complete a questionnaire?

If your facility **only** produced cast iron or steel castings or other non-aluminum metal castings, then you are not required to complete the questionnaire.

If you produced **aluminum castings** at your facility in 2022, you are required to complete the questionnaire if your product matches the definition of aluminum castings for this investigation: the solid, rough, finished, or near-finished (near-net) aluminum shapes resulting from the foundry or die-casting processes. Aluminum castings covered by this investigation are those products corresponding to HTSUS statistical reporting number 7616.99.5160.

5. My company produces forged products. Am I required to complete a questionnaire?

Iron and steel products considered “forgings” (such as those covered under HTSUS subheading 7307.91.10) are generally not covered steel products for purposes of this investigation. If your facility **only** produced iron and steel forgings that are not covered by this investigation in 2022, then you are not required to complete the questionnaire. However, certain hot-worked long steel products covered in this investigation may be produced using a hot-forging method, so please consult the list of [covered steel or aluminum products](#) or contact sa.emissions@usitc.gov or by phone at 202-780-0230 if you are unsure about whether your production is covered.

If you produced **any aluminum forgings** at your facility in 2022, then you are required to complete the questionnaire.

6. I am a dross processor. Am I required to complete a questionnaire?

For this questionnaire, dross processors are considered to be producing recycled unwrought aluminum. As such, you are required to complete the questionnaire.

7. I make metal products that are metallic alloys or blends. Are these considered covered steel or aluminum products?

This investigation defines the metals “steel” and “aluminum” consistently with the HTSUS. A summary of these definitions is provided in the U.S. Harmonized Tariff Schedule for steel in [Chapter 72](#), IRON AND STEEL, notes 1(d), 1l, 1(f) and Section XV, BASE METALS AND ARTICLES OF BASE METAL, note 7, and for aluminum in [Chapter 76](#), ALUMINUM AND ARTICLES THEREOF, subheading note 1.

In general terms, a product is made of steel if iron predominates by weight over any other base metals; if it is usefully malleable; and if it contains by weight 2 percent or less of carbon. There are exceptions to these criteria: in particular, ferrous materials under HTSUS heading 7203 (direct reduced iron, hot briquetted iron, and iron pellets)—which may have low amounts of carbon—are not considered steel. Also, certain chromium steels may contain higher proportions of carbon but are still considered steel.

In general terms, a product is made of aluminum if it is comprised of metallic substances in which aluminum predominates by weight over each of the other elements.

8. I’ve reviewed the above situations and operations, and I don’t think my company is required to complete the questionnaire, but I keep getting correspondence about it. What do I do?

Please contact the project team at sa.emissions@usitc.gov or by phone at 202-780-0230 if you believe your company does not produce covered products and has been included in the questionnaire population in error. Contacting the project team to confirm your exemption from completing the questionnaire is the only way to ensure your company will not receive further correspondence about this mandatory data collection.

VI. Accessing the electronic questionnaire

1. Where do I find the questionnaire my company or facility is required to complete?

The electronic questionnaires your company and facility are required to complete are accessible from links on the investigation webpage at www.usitc.gov/saemissions using unique tokens (i.e., alphanumeric codes of 10 characters) provided to your company and facility contacts as explained below. These electronic questionnaires are programmed with skip and display logic such that you will receive only the questions pertinent to your reported operations. You must use the electronic questionnaire to fulfill your response requirement.

As a reference resource only, PDF copies of the questionnaire and other supplementary materials are available at www.usitc.gov/saemissions. These PDFs contain all possible questions

that would be asked of any steel or aluminum producer and the textual explanations of the skip and display logic to indicate which questions pertain to which type of operations. While you may not submit your responses using the PDF copies, USITC staff encourages you to use these documents to help collect and compile the information requested before entering it into the electronic questionnaire for submission.

2. How do I enter my company's/facility's information?

You will receive a unique token in your notification correspondence (a letter and/or an email) that will allow you to log in to the electronic questionnaires linked to www.usitc.gov/saemissions.

3. I am having trouble navigating the questions and/or saving my responses in the questionnaire. What should I do?

Please contact project staff at sa.emissions@usitc.gov or by phone at 202-780-0230 with questions or concerns.

