

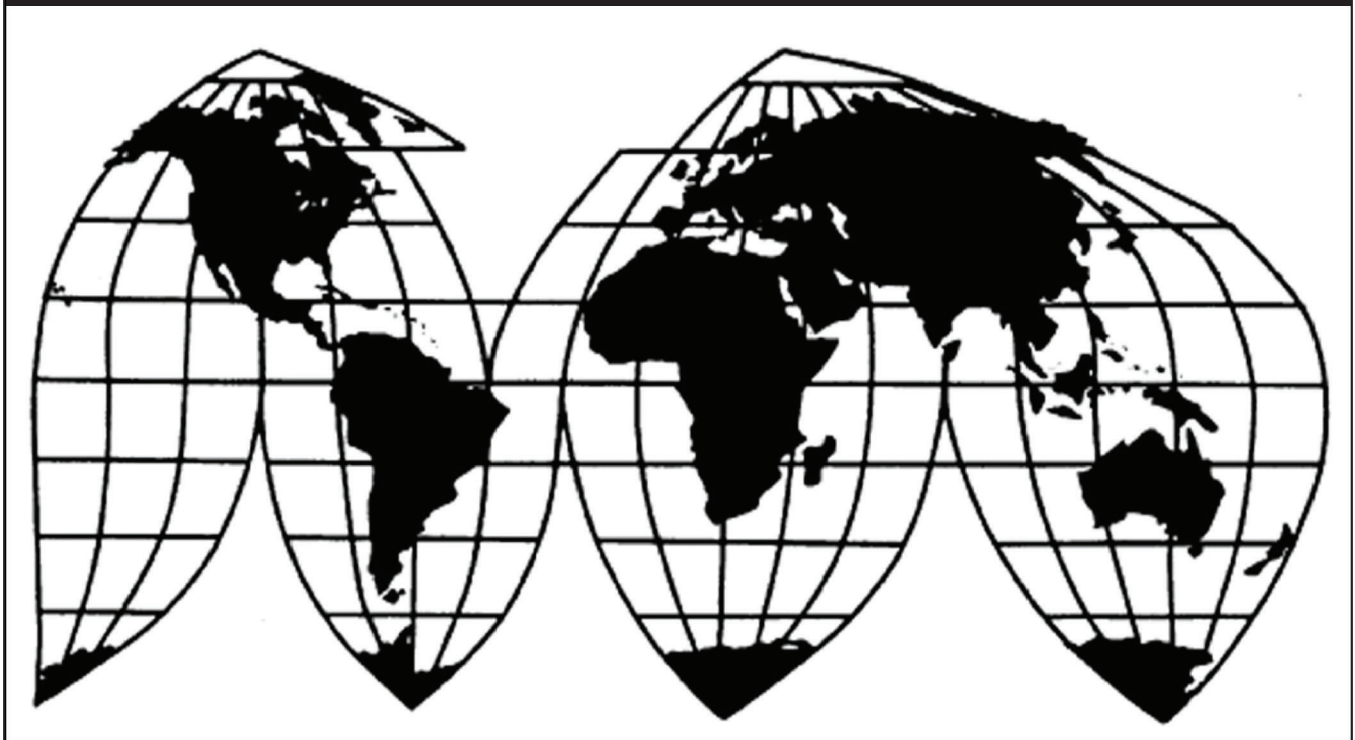
Common Alloy Aluminum Sheet from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey

Investigation Nos. 701-TA-639-642 and 731-TA-1475-1492 (Preliminary)

Publication 5049

April 2020

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

COMMISSIONERS

David S. Johanson, Chairman

Rhonda K. Schmidlein

Jason E. Kearns

Randolph J. Stayin

Amy A. Karpel

Catherine DeFilippo

Director of Operations

Staff assigned

Stamen Borisson, Investigator

Hugh Smachlo, Investigator

Daniel Matthews, Industry Analyst

Kelsi Van Veen, Industry Analyst

Natalia King, Economist

David Boyland, Accountant

Mara Alexander, Statistician

Michael Haldenstein, Attorney

Noah Meyer, Attorney

Douglas Corkran, Supervisory Investigator

**Address all communications to
Secretary to the Commission
United States International Trade Commission
Washington, DC 20436**

U.S. International Trade Commission

Washington, DC 20436
www.usitc.gov

Common Alloy Aluminum Sheet from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey

Investigation Nos. 701-TA-639-642 and 731-TA-1475-1492 (Preliminary)

Publication 5049



April 2020

CONTENTS

	Page
Determinations	1
Views of the Commission	3
Part I: Introduction	I-1
Background	I-1
Statutory criteria	I-2
Organization of report.....	I-3
Market summary	I-3
Summary data and data sources	I-4
Previous and related investigations.....	I-5
Nature and extent of alleged subsidies and sales at LTFV	I-7
Alleged subsidies	I-7
Alleged sales at LTFV.....	I-10
The subject merchandise.....	I-10
Commerce’s scope.....	I-10
Tariff treatment	I-11
The product	I-13
Description and applications	I-13
Manufacturing processes.....	I-15
Domestic like product issues	I-19

CONTENTS

	Page
Part II: Conditions of competition in the U.S. market.....	II-1
U.S. market characteristics.....	II-1
Channels of distribution	II-3
Geographic distribution.....	II-6
Supply and demand considerations.....	II-7
U.S. supply	II-7
U.S. demand	II-12
Substitutability issues.....	II-16
Lead times	II-16
Factors affecting purchasing decisions	II-17
Comparison of U.S.-produced and imported CAAS.....	II-17
Part III: U.S. producers' production, shipments, and employment.....	III-1
U.S. producers	III-1
U.S. production, capacity, and capacity utilization	III-8
Alternative products	III-10
U.S. producers' U.S. shipments and exports.....	III-11
U.S. producers' inventories	III-12
U.S. producers' imports and purchases.....	III-13
U.S. employment, wages, and productivity	III-18

CONTENTS

	Page
Part IV: U.S. imports, apparent U.S. consumption, and market shares.....	IV-1
U.S. importers.....	IV-1
U.S. imports.....	IV-5
Negligibility.....	IV-12
Cumulation considerations.....	IV-15
Fungibility	IV-15
Geographical markets.....	IV-19
Presence in the market.....	IV-23
Apparent U.S. consumption	IV-29
U.S. market shares.....	IV-31
Part V: Pricing data	V-1
Factors affecting prices.....	V-1
Raw material costs.....	V-1
Transportation costs to the U.S. market.....	V-3
U.S. inland transportation costs.....	V-4
Pricing practices	V-4
Pricing methods.....	V-4
Sales terms and discounts	V-6
Price data	V-6
Price trends.....	V-25
Price comparisons.....	V-30
Lost sales and lost revenue.....	V-32

CONTENTS

	Page
Part VI: Financial experience of U.S. producers.....	VI-1
Background	VI-1
Operations on CAAS	VI-2
Revenue.....	VI-2
Cost of goods sold and gross profit or loss	VI-14
SG&A expenses and operating income or loss.....	VI-17
Interest expense, other expenses and income, and net income or loss	VI-18
Capital expenditures and research and development expenses	VI-19
Assets and return on assets.....	VI-21
Capital and investment.....	VI-22
Part VII: Threat considerations and information on nonsubject countries	VII-1
The industry in Bahrain	VII-3
Changes in operations	VII-3
Operations on CAAS.....	VII-3
Alternative products	VII-6
Exports.....	VII-6
The industry in Brazil	VII-8
Changes in operations	VII-8
Operations on CAAS.....	VII-9
Alternative products	VII-11
Exports.....	VII-12
The industry in Croatia	VII-14
Changes in operations	VII-14
Operations on CAAS.....	VII-15
Alternative products	VII-17
Exports.....	VII-18

CONTENTS

	Page
The industry in Egypt.....	VII-20
Changes in operations	VII-20
Operations on CAAS.....	VII-20
Alternative products	VII-23
Exports.....	VII-24
The industry in Germany	VII-26
Changes in operations	VII-27
Operations on CAAS.....	VII-28
Alternative products	VII-30
Exports.....	VII-32
The industry in Greece	VII-34
Changes in operations	VII-34
Operations on CAAS.....	VII-35
Alternative products	VII-37
Exports.....	VII-38
The industry in India	VII-40
Changes in operations	VII-42
Operations on CAAS.....	VII-42
Alternative products	VII-45
Exports.....	VII-46
The industry in Indonesia	VII-48
Exports.....	VII-49
The industry in Italy	VII-51
Changes in operations	VII-52
Operations on CAAS.....	VII-53
Alternative products	VII-55
Exports.....	VII-57

CONTENTS

	Page
The industry in Korea	VII-59
Changes in operations	VII-61
Operations on CAAS.....	VII-61
Alternative products	VII-64
Exports.....	VII-65
The industry in Oman	VII-67
Changes in operations	VII-67
Operations on CAAS.....	VII-67
Alternative products	VII-70
Exports.....	VII-71
The industry in Romania.....	VII-73
Changes in operations	VII-73
Operations on CAAS.....	VII-74
Alternative products	VII-76
Exports.....	VII-77
The industry in Serbia.....	VII-79
Changes in operations	VII-79
Operations on CAAS.....	VII-79
Alternative products	VII-82
Exports.....	VII-83
The industry in Slovenia	VII-85
Changes in operations	VII-85
Operations on CAAS.....	VII-86
Alternative products	VII-87
Exports.....	VII-89

CONTENTS

	Page
The industry in South Africa	VII-90
Changes in operations	VII-90
Operations on CAAS.....	VII-91
Alternative products	VII-93
Exports.....	VII-94
The industry in Spain	VII-96
Changes in operations	VII-98
Operations on CAAS.....	VII-98
Alternative products	VII-100
Exports.....	VII-101
The industry in Taiwan	VII-103
Changes in operations	VII-103
Operations on CAAS.....	VII-103
Alternative products	VII-106
Exports.....	VII-107
The industry in Turkey.....	VII-109
Changes in operations	VII-109
Operations on CAAS.....	VII-110
Alternative products	VII-113
Exports.....	VII-115
Subject countries combined	VII-117
U.S. inventories of imported merchandise	VII-119
U.S. importers' outstanding orders	VII-122
Antidumping or countervailing duty orders in third-country markets.....	VII-124

CONTENTS

	Page
Information on nonsubject countries	VII-124
The industry in Canada	VII-127
The industry in Mexico	VII-128
The industry in China	VII-130
Appendixes	
A. <i>Federal Register</i> notices.....	A-1
B. List of staff conference witnesses	B-1
C. Summary data.....	C-1
D. Section 232 developments	D-1
E. U.S. shipments by product type (series and cladding)	E-1
F. U.S. producers' and importers' responses to interchangeability and significance of factors other than price	F-1

Note.—Information that would reveal confidential operations of individual concerns may not be published. Such information is identified by brackets in confidential reports and is deleted and replaced with asterisks (***) in public reports.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-639-642 and 731-TA-1475-1492 (Preliminary)

Common Alloy Aluminum Sheet from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey

DETERMINATIONS

On the basis of the record¹ developed in the subject investigations, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of common alloy aluminum sheet from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey, provided for in subheadings 7606.11.30, 7606.11.60, 7606.12.30, 7606.12.60, 7606.91.30, 7606.91.60, 7606.92.30, and 7606.92.60 of the Harmonized Tariff Schedule of the United States, that are alleged to be sold in the United States at less than fair value (“LTFV”) and to be subsidized by the governments of Bahrain, Brazil, India, and Turkey.²

COMMENCEMENT OF FINAL PHASE INVESTIGATIONS

Pursuant to section 207.18 of the Commission’s rules, the Commission also gives notice of the commencement of the final phase of its investigations. The Commission will issue a final phase notice of scheduling, which will be published in the *Federal Register* as provided in section 207.21 of the Commission’s rules, upon notice from the U.S. Department of Commerce (“Commerce”) of affirmative preliminary determinations in the investigations under sections 703(b) or 733(b) of the Act, or, if the preliminary determinations are negative, upon notice of affirmative final determinations in those investigations under sections 705(a) or 735(a) of the Act. Parties that filed entries of appearance in the preliminary phase of the investigations need not enter a separate appearance for the final phase of the investigations. Industrial users, and, if the merchandise under investigation is sold at the retail level, representative consumer

¹ The record is defined in sec. 207.2(f) of the Commission’s Rules of Practice and Procedure (19 CFR 207.2(f)).

² 85 FR 19449 (April 7, 2020) and 85 FR 19444 (April 7, 2020).

organizations have the right to appear as parties in Commission antidumping and countervailing duty investigations. The Secretary will prepare a public service list containing the names and addresses of all persons, or their representatives, who are parties to the investigations.

BACKGROUND

On March 9, 2020, The Aluminum Association Common Alloy Aluminum Sheet Working Group and its Individual Members, Aleris Rolled Products, Inc., Beachwood, Ohio; Arconic, Inc., Bettendorf, Iowa; Constellium Rolled Products Ravenswood, LLC, Ravenswood, West Virginia; JW Aluminum Company, Daniel Island, South Carolina; Novelis Corporation, Atlanta, Georgia; and Texarkana Aluminum, Inc., Texarkana, Texas filed petitions with the Commission and Commerce, alleging that an industry in the United States is materially injured or threatened with material injury by reason of subsidized imports of common alloy aluminum sheet from Bahrain, Brazil, India, and Turkey and LTFV imports of common alloy aluminum sheet from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey. Accordingly, effective March 9, 2020, the Commission instituted countervailing duty investigation Nos. 701-TA-639-642 and antidumping duty investigation Nos. 731-TA-1475-1492 (Preliminary).

Notice of the institution of the Commission's investigations and of a public conference to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of March 13, 2020 (85 FR 14702). In light of the restrictions on access to the Commission building due to the COVID-19 pandemic, the Commission conducted its conference (originally scheduled for March 30, 2020) through written questions, submissions of written testimony, written responses to questions, and postconference briefs; all persons who requested the opportunity were permitted to participate.

Views of the Commission

Based on the record in the preliminary phase of these investigations, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of common alloy aluminum sheet (“CAAS”) from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey that are allegedly sold in the United States at less-than-fair-value (“LTFV”) and allegedly subsidized by the governments of Bahrain, Brazil, India, and Turkey.

I. The Legal Standard for Preliminary Determinations

The legal standard for preliminary antidumping and countervailing duty determinations requires the Commission to determine, based upon the information available at the time of the preliminary determinations, whether there is a reasonable indication that a domestic industry is materially injured or threatened with material injury, or that the establishment of an industry is materially retarded, by reason of the allegedly unfairly traded imports.¹ In applying this standard, the Commission weighs the evidence before it and determines whether “(1) the record as a whole contains clear and convincing evidence that there is no material injury or threat of such injury; and (2) no likelihood exists that contrary evidence will arise in a final investigation.”²

II. Background

These investigations resulted from petitions filed on March 9, 2020, alleging that an industry in the United States is materially injured and threatened with material injury by reason of imports of CAAS from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey that are allegedly sold in the United States at LTFV and subsidized by the governments of Bahrain, Brazil, India, and Turkey. Petitioner is the Aluminum Association Common Alloy Aluminum Sheet Trade Enforcement Working Group and its individual members who are all domestic producers of CAAS: Aleris Rolled Products, Inc. (“Aleris”); Arconic, Inc. (“Arconic”); Constellium Rolled Products Ravenswood, LLC (“Constellium”); J.W. Aluminum Company (“J.W. Aluminum”); Novelis Corporation (“Novelis”); and Texarkana Aluminum, Inc. (“Texarkana”) (collectively, “Petitioners”). Petitioners submitted a joint postconference brief and witnesses from each of

¹ 19 U.S.C. §§ 1671b(a), 1673b(a); *see also American Lamb Co. v. United States*, 785 F.2d 994, 1001-04 (Fed. Cir. 1986); *Aristech Chem. Corp. v. United States*, 20 CIT 353, 354-55 (1996). No party argues that the establishment of an industry in the United States is materially retarded by the allegedly unfairly traded imports.

² *American Lamb Co.*, 785 F.2d at 1001; *see also Texas Crushed Stone Co. v. United States*, 35 F.3d 1535, 1543 (Fed. Cir. 1994).

the petitioning domestic producers (except Texarkana) presented written testimony to the Commission for the staff conference.³

Several respondents participated in these investigations by submitting postconference briefs.

- AKG North America Inc. (“AKG”), an importer of subject merchandise;
- Alro, S.A. (“Alro”), a producer and exporter of subject merchandise in Romania;
- Companhia Brasileira de Alumínio (“CBA”), a producer and exporter of subject merchandise in Brazil;
- ElvalHalcor Hellenic Copper and Aluminum Industry S.A. (“ElvalHalcor”), a producer and exporter of subject merchandise in Greece;
- Gulf Aluminum Rolling Mill B.S.C. (“GARMCO”), a producer and exporter of subject merchandise in Bahrain;
- Hulamin Operations Proprietary Limited (“Hulamin”), a producer and exporter of the subject merchandise in South Africa;
- Hydro Aluminum Rolled Products GmbH (“HARP”), a producer and exporter of the subject merchandise in Germany;
- Oman Aluminum Rolling Company LLC (“OARC”), a producer and exporter of the subject merchandise in Oman;
- R.M. Creations, Inc. (“RM”), an importer of subject merchandise;
- Ta Chen International, Inc. (“TCI”), an importer of subject merchandise; and
- Istanbul Ferrous and Non-Ferrous Metals Exporters’ Association, an association of producers and exporters in Turkey, and Assan Alüminyum Sanayi ve Ticaret A.Ş., a producer and exporter of subject merchandise in Turkey (collectively, “Turkish Producers and Exporters”).^{4 5}

³ The Commission originally scheduled the conference in these investigations to occur at its building on March 30, 2020. In light of the restrictions on access to the Commission building due to the COVID-19 pandemic, the Commission conducted its conference through written questions, submissions of written testimony, written responses to questions, and postconference briefs as set forth in procedures provided to the parties.

⁴ In addition, respondents Central National-Gottesman Inc. (“CNG”), an importer of subject merchandise; EvalHalcor; GARMCO; Hulamin; HARP; OARC; RM; and the governments of Egypt and Indonesia submitted written testimony to the Commission for the staff conference.

⁵ The Technical Secretariat of Anti-injurious Practices in International Trade of the Cooperation Council for the Arab States of the Gulf (“GCC”) and J.B. Poindexter & Co., Inc. (“JBP”), a purchaser of CAAS, submitted nonparty statements.

U.S. industry data are based on questionnaire responses from nine producers, accounting for the vast majority of U.S. production of CAAS during 2019.⁶ U.S. import data are based on official import statistics.⁷ The Commission also received questionnaire responses from 80 U.S. importers, accounting for 61.3 percent of imports.⁸

The Commission received responses to its foreign producer questionnaire from one firm in Bahrain, three firms in Brazil, one firm in Croatia, one firm in Egypt, six firms in Germany, one firm in Greece, three firms in India, six firms in Italy, one firm in Korea, one firm in Oman, one firm in Romania, one firm in Serbia, one firm in Slovenia, one firm in South Africa, two firms in Spain, one firm in Taiwan, and five firms in Turkey.⁹

III. Domestic Like Product

In determining whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of imports of the subject merchandise, the Commission first defines the “domestic like product” and the “industry.”¹⁰ Section 771(4)(A) of the Tariff Act of 1930, as amended (“the Tariff Act”), defines the relevant domestic industry as the “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”¹¹ In turn, the Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation.”¹²

By statute, the Commission’s “domestic like product” analysis begins with the “article subject to an investigation,” *i.e.*, the subject merchandise as determined by Commerce.¹³ Therefore, Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value is “necessarily the starting point of the Commission’s like product analysis.”¹⁴ The Commission then defines the domestic like product

⁶ Confidential Report, INV-SS-044 (April 16, 2020) (“CR”) at I-4; Public Report (“PR”) at I-4.

⁷ CR/PR at I-4.

⁸ CR/PR at I-4 to I-5.

⁹ CR/PR at VII-3, VII-7, VII-13, VII-19, VII-24, VII-32, VII-38, VII-46, VII-49, VII-57, VII-64, VII-69, VII-75, VII-80, VII-86, VII-91, VII-99, VII-104.

¹⁰ 19 U.S.C. § 1677(4)(A).

¹¹ 19 U.S.C. § 1677(4)(A).

¹² 19 U.S.C. § 1677(10).

¹³ 19 U.S.C. § 1677(10). The Commission must accept Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See, e.g., USEC, Inc. v. United States*, 34 Fed. App’x 725, 730 (Fed. Cir. 2002) (“The ITC may not modify the class or kind of imported merchandise examined by Commerce.”); *Algoma Steel Corp. v. United States*, 688 F. Supp. 639, 644 (Ct. Int’l Trade 1988), *aff’d*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

¹⁴ *Cleo Inc. v. United States*, 501 F.3d 1291, 1298 (Fed. Cir. 2007); *see also Hitachi Metals, Ltd. v. United States*, Case No. 19-1289, slip op. at 8-9 (Fed. Cir. Feb. 7, 2020) (the statute requires the

in light of the imported articles Commerce has identified.¹⁵ The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of “like” or “most similar in characteristics and uses” on a case-by-case basis.¹⁶ No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.¹⁷ The Commission looks for clear dividing lines among possible like products and disregards minor variations.¹⁸

A. Scope Definition

In its notices of initiation, Commerce defined the imported merchandise within the scope of these investigations as:

aluminum common alloy sheet (common alloy sheet), which is a flat-rolled aluminum product having a thickness of 6.3 mm or less, but greater than 0.2 mm, in coils or cut-to-length, regardless of width. Common alloy sheet within the scope of the investigations includes both not clad aluminum sheet, as well as multi-alloy, clad aluminum sheet. With respect to not clad aluminum sheet, common alloy sheet is manufactured from a 1XXX-, 3XXX-, or 5XXX-series alloy as designated by the Aluminum Association. With respect to multi-alloy, clad aluminum

(...Continued)

Commission to start with Commerce’s subject merchandise in reaching its own like product determination).

¹⁵ *Cleo*, 501 F.3d at 1298 n.1 (“Commerce’s {scope} finding does not control the Commission’s {like product} determination.”); *Hosiden Corp. v. Advanced Display Mfrs.*, 85 F.3d 1561, 1568 (Fed. Cir. 1996) (the Commission may find a single like product corresponding to several different classes or kinds defined by Commerce); *Torrington*, 747 F. Supp. at 748-52 (affirming the Commission’s determination defining six like products in investigations where Commerce found five classes or kinds).

¹⁶ *See, e.g., Cleo*, 501 F.3d at 1299; *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (“every like product determination ‘must be made on the particular record at issue’ and the ‘unique facts of each case’”). The Commission generally considers a number of factors including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. *See Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996).

¹⁷ *See, e.g., S. Rep. No. 96-249* at 90–91 (1979).

¹⁸ *See, e.g., Nippon*, 19 CIT at 455; *Torrington*, 747 F. Supp. at 748–49; *see also S. Rep. No. 96-249* at 90–91 (Congress has indicated that the like product standard should not be interpreted in “such a narrow fashion as to permit minor differences in physical characteristics or uses to lead to the conclusion that the product and article are not ‘like’ each other, nor should the definition of ‘like product’ be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.”).

sheet, common alloy sheet is produced from a 3XXX-series core, to which cladding layers are applied to either one or both sides of the core.

Common alloy sheet may be made to ASTM specification B209-14 but can also be made to other specifications. Regardless of specification, however, all common alloy sheet meeting the scope description is included in the scope. Subject merchandise includes common alloy sheet that has been further processed in a third country, including but not limited to annealing, tempering, painting, varnishing, trimming, cutting, punching, and/or slitting, or any other processing that would not otherwise remove the merchandise from the scope of these investigations if performed in the country of manufacture of the common alloy sheet.

Excluded from the scope of these investigations is aluminum can stock, which is suitable for use in the manufacture of aluminum beverage cans, lids of such cans, or tabs used to open such cans. Aluminum can stock is produced to gauges that range from 0.200 mm to 0.292 mm, and has an H-19, H-41, H-48, or H-391 temper. In addition, aluminum can stock has a lubricant applied to the flat surfaces of the can stock to facilitate its movement through machines used in the manufacture of beverage cans. Aluminum can stock is properly classified under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 7606.12.3045 and 7606.12.3055.

Where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set for the above.