Note that the questionnaires have been optimized for operation within the Google Chrome browser. Respondents are encouraged to use an incognito window to complete the questionnaire, especially if you are completing multiple questionnaires at the same time in different tabs. (Instructions for opening an incognito browsing window are available for [Chrome](#), [Firefox](#), [Edge](#), and [Safari](#) browsers). Also note that while a single token may be forwarded to different users within a company to permit access to the same questionnaire, multiple users from different computers cannot access the questionnaire simultaneously. If you are having difficulties with navigation freezing while you are in the questionnaire, please ensure that all other users of your token have closed out of their instances of the questionnaire you are viewing.

4. Can I start the questionnaire and then save it to come back to it later?

Yes. Your responses will be stored in the questionnaire specific to your facility or company if you close out of the tab and/or browser window in which you are entering data. You may log back in to your questionnaire response by using the questionnaire link and re-entering your token.

5. I submitted a company-level questionnaire, but the contacts I've designated haven't yet received their facility-level tokens. What do I do?

Please contact the project team at sa.emissions@usitc.gov or by phone at 202-780-0230 if there is a delay in receiving your facility-level token emails after you submit your company-level response.

VII. Questions on questionnaire content

1. My company has never estimated the greenhouse gas emissions associated with its operations. How will I answer the questionnaire without this information?

Companies and facilities are not required to estimate the greenhouse gas emissions associated with their operations as part of this questionnaire. The facility-level questionnaire asks for information on production output, energy use, and input use and sourcing. Estimation of the greenhouse gas emissions associated with these materials and processes will be performed by the USITC project team. If firms have prepared this information internally and would like to share it with the project team, there are optional question fields in section 7 of the facility-level questionnaire where this information may be entered.

2. These questionnaires are asking me to report a GHGRP ID. What is that, and how do I know if I have one?

The GHGRP IDs referenced in the questionnaires are referring to the 7-digit ID number associated with a facility's publicly reported 2022 data to the U.S. Environmental Protection Agency's Greenhouse Gas Reporting Program (GHGRP). For most facilities, their GHGRP IDs will be prepopulated in the fields in the company-level questionnaire. To check if this prepopulated field is correct or to see if your facility submitted data to the EPA's GHGRP, go to EPA's [Facility-Level Greenhouse Gases Tool \(FLIGHT\)](#) and enter your facility's address for the 2022 data year. If your facility submitted data, there will be an icon in the map (or a row in the list if you are in list view) for you to select to bring up the facility detail that will have a GHGRP ID listed. In the questionnaire, please do not provide the ID your facility uses to enter its data into the EPA's e-GGRT system.

3. In reporting production numbers for my facility, should I report gross production or net saleable production (not including scrap)?

When reporting your facility's production quantities for covered steel and aluminum products, do not include scrap in those totals. Because this questionnaire asks for production of steel and aluminum products in both intermediate and finished forms, even if part of a continuous production line, we do not use the term "saleable" in our definition of production.

4. I produce intermediate product and further-finished product at the same facility. How do I report this in the questionnaire?

If you are performing multiple production steps at your facility, please be sure to quantify production of both the intermediate product category and the further-finished product category in section 2 of the facility-level questionnaire, noting the amount shipped outside your facility and the amount used within your facility for the production of further-finished products. Multiple stages of production within the same product category do not need to be reported multiple times in responses to individual questions in section 2 (e.g., if you hot-roll flat steel and then pickle it, do not double count that tonnage under the row for hot-rolled flat steel products in question 2.1.1).

In section 5, you will be asked about how you use intermediate products in the production of downstream products. Such intermediate products would include any made at your own facility for use in the same facility, in addition to any you source externally.

- 5. I produce intermediate product and further-finished product at the same facility. From the answer above, it seems as if you want me to double-count my products. How can I be sure that emissions associated with these products aren't being double-counted as well?**

The Commission is determining emissions intensity estimates at the product-category level. This is a measure of greenhouse gas emissions associated with a product's direct and indirect emissions within its value chain and not a measure of absolute emissions released by each facility producing these products. As such, the data are being collected to track production and sourcing of inputs to allow for the appropriate attribution of emissions embedded within a product. The Commission's calculations will assure that emissions are not double-counted within the emissions intensity estimates for each product category.