Common alloy sheet is currently classifiable under HTSUS subheadings 7606.11.3060, 7606.11.6000, 7606.12.3096, 7606.12.6000, 606.91.3095, 7606.9.6095, 7606.92.3035, and 7606.92.6095. Further, merchandise that falls within the scope of these investigations may also be entered into the United States under HTSUS subheadings 7606.11.3030, 7606.12.3015, 7606.12.3025, 7606.12.3035, 7606.12.3091, 7606.91.3055, 7606.91.6055, 7606.92.3025, 7606.92.6055, 7607.11.9090. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of these investigations is dispositive.¹⁹

¹⁹ *Common Alloy Aluminum Sheet from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India,*

CAAS is a thin wrought aluminum product that is produced via a rolling process. It is produced in a variety of gauges or levels of thickness, though the subject product has a thickness greater than 0.2 mm up to 6.3 mm.²⁰ CAAS is used in a wide variety of applications, with different aluminum alloys used to elicit required characteristics of the aluminum.²¹ For instance, common applications for Alloy 3003 sheet include heat exchangers, air conditioning evaporators, motor vehicle radiators, and home appliances. Alloy 3105 sheet is commonly used in manufacturing mobile homes, residential siding, gutters and downspouts. Common applications for Alloy 5052 sheet include architecture, general sheet metal work, and heat exchangers.²²

B. Arguments of the Parties

Petitioners argue that the Commission should define a single domestic like product that is coextensive with the scope of these investigations. They note that in its prior determinations involving imports of CAAS from China, the Commission applied its six-factor test and found a single domestic like product coextensive with the scope. Petitioners state that the scope of these investigations is unchanged from the investigations of CAAS from China, and there have been no material changes to the physical characteristics and uses, interchangeability, channels of distribution, customer and producer perceptions, and manufacturing facilities in which CAAS is produced in the United States since the Commission's China investigations.²³

No respondent contests the domestic like product for purposes of the preliminary investigations.²⁴

(...Continued)

Indonesia, Italy, Republic of Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan and the Republic of Turkey: Initiation of Less-Than-Fair-Value Investigations, 85 Fed. Reg. 19444 (Dep't of Commerce April 7, 2020); *Common Alloy Aluminum Sheet From Bahrain, Brazil, India, and the Republic of Turkey: Initiation of Countervailing Duty Investigations*, 85 Fed. Reg. 19449 (Dep't of Commerce April 7, 2020).

²⁰ CR/PR at I-12.

²¹ See CR/PR at Table I-1. The various alloy series use different alloying metals. The alloying metals include pure aluminum (series 1xxx), manganese (3xxx), magnesium (5xxx), and magnesium and silicon (6xxx) (outside the scope of the investigations).

²² CR/PR at I-13.

²³ Petitioners' Brief at 5 (*citing Common Alloy Aluminum Sheet from China*, Inv. Nos. 701-TA-591 and 731-TA-1399 (Final) USITC Pub. 4861 (Jan. 2019) ("*CAAS from China*") at 11). See also CR/PR at I-5 to I-6 (reviewing the previous and related investigations on CAAS from China); and Section III.C. below (discussing the prior and related investigations on CAAS from China).

²⁴ See, e.g., HARP's Written Testimony, Introduction to Written Testimony of Respondents (March 27, 2020) at 1 (Sim).

C. Analysis

The scope of these investigations is the same as that in the *CAAS from China* investigations, which concluded in January 2019.²⁵ In *CAAS from China*, the Commission considered whether can stock, which was excluded from the scope, should nonetheless be included in the definition of the domestic like product.²⁶ The Commission concluded that the distinctions between can stock and CAAS outweighed the similarities. It consequently did not include can stock in the domestic like product and defined the domestic like product to be coextensive with the scope of the investigations.²⁷

In the current investigations, which involve the same product and scope definition as *CAAS from China*, there is no new information in the record to warrant reaching a different definition, and no party has raised any arguments to the contrary. Therefore, we define a single domestic like product consisting of all CAAS coextensive with the scope for purposes of these preliminary phase investigations.

IV. Domestic Industry and Related Parties

The domestic industry is defined as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”²⁸ In defining the domestic industry, the Commission’s general practice has been to include the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise

²⁵ Petitioners note that the HTSUS has been revised since the *CAAS from China* investigations, and as a result, the HTSUS subheadings identified in the scope of these investigations have been updated to reflect the currently applicable HTSUS classifications. Petition at 8 n.5. *See also* CR/PR at I-4 n.6.

²⁶ Can stock is used for the manufacture of aluminum beverage cans, lids of such cans, or tabs used to open such cans. CR/PR at I-14.

²⁷ *CAAS from China* at 11.

²⁸ 19 U.S.C. § 1677(4)(A).

or which are themselves importers.²⁹ Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.³⁰

A. Arguments of the Parties

Petitioners argue that appropriate circumstances do not exist to exclude any of the domestic producers from the domestic industry. They argue that each of the producers implicating the related parties provision either reported not importing at all or importing small quantities of subject merchandise. In each case, they maintain that the company's primary interest lies in domestic production and sales of CAAS.³¹

AKG argues that petitioners *** should be excluded as related parties. AKG contends that they are both owned by foreign producers and therefore do not have a primary interest in domestic production.³²

B. Analysis

Seven domestic producers – *** – implicate the related parties provision as each is an importer of subject merchandise and/or related to importers or exporters of subject merchandise.³³ We discuss below whether appropriate circumstances exist to exclude any of these producers from the domestic industry.

²⁹ See *Torrington Co. v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int'l Trade 1992), *aff'd without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int'l Trade 1989), *aff'd mem.*, 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int'l Trade 1987).

³⁰ The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

- (1) the percentage of domestic production attributable to the importing producer;
- (2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);
- (3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;
- (4) the ratio of import shipments to U.S. production for the imported product; and
- (5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int'l. Trade 2015); *see also Torrington*, 790 F. Supp. at 1168.

³¹ Petitioners' Brief, Answers to Questions at 4-8.

³² AKG's Brief at 14-15.

³³ *** are related parties because they imported subject CAAS during the POI. *See* CR/PR at Table III-9. In addition, *** are related parties because they are related to an importer or exporter of subject merchandise. *See* CR/PR at Table III-2.

***. *** was the *** domestic producer in 2019, accounting for *** percent of domestic production.³⁴ *** is a related party because it wholly owns an exporter of subject merchandise in ***.³⁵ *** exported *** short tons of subject merchandise to the United States over the POI.³⁶ *** itself did not import subject merchandise during the POI. *** operating income to net sales ratio was ***.³⁷

We find that appropriate circumstances do not exist to exclude *** from the domestic industry. Its U.S. production is considerably larger than its related exporter's exports to the United States, indicating that *** principal interest lies in domestic production.³⁸ Moreover, there is no evidence that its *** shielded it from subject imports to any significant degree or that it derived any benefit from the related exporter's exports to the U.S. market.³⁹

***. ***, was the *** largest domestic producer in 2019, accounting for *** percent of domestic production.⁴⁰ It implicates the related parties provision because it imported *** short tons of CAAS from *** in 2017 (the equivalent of *** percent of its domestic production), *** short tons from *** in 2018 (the equivalent of *** percent of its domestic production) and *** short tons from *** in 2019 (the equivalent of *** percent of its domestic production).⁴¹ It stated that it imported to ***.⁴² *** operating income to net sales ratio was *** than the industry average over the POI.⁴³

The *** imports relative to its domestic production indicates that its principal interest lies in domestic production. Also, no party has argued that *** should be excluded from the definition of the domestic industry. Accordingly, we find that appropriate circumstances do not exist to exclude *** from the domestic industry.

³⁴ CR/PR at Table III-1.

³⁵ CR/PR at Table III-2; ***.

³⁶ Derived from ***.

³⁷ See CR/PR at Table VI-4.

³⁸ Compare ***.

³⁹ While *** also purchased subject imports from *** during the POI, CR/PR at Table III-10, these purchases were not substantial and do not demonstrate control of large volumes of subject imports as required by the statute. See CR/PR at Tables III-10 and IV-2; 19 U.S.C. § 1677(4)(B)(ii)(III). The Commission has previously concluded that a purchaser may be treated as a related party if it controls large volumes of subject imports. The Commission has found such control to exist when the domestic producer was responsible for a predominant proportion of an importer's purchases and these purchases were substantial. See *Iron Construction Castings from Brazil, Canada, and China*, Inv. Nos. 701-TA-249, 731-TA-262-263 and 265 (Fourth Review), USITC Pub. 4655 (Dec. 2016) at 11.

⁴⁰ CR/PR at Table III-1.

⁴¹ CR/PR at Table III-9. *** also purchased subject imports from *** during the POI. CR/PR at Table III-10. However, these purchases were small relative to total imports from *** and do not demonstrate control as required by the statute. See CR/PR at Table IV-2; 19 U.S.C. § 1677(4)(B)(ii)(III).

⁴² CR/PR at Table III-9.

⁴³ See CR/PR at Table VI-4.

***. *** was the *** domestic producer in 2019, accounting for *** percent of domestic production.⁴⁴ *** implicates the related parties provision because it is related to an exporter of subject merchandise in *** through common ownership by ***.⁴⁵ *** exported *** of subject merchandise to the United States over the POI.⁴⁶ *** itself did not import subject merchandise during the POI. *** operating income to net sales ratio was ***.⁴⁷

We find that the appropriate circumstances do not exist to exclude *** from the domestic industry. Its U.S. production is considerably larger than the exports to the United States from its related exporter, indicating that *** principal interest lies in domestic production.⁴⁸ Moreover, there is no evidence that its *** shielded it from subject imports to any significant degree or that it derived any benefit from the related exporter's exports to the U.S. market.

***. *** was the *** largest domestic producer in 2019, accounting for *** percent of domestic production.⁴⁹ It implicates the relates parties provision because it imported subject merchandise during the POI and is related to ***.⁵⁰ *** imported *** short tons of CAAS from *** in 2017 (the equivalent of *** percent of its domestic production), *** short tons from *** in 2018 (the equivalent of *** percent of its domestic production), and *** short tons from *** in 2019 (the equivalent of *** percent of its domestic production).⁵¹ *** stated that the reason for its imports was to ***.⁵² *** operating income to net sales ratio was *** the industry average for two years of the three-year POI.⁵³ The company *** the imposition of antidumping and countervailing duties ***.⁵⁴

The *** imports relative to its domestic production indicates that its principal interest lies in domestic production. Also, no party has argued that *** should be excluded from the definition of the domestic industry. Accordingly, on the basis of the record in the preliminary phase of these investigations and recognizing that we lack information to determine the extent and role of subject imports from Jupiter's related exporter, we find that appropriate circumstances do not exist to exclude *** from the domestic industry.

⁴⁴ CR/PR at Table III-1.

⁴⁵ CR/PR at Table III-2; ***.

⁴⁶ ***.

⁴⁷ See CR/PR at Table VI-4.

⁴⁸ Compare ***.

⁴⁹ CR/PR at Table III-1.

⁵⁰ *** has a wholly owned subsidiary, ***, a producer and exporter of CAAS in ***. CR/PR at Table III-2. The foreign producer did not provide a questionnaire response. See CR/PR at VII-88 to VII-89.

⁵¹ CR/PR at Table III-9.

⁵² CR/PR at Table III-9.

⁵³ See CR/PR at Table VI-4.

⁵⁴ See ***.

***. *** was the *** largest domestic producer in 2019, accounting for *** percent of domestic production.⁵⁵ It implicates the related parties provision because it imported subject merchandise during the POI. It imported *** short tons of CAAS from *** in 2017 (the equivalent of *** percent of its domestic production), *** short tons in 2018 (the equivalent of *** percent of its domestic production) and *** short tons in 2019 (the equivalent of *** percent of its domestic production).⁵⁶ It stated that it imported to ***.⁵⁷ Its operating income to net sales ratio was *** to the industry average over the POI.⁵⁸

The *** imports relative to its domestic production indicates that its principal interest lies in domestic production. Also, no party has argued that it should be excluded from the definition of the domestic industry. Accordingly, we find that appropriate circumstances do not exist to exclude *** from the domestic industry.

***. *** was the *** largest domestic producer in 2019, accounting for *** percent of domestic production.⁵⁹ It implicates the related parties provision because it imported subject merchandise during the POI and is related to subject ***.⁶⁰ *** imported *** short tons of CAAS from *** in 2017 (the equivalent of *** percent of its domestic production), *** short tons from *** in 2018 (the equivalent of *** percent of its domestic production), and *** short tons from *** in 2019 (the equivalent of *** percent of its domestic production).⁶¹ According to ***, it imported to ***.⁶² *** operating income to net sales ratio was *** the industry average for most of the POI.⁶³ The company *** the imposition of antidumping and countervailing duties on ***.⁶⁴

Although *** imports as a share of its domestic production increased during the POI, it also ***, suggesting that its primary interest remains in domestic production.⁶⁵ While exports from the *** firms related to *** were substantial relative to *** production, there is no evidence that it derived any benefit from the affiliated foreign producers' exports to the U.S. market. Further, *** domestic production far exceeded its imports of subject merchandise in the first year of the POI and, *albeit* at increasing levels, continued to exceed its imports of

⁵⁵ CR/PR at Table III-1.

⁵⁶ CR/PR at Table III-9.

⁵⁷ CR/PR at Table III-9. ***. *Id.*

⁵⁸ See CR/PR at Table VI-4.

⁵⁹ See CR/PR at Table III-1.

⁶⁰ ***. Petitioners' Brief, Answers to Questions at 6. ***. CR/PR at Table III-2. These five exporters' shipments to the United States *** at *** short tons in 2019, which exceeds *** production of *** short tons that year. CR/PR at Table III-5; Foreign Producer Questionnaire Responses at II-8.

⁶¹ ***.

⁶² CR/PR at Table III-9. A *** company official explains that it ***. Petitioners' Brief at Exhibit 27 (***) Declaration) at Para. 10.

⁶³ See CR/PR at Table VI-4.

⁶⁴ ***.

⁶⁵ CR/PR at III-5, Table III-4.

subject merchandise throughout the entirety of the POI. Accordingly, we find that appropriate circumstances do not exist to exclude *** from the domestic industry.

***. *** was the *** largest domestic producer in 2019, accounting for *** percent of domestic production.⁶⁶ ***.⁶⁷ *** implicates the related parties provision because it imported subject merchandise during the POI and ***.⁶⁸

*** directly imported *** short tons of CAAS from *** in 2019 (the equivalent of *** percent of its domestic production,⁶⁹ and *** operating income to net sales ratio was *** the industry average during 2019, the first year it produced CAAS.⁷⁰ It *** the imposition of antidumping and countervailing duties.⁷¹

Although ***, we consider that the *** imports relative to its recently started domestic production and the substantial investment made *** suggest that its primary interest is in domestic production. Moreover, there is no indication, given *** financial performance during 2019, that its *** shielded it from subject imports to any significant degree or that it derived any benefit from its affiliate's imports to the U.S. market.⁷² No party has argued for its exclusion, and *** is a petitioner supporting imposition of antidumping and countervailing duties. Accordingly, we find that appropriate circumstances do not exist to exclude *** from the domestic industry.

We consequently define the domestic industry to include all domestic producers of CAAS in the definition of the domestic industry.

V. Negligibility

Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product shall be deemed negligible if they account for less than three percent (or four percent in the case of a developing country in a countervailing duty investigation) of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition.⁷³

⁶⁶ CR/PR at Table III-1

⁶⁷ See CR/PR at VI-1 n.3, Tables III-3 and III-4.

⁶⁸ CR/PR at Tables III-2 and III-9. See 19 U.S.C. § 1677(4)(B)(ii)(III). *** short tons of CAAS in 2019. Calculated from CR/PR at Tables IV-1 and IV-2.

⁶⁹ CR/PR at Table III-9. ***. *Id.*

⁷⁰ See CR/PR at Table VI-4. ***. CR/PR at VI-1 n.3. ***. CR/PR at Table VI-5.

⁷¹ See *** Producer Questionnaire at I-4.

⁷² However, all of ***. CR/PR at Table VI-2 n.5.

⁷³ 19 U.S.C. §§ 1671d(b), 1673d(b), 1677(24)(A)(i), 1677(24)(B); see also 15 C.F.R. § 2013.1 (developing countries for purposes of 19 U.S.C. § 1677(36)).

The statute further provides that subject imports from a single country that comprise less than 3 percent of such total imports of the product may not be considered negligible if there are several countries subject to investigation with negligible imports and the sum of such imports from all those countries collectively accounts for more than 7 percent of the volume of all such merchandise imported into the United States.⁷⁴ In the case of countervailing duty investigations involving developing countries (as designated by the United States Trade Representative (USTR)), the statute indicates that the negligibility limits are 4 percent and 9 percent, rather than 3 percent and 7 percent.⁷⁵

A. Arguments of the Parties

1. Petitioners

Petitioners contend that the Commission should not terminate any of the current investigations on the basis of negligibility. They argue that subject imports from Bahrain, Brazil, Germany, India, Indonesia, Korea, Oman, South Africa, Taiwan, and Turkey are not negligible because subject imports from each country surpass the 3 percent threshold of total U.S. imports during the relevant period (March 2019-February 2020).⁷⁶ Petitioners acknowledge that subject imports from several countries (Croatia, Egypt, Greece, Italy, Romania, Serbia, Slovenia, and Spain) are under the 3 percent threshold, but argue that collectively these countries account for 12.4 percent of imports of CAAS during the relevant period and thus exceed the 7 percent threshold in the aggregate.⁷⁷ Finally, they note that of the four countries subject to countervailing duty investigations, only Brazil accounts for less than 4 percent, although more than 3 percent, of total U.S. imports of CAAS over the relevant period. However, petitioners assert that Brazil is not subject to the 4 percent threshold because Brazil is not designated as a developing country by USTR.⁷⁸

2. Respondents

Several Respondents address negligibility in their postconference briefs. AKG and Alro observe that subject imports from Romania are under the 3 percent threshold during the pertinent negligibility period, although Alro recognizes that when aggregated with other individually negligible imports subject imports from Romania would not be negligible.⁷⁹

RM argues that subject imports from Italy are under the 3 percent threshold if the Commission relies on the volumes reported in the Italian foreign producer's questionnaire response. It also claims that the official import statistics overstate subject imports from Italy because they include imports by Novelis from its Italian parent, but it does not explain on what

⁷⁴ 19 U.S.C. § 1677(24)(A)(ii).

⁷⁵ 19 U.S.C. § 1677(24)(B).

⁷⁶ Petitioners' Brief at 8.

⁷⁷ Petitioners' Brief at 8-9.

⁷⁸ Petitioners' Brief at 8 n.6 (citing Designations of Developing and Least-Developed Countries Under the Countervailing Duty Law, 85 Fed. Reg. 7613, 7615-16 (USTR Feb. 10, 2020)).

⁷⁹ AKG's Brief at 17; Alro's Brief at 1.

basis such imports could be excluded.⁸⁰ ElvalHalcor urges the Commission to use the most recent import data available so that subject imports from Greece are under the 3 percent threshold.⁸¹

B. Analysis

We examine whether subject imports from any of the subject countries are negligible. As we explain below, we find that subject imports are not negligible in any of the antidumping or countervailing duty investigations.⁸²

We initially observe that imports from 10 of the 18 subject countries are above the statutory negligibility threshold. These subject countries, and their percentages of total imports for March 2019 through February 2020, the 12-month period preceding filing of the petitions, are as follows: Bahrain (7.7 percent), Brazil (3.3 percent), Germany (9.0 percent), India (4.8 percent), Indonesia (4.6 percent), Korea (3.9 percent), Oman (8.5 percent), South Africa (4.1 percent), Taiwan (5.2 percent), and Turkey (4.6 percent).⁸³ Accordingly, we find that imports from these ten subject countries are not negligible for purposes of the antidumping duty investigations on the aforementioned countries (Bahrain, Brazil, Germany, India, Indonesia, Korea, Oman, South Africa, Taiwan, and Turkey), and the countervailing duty investigations concerning CAAS from Bahrain, Brazil, India, and Turkey.

In contrast, eight of the 18 subject countries (none of which are subject to countervailing duty investigations) are below the 3 percent individual subject country statutory negligibility threshold applicable to antidumping duty investigations. These subject countries, and their percentages of total imports for March 2019 through February 2020 are as follows: Croatia (0.9 percent), Egypt (1.2 percent), Greece (2.9 percent), Italy (2.6 percent), Romania (1.1 percent), Serbia (0.4 percent), Slovenia (1.0 percent), and Spain (2.2 percent).⁸⁴ The aggregate percentage of total imports from these eight countries is 12.4 percent.⁸⁵ Because this exceeds the 7 percent statutory threshold pertinent to aggregated imports from individually negligible sources, we find that subject imports are not negligible for purposes of the antidumping duty investigations on CAAS from Croatia, Egypt, Greece, Italy, Romania,

⁸⁰ RMs' Brief at 6-8. *See also* RM's Written Testimony of Snehal Desai at 1. Nor does RM address the aggregate 7 percent threshold.

⁸¹ ElvalHalcor's Brief at 11.

⁸² There are antidumping duty investigations involving all 18 countries and countervailing duty investigations involving four countries: Bahrain, Brazil, India, and Turkey. The subject import volumes are the same in the countervailing duty investigations as in the antidumping duty investigations for these four countries, and none of the countervailing duty investigations involves a developing country for which the 4 percent threshold would apply. *See Designations of Developing and Least-Developed Countries Under the Countervailing Duty Law*, 85 Fed. Reg. 7613, 7615-16 (USTR Feb. 10, 2020).

⁸³ CR/PR at Table IV-3. Table IV-3 is based on official import statistics.

⁸⁴ CR/PR at Table IV-3.

⁸⁵ CR/PR at Table IV-3.

Serbia, Slovenia, and Spain.⁸⁶ Thus, we conclude that subject imports are not negligible in all of the subject investigations and therefore eligible for cumulation.⁸⁷

VI. Cumulation

For purposes of evaluating the volume and effects for a determination of material injury by reason of subject imports, section 771(7)(G)(i) of the Tariff Act requires the Commission to cumulate subject imports from all countries as to which petitions were filed and/or investigations self-initiated by Commerce on the same day, if such imports compete with each other and with the domestic like product in the U.S. market. In assessing whether subject imports compete with each other and with the domestic like product, the Commission generally has considered four factors:

- (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality related questions;
- (2) the presence of sales or offers to sell in the same geographic markets of subject imports from different countries and the domestic like product;
- (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and
- (4) whether the subject imports are simultaneously present in the market.⁸⁸

While no single factor is necessarily determinative, and the list of factors is not exclusive, these factors are intended to provide the Commission with a framework for determining whether the subject imports compete with each other and with the domestic like product.⁸⁹ Only a “reasonable overlap” of competition is required.⁹⁰

⁸⁶ None of the countries subject to countervailing duty investigations (Bahrain, Brazil, India, and Turkey) have imports under 3 percent during the relevant period.

⁸⁷ While respondents address negligibility, no respondent argues that subject imports from a particular country are not eligible to be aggregated if they are under 3 percent.

⁸⁸ See *Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-280 (Final), USITC Pub. 1845 (May 1986), *aff'd*, *Fundicao Tupy, S.A. v. United States*, 678 F. Supp. 898 (Ct. Int'l Trade), *aff'd*, 859 F.2d 915 (Fed. Cir. 1988).

⁸⁹ See, e.g., *Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int'l Trade 1989).

⁹⁰ The Statement of Administrative Action (SAA) to the Uruguay Round Agreements Act (URAA), expressly states that “the new section will not affect current Commission practice under which the statutory requirement is satisfied if there is a reasonable overlap of competition.” H.R. Rep. No. 103-316, Vol. I at 848 (1994) (*citing Fundicao Tupy, S.A. v. United States*, 678 F. Supp. at 902; see *Goss Graphic Sys., Inc. v. United States*, 33 F. Supp. 2d 1082, 1087 (Ct. Int'l Trade 1998) (“cumulation does not

A. Arguments of the Parties

Petitioners' Arguments. Petitioners argue that there is a reasonable overlap of competition because subject imports compete directly with each other and with the domestic like product in key alloys such as 3003, 5052, and 3105. Petitioners observe that domestic producers and importers generally reported that subject imports and the domestic product are used interchangeably and that nonprice differences are usually not significant.⁹¹ According to petitioners, CAAS from all subject countries and domestically produced CAAS compete in the same geographic markets, are sold through the same channels of distribution (either to distributors or to end users) and were present in the U.S. market during the majority of the POI, and all of 2018 and 2019. Thus, petitioners conclude that there was a reasonable overlap of competition between and among the imports from each subject country and the domestic like product.⁹²

Respondents' Arguments. AKG asserts that the respondents in this case are a diverse group of countries, geographically and in terms of their level of economic development. It claims there is no evidence that the subject imports are the same type of CAAS, sold to the same ports or regions, in the same time period, and in similar channels of distribution.⁹³

GARMCO argues that subject imports from Bahrain do not compete with domestic like product and other subject imports. Specifically, it contends that imports from Bahrain are a different product mix; serve particular customer types; and are made to order, rather than sold from inventory like the domestic producers.⁹⁴

CBA argues that subject imports from Brazil should not be cumulated with other subject imports. CBA asserts that Novelis do Brasil's exports to the United States were exclusively to Novelis, and that over the POI, the vast majority of CBA's exports were sold ***. Based on these distinctions, it concludes that subject imports from Brazil should not be cumulated with other subject imports.⁹⁵

A. Analysis and Conclusion

The initial statutory requirement is satisfied because the petitioners filed the antidumping and countervailing duty petitions with respect to all 18 countries on the same day, March 9, 2020. As discussed below, we find that there is a reasonable overlap of competition

(...Continued)

require two products to be highly fungible"); *Wieland Werke, AG*, 718 F. Supp. at 52 ("Completely overlapping markets are not required.").

⁹¹ Petitioners' Brief at 11.

⁹² Petitioners' Brief at 11.

⁹³ AKG's Brief at 6.

⁹⁴ GARMCO's Brief at 4-5.

⁹⁵ CBA's Brief at 9-10.

between subject imports from each of the subject countries and between subject imports from each source and the domestic like product.

Fungibility. CAAS is typically produced to certain specifications that include alloy series, temper designations, thickness and width.⁹⁶ CAAS may also be produced to the requirements of various international standards, including but not limited to the American Society for Testing and Materials (ASTM) International Standard B209-14 for aluminum and aluminum alloy sheet and plate.⁹⁷

Market participants' questionnaire responses indicate that CAAS from domestic and subject sources are used interchangeably. When comparing the domestic product to the subject imports from each country, a majority of responding U.S. producers and importers reported that the domestic product and imports from each subject source are "always" or "frequently" used interchangeably.⁹⁸ For comparisons between imports from subject sources, almost all responding U.S. producers indicated that CAAS from each subject source is "always" used interchangeably.⁹⁹ Moreover, the great majority of importers also indicated that CAAS from each subject source was "always" or "frequently" used interchangeably with CAAS from other subject sources.¹⁰⁰

In addition, virtually all U.S. producers reported that there are "never" significant differences other than price between subject imports and domestically produced CAAS.¹⁰¹ In comparing imports from different subject sources, most U.S. producers also indicated that non-price factors were "never" significant.¹⁰² Most importers also reported that there were "sometimes" or "never" significant differences other than price between all country pairs and between subject imports and domestically produced CAAS.¹⁰³

The product mix shipped by domestic producers and importers of subject merchandise also suggests that there is substantial similarity in the products being sold. The vast majority of reported U.S. shipments of U.S. producers were non-clad 3XXX series, followed by non-clad 5XXX series, accounting for *** percent and *** percent of total U.S. producer shipments, respectively.¹⁰⁴ Subject imports from each subject country were also primarily comprised of non-clad 3XXX series and/or non-clad 5XXX series.¹⁰⁵ There appears to be little support in the record for GARMCO's argument that the product mix of subject imports from Bahrain differs

⁹⁶ CR/PR at I-13.

⁹⁷ CR/PR at I-14.

⁹⁸ See CR/PR at Table II-7.

⁹⁹ See CR/PR at Table F-1.

¹⁰⁰ See CR/PR at Table F-1.

¹⁰¹ See CR/PR at Table II-8.

¹⁰² See CR/PR at Table F-2.

¹⁰³ See CR/PR at Tables II-8 and F-2.

¹⁰⁴ CR/PR at IV-15, Table IV-4.

¹⁰⁵ See CR/PR at Table IV-4.

from that of domestically produced CAAS and imports from other subject countries sold during the POI.¹⁰⁶

Accordingly, the record indicates that there is a sufficient degree of fungibility among the subject imports and the domestic like product for purposes of finding a reasonable overlap of competition.

Channels of Distribution. Subject imports and the domestic like product shared the same general channels of distribution. During the POI, domestic producers split their sales relatively evenly among distributors, converters, and end users, with end users accounting for an increasing portion of domestic producers' sales.¹⁰⁷ Approximately two-thirds of subject imports were sold to distributors with smaller portions sold to end users and converters.¹⁰⁸ Although the concentration of subject imports in each channel of distribution varied by country, a substantial portion of subject imports from each subject source were sold to distributors.¹⁰⁹

CBA argues that subject imports from Brazil had a unique channel of distribution because its exports were ***. ***, and its imports appear to have been sold in competition with the domestic product and other subject imports.¹¹⁰

Geographic Overlap. U.S. producers reported selling CAAS to all regions of the contiguous United States.¹¹¹ Likewise, importers sold imports from each subject country in all six regions, except for subject imports from Brazil and Romania which were sold in five

¹⁰⁶ GARMCO asserts that subject imports from Bahrain consist of different products than other subject imports, have different customers and are not sold from inventory like the domestic product. GARMCO's Brief at 5. However, the record indicates that, like the domestic product and imports from other subject countries, subject imports from Bahrain were primarily non-clad 5XXX series and non-clad 3XXX series CAAS. See CR/PR at Tables IV-4 and E-2. We also observe that subject imports from Bahrain were sold in pricing product categories 1, 2, and 4 in competition with imports from other subject countries and the domestic product. See CR/PR at Tables V-3, V-4, and V-6. Further, like a substantial portion of shipments of the domestic product and the majority of subject imports, subject imports from Bahrain were sold to distributors. See CR/PR at Table II-2. Finally, contrary to GARMCO's argument, the majority of shipments of the domestic product and subject imports are, like subject imports from Bahrain, produced-to-order and not sold from inventory. See CR/PR at II-16.

¹⁰⁷ See CR/PR at Table II-2.

¹⁰⁸ See CR/PR at Table II-2.

¹⁰⁹ See CR/PR at Table II-2. The exception is subject imports from Oman, which were primarily sold to end users and converters. The domestic product, and substantial quantities of subject imports from India, Italy, Romania, Spain, and Turkey were also sold to end users. See CR/PR at Table II-2.

¹¹⁰ See ***. *** also sold substantial quantities of subject imports from Brazil in pricing product categories 1, 2, and 4. *Id.* at III-2b. See also CR/PR at Tables V-3, V-4, and V-6 (showing sales of subject imports from Brazil overlapping with sales of the domestic product and imports from other subject countries in pricing product categories 1, 2, and 4).

¹¹¹ CR/PR at Table II-3.

regions.¹¹² Subject imports also entered at ports throughout the United States. In 2019, official import statistics show that 60.2 percent of subject imports entered through the Eastern border of entry of the United States, followed by the Southern, Western, and Northern borders of entry with 16.4 percent, 15.6 percent, and 7.8 percent, respectively.¹¹³

Simultaneous Presence in Market. The monthly import statistics indicate that U.S. imports of CAAS from each subject country were present during all 36 months of the POI, with the exception of Croatia (22 of 36 months), Egypt (23 of 36 months), Serbia (11 of 36 months), and Slovenia (21 of 36 months).¹¹⁴

Conclusion. The record demonstrates that imports from each subject country are fungible with the domestic like product and each other, that imports from each of the subject countries and the domestic like product are sold in similar channels of distribution, similar geographic markets, and have been simultaneously present in the U.S. market. In light of the foregoing, we find that there is a reasonable overlap of competition between the domestic like product and imports from each subject country and among imports from each subject country. Therefore, we cumulatively assess the volume and effects of subject imports from all 18 countries for purposes of analysis of present material injury in the preliminary phase of these investigations.

VII. Reasonable Indication of Material Injury by Reason of Subject Imports

A. Legal Standard

In the preliminary phase of antidumping and countervailing duty investigations, the Commission determines whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.¹¹⁵ In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.¹¹⁶ The statute defines “material injury” as “harm which is not inconsequential,

¹¹² CR/PR at Table II-3.

¹¹³ CR/PR at IV-19. Imports from some subject sources were in relatively small volumes at certain ports of entry, but there appear to be substantial quantities from all subject sources entering at the eastern ports of entry. See CR/PR at IV-19, Table IV-5.

¹¹⁴ CR/PR at Table IV-6.

¹¹⁵ 19 U.S.C. §§ 1671b(a), 1673b(a). The Trade Preferences Extension Act of 2015, Pub. L. 114-27, amended the provisions of the Tariff Act pertaining to Commission determinations of reasonable indication of material injury and threat of material injury by reason of subject imports in certain respects.

¹¹⁶ 19 U.S.C. § 1677(7)(B). The Commission “may consider such other economic factors as are relevant to the determination” but shall “identify each {such} factor ... {a}nd explain in full its relevance to the determination.” 19 U.S.C. § 1677(7)(B).

immaterial, or unimportant.”¹¹⁷ In assessing whether there is a reasonable indication that the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.¹¹⁸ No single factor is dispositive, and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”¹¹⁹

Although the statute requires the Commission to determine whether there is a reasonable indication that the domestic industry is “materially injured by reason of” unfairly traded imports,¹²⁰ it does not define the phrase “by reason of,” indicating that this aspect of the injury analysis is left to the Commission’s reasonable exercise of its discretion.¹²¹ In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the “by reason of” standard must ensure that subject imports are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.¹²²

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.¹²³ In performing its examination, however, the Commission need not isolate

¹¹⁷ 19 U.S.C. § 1677(7)(A).

¹¹⁸ 19 U.S.C. § 1677(7)(C)(iii).

¹¹⁹ 19 U.S.C. § 1677(7)(C)(iii).

¹²⁰ 19 U.S.C. §§ 1671b(a), 1673b(a).

¹²¹ *Angus Chemical Co. v. United States*, 140 F.3d 1478, 1484-85 (Fed. Cir. 1998) (“{T}he statute does not ‘compel the commissioners’ to employ {a particular methodology}.”), *aff’g* 944 F. Supp. 943, 951 (Ct. Int’l Trade 1996).

¹²² The Federal Circuit, in addressing the causation standard of the statute, has observed that “{a}s long as its effects are not merely incidental, tangential, or trivial, the foreign product sold at less than fair value meets the causation requirement.” *Nippon Steel Corp. v. USITC*, 345 F.3d 1379, 1384 (Fed. Cir. 2003). This was re-affirmed in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), in which the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that “this court requires evidence in the record ‘to show that the harm occurred “by reason of” the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.’” See also *Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass’n v. USITC*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

¹²³ SAA, H.R. Rep. 103-316, Vol. I at 851-52 (1994) (“{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.”); S. Rep. 96-

the injury caused by other factors from injury caused by unfairly traded imports.¹²⁴ Nor does the “by reason of” standard require that unfairly traded imports be the “principal” cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.¹²⁵ It is clear that the existence of injury caused by other factors does not compel a negative determination.¹²⁶

Assessment of whether material injury to the domestic industry is “by reason of” subject imports “does not require the Commission to address the causation issue in any particular way” as long as “the injury to the domestic industry can reasonably be attributed to the subject imports.”¹²⁷ The Commission ensures that it has “evidence in the record” to “show that the

(...Continued)

249 at 75 (1979) (the Commission “will consider information which indicates that harm is caused by factors other than less-than-fair-value imports.”); H.R. Rep. 96-317 at 47 (1979) (“in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the petitioner to the subsidized or dumped imports is attributable to such other factors;” those factors include “the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry”); *accord Mittal Steel*, 542 F.3d at 877.

¹²⁴ SAA at 851-52 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports.”); *Taiwan Semiconductor Industry Ass’n*, 266 F.3d at 1345. (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.” (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int’l Trade 2002) (“{t}he Commission is not required to isolate the effects of subject imports from other factors contributing to injury” or make “bright-line distinctions” between the effects of subject imports and other causes.); *see also Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Remand), USITC Pub. 3658 at 100-01 (Dec. 2003) (Commission recognized that “{i}f an alleged other factor is found not to have or threaten to have injurious effects to the domestic industry, *i.e.*, it is not an ‘other causal factor,’ then there is nothing to further examine regarding attribution to injury”), *citing Gerald Metals*, 132 F.3d at 722 (the statute “does not suggest that an importer of LTFV goods can escape countervailing duties by finding some tangential or minor cause unrelated to the LTFV goods that contributed to the harmful effects on domestic market prices.”).

¹²⁵ S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

¹²⁶ *See Nippon*, 345 F.3d at 1381 (“an affirmative material-injury determination under the statute requires no more than a substantial-factor showing. That is, the ‘dumping’ need not be the sole or principal cause of injury.”).

¹²⁷ *Mittal Steel*, 542 F.3d at 876 & 878; *see also id.* at 873 (“While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured ‘by reason of’ subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.”), *citing United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its

harm occurred ‘by reason of’ the LTFV imports,” and that it is “not attributing injury from other sources to the subject imports.”¹²⁸ The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”¹²⁹

The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial evidence standard.¹³⁰ Congress has delegated this factual finding to the Commission because of the agency’s institutional expertise in resolving injury issues.¹³¹

B. Conditions of Competition and the Business Cycle

The following conditions of competition inform our analysis of whether there is a reasonable indication of material injury by reason of cumulated subject imports.

1. Demand Conditions

CAAS is used in a broad variety of applications, principally in automotive, energy, marine, and aerospace applications.¹³² End uses for CAAS include roofing, aluminum sheet or coil, heat exchangers, commercial and non-commercial transportation equipment, residential siding, gutters and downspouts, general fabrication, and HVAC equipment.¹³³ Demand for CAAS depends on demand for U.S. produced products in these downstream sectors.¹³⁴

Most U.S. producers reported an increase in U.S. demand for CAAS since January 1,

(...Continued)

decision in *Swift-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission’s causation analysis as comports with the Court’s guidance in *Mittal*.

¹²⁸ *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 877-79. We note that one relevant “other factor” may involve the presence of significant volumes of price-competitive nonsubject imports in the U.S. market, particularly when a commodity product is at issue. In appropriate cases, the Commission collects information regarding nonsubject imports and producers in nonsubject countries in order to conduct its analysis.

¹²⁹ *Nucor Corp. v. United States*, 414 F.3d 1331, 1336, 1341 (Fed. Cir. 2005); see also *Mittal Steel*, 542 F.3d at 879 (“*Bratsk* did not read into the antidumping statute a Procrustean formula for determining whether a domestic injury was ‘by reason’ of subject imports.”).

¹³⁰ We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

¹³¹ *Mittal Steel*, 542 F.3d at 873; *Nippon Steel Corp.*, 458 F.3d at 1350, citing *U.S. Steel Group*, 96 F.3d at 1357; S. Rep. 96-249 at 75 (“The determination of the ITC with respect to causation is ... complex and difficult, and is a matter for the judgment of the ITC.”).

¹³² CR/PR at II-1.

¹³³ CR/PR at I-13–14, II-12, Table I-1.

¹³⁴ CR/PR at II-12. While most U.S. producers and importers indicated that CAAS was not subject to business cycles, some importers reported that CAAS for road work and residential and commercial construction was seasonal. CR/PR at II-12–13.

2017, while a slight plurality of importers reported that demand had fluctuated.¹³⁵ Apparent U.S. consumption of CAAS increased by 4.3 percent over the POI; it was 2.16 million short tons in 2017, 2.21 million short tons in 2018, and 2.25 million short tons in 2019.¹³⁶

2. Supply Conditions

The domestic industry supplied the largest share of CAAS to the U.S. market during the POI. Its market share increased from 53.9 percent in 2017 to 55.4 percent in 2018 before declining to 53.5 in 2019.¹³⁷ The domestic industry's reported capacity increased from approximately 1.6 million short tons in 2017, to 1.7 million short tons in 2018 and then to 2.1 million short tons in 2019.¹³⁸ Domestic producers' inventories of CAAS increased by 30.9 percent over the POI from 180,627 short tons in 2017 to 221,909 short tons in 2018, and then to 236,465 short tons in 2019.¹³⁹

There were several notable developments affecting the operations of the domestic industry during the POI. Four U.S. producers (***) reported capital expenditures for plant expansions, upgrades, or openings including ***, ***, and ***. Five producers (***) reported production or employment curtailments, as well as shutdowns, ***.¹⁴⁰

Subject imports' share of apparent U.S. consumption increased over the POI as they became the second largest source of CAAS in the U.S. market in 2018 and 2019. Subject imports' market share was 15.9 percent in 2017, 24.5 percent in 2018, and 32.5 percent in 2019.¹⁴¹ Thus, subject imports' market share more than doubled over the POI - increasing by 16.6 percentage points.¹⁴²

¹³⁵ CR/PR at II-15, Table II-5. Five out of nine responding U.S. producers (or 55.5 percent) reported that U.S. demand for CAAS increased since January 1, 2017, while 21 out of 68 importers (or 30.8 percent) reported that demand fluctuated. CR/PR at Table II-5.

¹³⁶ CR/PR at IV-29, Tables IV-7 and C-1. U.S. consumption of CAAS grew at a slower pace in the last year of the POI - increasing only 1.6 percent from 2018 to 2019. *Id.*

¹³⁷ CR/PR at IV-31, Tables IV-8 and C-1. Thus, the U.S. producers' share of apparent U.S. consumption declined by 0.5 percent during the POI (2017-19).

¹³⁸ CR/PR at Tables III-5 and C-1.

¹³⁹ CR/PR at Tables III-8 and C-1. Thus, domestic producers' inventories increased by 30.9 percent over the POI (2017-19).

¹⁴⁰ CR/PR at Tables III-3 and III-4. There were several sales or acquisitions involving U.S. plants during the POI, including: Novelis' acquisition of Aleris, approved by the U.S. Department of Justice in March 2020 on the condition that Novelis divest all of Aleris' aluminum autobody sheet manufacturing operations in North America; and Arconic's sale of its aluminum rolling mill facility in Texarkana, TX to TCI in October 2018. CR/PR at Table III-4.

¹⁴¹ CR/PR at Tables IV-8 and C-1. Importers' CAAS inventories increased overall during the POI (2017-19), with inventories of subject imports increasing and inventories of nonsubject imports decreasing over the same period. CR/PR at Table VII-84.

¹⁴² CR/PR at Table IV-8 and C-1.

In contrast, nonsubject imports' share of apparent U.S. consumption declined over the POI; it was 30.2 percent in 2017, 20.1 percent in 2018, and 14.0 percent in 2019.¹⁴³ Thus, nonsubject imports' share of apparent U.S. consumption declined by more than half over the POI.¹⁴⁴ The largest sources of nonsubject imports during the POI were China and Canada.¹⁴⁵

3. Substitutability and Other Conditions

There is a moderate to high degree of substitutability between domestically produced CAAS and CAAS imported from subject countries.¹⁴⁶ The vast majority of responding U.S. producers reported that the domestic like product and imports from subject countries were always interchangeable.¹⁴⁷ A majority of responding importers indicated that the domestic like product and imports from each subject country were always or frequently interchangeable.¹⁴⁸ All six responding U.S. producers also reported that product from each subject country was always interchangeable with product from another subject country.¹⁴⁹ A majority or plurality of importers reported that product from one subject country was always interchangeable with CAAS from other subject countries, except that imports from Germany and from Greece were reported as frequently interchangeable with imports from Oman and Turkey.¹⁵⁰

¹⁴³ CR/PR at Table IV-8 and C-1. Imports of CAAS from China, as a share of apparent U.S. consumption, decreased from 18.1 percent in 2017 to 2.2 percent in 2019. Imports of CAAS from China became subject to antidumping and countervailing duty orders issued in February 2019 as a result of investigations initiated in December 2017. CR/PR at IV-31; CR/PR at II-1 n.6; see *Common Alloy Aluminum Sheet from the People's Republic of China: Antidumping Duty Order*, 84 Fed. Reg. 2813 (Feb. 8, 2019); see also *Common Alloy Aluminum Sheet from the People's Republic of China: Countervailing Duty Order*, 84 Fed. Reg. 2157 (Feb. 6, 2019). In September 2019, imports of CAAS from China also became subject to an additional 15 percent *ad valorem* duty under Section 301 of the Trade Act of 1974 ("Section 301 duties"), 19 U.S.C. § 2411. CR/PR at I-12. On January 22, 2020, the rate of duty was modified to 7.5 percent *ad valorem*. *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 85 FR 3741, January 22, 2020.

¹⁴⁴ CR/PR at Table IV-8.

¹⁴⁵ CR/PR at IV-5.

¹⁴⁶ CR/PR at Table II-7.

¹⁴⁷ CR/PR at Table II-7. Factors impacting interchangeability included the surface condition, smut levels, or forming characteristics, long validation periods with OEM producers, and material requirements. CR/PR at II-18.

¹⁴⁸ CR/PR at II-17 to II-18, Table II-7. A slight plurality of responding importers (eight) indicated that the domestic product and imports of CAAS from Germany were sometimes interchangeable with the domestic like product. Seven responding importers indicated that those imports were always interchangeable, and seven responding importers indicated that they were frequently interchangeable. *Id.*

¹⁴⁹ CR/PR at II-17 and Table F-1.

¹⁵⁰ CR/PR at II-18 and Table F-1.

Domestically produced CAAS and subject imports were sold in overlapping alloy series over the POI.¹⁵¹ Accordingly, the record does not suggest that substitutability between subject imports and the domestic like product was significantly limited by varying alloy series.

Price is among the most important factors in purchasing decisions for CAAS. Purchasers most frequently cited price, quality, and availability as being among the three most important factors in purchasing decisions.¹⁵² Almost all U.S. producers reported that non-price factors were never important in purchasing decisions, while a majority of responding importers reported that non-price factors were sometimes or never important.¹⁵³

The primary raw materials used to manufacture CAAS are primary aluminum and aluminum sheet scrap.¹⁵⁴ Domestic producers' prices for CAAS reportedly consist of three components: an indexed price of aluminum such as the London Metal Exchange ("LME") price for high-grade unwrought aluminum, the Midwest premium, and a fabrication or conversion price.¹⁵⁵ The LME plus Midwest premium for aluminum fluctuated over the POI, increasing irregularly until the middle of 2018 before decreasing for an overall increase of *** percent from January 2017 to December 2019.¹⁵⁶ Aluminum sheet scrap prices decreased by *** percent from January 2017 to December 2019.¹⁵⁷ Seven of nine U.S. producers reported that raw material prices fluctuated during the POI. Thirty-one of 68 importers also indicated that raw material prices fluctuated during the POI, with 23 reporting that raw material costs increased.¹⁵⁸ Raw materials as a portion of the domestic industry's average cost of goods sold ("COGS") increased from 67.6 percent in 2017 to 69.0 percent in 2018 before declining to 67.8 percent in 2019.¹⁵⁹

U.S. producers' shipments of domestically produced CAAS were sold primarily on the basis of annual and long-term contracts, with a smaller percentage being sold through spot sales and short-term contracts.¹⁶⁰ By comparison, U.S. importers' shipments of subject imports

¹⁵¹ CR/PR at Appx. E.

¹⁵² CR/PR at Table II-6.

¹⁵³ CR/PR at Tables II-8 and F-2.

¹⁵⁴ CR/PR at V-1. Other raw materials include alloying metals. *Id.*

¹⁵⁵ CR/PR at V-1 n.3.

¹⁵⁶ CR/PR at V-2; Fig. V-1. From December 2019 to February 2020, the LME plus Midwest premium decreased by *** percent. CR/PR at V-2. Hulamin argues that the Midwest premium was increased by the imposition of tariffs under Section 232 of the Trade Expansion Act of 1962, 19 U.S.C. § 1862 ("Section 232 tariffs"). Hulamin's Brief at 17. Hulamin also argues that aluminum prices on the LME *** in response to Section 301 duties. *Id.* at 17-18.

¹⁵⁷ CR/PR at V-3, Fig.V-2.

¹⁵⁸ CR/PR at V-1.

¹⁵⁹ CR/PR at Table VI-1. Thus, raw materials as a portion of COGs slightly increased by 0.2 percentage points over the POI (2017-19).