- 6. I produced covered products in 2022 that were set in inventory at my facility (i.e., products that were produced but not used internally at my facilities or shipped offsite to another facility in the same year). How should I designate this production in section 2 of the questionnaire?**

Question 2.1.1 (for steel) and 2.2.1–2.2.3 (for aluminum) ask for production that occurred in 2022, split between whether the product is (1) for shipment to customers or other facilities or (2) for use in the same facility. The questionnaire does not specify that the material be shipped or used within a certain time limit. So if you produced for inventory in 2022, please continue to allocate that production based on your best estimate of whether that material will eventually be shipped externally or used for onsite production. Please ensure that the two columns together equal your facility's total production in 2022. Ideally, your reported production for use in the same facility (reported in section 2) added to your total reported external receipts in 2022 (reported in section 5) should be similar to your facility's total use of that product category used in the production of downstream products (also reported in section 5). However, if production and/or receipts of inputs for downstream use in 2022 substantially diverged from use of those inputs in that year due to inventory effects, please let us know in response to the open narrative question 7.3 of the questionnaire.

- 7. My facility produces covered products and does further finishing processes that are not listed in FAQ V.1 in this document, like painting and anodizing. When I am reporting my energy use, should I be including the energy dedicated to these activities?**

The questionnaire asks that you report your facility's fuel and energy use. In questions 3.8–3.12, we ask that you allocate quantities of fuel and energy use to specific, defined processes. Each process corresponds with the product being made. For example, if you are using electricity to apply a surface coating to aluminum sheet, you should allocate that electricity to "wrought aluminum products." Alternatively, if you are further manufacturing a steel or aluminum product into a product that is not covered, you may report energy used in such transformations under "Processes used to make products other than covered steel, covered aluminum, or their upstream material inputs" within questions 3.8–3.12.

If you are not sure how to estimate your facility's energy use in these categories, you may default to estimating the allocations based on your facility-wide energy use and the relative tonnage of your production, but please note that you have done so in your narrative response in question 3.13.

8. My facility only has energy data for the entire facility not separated out specifically for production of covered products. Should I estimate data for production or just report the entire facility?

Please report data for the entire facility in questions 3.6 and 4.1 (for question 3.6, the only exceptions to this are described in bullets within the question). For questions 3.8–3.12, facilities that only produce covered products in one of the questionnaire’s product categories and have no generation, cogeneration, or multipurpose boiler units can report their facility-wide energy data in that product category. All other facilities need to estimate the amounts of energy use that your facility dedicates to each category of covered products produced and to the other process steps listed.

To ensure the data is totaled correctly, you will need to estimate both the energy use for the covered product production and the energy use for the rest of your facility’s activities. For example, for a facility producing multiple covered product categories without any energy generation, the total electricity reported in 3.9 should equal the total electricity purchased in 4.1, even if the processes are not metered separately and the breakouts are estimates. We encourage you to elaborate on your approach to these estimates in your narrative response in question 3.13.

9. When I am reporting fuel consumption totals in the questionnaire, should I include fuel used for indirect processes like mobile equipment and long-haul trucks?

No, please do not report fuel consumption associated with nonstationary processes and portable equipment in the questionnaire.

10. The facilities within my company exchange shipments of intermediate products for use in the production of covered products. How should I report this in the questionnaire?

Any inputs sourced from outside your facility should be reported as “externally sourced” in section 5, even if the facilities you are sourcing from are owned by the same company as your own. Similarly, if you are shipping any product from your facility to other facilities that are owned by the same company as your own, these should be reported as production for “shipment to customers or other facilities” in section 2.

11. I see section 6 is skipped in the questionnaire I am filling out. Is this correct?

Section 6 of the questionnaire is intended only for steel-producing facilities with an electric arc furnace onsite that did not report to the EPA’s Greenhouse Gas Reporting Program (GHGRP). If your facility does not fall under this description, you do not need to complete section 6 of the facility-level questionnaire.

VIII. Methodology

1. How are these data, collected at the facility level, going to be translated to the product level to produce emissions intensities?

The Commission is developing a calculation methodology to use data reported in this questionnaire combined with other external data sources, including the EPA's Greenhouse Gas Reporting Program (GHGRP), to produce product-level emissions intensity estimates. This methodology will be shared in the final public report the Commission will publish in 2025.

2. How will the embedded emissions of inputs produced in other markets be calculated in the generation of an emissions intensity estimate?

The Commission is researching market conditions and external datasets to develop emission factors to apply to the material inputs reported from various foreign and domestic sources. The Commission will use these emission factors in its estimates of product-level emissions intensities. These emissions intensities will be shared along with the Commission's scope 3 methodology in the final public report in 2025.