¹⁶⁰ CR/PR at Table V-2. During 2019, U.S. producers reported selling *** percent of their U.S. commercial shipments through annual contracts, *** percent through long-term contracts, *** percent on the spot market, and *** percent through short-term contracts. *Id.*

were sold primarily through short-term contracts.¹⁶¹ U.S. producers sold about equally to distributors, converters, and end users in 2017, and sold an increasing portion to end users in 2019. In contrast, importers collectively sold primarily to distributors.¹⁶²

Additional tariffs of 10-percent *ad valorem* were imposed on certain aluminum products, including CAAS, in March 2018 under Section 232 of the Trade Expansion Act of 1962.¹⁶³ The parties disagree concerning the relevance of requests made to the Secretary of Commerce to exclude from Section 232 tariffs HTSUS categories under which CAAS is currently classifiable.¹⁶⁴ The majority of responding importers indicated that the Section 232 tariffs had increased prices for CAAS but provided mixed responses regarding the Section 232 tariffs' effect on the supply of imported and domestically produced CAAS.¹⁶⁵ When asked about changes in purchasing patterns since 2018, a plurality of reporting U.S. purchasers indicated increasing purchases of domestic product; those purchasers that reported decreasing purchases of the domestic like product explained that there was limited capacity and availability from U.S. producers.¹⁶⁶

¹⁶¹ CR/PR at Table V-2. During 2019, U.S. importers reported selling *** percent of their U.S. commercial shipments on the spot market, *** percent through short-term contracts, and *** percent through annual contracts. No U.S. importers reported selling a portion of their U.S. commercial shipments through long-term contracts. *Id.*

¹⁶² CR/PR at Table II-2. Several domestic producers directly imported CAAS from both subject and nonsubject sources during the POI. CR/PR at Table III-9.

¹⁶³ CR/PR at II-2. Section 232 authorizes the Secretary of Commerce to conduct investigations to determine the effects of imports on the national security of the United States and authorizes the President to take action to restrict such imports. See 19 U.S.C. § 1862. The President announced tariffs of 10 percent *ad valorem* on U.S. imports of certain aluminum products, including CAAS, on March 8, 2018, effective on March 23, 2018. On March 22, 2018, the President temporarily suspended Section 232 tariffs on imports from Brazil, South Korea, and members of the European Union ("EU"), including subject countries Croatia, Germany, Greece, Italy, Romania, Slovenia, and Spain. The suspension of tariffs on aluminum imports from South Korea lapsed on April 30, 2018, and the suspension of tariffs on Brazil and EU countries lapsed on May 31, 2018. The President suspended tariffs on imports of aluminum from Canada and Mexico on May 19, 2019. CR/PR at II-2 n.7.

¹⁶⁴ Respondents generally argue that attestations in the exclusion requests purportedly submitted by petitioners show, for purposes of these investigations, a lack of domestic supply of large volumes of CAAS products. See, e.g., Alro's Brief at 5-7 and RM's Brief at 9-10. In denying that any such requests demonstrate that imports were required to meet demand, petitioners cite investments in increasing domestic capacity as evidence of their intention to increase U.S. production. See, e.g., Petitioner's Brief at 14-15 (investments "directly contradict assertions by respondents that domestic producers are not committed to supplying the needs of domestic CAAS purchases").

¹⁶⁵ CR/PR at II-2 and Table II-1.

¹⁶⁶ CR/PR at V-33 and Table V-11.

C. Volume of Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the “Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant.”¹⁶⁷

The volume of cumulated subject imports increased by 113.7 percent over the POI, increasing from 342,167 short tons in 2017 to 542,114 short tons in 2018 and 731,327 short tons in 2019.¹⁶⁸ As a share of apparent U.S. consumption, cumulated subject imports more than doubled over the POI - increasing from 15.9 percent in 2017 to 24.5 percent in 2018 and 32.5 percent in 2019.¹⁶⁹ For purposes of these preliminary determinations, we find that the volume of cumulated subject imports, and their increase, were significant in both absolute terms and relative to consumption in the United States during the POI.

D. Price Effects of the Subject Imports

Section 771(7)(C)(ii) of the Tariff Act provides that, in evaluating the price effects of subject imports, the Commission shall consider whether –

(I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and

(II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.¹⁷⁰

As addressed in section VII.B.3 above, the record indicates that there is a moderate-to-high degree of substitutability between subject imports and the domestic like product and that price is an important consideration in purchasing decisions for CAAS.

The Commission collected quarterly pricing data from U.S. producers and importers for total quantity and f.o.b. value of four CAAS products shipped to unrelated U.S. customers over the POI.¹⁷¹ Six U.S. producers and 28 importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.¹⁷²

¹⁶⁷ 19 U.S.C. § 1677(7)(C)(i).

¹⁶⁸ CR/PR at Tables IV-2 and C-1. Petitioners and Respondents agree that official statistics are an appropriate measure of imports of CAAS in these investigations. CR/PR at IV-4 n.6; Petitioners’ Brief, Exhibit 1, Answers to Questions at 34; Alro’s Brief, Exhibit A at 7; HARP’s Brief, Attachment 8 at 1; Hulamin’s Brief, Exhibit 1 at 7.

¹⁶⁹ CR/PR at Tables IV-8 and C-1. Thus, as a share of apparent U.S. consumption, cumulated subject imports increased by 16.6 percentage points during the POI (2017-19).

¹⁷⁰ 19 U.S.C. § 1677(7)(C)(ii).

¹⁷¹ The pricing products were as follows: (1) Product 1 – Alloy 3003, H-14 temper, 0.125” thick, 48” wide; (2) Product 2 – Alloy 5052, H-32 temper, 0.125” thick, 48” wide; (3) Product 3 – Alloy 3105,

During the POI, cumulated subject imports undersold the domestic like product in 228 of 405 (56.3 percent) quarterly comparisons, and oversold the domestic like product in the remaining 177 instances (43.7 percent).¹⁷³ The reported quantity of subject imports that undersold the domestic like product during the POI was 183.7 million pounds (or 91,700 short tons) with underselling concentrated in pricing product 2; the overselling quantity during the POI was 82.4 million pounds (41,200 short tons).¹⁷⁴ Subject imports' margins of underselling averaged 8.4 percent and ranged up to 21.9 percent; overselling margins averaged 12.4 percent and ranged up to 57.0 percent.¹⁷⁵ The quantity of subject imports associated with underselling comparisons (183.7 million pounds) represented 69.0 percent of the total quantity of subject imports for which pricing data were reported (266.1 million pounds).¹⁷⁶

The Commission also collected information from purchasers concerning their purchases of the domestic product and subject imports. Of the 20 purchasers who responded to the preliminary phase lost sales/lost revenue survey, nine reported that price was a primary reason for the decision to purchase subject imports rather than domestically produced product.¹⁷⁷ These purchasers reported purchasing 191,840 short tons of subject imports instead of domestic product because of lower prices, an amount equivalent to 35.1 percent of the 547,160 short tons of subject imports that those firms reported purchasing.¹⁷⁸

In light of the importance of price in purchasing decisions for CAAS, the fact that the domestic like product and subject imports are moderately to highly substitutable, the preponderance of underselling by cumulated subject imports measured by number of instances and volume, and the evidence of sales lost due to price, we conclude on the record in the preliminary phase of these investigations, that there has been significant underselling of the domestic like product by the cumulated subject imports. Further, we find that although subject import market share increased largely at the expense of nonsubject imports, domestic producers lost 0.5 percent market share to subject imports over the POI (including 2.0 percent from 2018 to 2019) and were unable to gain any of the market share ceded by nonsubject imports from China when such imports declined precipitously following institution of

(...Continued)

H-26 temper, 0.016" thick, 24" wide; and (4) Product 4 – Alloy 3003, H-14 temper, 0.063" thick, 48" wide. CR/PR at V-6.

¹⁷² CR/PR at V-6. Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. shipments and *** percent of U.S. shipments of subject imports in 2019. CR/PR at V-7.

¹⁷³ CR/PR at V-30, Table V-8.

¹⁷⁴ CR/PR at V-30, Table V-8.

¹⁷⁵ CR/PR at V-30, Table V-8.

¹⁷⁶ CR/PR at V-30.

¹⁷⁷ CR/PR at V-36.

¹⁷⁸ See CR/PR at Tables V-9 and V-12. Further, of the 20 responding purchasers, four reported that U.S. producers had reduced prices by margins ranging from *** to *** percent in order to compete with lower-priced imports from the subject countries. See CR/PR at V-37, Table V-14.

antidumping and countervailing duty investigations and the ultimate imposition of duties on such imports.¹⁷⁹

We have also considered price trends for the domestic like product and subject imports. Prices for each of the four domestically produced pricing products generally increased from the first quarter of 2017 to the fourth quarter of 2019, with domestic price increases ranging from *** percent to *** percent.¹⁸⁰ Petitioners assert that despite these overall trends, domestic prices were depressed late in the POI.¹⁸¹ We note that subject import levels were at their greatest in the final year of the POI and that domestic prices for each pricing product decreased from the first quarter of 2019 through the last quarter of 2019.¹⁸² In addition, we note that purchasers accounting for 29.5 percent of reported purchases of domestic product over the POI confirmed that the industry lowered prices to compete with subject imports.¹⁸³ In any final phase investigations, we will further examine possible effects of subject imports on domestic prices, including with respect to any changes in fabrication fees.

Finally, we consider whether the subject imports prevented price increases that otherwise would have occurred to a significant degree. Over the POI, the domestic industry's raw material costs increased from \$1,864 per short ton in 2017 to \$2,103 per short ton in 2018 and then declined to \$2,027 per short ton in 2019.¹⁸⁴ The overall increase in raw material costs in large part contributed to the overall upward trend in the industry's unit COGS, which increased from \$2,757 per short ton in 2017 to \$3,048 per short ton in 2018, before declining to \$2,991 per ton in 2019.¹⁸⁵ The domestic industry's net sales values, however, increased by a greater amount overall, from \$2,947 per short ton in 2017 to \$3,349 per short ton in 2018 and \$3,375 per short ton in 2019, resulting in the domestic industry's COGS to net sales ratio declining from 93.6 percent in 2017 to 91.0 percent in 2018 and 88.6 percent in 2019.¹⁸⁶

¹⁷⁹ See CR/PR at Table C-1.

¹⁸⁰ CR/PR at Table V-7. Over the POI, domestic prices increased by *** percent for Product 1, *** percent for Product 2, *** percent for Product 3, and *** percent for Product 4. CR/PR at V-7. Average subject import prices increased by *** percent for Product 1, *** percent for Product 2, *** percent for Product 3, and *** percent for Product 4 over the POI. CR/PR at V-7.

¹⁸¹ Petitioners contend that domestic prices were depressed in 2019 when subject imports were at their peak. Specifically, they argue that the decline in fabrication prices late in the POI, ranging from *** to *** percent between the first quarter of 2019 and the first quarter of 2020, are probative of declines in domestic CAAS prices. See Petitioners' Brief at 27–28, 37-38 and Exhibit 21 (report indicating ***).

¹⁸² CR/PR at IV-6, Table IV-2; CR/PR at V-8, Table V-3, V-12, Table V-4, V-16, Table V-5, V-17, Table V-6.

¹⁸³ Calculated from CR/PR at V-34, Table V-9.

¹⁸⁴ CR/PR at Table VI-1.

¹⁸⁵ CR/PR at Tables VI-1, C-1.

¹⁸⁶ CR/PR at Tables VI-1, C-1. See also CR/PR at Table VI-2 (showing change in unit values over POI). Thus, the domestic industry's COGS to net sales ratio declined by 5.0 percentage points over the POI (2017-19).

Petitioners observe that, for the fourth quarter of 2019, as subject import levels rose, U.S. producers' unit net sales value decreased notwithstanding increasing unit costs.¹⁸⁷

Given the significant and increasing volume of subject imports and the significant underselling by subject imports, we cannot conclude, for purposes of this preliminary determination, that there is clear and convincing evidence that the subject imports were not having significant adverse price effects on the domestic industry.¹⁸⁸

E. Impact of the Subject Imports¹⁸⁹

Section 771(7)(C)(iii) of the Tariff Act provides that the Commission, in examining the impact of the subject imports on the domestic industry, "shall evaluate all relevant economic factors which have a bearing on the state of the industry." These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debt, research and development, and factors affecting domestic prices. No single factor is dispositive, and all relevant factors are considered "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."¹⁹⁰

During the POI, the domestic industry invested in additional production capacity primarily to take advantage of the retreat from the U.S market of nonsubject imports from China.¹⁹¹ The investments increased the domestic industry's capacity by 27.5 percent over the

¹⁸⁷ Petitioners' Brief, Exhibit 1 at 50.

¹⁸⁸ Commissioner Kearns finds, given the significant underselling by subject imports that enabled them to grow substantially in volume and market share, that subject imports have had significant adverse price effects.

¹⁸⁹ Commerce initiated the investigations based on the following estimated antidumping duty margins: (1) Bahrain- 58.45 percent; (2) Brazil- 17.96 and 27.01 percent; (3) Croatia- 13.79 percent; (4) Egypt- 31.50 percent; (5) Germany- 37.22 percent; (6) Greece- 61.87 percent; (7) India- 122.80 to 151.00 percent; (8) Indonesia- 32.12 percent; (9) Italy- 29.13 percent; (10) Korea- 36.55 and 44.03 percent; (11) Oman- 15.90 and 58.17 percent; (12) Romania- 12.51 percent; (13) Serbia- 25.84 percent; (14) Slovenia- 12.95 percent; (15) South Africa- 63.27 percent; (16) Spain- 24.26 percent; (17) Taiwan- 27.22 percent; and (18) Turkey- 42.88 percent. *Common Alloy Aluminum Sheet from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Republic of Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan and the Republic of Turkey: Initiation of Less-Than-Fair-Value Investigations*, 85 Fed. Reg. 19444, 19447 (Dep't of Commerce April 7, 2020).

¹⁹⁰ 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act of 2015, Pub. L. 114-27.

¹⁹¹ Petitioners' Brief at 1, 14; Petitioners' Brief, Answers to Questions at 15, Exhibit 2 (Testimony of Tom Dobbins) at 2, Exhibit 5 (Testimony of Michael Keown) at 2-3, Exhibit 11 (Testimony of Lee McCarter) at 2-3, Exhibit 12 (Johnny Hsieh's Declaration) at para. 2, Exhibit 13 (Testimony of Mark Vrablec) at 2-3, Exhibit 17 (Testimony of Ganesh Paneer) at 2-3.

POI,¹⁹² as four domestic producers reported greater production capacity and one domestic producer started production.¹⁹³

Although virtually all of the domestic industry's trade indicators increased, the increases were modest given the 51.6 percent decline in nonsubject imports supplying the U.S. market.¹⁹⁴

The domestic industry's production increased by 7.9 percent from 2017 to 2018 (1.26 million short tons in 2017 to 1.29 million short tons in 2018), before decreasing by 4.7 percent from 2018 to 2019, for an overall increase of 2.8 percent over the POI.¹⁹⁵ The domestic industry's capacity utilization rate declined overall.¹⁹⁶ The domestic industry's U.S. shipments (by quantity) increased by 5.5 percent from 2017 to 2018, before decreasing by 2.0 percent 2018 to 2019, for an overall increase of 3.4 percent over the POI.¹⁹⁷ Even with the modest increase in U.S. shipments over the POI, the domestic industry's market share decreased by 0.5 percentage points overall during the POI, initially increasing from 53.9 percent in 2017 to 55.4 percent in 2018, before declining to 53.5 percent in 2019, as subject imports' market share increased by 16.6 percentage points.¹⁹⁸ The domestic industry's end-of-period inventories also increased by 30.9 percent from 2017 to 2019, while end-of-period inventories as a share of total shipments increased by 3.9 percentage points over the same period.¹⁹⁹

¹⁹² See CR/PR at Tables C-1, III-3 and III-4. Most of the domestic industry's increased capacity occurred in the last year of the POI following the imposition of the AD/CVD Orders on CAAS from China in February 2019. See *id.*; see also CR/PR at I-5 (AD/CVD order on CAAS from China). The domestic industry's capacity slightly increased from 1.62 million short tons in 2017 to 1.66 million short tons in 2018, but then increased to 2.07 million short tons in 2019. CR/PR at Tables III-5 and C-1.

¹⁹³ *** each increased their capacity during the POI and Texarkana started up a previously idled plant. See CR/PR at Table III-5.

¹⁹⁴ Imports of CAAS from China decreased by 57.7 percent by quantity from 2017 to 2018 and decreased by 70.2 percent by quantity from 2018 to 2019. CR/PR at IV-5. The market share held by CAAS from China decreased from 18.1 percent in 2017 to 7.5 percent in 2018, and 2.2 percent in 2019. CR/PR at IV-31, Table IV-8. As noted above, Commerce issued antidumping and countervailing duty orders on CAAS from China on February 6, 2019 as a result of investigations initiated in December 2017.

¹⁹⁵ The domestic industry's production increased from 1.26 million short tons in 2017 to 1.36 million short tons in 2018, but then declined to 1.29 million short tons in 2019. CR/PR at Tables III-5 and C-1.

¹⁹⁶ The domestic industry's capacity utilization increased from 77.4 percent in 2018 to 81.5 percent in 2018, before declining to 62.4 percent in 2019. CR/PR at Tables III-5 and C-1. As noted above, the domestic industry increased production capacity during the POI.

¹⁹⁷ The domestic industry's U.S. shipments increased from 1.16 million short tons in 2017 to 1.23 million short tons in 2018, but then declined to 1.20 million short tons in 2019. CR/PR at Tables III-7 and C-1.

¹⁹⁸ CR/PR at Tables IV-8 and C-1.

¹⁹⁹ The domestic industry's end-of-period inventories increased from 180,627 short tons in 2017 to 221,909 short tons in 2018 and 236,465 short tons in 2019. CR/PR at Tables III-8 and C-1. The domestic industry's end-of-period inventories as a share of total shipments increased from 14.6 percent in 2017 to 16.9 percent in 2018 and 18.5 percent in 2019. *Id.*

The domestic industry's financial indicators showed improvement overall from 2017 to 2019, *albeit* from a generally low starting point and generally less so from 2018 to 2019 than from 2017 to 2018. Sales revenues increased by 18.0 percent,²⁰⁰ and gross profit increased by 108.8 percent.²⁰¹ Net sales growth outpaced increases in raw material costs, other factory costs, and direct labor costs (on a per ton basis).²⁰² Operating income²⁰³ and net income both increased as well.²⁰⁴ The domestic industry's operating income to net sales ratio increased from 1.0 percent in 2017 to 4.8 percent in 2018 and 6.2 percent in 2019; its net income ratio increased similarly over the POI.²⁰⁵ Yet, while overall the domestic industry's results were mostly positive, in 2019 two firms reported operating losses and three firms reported net losses.²⁰⁶

With the exception of the number of production-related workers, the domestic industry's employment-related indicators increased over the course of the POI.²⁰⁷ Total hours worked,²⁰⁸ hours worked per PRW,²⁰⁹ hourly wages,²¹⁰ total wages paid,²¹¹ unit labor costs,²¹²

²⁰⁰ The domestic industry's net sales revenues increased from \$3.65 billion in 2017 to \$4.40 billion in 2018, but then declined to \$4.31 billion 2019. CR/PR at Tables VI-1 and C-1. Thus, during the last year of the POI the industry's sales revenues decreased by 2.1 percent (from 2018 to 2019).

²⁰¹ The domestic industry's gross profits increased from \$235.13 million in 2017 to \$395.79 million in 2018 and \$491.02 million in 2019. CR/PR at Tables VI-1 and C-1. Thus, gross profits increased at a significantly slower pace during the last year of the POI – increasing only 24.1 percent (from 2018 to 2019).

²⁰² See CR/PR at Tables VI-1 (results of operations of U.S. producers) and VI-2 (changes in AUVs).

²⁰³ As noted above, antidumping and countervailing duty investigations on CAAS from China were instituted by the Commission in December 2017, culminating in issuance of antidumping and countervailing duties on imports of CAAS from China in February 2019. CR/PR at I-12. Paralleling the institution of those investigations and the imposition of antidumping and countervailing duties on imports of CAAS from China, nonsubject imports in this investigation declined from 651,341 short tons in 2017 to 444,417 short tons in 2018 to 315,346 short tons in 2019, and the market share of nonsubject imports declined from 30.2 percent in 2017 to 20.1 percent in 2018 and 14.0 percent in 2019. CR/PR at Table C-1. At the same time, the domestic industry's operating income increased from \$35.57 million in 2017 to \$212.93 million in 2018 and \$268.00 million in 2019. CR/PR at Tables VI-1 and C-1.

²⁰⁴ After a net loss of \$101.94 million in 2017, the domestic industry had net income of \$42.08 million in 2018 and \$101.35 million in 2019. CR/PR at Tables VI-1 and C-1.

²⁰⁵ CR/PR at Tables VI-1 and C-1. The domestic industry's net income to sales ratio increased from negative 2.8 percent in 2017 to 1.0 percent in 2018 and 2.4 percent in 2019. *Id.*

²⁰⁶ See CR/PR at Table VI-1 (indicating that in 2019 two firms reported operating losses and three reported net losses).

²⁰⁷ The number of production-related workers ("PRWs") increased from 4,779 PRWs in 2017 to 4,784 PRWs in 2018 and then declined to 4,731 PRWs in 2019. CR/PR at Tables III-11 and C-1.

²⁰⁸ Total hours worked increased from 10.03 million in 2017 to 10.14 million in 2018 and then declined to 10.04 million in 2019. CR/PR at Tables III-11 and C-1.

²⁰⁹ Hours worked per PRW increased from 2,099 per PRW in 2017 to 2,119 per PRW in 2018 and 2,121 per PRW in 2019. CR/PR at Tables III-11 and C-1.

²¹⁰ Hourly wages increased from 32.44 per hour in 2017, to 33.19 per hour in 2018, and 33.97 per hour in 2019. CR/PR at Tables III-11 and C-1.

and productivity all increased overall from 2017 to 2019.²¹³ The domestic industry reported increasing capital expenditures and research and development (R&D) expenses over the POI,²¹⁴ and its total assets and return on total assets increased over the POI.²¹⁵

Thus, the record shows that the domestic industry's financial performance was generally positive, but its trade indicators indicate that it was prevented from taking advantage of the increase in apparent U.S. consumption over the POI.²¹⁶ Further, despite the decline in nonsubject imports from China following institution of antidumping and countervailing duty investigations on CAAS from China and the ultimate imposition of duties on such imports, domestic producers did not gain any market share and in fact saw a 0.5 percent decline in market share over the POI (including a 2 percent decline from 2018 to 2019).

Instead, as discussed above, significant and increasing volumes of low-priced cumulated subject imports that were generally substitutable with the domestic like product entered the U.S. market and significantly undersold the domestic like product. Cumulated subject imports captured the market share vacated by the nonsubject imports from China and took market share from the domestic industry. Thus, the domestic industry's production, shipments, and sales revenues were lower than they would have been, had domestic producers been able to capture some of the market share vacated by nonsubject imports from China instead of losing 0.5 percent market share to subject imports over the POI. We cannot therefore conclude that the record of the preliminary phase of these investigations contains clear and convincing evidence that cumulated subject imports did not have a significant adverse impact on the domestic industry.²¹⁷

(...Continued)

²¹¹ Wages paid increased from \$325.48 million in 2017 to \$336.49 million in 2018 and \$340.90 million in 2019. CR/PR at Tables III-11 and C-1.

²¹² Unit labor costs in dollars per short ton decreased from \$258.83 in 2017 to \$248.10 in 2018 and then increased to \$263.83. CR/PR at Tables III-11 and C-1.

²¹³ Productivity in short tons per 1,000 hours improved from 125.3 in 2017 to 133.8 in 2018 and then fell to 128.8 in 2019. CR/PR at Tables III-11 and C-1.

²¹⁴ Domestic capital expenditures totaled \$168.91 million in 2017, \$190.72 million in 2018, and \$294.60 million in 2019. CR/PR at Tables VI-5 and C-1. Spending on (R&D) was \$8.32 million in 2017, \$10.26 million in 2018, and \$13.19 million in 2019. *Id.*

We note that virtually all domestic producers reported significant negative effects on investment, growth, and development due to subject imports during the POI. CR/PR at Tables VI-7 and VI-8. For example, *** CR/PR at Table VI-8.

²¹⁵ See CR/PR at Table VI-6.

²¹⁶ For example, while U.S. consumption increased 4.3 percent over the POI, domestic industry's U.S. shipments increased only 3.4 percent and its production increased only 2.8 percent over the POI. CR/PR at Table C-1.

²¹⁷ Commissioner Kearns concludes based on the discussion above that cumulated subject imports have had a significant adverse impact on the domestic industry.

Respondents argue that despite its investments in additional capacity, the domestic industry was not in a position to serve more of the U.S. market. They show that many CAAS products are exempted from the Section 232 national security tariffs and that a domestic producer, ***, submitted many of the exclusion requests.²¹⁸ They further contend that the number of granted requests shows that the domestic industry will not produce many CAAS products because it chooses to focus on high-end products.²¹⁹ We acknowledge that certain exclusion requests may suggest U.S. producers had limited supply of certain products, but observe that the domestic industry's increasing inventories is inconsistent with respondents' argument. A supply shortage also would not explain the extent to which cumulated subject imports undersold domestic products in the U.S. market.²²⁰ Moreover, respondents concede that the U.S. market became oversupplied in 2019, and that cumulated subject imports increased by over 113.7 percent during the POI and gained significant market share as the domestic industry lost market share.²²¹ In any final phase investigation, we will explore the extent to which subject imports are entering for reasons other than price, such as to make up for a supply shortfall.

We have also considered other factors to ensure that we are not attributing any injury from other factors to the subject imports. As noted above, apparent U.S. consumption for CAAS increased during the POI, so any impact on the domestic industry's condition cannot be explained by declines in apparent U.S. consumption.²²² Moreover, nonsubject imports declined by over 50 percent during the POI and the AUVs for nonsubject imports were substantially higher than subject import AUVs during 2018 and 2019.²²³ Thus, any impact on the domestic industry's condition also does not appear to be explained by nonsubject imports.

For the foregoing reasons, we find a reasonable indication of material injury by reason of cumulated subject imports.

VIII. Conclusion

For the reasons stated above, we determine for the preliminary phase investigations that there is a reasonable indication that an industry in the United States is materially injured by reason of subject imports of CAAS from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey that are allegedly sold in the United States at LTFV and allegedly subsidized by the governments of Bahrain, Brazil, India and Turkey.

²¹⁸ See Alro's Brief at 5-7; EvalHalcor's Brief at 7; GARMCO's Brief at 6-7; HARP's Brief at 4-6; Hulamin's Brief at 8-9; RM's Brief at 9-10.

²¹⁹ See Hulamin's Brief at 5; HARP's Brief at 5. See also AKG's Brief at 5.

²²⁰ See CR/PR at Table III-7.

²²¹ See EvalHalcor's Brief at 7-9 (describing "massive oversupply" in 2019).

²²² CR/PR at Tables IV-7 and C-1.

²²³ CR/PR at Tables IV-2 and C-1.

Part I: Introduction

Background

These investigations result from petitions filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by The Aluminum Association Common Alloy Aluminum Sheet Working Group and its Individual Members, Aleris Rolled Products, Inc. (“Aleris”), Beachwood, Ohio; Arconic, Inc. (“Arconic”), Bettendorf, Iowa; Constellium Rolled Products Ravenswood, LLC (“Constellium”), Ravenswood, West Virginia; JW Aluminum Company (“JW”), Daniel Island, South Carolina; Novelis Corporation (“Novelis”), Atlanta, Georgia; and Texarkana Aluminum, Inc. (“Texarkana Aluminum”), Texarkana, Texas, on March 9, 2020, alleging that an industry in the United States is materially injured and threatened with material injury by reason of less-than-fair-value (“LTFV”) imports of common alloy aluminum sheet (“CAAS”)¹ from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey, and imports of CAAS subsidized by the Governments of Bahrain, Brazil, India, and Turkey. The following tabulation provides information relating to the background of these investigations.^{2 3}

Effective date	Action
March 9, 2020	Petitions filed with Commerce and the Commission; institution of Commission investigations (85 FR 14702, March 13, 2020)
March 30, 2020	Commission’s conference (conducted through written statements, testimony, questions, and responses, March 27 – April 2, 2020)
March 30, 2020	Commerce’s notice of initiation AD (85 FR 19444, April 7, 2020)
March 30, 2020	Commerce’s notice of initiation CVD (85 FR 19449, April 7, 2020)

¹ See the section entitled “The subject merchandise” in Part I of this report for a complete description of the merchandise subject in this proceeding.

² Pertinent *Federal Register* notices are referenced in appendix A, and may be found at the Commission’s website (www.usitc.gov).

³ A list of witnesses providing testimony is presented in appendix B of this report.

Statutory criteria

Section 771(7)(B) of the Tariff Act of 1930 (the “Act”) (19 U.S.C. § 1677(7)(B)) provides that in making its determinations of injury to an industry in the United States, the Commission--

shall consider (I) the volume of imports of the subject merchandise, (II) the effect of imports of that merchandise on prices in the United States for domestic like products, and (III) the impact of imports of such merchandise on domestic producers of domestic like products, but only in the context of production operations within the United States; and. . . may consider such other economic factors as are relevant to the determination regarding whether there is material injury by reason of imports.

Section 771(7)(C) of the Act (19 U.S.C. § 1677(7)(C)) further provides that--⁴

In evaluating the volume of imports of merchandise, the Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States is significant. . . In evaluating the effect of imports of such merchandise on prices, the Commission shall consider whether. . . (I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree. . . In examining the impact required to be considered under subparagraph (B)(i)(III), the Commission shall evaluate (within the context of the business cycle and conditions of competition that are distinctive to the affected industry) all relevant economic factors which have a bearing on the state of the industry in the United States, including, but not limited to. . . (I) actual and potential decline in output, sales, market share, gross profits, operating profits, net profits, ability to service debt, productivity, return on investments, return on assets, and utilization of capacity, (II) factors affecting domestic prices, (III) actual and potential negative effects on cash flow, inventories, employment, wages, growth,

⁴ Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

ability to raise capital, and investment, (IV) actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and (V) in {an antidumping investigation}, the magnitude of the margin of dumping.

In addition, Section 771(7)(J) of the Act (19 U.S.C. § 1677(7)(J)) provides that—⁵

(J) EFFECT OF PROFITABILITY.—The Commission may not determine that there is no material injury or threat of material injury to an industry in the United States merely because that industry is profitable or because the performance of that industry has recently improved.

Organization of report

Part I of this report presents information on the subject merchandise, alleged subsidy/dumping margins, and domestic like product. Part II of this report presents information on conditions of competition and other relevant economic factors. Part III presents information on the condition of the U.S. industry, including data on capacity, production, shipments, inventories, and employment. Parts IV and V present the volume of subject imports and pricing of domestic and imported products, respectively. Part VI presents information on the financial experience of U.S. producers. Part VII presents the statutory requirements and information obtained for use in the Commission’s consideration of the question of threat of material injury as well as information regarding nonsubject countries.

Market summary

The building and construction, infrastructure, electrical, marine, and transportation sectors utilize CAAS in a variety of applications including heat exchangers, air condition evaporators, motor vehicle radiators, home appliances, mobile homes, residential siding, architecture, and general sheet metal work. The leading U.S. producers of CAAS are Aleris and Arconic, while leading producers of CAAS from subject sources that submitted questionnaires responses include Hydro Aluminium Rolled Products GmbH (“Hydro Aluminium”), and Novelis Deutschland GmbH (“Novelis Deutschland”) of Germany, Aluminyum Sanayi ve Ticart A.S. (“Assan”) of Turkey, Profilglass S.P.A. (“Profilglass”) of Italy, and Aludium Transformacion De Productos (“Aludium”) of Spain.

⁵ Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

The leading U.S. importers of CAAS from subject sources are ***. Leading importers of CAAS from nonsubject sources include ***. Leading U.S. purchasers of CAAS that responded to the Commission’s questionnaire include Reliance Steel & Aluminum Co. and Ryerson. Staff contacted 45 purchasers and received responses from 21 purchasers.

Apparent U.S. consumption of CAAS totaled approximately 2.2 million short tons (\$7.4 billion) in 2019. Currently, 13 firms are known to produce CAAS in the United States. U.S. producers’ U.S. shipments of CAAS totaled 1.2 million short tons (\$4.1 billion) in 2019, and accounted for 53.5 percent of apparent U.S. consumption by quantity and 54.7 percent by value. U.S. imports from subject sources totaled 731,327 short tons (\$2.3 billion) in 2019 and accounted for 32.5 percent of apparent U.S. consumption by quantity and 30.6 percent by value. U.S. imports from nonsubject sources totaled 315,346 short tons (\$1.1 billion) in 2019 and accounted for 14.0 percent of apparent U.S. consumption by quantity and 14.7 percent by value.

Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, table C-1. Except as noted, U.S. industry data are based on questionnaire responses of nine firms that accounted for the vast majority of U.S. production of CAAS during 2019. U.S. imports are based on official U.S. import statistics under 14 HTSUS statistical reporting numbers.⁶ Additional data

⁶ From January 1, 2017 through June 30, 2019, imports of CAAS entered the United States under HTSUS statistical reporting numbers: 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.6000, 7606.91.3090, 7606.91.6080, 7606.92.3090, and 7606.92.6080. Effective July 1, 2019, the following changes to the HTSUS were made: (1) statistical reporting number 7606.91.3090 was consolidated with statistical reporting number 7606.91.3075 into current HTSUS statistical reporting number 7606.91.3095; (2) statistical reporting number 7606.91.6080 was consolidated with statistical reporting number 7606.91.6060 into current HTSUS statistical reporting number 7606.91.6095; (3) statistical reporting number 7606.92.3090 was consolidated with statistical reporting number 7606.92.3075 into current HTSUS statistical reporting number 7606.92.3035; and (4) statistical reporting number 7606.92.6080 was consolidated with statistical reporting number 7606.92.6060 into current HTSUS statistical reporting number 7606.92.6095. Given these various changes, the quantity and value of imports for calendar year 2019 include imports under the following HTSUS statistical reporting numbers: 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.6000, 7606.91.3090, 7606.91.3095, 7606.91.6080, 7606.91.6095, 7606.92.3035, 7606.92.3090, 7606.92.6080, and 7606.92.6095. Effective January 1, 2020, statistical reporting number 7606.12.3090, which covered not clad aluminum alloy sheet and strip with a thickness exceeding 0.2 millimeters and 6.3 millimeters or less (not including aluminum can stock), was

(continued...)

regarding imported CAAS are based on the responses of 80 U.S. importers accounting for 61.3 percent from all import sources. Additionally, the Commission received 21 usable questionnaire responses from firms that have purchased CAAS since 2017. The Commission received 36 foreign producer questionnaires from firms in 17 subject countries⁷ where coverage ranged from *** percent to over *** percent. Reported coverage of CAAS exports to the United States was 40 percent to 80 percent for six countries (***), and over 80 percent for 11 countries (***).⁸

Previous and related investigations

Commission proceedings

CAAS has been the subject of prior countervailing and antidumping duty investigations in the United States. In December 2017, the Commission instituted investigations on CAAS from China in response to a notification of investigations self-initiated by Commerce. The Commission determined that an industry in the United States was materially injured by reason of imports of CAAS from China that have been found by Commerce to be sold in the United States at LTFV, and to be subsidized by the government of China.⁹ In February 2019, Commerce issued antidumping and countervailing duty orders on CAAS from China.¹⁰

(...continued)

sub-divided into two new categories, HTSUS statistical reporting numbers 7606.12.3091 and 7606.12.3096. These statistical reporting numbers cover imports of out-of-scope heat-treatable sheet, and in-scope CAAS, respectively. As a result, CAAS imports under HTSUS statistical reporting number 7606.12.3090 for calendar years 2017-2019 are somewhat overstated and contain some volume of out-of-scope heat-treatable sheet.

⁷ The Commission did not receive a foreign producer/exporter questionnaire response from any firms in Indonesia.

⁸ Coverage figures were calculated comparing reported figures from foreign producer questionnaires and official import statistics.

⁹ USITC Publication 4861, January 2019, p.1.

¹⁰ *Common Alloy Aluminum Sheet From the People's Republic of China: Preliminary Affirmative Countervailing Duty (CVD) Determination, Alignment of Final CVD Determination With Final Antidumping Duty Determination, and Preliminary CVD Determination of Critical Circumstances*, 83 FR 17651, April 23, 2018. *Countervailing Duty Investigation of Common Alloy Aluminum Sheet From the People's Republic of China: Final Affirmative Determination*, 83 FR 57427, November 15, 2018. *Common Alloy Aluminum Sheet From the People's Republic of China: Countervailing Duty Order*, 84 FR 2157, February 6, 2019. *Antidumping Duty Investigation of Common Alloy Aluminum Sheet From the People's Republic of China: Affirmative Preliminary Determination of Sales at Less-Than-Fair Value, Preliminary Affirmative*

(continued...)

In 2018, the Commission conducted final phase antidumping duty and countervailing duty investigations on aluminum foil from China. The Commission determined that an industry in the United States was materially injured by reason of imports of aluminum foil from China that Commerce determined to be subsidized and sold in the United States at less than fair value.¹¹ In April 2018, Commerce issued antidumping and countervailing duty orders on aluminum foil from China.¹²

In 2017, the Commission conducted a study of the global aluminum industry and on factors affecting the global competitiveness of the U.S. aluminum industry, which included both unwrought (primary and secondary) and wrought (semi-finished) aluminum products.¹³

In 2004, the Commission conducted an antidumping duty investigation on aluminum plate from South Africa. The Commission determined that an industry in the United States was not materially injured or threatened with material injury, and the establishment of an industry in the United States was not materially retarded, by reason of imports from South Africa of certain aluminum plate.¹⁴

Commerce proceedings

On April 26, 2017, Commerce initiated an investigation under section 232 of the Trade Expansion Act of 1962, as amended (19 U.S.C. 1862), to determine the effects on the national security of imports of aluminum. Further information regarding this investigation is presented in Part II and Appendix D of this report.

(...continued)

Determination of Critical Circumstances, and Postponement of Final Determination, 83 FR 29088, June 22, 2018. *Antidumping Duty Investigation of Common Alloy Aluminum Sheet From the People's Republic of China: Affirmative Final Determination of Sales at Less-Than-Fair Value*, 83 FR 57421, November 15, 2018. *Common Alloy Aluminum Sheet From the People's Republic of China: Antidumping Duty Order*, 84 FR 2813, February 8, 2019.

¹¹ USITC Publication 4771, May 2018, p. 1

¹² 83 FR 17360, April 19, 2018 and 83 FR 17362, April 19, 2018.

¹³ USITC Publication 4703, June 2017, p. 30

¹⁴ USITC Publication 3734, November 2004, p. 1.

Nature and extent of alleged subsidies and sales at LTFV

Alleged subsidies

On April 7, 2020, Commerce published a notice in the *Federal Register* of the initiation of its countervailing duty investigation on CAAS from Bahrain, Brazil, India, and Turkey.¹⁵ Commerce determined that there is sufficient information to initiate a CVD investigation on the following government programs in each subject country:

Bahrain¹⁶

- Provision of Land in Industrial Areas for Less Than Adequate Remuneration
- Provision of Primary Aluminum for Less Than Adequate Remuneration
- Provision of Natural Gas for Less Than Adequate Remuneration
- Provision of Electricity for Less Than Adequate Remuneration
- Provision of Water for Less Than Adequate Remuneration
- Loans and Export Credits from Bahrain Development Bank
- Corporate Income Tax Exemption
- Import Duty Exemption for Industrial Inputs
- Cloud Accelerator Allied Venture Capital Fund

Brazil¹⁷

- Ex-Tarifário
- Exemption of Payroll Taxes
- Research and Development Incentives INOVA Brasil Program
- Amazon Region Development Authority and Northeast Region Development Authority Tax Incentives
- Pernambuco Development Program
- BNDES Giro/PROGEREN
- BNDES ExIm Pre-and Post-Shipment Loans
- BNDES FINAME
- BNDESPAR Loans
- Automatic BNDES

¹⁵ 85 FR 19449, April 7, 2020.

¹⁶ Bahrain CVD Initiation Checklist, March 30, 2020.

¹⁷ Brazil CVD Initiation Checklist, March 30, 2020.

- Export Financing from Banco do Brasil – PROEX
- REINTEGRA Program
- Special Regime for the Acquisition of Capital Goods for Export Companies – (RECAP)
- Integrated Drawback Program
- Export Credit Insurance and Guarantees
- Export Guarantee Fund
- Export Promotion and Marketing Assistance Government Provision of Goods or Services for Less Than Adequate Remuneration (LTAR): Provision of Electricity for LTAR

India¹⁸

- Advance Authorization Program (AAP)
- Duty Drawback Program (DDB)
- Duty-Free Import Authorization Scheme (DFIA)
- Export Promotion of Capital Good Scheme (EPCGS)
- Merchandise Export Incentive Scheme (MEIS)
- Status Holders Incentive Scrip Scheme (SHIS)
- Incremental Exports Incentive Scheme (IEIS)
- Special Economic Zones (SEZs)
- Export-Oriented Unit (EOU) Scheme
- Market Access Initiative
- Market Development Assistance Program
- GOI Loan Guarantees
- Income Tax Deductions for Research and Development Expenses
- Renewable Energy Certificate
- Provision of Coal for Less Than Adequate Remuneration (LTAR)

State Government Subsidy Programs

- State and Union Territory Sales Tax Incentive

State Government of Maharashtra (SGOM) Subsidy Programs

- Industrial Promotion Subsidy/Sales Tax Program
- Interest Subsidy under the SGOM Package Scheme of Incentives

¹⁸ India CVD Initiation Checklist, March 30, 2020.

- Electricity Duty Exemption
- Exemption of Stamp Duty
- Incentives to Strengthen Micro to Large-Scale Industries
- Subsidies for Mega Projects under the Package Scheme of Incentives

State Government of Gujarat (SGOG) Subsidy Programs

- SGOG Industrial Policy 2009
- Provision of Land for LTAR
- Provision of Water for LTAR
- Electricity Duty Exemption

State Government of Uttar Pradesh (SGUP) Subsidy Programs

- Investment Promotion Scheme
- Special Assistance for Mega Projects
- Electricity Duty Exemption
- Stamp Duty Exemption

State Government of Chhattisgarh (SGOC) Subsidy Programs

- Stamp Duty Exemption
- Exemption of Entry Tax

State Government of Odisha (SGOO) Subsidy Programs

- SGOO Industrial Policy 2015

Turkey¹⁹

- Deductions from Taxable Income for Export Revenue
- Inward Processing Certificates
- Exemption from Property Tax
- Free Zones Law No. 3218: Corporate Income Tax Exemption
- Free Zones Law No. 3218: Exemption from Income Tax for Workers' Wages
- Tax and Fee Incentives for Renewable Energy
- Investment Incentive Scheme
- Regional Investment Incentive Scheme
- Large Scale Investment Incentive Scheme
- Strategic Investment Incentive Scheme
- Project-Based Investment Incentive Program

¹⁹ Turkey CVD Initiation Checklist, March 30, 2020.

- Rediscount Program
- Investment Credit for Export Program
- Export-Oriented Business Investment Loans
- Export Buyer’s Credits
- Provision of Natural Gas for Less Than Adequate Remuneration
- Renewable Energy Support Mechanism
- Foreign Fair Support Program
- Foreign Market Research and Market Entry Grants
- Incentives Under the R&D Law
- TUBITAK Grants

Alleged sales at LTFV

On April 7, 2020, Commerce published a notice in the *Federal Register* of the initiation of its antidumping duty investigations on CAAS from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan and the Turkey.²⁰ Commerce has initiated antidumping duty investigations based on estimated dumping margins for each of the countries covered by this initiation as follows: (1) Bahrain—58.45 percent; (2) Brazil—17.96 and 27.01 percent; (3) Croatia—13.79 percent; (4) Egypt—31.50 percent; (5) Germany—37.22 percent; (6) Greece—61.87 percent; (7) India—122.80 to 151.00 percent; (8) Indonesia—32.12 percent; (9) Italy—29.13 percent; (10) Korea—36.55 and 44.03 percent; (11) Oman—15.90 and 58.17 percent; (12) Romania—12.51 percent; (13) Serbia—25.84 percent; (14) Slovenia—12.95 percent; (15) South Africa—63.27 percent; (16) Spain—24.26 percent; (17) Taiwan—27.22 percent; and (18) Turkey—42.88 percent.

The subject merchandise

Commerce’s scope

In the current proceeding, Commerce has defined the scope as follows:²¹

The products covered by these investigations are common alloy aluminum sheet, which is a flat-rolled aluminum product having a thickness of 6.3 mm or less, but greater than 0.2 mm, in coils or cut-to-length, regardless of width. Common alloy sheet within the scope of these investigations

²⁰ 85 FR 19444, April 7, 2020.

²¹ 85 FR 19444, April 7, 2020; 85 FR 19449, April 7, 2020.

includes both not clad aluminum sheet, as well as multi-alloy, clad aluminum sheet. With respect to not clad aluminum sheet, common alloy sheet is manufactured from a 1XXX-, 3XXX-, or 5XXX-series alloy as designated by the Aluminum Association. With respect to multi-alloy, clad aluminum sheet, common alloy sheet is produced from a 3XXX-series core, to which cladding layers are applied to either one or both sides of the core.

Common alloy sheet may be made to ASTM specification B209-14 but can also be made to other specifications. Regardless of specification, however, all common alloy sheet meeting the scope description is included in the scope. Subject merchandise includes common alloy sheet that has been further processed in a third country, including but not limited to annealing, tempering, painting, varnishing, trimming, cutting, punching, and/or slitting, or any other processing that would not otherwise remove the merchandise from the scope of these investigations if performed in the country of manufacture of the common alloy sheet.

Excluded from the scope of these investigations is aluminum can stock, which is suitable for use in the manufacture of aluminum beverage cans, lids of such cans, or tabs used to open such cans. Aluminum can stock is produced to gauges that range from 0.200 mm to 0.292 mm, and has an H-19, H-41, H-48, or H-391 temper. In addition, aluminum can stock has a lubricant applied to the flat surfaces of the can stock to facilitate its movement through machines used in the manufacture of beverage cans. Aluminum can stock is properly classified under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 7606.12.3045 and 7606.12.3055.

Where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set for the above.

Tariff treatment

Based upon the scope set forth by Commerce, information available to the Commission indicates that the merchandise subject to these investigations is imported under the following provisions of the Harmonized Tariff Schedule of the United States (“HTS”): 7606.11.3060, 7606.11.6000, 7606.12.3096, 7606.12.6000, 7606.91.3095, 7606.91.6095, 7606.92.3035, and

7606.92.6095.²² CAAS provided for in the covered subheadings is accorded a column-1 general duty rate of 3.0 percent (7606.11.30, 7606.12.30, 7606.91.30, 7606.92.30), 2.7 percent (7606.11.60, 7606.91.60), or 6.5 percent ad valorem (7606.12.60, 7606.92.60). The merchandise subject to these investigations may also be imported under statistical reporting numbers 7606.11.3030, 7606.12.3015, 7606.12.3025, 7606.12.3035, 7606.12.3091, 7606.91.3055, 7606.91.6055, 7606.92.3025, 7606.92.6055, and 7607.11.9090. The general rate of duty for subheading 7607.11.90 is 3 percent ad valorem; other general rates are indicated above for covered rate lines. Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

U.S. imports of subject common alloy aluminum sheet from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey are subject to an additional 10-percent ad valorem duty under Section 232 of the *Trade Expansion Act of 1962*, as amended. For further information on the Section 232 measures, please see Part II and Appendix D.

U.S. imports of common alloy aluminum sheet from China are currently subject to an additional 7.5 percent ad valorem duty under Section 301 of the Trade Act of 1974.²³

²² Section 484(f) of the *Tariff Act of 1930* (19 U.S.C. 1484(f)), as amended, authorizes the establishment of categories in the HTS and Schedule B for statistical purposes. Requests for changes to these non-legal statistical elements that appear in the HTS and in Schedule B (exports) are reviewed by the Committee for Statistical Annotation of Tariff Schedules (known informally as the “484(f) Committee”), an interagency committee chaired by the Commission and composed of representatives of U.S. Customs and Border Protection and the Census Bureau. After receiving a request to make additions, removals, and other revisions to Chapter 76 of the Harmonized Tariff Schedule of the United States, the 484(f) Committee implemented a series of changes that discontinued the use of certain HTSUS reporting numbers under which CAAS was previously imported, including: 7606.12.3090, 7606.91.3090, 7606.91.6080, 7606.92.3090, and 7606.92.6080. U.S. International Trade Commission, “2020 Basic Edition,” January 1, 2020, <https://hts.usitc.gov/view/Change%20Record?release=2020HTSABasicB>, retrieved March 30, 2020.

²³ Common alloy aluminum sheet is among the products included in the Office of the U.S. Trade Representative’s \$300 billion trade action (List 4). *Notice of Modification of Section 301 Action: China’s Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 85 FR 3741, January 22, 2020; Office of the U.S. Trade Representative, “\$300 Billion Trade Action (List 4),” <https://ustr.gov/issue-areas/enforcement/section-301-investigations/section-301-china/300-billion-trade-action>, retrieved April 10, 2020.

The product²⁴

Description and applications

Common alloy aluminum sheet (i.e., CAAS) is a thin wrought aluminum product that is produced via a rolling process.²⁵ Like other aluminum sheet products, the subject product has a thickness of 6.3 mm or less, but greater than 0.2 mm, however the subject product in these investigations includes both CAAS in rolled coils or cut-to-length, regardless of width. Commerce's scope in these investigations also includes both not clad and multi-alloy clad aluminum sheet. Not clad aluminum alloy sheet is derived from molten aluminum that is mixed with other nonferrous metals, and then cast into a semifinished form for further processing (i.e., rolling). Multi-alloy clad aluminum sheet is produced through a roll bonding process, during which aluminum sheet and other nonferrous metals or aluminum alloy sheets are passed concurrently through steel rollers that apply pressure to bind the metals together (see figure I-3). Multi-alloy clad aluminum sheet is produced from a 3XXX series alloy core, to which layers are applied to one or both sides of the core. This process increases the strength of the final product.

Table I-1 presents information on subject alloy series, various series of aluminum alloys, properties of those alloys, and the end use applications. The pricing products in these investigations are composed of Alloy 3003, Alloy 3105, and Alloy 5052, whose properties and end uses are described later in this section. These products also have unique temper designations, which are alphanumeric codes that convey to the producer and end user information about the manner in which the aluminum has been mechanically and/or thermally treated to obtain the desired properties.²⁶

CAAS is used in a variety of applications, and different alloys are used to elicit certain characteristics. Common applications for Alloy 3003 sheet include heat exchangers, air condition evaporators, motor vehicle radiators, and home appliances. Alloy 3105 sheet is commonly used in manufacturing mobile homes, residential siding, and rain carrying goods

²⁴ Unless otherwise specified, information in this section is derived from *Common Alloy Aluminum Sheet from China, Inv. No. 701-TA-591 and 731-TA-1399 (Final)*, USITC Publication 4861, January 2019, pp. I-11—I-14.

²⁵ Wrought aluminum consists of aluminum products that are rolled, drawn, extruded, or otherwise mechanically formed of aluminum or aluminum alloys.

²⁶ Kaufman, "Understanding the Aluminum Temper Designation System," 2013, <https://materialsdata.nist.gov/bitstream/handle/11115/186/Understanding%20Temper%20Designation.pdf?isAllowed=y&sequence=3>, retrieved March 31, 2020.

(e.g., gutters and downspouts).²⁷ Common applications for Alloy 5052 sheet include architecture, general sheet metal work, and heat exchangers.²⁸ Petitioners note that CAAS products subject to these investigations are commonly used in downstream industries such as transportation (e.g., truck trailers, passenger cars and light trucks, and trucks and buses); building and construction (e.g., siding, gutters, downspouts, curtail wall, and roofing); infrastructure (e.g., signs and license plate stock); and electrical and marine applications.²⁹

Table I-1
Aluminum alloys: Alloy series, alloying metal, properties, and end uses

Series	Alloying metal	Properties	End use applications
1XXX	Pure aluminum (Al)	Commercially pure (99 percent or more Al by weight), non-heat-treatable, low strength, excellent formability, high thermal and electrical conductivity, high corrosion resistance, highly reflective	Aircraft frames, fuel filters, electric power grid lines, radiator tubing, lighting reflectors, decorative components, food packaging trays
3XXX	Manganese (Mn)	Non-heat-treatable, medium strength, good formability, good corrosion resistance	Storage tanks, beverage cans, home appliances, heat exchangers, pressure vessels, siding, gutters
5XXX	Magnesium (Mg)	Non-heat-treatable, medium to high strength, good formability, excellent marine corrosion resistance	Interior automotive, appliance trim, pressure vessels, armor plate, marine and cryogenic components
6XXX	Magnesium (Mg) and silicon (Si)	Heat-treatable Medium-high strength, good corrosion resistance, easily extruded	Exterior automotive, automotive profiles, railcars, tubing, marine vessel frames, screw stock, doors and windows

Note.— 1XXX, 3XXX, and 5XXX series alloys are included in Commerce’s scope. However, the properties and end uses described above may include product that is out of scope (e.g., due to thickness) or specifically excluded from the scope (e.g., can stock). 6XXX series alloys are not included within Commerce’s scope.

Source: Aluminum Association, “Aluminum Alloys 101,” 2017; ASM International, “Subject Guide: Aluminum and Aluminum Alloys,” 2017; Havrilla, “Joining Aluminum with Laser,” July 12, 2013; Aluminum: Competitive Conditions Affecting the U.S. Industry, Inv. No. 332-557, USITC Publication 4703, June 2017, pp. 530-31.

²⁷ AZO Materials, “Aluminium / Aluminum 3105 Alloy (UNS A93015),” <https://www.azom.com/article.aspx?ArticleID=6620>, retrieved March 19, 2020.

²⁸ 6XXX series alloys (not included in Commerce’s scope) are used primarily in automotive applications (e.g., automotive body sheet), as well as other applications such as railcars and marine vessel frames.

²⁹ Petition, p. 7.

CAAS can be produced to the requirements of various international standard specifications, including but not limited to the American Society for Testing and Materials (ASTM) International Standard B209-14 for aluminum and aluminum alloy sheet and plate.

The scope of these investigations excludes “aluminum can stock, which is suitable for use in the manufacture of aluminum beverage cans, lids of such cans, or tabs used to open such cans.” Can stock is manufactured with a thickness ranging from 0.200 mm to 0.292 mm—thereby overlapping with the thickness requirements of both aluminum foil and aluminum sheet—as well as any of the following tempers: H-19, H-41, H-48, or H-39.³⁰ Aluminum can body stock is manufactured using alloy 3004 which provides sufficient strength for the body of the can at the thinnest possible gauge. Aluminum can lid and tab stock use a stronger alloy (alloy 5182) in order to maintain pressure within the can.³¹ Aluminum can stock also has a lubricant applied to its surface in order to easily facilitate movement throughout the final can assembly equipment.

Manufacturing processes

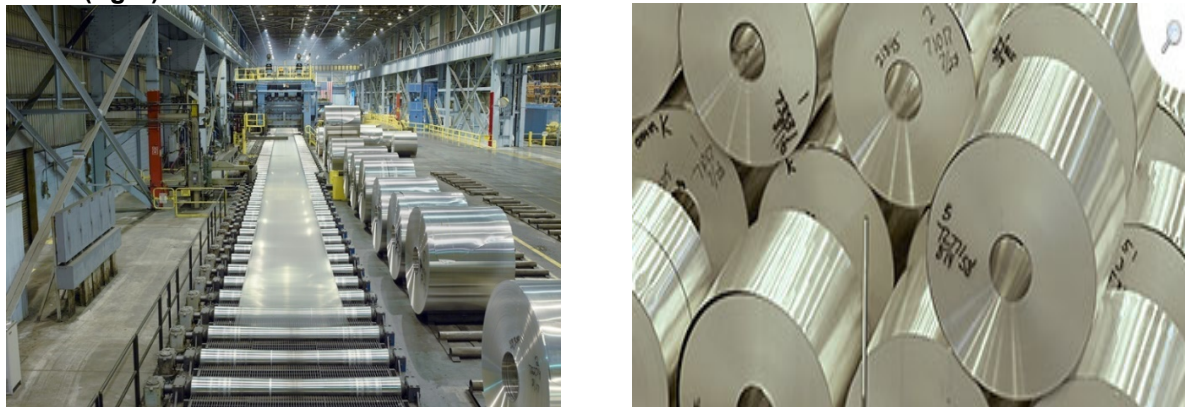
The manufacturing processes for CAAS are summarized below. In general, there are three distinct stages that include: (1) melting and refining aluminum, (2) casting aluminum into semi-finished forms such as sheet ingot, and (3) rolling semi-finished forms into flat-rolled products such as aluminum sheet.³² Figure I-1 includes images of an aluminum rolling mill (left) and coils of aluminum sheet (right).

³⁰ In metallurgy, tempering is a heat-treating process that is used to strengthen or harden metal. The Aluminum Association identifies various aluminum products by specifying both an alloy and a temper for that product. H tempers indicate the degree of strain-hardening for that product.

³¹ Schaeffler, Sheet Aluminum Alloys for Cans and Cars,” *The Fabricator*, <https://www.thefabricator.com/thefabricator/article/metalsmaterials/sheet-aluminum-alloys-for-cans-and-cars>, retrieved March 19, 2020.

³² Sheet ingot is a large unwrought slab of aluminum that can weigh more than 20 metric tons and is approximately 6 feet wide, 20 feet long, and more than 2 feet thick. Sheet ingot is reduced in thickness to produce flat-rolled products such as sheet, plate, and foil. *Aluminum: Competitive Conditions Affecting the U.S. Industry*, Inv. No. 332-557, USITC Publication 4703, June 2017, p. 27.

Figure I-1: Novelis, Oswego, New York aluminum rolling mill (left), stacked coils of aluminum sheet (right)



Source: The International Aluminum Institute, “Rolling,” <http://primary.world-aluminium.org/processes/rolling/>, retrieved March 18, 2020.

Melting and refining

Aluminum is produced using either the primary or secondary smelting process. Inputs for the primary smelting process are derived from aluminum-containing ore (i.e., bauxite) that is first mined then refined into aluminum-oxide (i.e., alumina) through a chemical reaction known as the Bayer process. The alumina is then electrolytically smelted to remove oxygen and produce molten aluminum metal (i.e., the Hall-Héroult process). This process is energy-intensive and requires significant amounts of electricity. The molten aluminum produced through the smelting process is then alloyed with other nonferrous metals to enhance certain properties and characteristics. Aluminum can also be alloyed with other nonferrous metals later in the manufacturing process through a cladding process (described later in this section).

Unlike the primary smelting process, aluminum produced using the secondary smelting process is sourced from old and new sources of aluminum scrap metal.³³ Secondary smelters purchase large volumes of aluminum scrap, melt it down, and alloy it with primary aluminum and other metals in order to adjust the chemical composition. Most U.S. secondary aluminum smelters rely on a combination of primary and scrap aluminum (including old sheet), and may adjust the amount of primary aluminum they mix in depending on the availability of and price

³³ Old scrap is post-consumer material derived from various end uses such as manufactured products and construction materials. New scrap is generated during the manufacturing of various aluminum products, and often takes the form of shavings and trimmings.

of scrap metal relative to primary aluminum.³⁴ The desired characteristics of the final end use product are determined during the melting and refining stages.

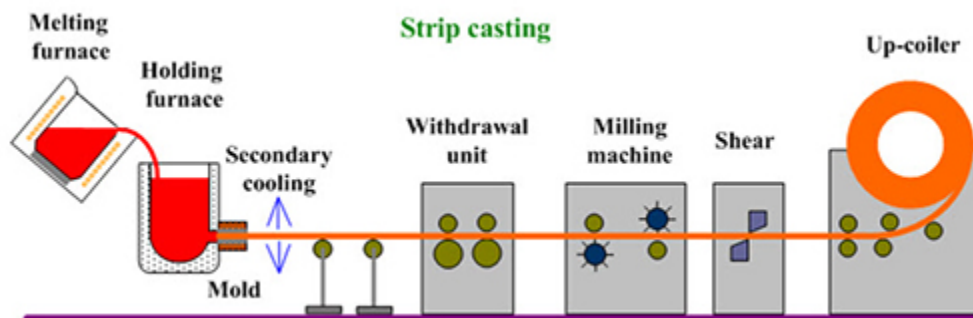
Casting

Following the production of molten aluminum with the desired properties, the molten aluminum is cast into a semi-finished form that can enter a rolling process. The most common casting methods used during the production of aluminum sheet include continuous casting and direct chill casting. Direct chill casting requires more energy and higher production costs, but produces a higher-quality product when compared to continuous casting.

Continuous casting

During the continuous casting process, molten aluminum is transferred to a holding hearth where it is stored at the correct level of purity and temperature until it is ready to be fed into a casting unit. As the molten aluminum is fed into the casting unit, it flows between water-cooled rollers and emerges as a continuous solid strip of aluminum (figure I-2). The strip of aluminum is fed into a combination stand where it is cut into designated lengths by shears before it is wound into a coil. The coil is then transferred to a cold rolling mill where, depending on the desired level of thickness, it is then further reduced to produce different gauges of aluminum sheet.

Figure I-2
Aluminum sheet: Strip casting (continuous casting process)



Source: Total Materia, "Aluminum Strip Casting," <https://www.totalmateria.com/page.aspx?ID=CheckArticle&site=ktn&NM=403>, retrieved March 18, 2020.

³⁴ *Aluminum: Competitive Conditions Affecting the U.S. Industry*, Inv. No. 332-557, USITC Publication 4703, June 2017, pp. 138, 166-167.

Direct chill casting

Another method of casting used in the production of CAAS is direct chill casting. During this process, molten aluminum is transferred to a holding hearth where it is stored at the desired level of purity and temperature until it is ready to be fed into a casting unit with a mold. As the molten aluminum flows into the casting unit, cold water is pumped around the base of the mold. This cools the molten aluminum, solidifying it into the shape of the mold, producing a semi-finished product known as slab or sheet ingot. These semi-finished products are then removed from the casting unit and undergo a process known as scalping before they are cooled to room temperature and transferred to a hot rolling mill for further processing.³⁵

Rolling

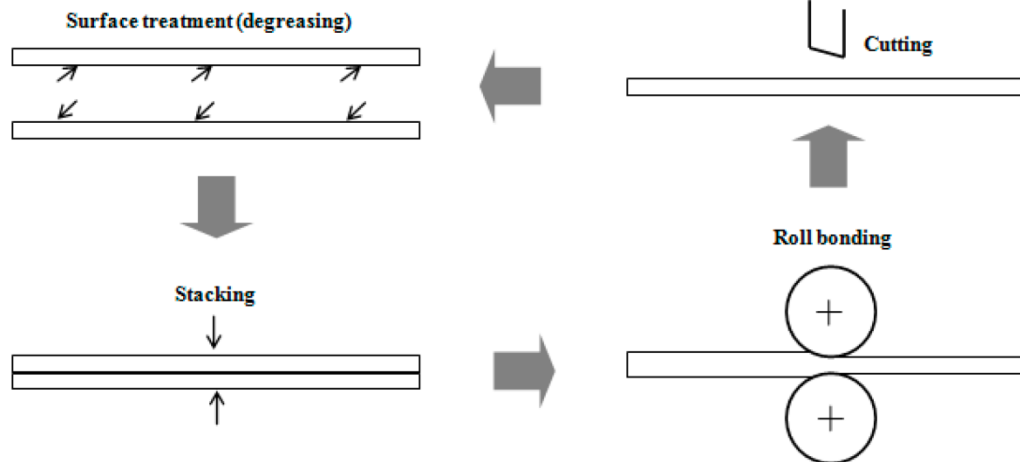
Semi-finished forms of aluminum derived from the continuous casting and direct chill casting processes are reduced in thickness in a rolling mill. Hot rolling and cold rolling are two different methods by which semi-finished forms of aluminum are reduced in thickness between rollers. The major difference between these methods is how the input (in coils, slabs, sheet ingot) is treated before it is reduced.

Certain product described in Commerce's scope can be alloyed through a cladding process. During this process, clad multi-alloy aluminum sheet is produced through a roll-bonding process, during which sheets of aluminum alloys are bound together through the rolling process. Some manufacturers apply surface treatment to the aluminum and the alloying metal(s) before stacking the sheets together. Once stacked, the sheets are then passed through a series of steel rollers that apply pressure to bond the metals together. The product is then cut and further processed for various end-use applications (see figure I-3).³⁶

³⁵ Scalping removes irregularities or undesirable chemical compositions from the surface of the ingot.

³⁶ Certain aluminum flat-rolled products such as coils can be further worked through re-rolling the metal. During this process, the metal is passed through steel rollers again in order to reduce it to the desired level of thickness. An additional processing step is heat-treating. Depending on the intended end use application and alloying metal present, certain flat-rolled aluminum products can undergo a heat-treating process (i.e., annealing), however heat-treated aluminum sheet (e.g., 6XXX series alloys) is not covered by Commerce's scope. During this process, the aluminum is heated to temperatures in excess of 600 degrees Fahrenheit in an annealing furnace in order to strengthen the metal. Certain aluminum alloys undergo a two-stage heat-treating process known as "solution heat-treatment and aging." During this process, metal is heated to an extremely high temperature then rapidly cooled to room temperature. The metal then develops its full properties through a low-temperature aging process.

Figure I-3
Clad aluminum sheet: Roll-bonding process



Source: MDPI, "Microstructure Evolution and Mechanical Properties of Al-TiB₂/TiC In Situ Aluminum-Based Composites during Accumulative Roll Bonding (ARB) Process," <http://www.mdpi.com:8080/1996-1944/10/2/109>, retrieved March 18, 2020.

Domestic like product issues

No issues with respect to domestic like product have been raised in these investigations. The petitioner proposes that the that there is a single domestic like product that is co-extensive with the scope of the investigations and also be defined as all CAAS consistent with the domestic like product definition adopted by the Commission in its recent investigation involving CAAS from China. Respondents do not contest the domestic like product definition for the preliminary phase of these investigations.

Part II: Conditions of competition in the U.S. market

U.S. market characteristics

Common alloy aluminum sheet (“CAAS”) is a flat-rolled, sheet-gauge aluminum product. It can be produced in coils or in straight lengths and has a variety of uses depending on its gauge, alloy, temper, width, and finish.¹ CAAS is used in downstream products for the construction, automotive, electrical, marine, and aerospace industries. These industries account for the vast majority of U.S. demand for CAAS.² Each sector uses a wide product mix of CAAS.³ CAAS can be produced as clad and not clad, and a small minority of CAAS is clad. Not clad CAAS is manufactured from one of three alloy series as designated by the Aluminum Association – 1XXX-, 3XXX-, or 5XXX- series, and clad CAAS is manufactured with a 3XXX- series alloy.⁴ The U.S. market for CAAS is served by a large number of producers and importers,⁵ with imports from Canada, Germany, and numerous other sources. China was a major import source in 2017 and to a lesser degree in 2018; however, Chinese-produced CAAS is currently subject to antidumping and countervailing duty orders.⁶

Apparent U.S. consumption of CAAS increased in both 2018 and 2019. Overall, apparent U.S. consumption in 2019 was 4.3 percent higher than in 2017.

¹ Petition, p. 7.

² *Common Alloy Aluminum Sheet from China, Inv. Nos. 701-TA-591 and 731-TA-1399 (Final)*. USITC Publication 4861, January 2019 (“USITC Publication 4861”), p. II-1.

³ Petitioners’ postconference brief, Exhibit 1, pp. 43-44.

⁴ Petition, p. 7.

⁵ U.S. producers *** were also importers of CAAS. These firms’ U.S. producer responses are reported separately from their U.S. importer responses throughout this section. U.S. producer ***. These firms’ responses are reported separately. U.S. producer *** questionnaires. Importer and master distributor Ta Chen acquired U.S. producer Texarkana in October 2018. Prior to this, Texarkana was owned by U.S. producer Arconic. Declaration of Johnny Hsieh, Ta Chen International (April 2, 2020), p. 2.

⁶ As detailed in Part I, Commerce self-initiated antidumping and countervailing duty investigations on CAAS from China in December 2017. Chinese CAAS is subject to antidumping margins of 49.85 percent for certain exporter-producers, and a China-wide margin of 59.72 percent. Subsidy rates for Chinese CAAS range from 46.48 percent to 116.49 percent for certain Chinese producers, and an all-others rate of 50.75 percent. See, *Common Alloy Aluminum Sheet from the People's Republic of China: Antidumping Duty Order*, 84 FR 2813, February 8, 2019; *Common Alloy Aluminum Sheet from the People's Republic of China: Countervailing Duty Order*, 84 FR 2157, February 6, 2019.

(continued...)

Impact of section 232 tariffs

CAAS subject to these investigations has been subject to section 232 tariffs beginning on March 23, 2018, although exclusions for product from certain countries have been granted.⁷ Most U.S. producers (seven of nine responding) reported that the section 232 tariffs had no impact on the market for CAAS, the remaining two U.S. producers had differing responses regarding the impact on the CAAS market (table II-1). The majority of importers (43 of 74 responding), in contrast, reported that the section 232 tariffs had an impact on the U.S. market.⁸ Importers differed in their responses regarding the impact of the section 232 tariffs on the CAAS market, with the exception of the effect on the price of CAAS (table II-1) which the majority of importers reported that prices of CAAS had increased due to the section 232 tariffs.

In describing the effects of the section 232 tariffs, numerous importers reported that domestic mills increased prices and did not have the capacity or availability to supply the market. *** indicated that it was unable to buy domestic plate and sheet until the end of 2019. *** reported that U.S. producers took advantage of the trend in the automotive sector of increased aluminum in cars to increase prices and limit availability to smaller, non-OEM users. *** reported that U.S. producers were “more stable” while *** reported that the large amount of section 232 exclusions increased the availability of imported CAAS. Importer and purchaser *** reported that there was a “panic buy” of product in 2018 and demand has leveled since then.

⁷ The President announced tariffs of 10 percent ad valorem on U.S. imports of certain aluminum products, including CAAS, on March 8, 2018, and these tariffs went into effect on March 23, 2018. The President temporarily suspended section 232 tariffs on imports from Brazil, South Korea, and members of the European Union (“EU”), including subject countries Croatia, Germany, Greece, Italy, Romania, Slovenia, and Spain on March 22, 2018. The suspension of tariffs on aluminum imports from South Korea lapsed on April 30, 2018, and the suspension of tariffs on Brazil and EU countries lapsed on May 31, 2018. The President suspended tariffs on imports of aluminum from Canada and Mexico on May 19, 2019. Petition, p. 6.

⁸ Nine importers reported that the section 232 tariffs had no impact, and 22 reported that they did not know if there was an impact.

Table II-1**CAAS: U.S. producers and importers' responses to the impact of the section 232 tariffs on the CAAS market**

Item	Increase	No change	Decrease	Fluctuate
Supply of U.S. produced CAAS				
U.S. producers	1	---	1	---
Importers	14	16	11	6
Supply of imported CAAS				
U.S. producers	2	---	---	---
Importers	13	11	15	6
Prices of CAAS				
U.S. producers	1	---	1	---
Importers	34	3	4	6
Overall demand in the market for CAAS				
U.S. producers	1	1	---	---
Importers	12	17	9	10

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

Channels of distribution

U.S. producers sold about equally to distributors, converters, and end users in 2017, and sold an increasing portion to end users in 2019, although sales to distributors and converters were still sizeable.⁹ Importers sold mainly to distributors, as shown in table II-2.

⁹ Converters further process CAAS into other products.

Table II-2
CAAS: U.S. producers' and importers' U.S. commercial shipments, by sources and channels of distribution, 2017-19

Item	Calendar year		
	2017	2018	2019
	Share of U.S. shipments (percent)		
U.S. producers: to Distributors	31.6	30.7	29.2
to Converters	31.7	31.3	29.5
to End users	36.7	38.0	41.3
U.S. importers: Bahrain to Distributors	***	***	***
to Converters	***	***	***
to End users	***	***	***
U.S. importers: Brazil to Distributor	***	***	***
to Converters	***	***	***
to End users	***	***	***
U.S. importers: Croatia to Distributors	***	***	***
to Converters	***	***	***
to End users	***	***	***
U.S. importers: Egypt to Distributors	***	***	***
to Converters	***	***	***
to End users	***	***	***
U.S. importers: Germany to Distributors	***	***	***
to Converters	***	***	***
to End users	***	***	***
U.S. importers: Greece to Distributors	***	***	***
to Converters	***	***	***
to End users	***	***	***

Table continued on next page.

Table II-2--Continued
CAAS: U.S. producers' and importers' U.S. commercial shipments, by sources and channels of distribution, 2017-19

Item	Calendar year		
	2017	2018	2019
	Share of U.S. shipments (percent)		
U.S. importers: India to Distributors	***	***	***
to Converters	***	***	***
to End users	***	***	***
U.S. importers: Indonesia to Distributors	***	***	***
to Converters	***	***	***
to End users	***	***	***
U.S. importers: Italy to Distributors	***	***	***
to Converters	***	***	***
to End users	***	***	***
U.S. importers: Korea to Distributors	***	***	***
to Converters	***	***	***
to End users	***	***	***
U.S. importers: Oman to Distributors	***	***	***
to Converters	***	***	***
to End users	***	***	***
U.S. importers: Romania to Distributors	***	***	***
to Converters	***	***	***
to End users	***	***	***
U.S. importers: Serbia to Distributors	***	***	***
to Converters	***	***	***
to End users	***	***	***
U.S. importers: Slovenia to Distributors	***	***	***
to Converters	***	***	***
to End users	***	***	***
U.S. importers: South Africa to Distributors	***	***	***
to Converters	***	***	***
to End users	***	***	***
U.S. importers: Spain to Distributors	***	***	***
to Converters	***	***	***
to End users	***	***	***

Table continued on next page.

Table II-2--Continued
CAAS: U.S. producers' and importers' U.S. commercial shipments, by sources and channels of distribution, 2017-19

Item	Calendar year		
	2017	2018	2019
	Share of U.S. shipments (percent)		
U.S. importers: Taiwan to Distributors	***	***	***
to Converters	***	***	***
to End users	***	***	***
U.S. importers: Turkey to Distributors	***	***	***
to Converters	***	***	***
to End users	***	***	***
U.S. importers: Subject to Distributors	68.2	70.0	67.7
to Converters	13.2	5.6	2.9
to End users	18.6	24.4	29.4
U.S. importers: Nonsubject to Distributors	80.7	78.4	56.5
to Converters	1.2	0.2	9.5
to End users	18.0	21.4	33.9
U.S. importers: All sources: to Distributors	75.5	73.0	66.4
to Converters	6.2	3.7	3.7
to End users	18.3	23.3	29.9

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Geographic distribution

U.S. producers and importers reported selling CAAS to all regions in the United States (table II-3). For U.S. producers, 6.6 percent of sales were within 100 miles of their production facility, 78.4 percent were between 101 and 1,000 miles, and 14.9 percent were over 1,000 miles. Importers sold 38.6 percent within 100 miles of their U.S. point of shipment, 55.4 percent between 101 and 1,000 miles, and 6.0 percent over 1,000 miles.

**Table II-3
CAAS: Geographic market areas in the United States served by U.S. producers and importers**

Region	Northeast	Midwest	Southeast	Central Southwest	Mountains	Pacific Coast	Other	All regions (except Other)
U.S. producers	9	9	9	8	9	9	***	8
Subject sources:								
Bahrain	***	***	***	***	***	***	---	3
Brazil	4	6	6	4	---	***	---	6
Croatia	3	3	3	***	***	***	---	3
Egypt	5	6	6	5	***	4	---	7
Germany	9	10	15	8	6	7	***	16
Greece	8	8	6	5	4	***	---	12
India	12	12	11	10	6	10	***	17
Indonesia	3	3	3	3	3	3	***	3
Italy	10	12	7	6	4	6	***	16
Korea	4	7	5	3	***	5	---	9
Oman	7	8	7	4	***	4	---	10
Romania	5	6	5	5	---	***	---	6
Serbia	***	***	***	***	***	***	---	3
Slovenia	4	4	3	2	***	***	---	5
South Africa	***	4	3	3	***	***	---	5
Spain	6	7	6	4	***	3	***	8
Taiwan	3	4	3	***	***	5	***	7
Turkey	8	9	8	6	4	6	***	11
Subject sources	36	41	38	27	17	28	4	59

Note: All other U.S. markets, including AK, HI, PR, and VI.

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

Supply and demand considerations

U.S. supply

Table II-4 provides a summary of the supply factors regarding CAAS from U.S. producers and from subject countries.

Table II-4

CAAS: Supply factors that affect the ability to increase shipments to the U.S. market

Item	2017	2019	2017	2019	2017	2019	Shipments by market in 2019 (percent)		Able to shift to alternate products
	Capacity (short tons)		Capacity utilization (percent)		Inventories as a ratio to total shipments (percent)		Home market shipments	Exports to non-U.S. markets	No. of firms reporting "yes"
United States	1,624,150	2,070,746	77.4	62.4	14.6	18.5	94.2	5.8	5 of 9
Bahrain	***	***	***	***	***	***	***	***	*** of 1
Brazil	***	***	***	***	***	***	***	***	*** of 3
Croatia	***	***	***	***	***	***	***	***	*** of 1
Egypt	***	***	***	***	***	***	***	***	*** of 1
Germany	***	***	***	***	***	***	***	***	*** of 5
Greece	***	***	***	***	***	***	***	***	*** of 1
India	***	***	***	***	***	***	***	***	*** of 3
Indonesia	***	***	***	***	***	***	***	***	*** of 0
Italy	***	***	***	***	***	***	***	***	*** of 6
Korea	***	***	***	***	***	***	***	***	*** of 1
Oman	***	***	***	***	***	***	***	***	*** of 1
Romania	***	***	***	***	***	***	***	***	*** of 1
Serbia	***	***	***	***	***	***	***	***	*** of 1
Slovenia	***	***	***	***	***	***	***	***	*** of 1
South Africa	***	***	***	***	***	***	***	***	*** of 1
Spain	***	***	***	***	***	***	***	***	*** of 2
Taiwan	***	***	***	***	***	***	***	***	*** of 1
Turkey	***	***	***	***	***	***	***	***	*** of 5
Subtotal	***	***	***	***	***	***	***	***	18 of 35

Note: Responding U.S. producers accounted for virtually all of U.S. production of CAAS in 2019. Responding foreign producer/exporter firms accounted for more than 80 percent of U.S. imports of CAAS from all subject countries combined during 2019. 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 Part I, "Summary Data and Data Sources."

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

Domestic production

Based on available information, U.S. producers of CAAS have the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced CAAS to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity or inventories and the ability to shift shipments from alternate markets or inventories. Factors mitigating responsiveness of supply include some limited ability to shift production to or from alternate products.

Since 2017, U.S. producers' CAAS capacity has increased by 27.5 percent, however, production did not match the increase in capacity, resulting in decreased capacity utilization over the period. U.S. producers reported major export markets as Mexico and Canada. Of the nine responding U.S. producers, some reported that they can produce aluminum can stock (one firm), aluminum foil (four firms), aluminum plate (1 firm), and other products (3 firms) on the same equipment as CAAS.¹⁰ *** also reported that it can switch production between plate and coil products. Factors affecting U.S. producers' ability to shift production include equipment and machinery constraints, technical requirements,¹¹ and the alloy mix required.¹²

Subject imports from subject countries

Table II-4 provides a summary of supply of CAAS from subject countries and additional data are provided in Part VII. Producers of CAAS from subject countries have varying abilities to respond to changes in demand; generally, subject producers are able to respond to changes in demand with moderate-to-large changes in the quantity of shipments of CAAS to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of some unused capacity, and an ability for subject producers to shift shipments from alternative markets. Factors mitigating responsiveness of supply include a limited ability to shift shipments from inventories, and a limited ability for some producers to shift production to or from alternate products.

CAAS production capacity decreased for six countries, including Germany,¹³ while production capacity increased for three countries, including Italy and Turkey.¹⁴ Production capacity remained constant during 2017-19 for eight subject countries.¹⁵ Most subject countries (13 of 17 responding, all except ***, ***, ***, and ***) had capacity utilization rates of more than 80 percent in 2019 and six of those countries (***) had capacity utilization rates of more than 90 percent.

¹⁰ Other products include: 6XXX alloy (***); auto sheet (***); HVAC, conductors, heat shields and building products (***).

¹¹ Technical requirements include gauge, temper, tolerance, flatness, surface, and finish (***). *** also reported constraints due to finishing equipment.

¹² *** reported that it does not produce all alloys at certain plants.

¹³ Germany had the largest production capacity in 2019, accounting for more than *** percent of total CAAS capacity of all subject countries.

¹⁴ Turkey and Italy had the second and third largest production capacities in 2019 and accounted for nearly *** percent of total capacity of all subject countries.

¹⁵ The Commission did not receive questionnaire responses from foreign producers in Indonesia.

(continued...)

Fourteen of the 17 responding subject countries had inventory-to-shipment ratios that were less than 10 percent of total shipments in 2019. Three subject countries, ***, reported larger inventory-to-shipment ratios which ranged from approximately 12 percent to 21 percent of total shipments in 2019.

Lastly, nine subject countries, including those with the largest capacity (***), exported more than one-third of their total shipments to non-U.S. markets in 2019, indicating that there is some ability to shift shipments from alternate markets. About half of responding subject producers indicated that they were able to shift production from CAAS to other products.¹⁶ Foreign producers reported that finishing line capacity, heat-treatment capability and capacity, machine technical abilities, the cost and time required to shift production lines to other products, and long term supply agreements are factors that limit shifting production to alternate products.

Petitioners stated that there are no major differences between how CAAS is produced in the United States and in the subject countries.¹⁷

Imports from nonsubject sources

Nonsubject imports accounted for 30.1 percent of total U.S. imports in 2019. The largest sources of nonsubject imports during 2017-19 were China, especially during 2017 and 2018, and Canada.

Supply constraints

Three U.S. producers reported capacity constraints since January 2017. *** reported that it offered capacity to “strategic customers” when available on a spot basis, and *** indicated that due to the 2018 AD and CVD case on CAAS from China, it had to constrain orders in early 2019 until it expanded capacity ***. *** also reported it had constrained capacity until its ***.

Most importers (49 of 73) reported that they had no supply constraints. Those firms reporting supply constraints reported that supply was tight in 2018 and early 2019 (***), and multiple importers reported that the Chinese

¹⁶ Some foreign producers reported being able to shift production from CAAS to other products including 6XXX and 8XXX series for automotive applications, 8XXX series alloys for sheets and coils, foil stock, closure stock for making pilfer-proof caps, circles for making cookware, and plates.

¹⁷ Petitioners’ postconference brief, Exhibit 1, p. 3.

antidumping and countervailing duty orders caused supply constraints. *** reported that it could not supply customers due to limited availability from domestic producers and extended lead times from foreign suppliers. *** also reported that it had to curtail customers' order volumes by *** in July 2018. Multiple importers also reported tight domestic capacity and availability. Importer *** reported that U.S. producers have not offered a quote on ***, and instead U.S. producers have focused on the auto and aerospace industries.

Respondents argued the CAAS industry has encountered supply constraints due to: U.S. producers' limited capacity to produce certain products;¹⁸ U.S. producers shifting production from common and lower-priced CAAS in order to supply higher-end and more expensive CAAS,¹⁹ particularly for the automotive and aerospace industries;²⁰ and generally limited domestic capacity.^{21 22} Respondents also argued that petitioners' section 232 exclusions are indicative of supply constraints.²³ Petitioners responded that domestic producers produced all three types of CAAS products during 2017-19, and that in 2019 *** direct chill cast CAAS. Petitioners stated U.S. producers expanded capacity to increase production of in-scope CAAS, and that the specialty products respondents and purchasers refer to for the automotive and aerospace industries could include out-of-scope products.²⁴

¹⁸ Respondents argued that U.S. producers do not have the capacity to produce direct cast CAAS, direct chill CAAS, and clad sheet. Statement of Nathan Khan, Central National Gottesman (March 27, 2002), p. 5; Written Testimony of Gheorghe Dobra, General Manager, Alro, SA (March 27, 2020), p. 2;

¹⁹ Respondent Hydro Aluminum also argued that petitioners have shifted production from "common CAAS" to higher-end and nonsubject product such as sheet for cans and heat-treatable alloys. Respondent Hydro Aluminum's postconference brief, p. 5.

²⁰ Statement of Nathan Khan, Central National Gottesman (March 27, 2002), p. 5; Statement of Ian Smith, Hulamin (March 27, 2020), p. 2. Written Testimony of Gheorghe Dobra, General Manager, Alro (March 27, 2020), p. 2.

²¹ Statement of Nathan Kahn, Central National Gottesman (March 27, 2020), p. 2; Testimony of Peter Ohlendorf, Hydroaluminum Metals USA, (March 27, 2020),p. 2; Statement of Peter Rijkoort, Oman Aluminum Rolling Company (March 27, 2020), p. 2; Testimony of Sam Desai, R.M. Creations,(March 27, 2020), p. 2.

²² Respondent and Greek foreign producer EvalHalcor provided multiple citations to industry publications citing a "supply crisis" in the U.S. market in 2018 following the antidumping and countervailing duty orders on Chinese CAAS. See Respondent EvalHalcor's postconference brief, pp. 4-7.

²³ See Appendix D for more information on U.S. producers' section 232 exclusion requests.

²⁴ Petitioners noted that automotive grade CAAS could include out-of-scope 6XXX-series heat-treatable aluminum sheet. Respondent Hydro Aluminum, however, stated that automotive CAAS could also include 5XXX series CAAS, which is in-scope product. Petitioners' postconference brief, Exhibit 1, p. 13 and pp. 21-23. Respondent Hydro Aluminum's postconference brief, Exhibit 8, p. 2.

(continued...)

U.S. demand

Based on available information, the overall demand for CAAS is likely to experience small-to-moderate changes in response to changes in price. The main contributing factors are the lack of substitute products and the varying cost share of CAAS in most of its end-use products. CAAS also has a small share in its ultimate end-use products, such as automobiles or residential and commercial construction. In addition, different alloy series (i.e., alloy 1XXX, 3XXX, and 5XXX) have different product characteristics, which makes them less applicable for certain end uses and industries. As a result, different series may exhibit different demand patterns.

End uses and cost share

U.S. demand for CAAS depends on the demand for U.S.-produced downstream products. Reported end uses include automotive products, building and fabrication, and signs.

CAAS accounts for a varying share of the cost of the end-use products in which it is used. Reported cost shares for some end uses were as follows:

- Aluminum sheet or coil, 98 percent.
- Automotive parts, 40 to 80 percent.²⁵
- Automotive sheet, 99 percent.
- Building and construction, 1 to 91 percent.
- Displays and signs, 20 to 80 percent.
- General fabrication, 80 percent.
- Gutters, 83 to 90 percent.
- Lithographic printing plates, 55 percent.
- Transportation generally, 1 to 90 percent.

Business cycles

Most U.S. producers (seven of nine) and importers (59 of 73) indicated that CAAS was not subject to business cycles. Importers reporting that CAAS was subject to business cycles

²⁵ Importers' reported automotive parts include evaporators, heat shields, heaters, truck bed covers, and automotive components.

reported that road work and residential and commercial construction are seasonal. One importer reported that the auto industry has higher demand in the second and third quarters.

Three U.S. producers reported that CAAS was subject to distinct conditions of competition, reporting that imported CAAS “flooded the market” after the Chinese antidumping and countervailing duty orders. Importers reported that CAAS is subject to distinct conditions of competition, citing the effect of the China antidumping and countervailing duty orders, the section 232 tariffs, and “trade wars” and “tariffs” generally. *** noted that the demand for autos and trucks has declined due to ride-sharing and the gig economy.

Importers also reported that the conditions of competition in the CAAS market had changed since January 2017. *** reported that the “inconsistent” section 232 exclusions had created “an uneven playing field” which allowed certain firms like Ta Chen to import. *** reported that the China orders caused prices to spike and led to panic buying. Multiple importers reported that U.S. producers did not have the capacity to supply demand. *** also reported that the auto industry increased demand for aluminum, which caused shortages in domestic mills and that it would have lost business had it been unable to import from Germany.

Demand trends

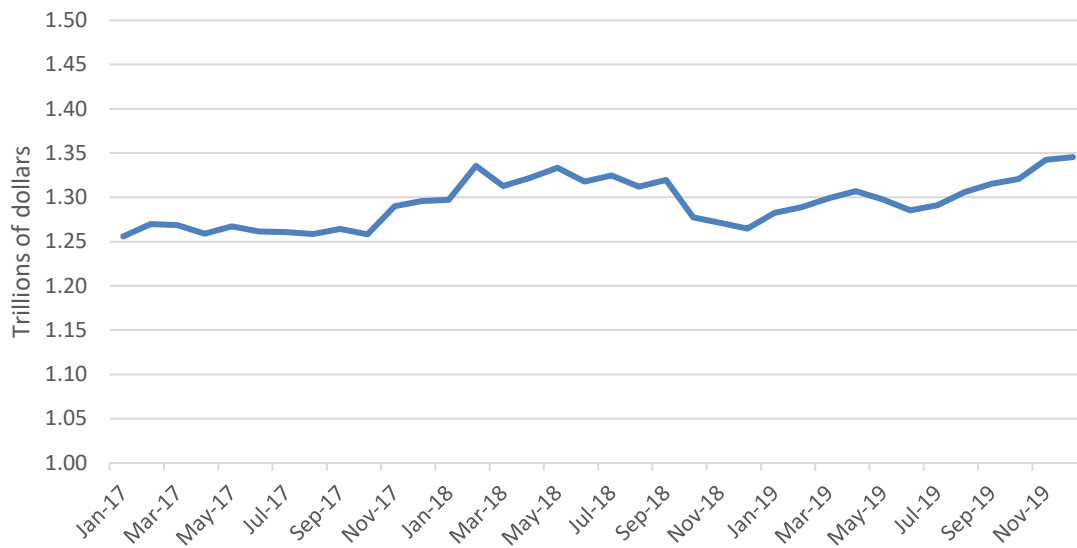
U.S. demand for CAAS is driven primarily by the construction and automotive markets, as well as a number of other industries.²⁶ Construction spending and auto production moved in opposing directions from 2017 to 2019, with construction spending increasing and auto production decreasing. The decrease in auto production was larger than the increase in construction spending.

Between January 2017 and December 2019, the seasonally adjusted total value of construction put in place increased by 7.1 percent (figure II-1).

²⁶ *Common Alloy Aluminum Sheet from China. Inv. Nos. 701-TA-591 and 731-TA-1399 (Final)*. USITC Publication 4861, January 2019, p. II-6.

Figure II-1

Construction spending: Total value of construction put in place in the United States, seasonally adjusted annual rate, monthly, January 2017-December 2019



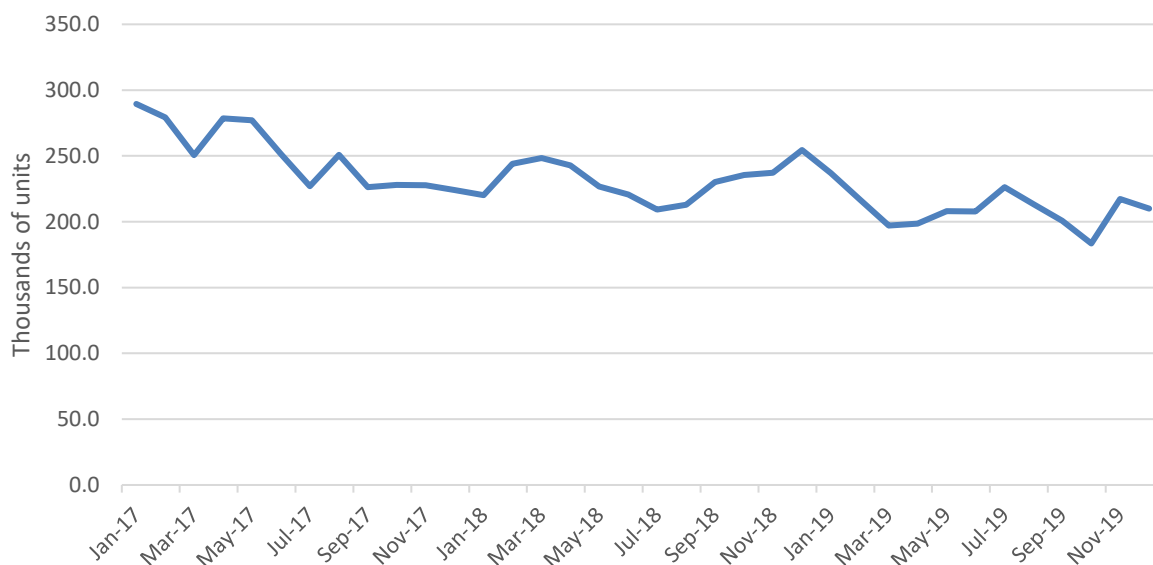
Source: Economic Research Division, Federal Reserve Bank of St. Louis, retrieved March 23, 2020.

From January 2017 to December 2019, seasonally adjusted domestic auto production decreased by 27.5 percent (figure II-2). However, the auto industry has shifted towards using more aluminum per car to reduce weight and increase fuel economy, energy efficiency, and reduce emissions.²⁷

²⁷ Gregory Barker. "The hidden carbon footprint of aluminum cars." Automotive News. (July 22, 2019). Retrieved April 7, 2020 <https://www.autonews.com/commentary/hidden-carbon-footprint-aluminum-cars>

Figure II-2

Domestic auto production: Thousands of units, monthly, seasonally adjusted, January 2017-December 2019



Source: Economic Research Division, Federal Reserve Bank of St. Louis, retrieved March 23, 2020.

Most U.S. producers reported an increase in U.S. demand for CAAS since January 1, 2017, while a slim plurality of importers reported that demand had fluctuated (table II-5). U.S. producer *** noted that construction industry is still recovering the from 2008 recession, and U.S. producer *** reported that the auto industry is using more aluminum. Importers reporting that demand has fluctuated cited that U.S. mill allocations caused “panic buying” (***), and that domestic production of CAAS is limited and higher priced. A number of importers also reported that demand for CAAS had increased due to a general strengthening of the U.S. economy (***). Importer *** reported that domestic mills could not meet demand, and *** reported that the orders against Chinese CAAS increased demand.

Table II-5

CAAS: Firms’ responses regarding U.S. demand and demand outside the United States

Item	Increase	No change	Decrease	Fluctuate
Demand in the United States				
U.S. producers	5	1	1	2
Importers	19	17	11	21
Demand outside the United States				
U.S. producers	1	---	1	3
Importers	10	13	11	18

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

Substitute products

Substitutes for CAAS are very limited. Most U.S. producers (seven of eight) and importers (66 of 70) reported that there were no substitutes of CAAS. The five firms reporting substitutes listed copper and copper sheet, vinyl, out-of-scope aluminum sheet, and soft steel.

Substitutability issues

The degree of substitution between domestic and imported CAAS depends upon such factors as relative prices, quality (e.g., grade standards, defect rates, etc.), and conditions of sale (e.g., price discounts/rebates, lead times between order and delivery dates, reliability of supply, product services, etc.). Based on available data, staff believes that there is moderate-to-high degree of substitutability between domestically produced CAAS and CAAS imported from subject sources. The main factor limiting substitutability would be the availability of CAAS from domestic producers.

Lead times

CAAS is primarily produced-to-order. U.S. producers reported that *** percent of their commercial shipments were produced-to-order, with lead times ranging from 32 to 56 days and averaging 44.5 days. The remaining *** percent of their commercial shipments came from inventories, with lead times averaging 8.3 days. Importers reported that *** percent of their commercial shipments were produced-to-order, with lead times ranging from 14 to 150 days and averaging 99.9 days.²⁸ Importers reported that the remaining *** percent of their commercial U.S. shipments were sold from U.S. inventories and *** percent from foreign inventories. Lead times of sales from U.S. inventories averaged *** days, and *** days from foreign inventories.

Petitioners state that inventories are “an important part” of supply chain management in the CAAS market and that inventories are held at every level of distribution, including U.S. producers, importers, master distributors, distributors, and end users.²⁹

²⁸ Importers *** reported lead times of two and four days for material produced-to-order, these have not been included.

²⁹ Petitioners’ postconference brief, Exhibit 1, pp. 9-10.

Factors affecting purchasing decisions

Purchasers responding to lost sales lost revenue allegations³⁰ were asked to identify the main purchasing factors their firm considered in their purchasing decisions for CAAS. The major purchasing factors identified by firms include quality, price, and availability. Other factors purchasers listed included production lead times, technical support, capacity, terms, willingness of supplier to quote, and adherence to specification.

Table II-6

CAAS: Ranking of factors used in purchasing decisions as reported by U.S. purchasers, by factor

Item	1st	2nd	3rd	Total
	Number of firms (number)			
Quality	7	9	1	17
Price / Cost	4	3	9	16
Availability / Supply	8	3	---	11
All other factors	1	5	9	NA

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

Comparison of U.S.-produced and imported CAAS

In order to determine whether U.S.-produced CAAS can generally be used in the same applications as imports from subject countries, U.S. producers and importers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in table II-7, U.S. producers reported that U.S.-produced CAAS and CAAS from subject countries were always interchangeable. U.S. importers' responses were mixed, with a plurality or majority of importers responding that U.S.-produced CAAS was always or frequently interchangeable with subject CAAS, with the exception of German CAAS. A slim plurality of importers reported that U.S. and German CAAS were sometimes interchangeable, although many importers reported that they were always and frequently interchangeable.³¹ Factors impacting interchangeability included the surface condition, smut levels, or forming characteristics reported by (***), long validation periods with OEM producers (***), and material requirements (***).

All six responding U.S. producers also reported that product from each subject country was always interchangeable with product from another subject country. Importers rated

³⁰ This information is compiled from responses by purchasers identified by Petitioners to the lost sales lost revenue allegations. See Part V for additional information.

³¹ Responding importers did not provide an explanation for why domestic CAAS is sometimes interchangeable with German CAAS. See Part V for purchasers' responses regarding German-produced CAAS.

German CAAS as always interchangeable with CAAS from subject countries, except when comparing German product to product from Oman and Turkey, in which a plurality reported that German CAAS was frequently interchangeable. Similarly, importers rated Greek CAAS as always interchangeable, except when comparing it to CAAS from Oman and Turkey, with a plurality reporting that Greek CAAS was frequently interchangeable. A majority or plurality of importers reported that product from the one subject country was always interchangeable with CAAS from other subject countries, with the exceptions noted above. U.S. producers' and importers' responses regarding interchangeability between CAAS produced in each subject country and another subject country and nonsubject countries are presented in Appendix F.

Table II-7
CAAS: Interchangeability between CAAS produced in the United States and in other countries, by country pair

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
United States vs. Bahrain	6	---	---	---	6	10	2	---
United States vs. Brazil	6	---	1	---	5	6	4	---
United States vs. Croatia	6	---	---	---	5	2	2	---
United States vs. Egypt	6	---	---	---	7	7	1	---
United States vs. Germany	6	---	---	---	7	7	8	2
United States vs. Greece	6	---	---	---	8	9	2	---
United States vs. India	7	---	---	---	8	9	5	1
United States vs. Indonesia	6	---	1	---	6	4	4	---
United States vs. Italy	6	---	1	---	12	7	5	---
United States vs. Korea	6	---	1	---	7	8	4	---
United States vs. Oman	7	---	---	---	6	6	2	---
United States vs. Romania	6	---	---	---	7	2	3	---
United States vs. Serbia	6	---	---	---	5	2	2	---
United States vs. Slovenia	6	---	---	---	6	3	1	---
United States vs. South Africa	6	---	---	---	6	4	3	1
United States vs. Spain	6	---	1	---	6	6	5	1
United States vs. Taiwan	6	---	1	---	6	2	4	1
United States vs. Turkey	6	---	1	---	8	7	6	---

Note: A=Always, F=Frequently, S=Sometimes, N=Never.

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

In addition, U.S. producers and importers were asked to assess how often differences other than price were significant in sales of CAAS from the United States, subject, or nonsubject countries. As seen in table II-8, U.S. producers reported that factors other than price were never important, while importers reported that non-price factors were sometimes important in comparing U.S.-produced CAAS to CAAS from Egypt, Germany, Greece, and India. Most firms did not provide a country-specific comparison in describing important non-price factors, instead listing that availability, quality, on-time delivery, and technical specifications were important

non-price factors.³² Importer *** reported that Novelis would no longer supply it after the section 232 tariffs were announced. It also reported that Arconic stopped selling wide sheet for commercial applications resulting in *** buying sheet from Greece. Importer *** indicated that U.S. producers supply “standard, large volume materials” as opposed to European CAAS producers which provide a “full range.” *** also noted that U.S. producers of not clad CAAS are “notoriously unreliable” due to the seasonality of their main HVAC customers which are given priority. Importer *** reported that on-time deliveries from U.S. producers were low in 2018 and 2019, which led to it stockpiling CAAS from domestic and subject sources.

Almost all responding U.S. producers reported that non-price factors were never important when comparing one subject country with other subject countries. A plurality of importers reported that non-price factors were sometimes or never important when comparing one subject country with other subject countries. U.S. producers’ and importers’ responses regarding the significance of factors other than price between each subject country and another subject country and nonsubject countries are presented in Appendix F.

³² Importer *** provided country-specific comparisons, reporting that reliable and consistent supply was a non-price factor when comparing domestic and Italian CAAS as well as domestic and Turkish CAAS. It also reported that domestic mills have not offered to supply any product within the past 18 months. Importer *** also reported that the U.S. producers offered better technical and quality support than Spanish producers.

Table II-8

CAAS: Significance of differences other than price between CAAS produced in the United States and in other countries, by country pair

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
United States vs. Bahrain	---	---	---	7	2	2	6	8
United States vs. Brazil	---	---	---	7	1	2	3	9
United States vs. Croatia	---	---	---	7	1	1	2	6
United States vs. Egypt	---	---	---	7	1	1	6	6
United States vs. Germany	---	---	---	7	3	4	7	6
United States vs. Greece	---	---	---	7	4	3	6	6
United States vs. India	---	---	---	7	3	3	10	8
United States vs. Indonesia	---	---	---	7	---	1	3	8
United States vs. Italy	---	---	---	7	3	3	7	9
United States vs. Korea	---	---	---	7	1	2	5	7
United States vs. Oman	---	---	---	7	2	---	5	6
United States vs. Romania	---	---	---	7	2	1	3	7
United States vs. Serbia	---	---	---	7	1	1	2	6
United States vs. Slovenia	---	---	1	6	2	2	3	4
United States vs. South Africa	---	---	---	7	3	1	1	7
United States vs. Spain	---	---	---	7	3	2	4	7
United States vs. Taiwan	---	---	---	7	1	---	2	7
United States vs. Turkey	---	---	---	7	5	3	4	7

Note: A = Always, F = Frequently, S = Sometimes, N = Never.

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

Part III: U.S. producers' production, shipments, and employment

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the subsidies and dumping margins was presented in *Part I* of this report and information on the volume and pricing of imports of the subject merchandise is presented in *Part IV* and *Part V*. Information on the other factors specified is presented in this section and/or *Part VI* and (except as noted) is based on the questionnaire responses of nine firms that accounted for the vast majority of U.S. production of CAAS during 2019.

U.S. producers

The Commission issued a U.S. producer questionnaire to 13 firms based on information contained in the petition, and industry sources. Nine firms provided usable data on their operations.¹ Staff believes that these responses represent the vast majority of U.S. production of CAAS.

Table III-1 lists U.S. producers of CAAS, their production locations, positions on the petition, and shares of total production.

¹ Four firms did not respond to the Commission questionnaire request, but are estimated by staff to account for less than *** percent of U.S. production. Petitioners estimate that the six petitioning firms and the other domestic producer that supports the petition, Jupiter, account for *** percent of total U.S. production of CAAS. Petition, p.4.

Table III-1

CAAS: U.S. producers, their position on the petition, location of production, and share of reported production, 2019

Firm	Position on petition	Production location(s)	Share of production (percent)
Aleris	Petitioner	Lewisport, KY Uhrichsville, OH Richmond, VA Davenport, IA (2) Lincolnshire, IL Ashville, OH	***
Arconic	Petitioner	Bettendorf, IA Lancaster, PA Alcoa, TN Elmendorf, TX	***
Constellium	Petitioner	Ravenswood, WV	***
Golden	***	Fort Lupton, CO	***
Granges	***	Huntingdon, TN Salisbury, NC Newport, AR	***
Jupiter	***	Hammond, IN	***
JW Aluminum	Petitioner	Goose Creek, SC Russellville, AR	***
Novelis	Petitioner	Oswego, NY Russelville, KY	***
Texarkana	Petitioner	Texarkana, TX	***
Total			***

Note: ***.

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

Table III-2 presents information on U.S. producers' ownership, related and/or affiliated firms.

Table III-2

CAAS: U.S. producers' ownership, related and/or affiliated firms

Item / Firm	Firm Name	Affiliated/Ownership
Ownership:		
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Table continued on next page.

Table III-2--Continued
CAAS: U.S. producers' ownership, related and/or affiliated firms

Item / Firm	Firm Name	Affiliated/Ownership
Related importers/exporters:		
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
Related producers:		
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

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

As indicated in table III-2, five U.S. producers (***) are related both to foreign producers and to U.S. importers of CAAS. In addition, as discussed in greater detail below in tables III-9 and III-10, seven U.S. producers directly import CAAS and five purchase CAAS from U.S. importers and other domestic producers.

Table III-3 presents U.S. producers' reported changes in operations since January 1, 2017.

**Table III-3
CAAS: U.S. producers' reported changes in operations, since January 1, 2017**

Item / Firm	Reported changed in operations
Plant openings:	
***	***
Expansions:	
***	***
***	***
***	***
***	***
Acquisitions:	
***	***
Prolonged shutdowns or curtailments:	
***	***
***	***
***	***
***	***
***	***
Revised labor agreements:	
***	***
***	***
***	***

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

Recent developments in U.S. industry

Table III-4 highlights recent developments in the domestic industry. Since 2017, the U.S. industry has experienced consolidation and changes in ownership, as well as new investments in rolling mill facilities serving a variety of end markets. In 2017, the acquisition of a domestic producer (Aleris) by a foreign producer (Zhongwang USA) was suspended after it appeared that it would fail to win approval from the Committee on Foreign Investment in the United States (“CFIUS”). Subsequently, a domestic producer (Novelis) announced that it would attempt to acquire Aleris. In March 2020, the acquisition received antitrust approval from the U.S. Department of Justice on the condition that Aleris’ aluminum automotive body sheet assets be sold to a third party. In addition, two firms (Arconic and JW Aluminum) announced the closure of aluminum rolling mills in late 2019 and early 2020.

Table III-4
CAAS: Important industry events, since January 1, 2017

Year	Firm	Event
2017	Gränges Americas Inc.	Investment: Granges announced that it would invest \$110 million to expand its rolling mill operations in Huntingdon, Tennessee. ¹
	Aleris Corporation	Expansion: Aleris opened a \$400 million sheet production facility in Lewisport, Kentucky. The facility primarily produces out-of-scope aluminum sheet. ²
	Aleris Corporation	Acquisition suspended: Aleris Corporation and Zhongwang USA announced that their planned merger was suspended after failing to win approval from the CFIUS. ³
	Novelis	Expansion: Novelis announced that it would invest \$4.5 million in its aluminum rolling operations in Warren, Ohio. ⁴
2018	***	***
	Novelis	Acquisition: On July 26, 2018, Aleris announced that it entered into a definitive agreement to be acquired by Novelis. The acquisition required approval from the U.S. Department of Justice before it could take effect. ⁵
	Arconic	Sale: Arconic announced on October 1, 2018 that it would sell its aluminum rolling mill in Texarkana, Texas to the American subsidiary of Ta Chen Stainless Pipe Co., Ltd. (“Ta Chen”). ⁶
	Jupiter Aluminum	Acquisition: In December 2018, Jupiter Aluminum announced that it acquired Spanish hot- and cold-rolled aluminum company Grupo Valenciana de Aluminio Baux (“Baux”). Baux was previously one of Europe’s “top tier” aluminum smelting, rolling, and coil manufacturers. ⁷

Table continued on next page.

Table III-4--Continued
CAAS: Important industry events, since January 1, 2017

Year	Firm	Event
2019	Commerce	Imposition of countervailing duty orders: On February 6, Commerce issued countervailing duty orders on CAAS from China. ⁸
	Commerce	Imposition of antidumping orders: On February 8, Commerce issued antidumping orders on CAAS from China. ⁹
	Arconic	Investment: In February 2019, Arconic announced that it would invest \$100 million into its aluminum rolling mill operations in Alcoa, Tennessee. The project is projected to complete in Q4 2020 and create 70 new jobs. ¹⁰
	Arconic	Labor agreement: In July 2019, Arconic and the United Steelworkers Union (“USW”) negotiated a three-year contract. The agreement covers USW employees at Arconic’s Davenport, Iowa and Alcoa, Tennessee aluminum rolling mill operations. ¹¹
	JW Aluminum	Investment: JW Aluminum announced that it had made or had committed to making \$255 million in investments at its Goose Creek, South Carolina aluminum rolling mill facility. The expansion is expected to be completed in 2020. ¹²
	Texarkana Aluminum	Investment/Opening: Texarkana Aluminum, a Ta Chen subsidiary that acquired Arconic’s former aluminum rolling mill operations in Texarkana, Texas, announced that it had officially opened and expects to be fully operational by May 2020. The site is projected to employ 300 workers and produce 300 million pounds of aluminum coils (including CAAS). ¹³
	Arconic	Shutdown: Arconic announced that it would shut down its San Antonio aluminum rolling mill operations in the end of 2019. ¹⁴
2020	JW Aluminum	Shutdown: In January 2020, JW Aluminum announced that it would close its St. Louis, Missouri aluminum rolling mill operations, citing unfair trade practices from China. ¹⁵
	Novelis/Aleris	Acquisition: In early March 2020, Novelis won antitrust approval from the U.S. Department of Justice for its \$2.6 billion acquisition of Aleris. The acquisition is conditional on the basis that Novelis divest all of Aleris’ aluminum autobody sheet manufacturing operations in North America. ¹⁶

¹ *Aluminum Insider*, “Granges Announces \$110 Million Expansion at Tennessee Aluminum Rolling Mill,” September 16, 2017, <https://aluminiuminsider.com/granges-announces-us110-million-expansion-tennessee-aluminium-rolling-mill/>, retrieved March 26, 2020.

² *Aluminum Insider*, “Aleris Opens U.S. \$400 Million Aluminum Auto Body Sheet Production Facility in NW Kentucky, November 17, 2017, <http://aluminiuminsider.com/aleric-opens-us400-mm-aluminium-auto-body-sheet-production-facility-nw-kentucky/>, retrieved March 26, 2020.

³ *Business Insider* (originally posted by *Reuters*), “Aluminum Maker Aleris Says Zhongwang USA Deal is Off,” November 13, 2017, <http://www.businessinsider.com/r-aluminum-maker-aleric-says-zhongwang-usa-deal-is-off-2017-11>, retrieved March 26, 2020.

⁴ Novelis, “News Releases: Novelis Invests \$4.5 million at Warren Facility,” November 28, 2017, <http://investors.novelis.com/news-releases?item=643>, retrieved March 26, 2020.

⁵ Novelis, “Novelis to Acquire Downstream Aluminum Producer Aleris,” July 26, 2018, <http://investors.novelis.com/2018-07-26-Novelis-to-Acquire-Downstream-Aluminum-Producer-Aleris>, retrieved March 26, 2020.

⁶ *Aluminum Insider*, “Arconic Sells Texarkana Aluminum Rolling Mill to Taiwan Firm for US\$300 Million Plus Contingency Cash,” October 3, 2018, <https://aluminiuminsider.com/arconic-sells-texarkana-aluminium-rolling-mill-to-taiwan-firm-for-us300-million-plus-contingency-cash/>, retrieved March 26, 2020.

⁷ *Aluminum Insider*, "Jupiter Aluminum Buys Spanish Cold-Rolled Producer Grupo Valenciana de Aluminio Baux," <https://aluminuminsider.com/jupiter-aluminum-buys-spanish-cold-rolled-producer-grupo-valenciana-de-aluminio-baux/>, retrieved March 26, 2020.

⁸ *Common Alloy Aluminum Sheet From the People's Republic of China: Countervailing Duty Order*, 84 FR 2157, February 6, 2019.

⁹ *Common Alloy Aluminum Sheet From the People's Republic of China: Antidumping Duty Order*, 84 FR 2813, February 8, 2019.

¹⁰ Toto, "Arconic to invest \$100 million in expansion," *Recycling Today*, <https://www.recyclingtoday.com/article/arconic-upgrades-alcoa-tennessee-plant/>, retrieved March 26, 2020.

¹¹ Larson, "United Steelworkers, Arconic Agree on 3-Year Master Contract," *Pittsburgh Business Times*, <https://www.bizjournals.com/pittsburgh/news/2019/07/12/united-steelworkers-arconic-agree-on-3-year-master.html>, retrieved March 26, 2020.

¹² JW Aluminum, "JW Aluminum Ranks Fourth in Top Economic Development Announcements by Capital Investment in South Carolina," <http://www.globenewswire.com/news-release/2019/02/11/1716713/0/en/JW-Aluminum-Ranks-Fourth-in-Top-Economic-Development-Announcements-by-Capital-Investment-in-South-Carolina.html>, retrieved March 26, 2020.

¹³ Light Metal Age, "Texarkana Aluminum Opens Aluminum Rolling Plant," October 29, 2019, <https://www.lightmetlage.com/news/industry-news/flat-rolled-sheet/texarkana-aluminum-opens-aluminum-rolling-plant/>, retrieved March 26, 2020.

¹⁴ *Argus Media*, "Arconic to idle Al rolling capacity in Texas," November 5, 2019, <https://www.argusmedia.com/en/news/2009507-arconic-to-idle-al-rolling-capacity-in-texas>, retrieved March 26, 2020.

¹⁵ Eisele, "JW Aluminum closing St. Louis foil plant in May citing unfair trade practices from China," January 27, 2020, https://www.kmov.com/news/jw-aluminum-closing-st-louis-foil-plant-in-may-citing/article_b61919c6-4182-11ea-b028-8b60359024ac.html, retrieved March 26, 2020.

¹⁶ Bartz, "Novelis wins antitrust approval to buy Aleris with conditions," *Reuters*, March 9, 2020, <https://www.reuters.com/article/us-aleris-m-a-novelis/novelis-wins-antitrust-approval-to-buy-aleris-with-conditions-idUSKBN20W2UE>, retrieved March 26, 2020.

Note: Brackets indicate business proprietary information that was obtained from questionnaires for which no public source was found.

Source: Various company websites and news articles.

U.S. production, capacity, and capacity utilization

Table III-5 and figure III-1 present U.S. producers' CAAS production, capacity, and capacity utilization. U.S. producers' capacity increased from 1,624,150 short tons in 2017 to 1,664,467 in 2018 and to 2,070,746 short tons in 2019, a 27.5 percent increase from 2017-19. The increase in capacity reflected the ***. U.S. producers' production increased by 7.9 percent from 2017 to 2018 and then decreased by 4.7 percent in 2019, ending 2.8 percent higher than in 2017. Capacity utilization increased from 77.4 percent in 2017 to 81.5 percent 2018, but then declined to 62.4 percent in 2019, ending 15.0 percentage points lower than in 2017.²

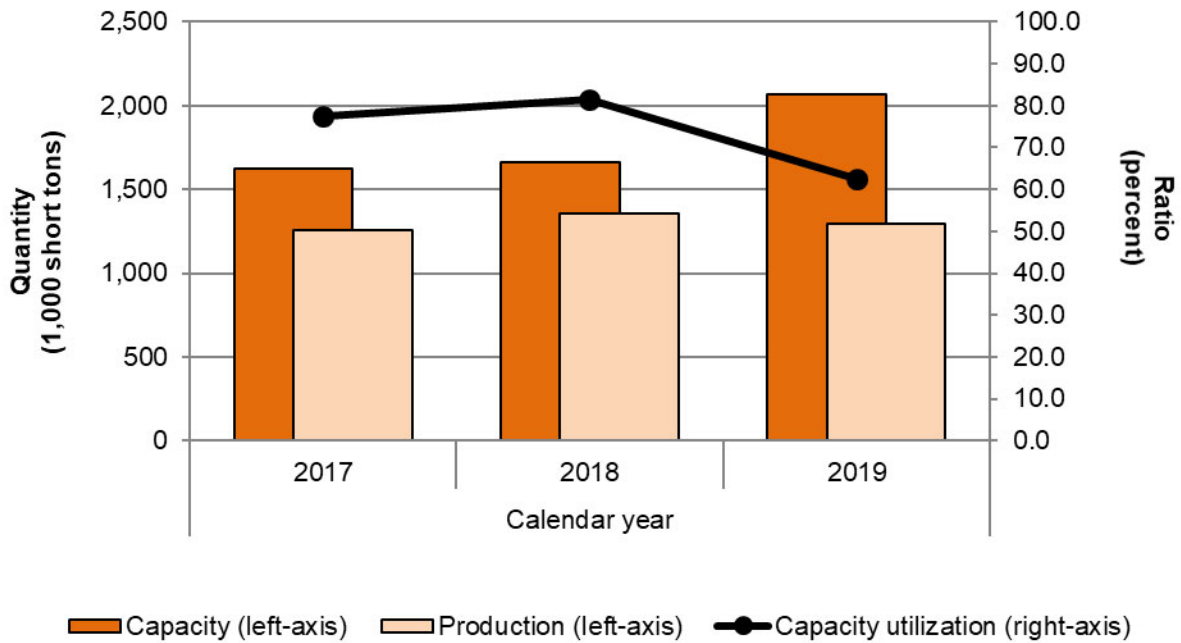
² Questionnaire responses by U.S. producers show different 2017-19 trends for allocated CAAS production capacity and overall production capacity (including out-of-scope merchandise using the same machinery and equipment as scope merchandise). Reported overall production capacity reported by U.S. producers was 82.2 percent in 2017, 88.5 percent in 2018, and 82.2 percent in 2019. *** allocated ***. ***. *** allocated ***.

**Table III-5
CAAS: U.S. producers' capacity, production, and capacity utilization, 2017-19**

Item	Calendar year		
	2017	2018	2019
	Capacity (short tons)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	***	***	***
All firms	1,624,150	1,664,467	2,070,746
	Production (short tons)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	***	***	***
All firms	1,257,531	1,356,265	1,292,137
	Capacity utilization (percent)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	***	***	***
All firms	77.4	81.5	62.4
	Share of production (percent)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	***	***	***
All firms	100.0	100.0	100.0

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

Figure III-1
CAAS: U.S. producers' capacity, production, and capacity utilization, 2017-19



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

Alternative products

As shown in table III-6, 39.8 percent of the product produced during 2019 by U.S. producers on shared equipment was CAAS. Overall, net production growth kept pace with increasing capacity, although CAAS accounted for a declining share of overall production during 2017-19. Two firms reported producing can stock, which held the second largest individual share of production between 2017 and 2019 after CAAS. Overall capacity utilization was 82.2 percent in 2017 and 2019, with a peak of 88.5 percent in 2018.

Table III-6
CAAS: U.S. producers' overall capacity and production on the same equipment as subject production, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Overall capacity	3,681,225	3,699,249	3,948,055
Production:			
CAAS	1,257,531	1,356,265	1,292,137
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	1,768,789	1,916,843	1,951,961
Total production on same machinery	***	***	***
	Ratios and shares (percent)		
Overall capacity utilization	82.2	88.5	82.2
Share of production:			
CAAS	41.6	41.4	39.8
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	58.4	58.6	60.2
Total production on same machinery	100.0	100.0	100.0

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

U.S. producers' U.S. shipments and exports

Table III-7 presents U.S. producers' U.S. shipments, export shipments, and total shipments. One firm, ***, reported internal consumption, accounting for *** percent of U.S. producers' U.S. shipments, by quantity, in 2019. One firm, ***, reported transfers to related firms in 2019, accounting for *** percent of U.S. producers' U.S. shipments, by quantity. Seven of the nine U.S. producers reported export shipments to Canada and/or Mexico which ranged from 5.8 to 6.6 percent of total U.S. producers' total shipments during 2017-19. U.S. producers' U.S. shipments increased by quantity and by value in 2018, before declining by both in 2019. Average unit values of U.S. shipments increased in both 2018 and 2019.

Table III-7
CAAS: U.S. producers' U.S. shipments, export shipments, and total shipments, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
U.S. shipments	1,163,843	1,227,391	1,203,141
Export shipments	75,548	87,220	74,299
Total shipments	1,239,391	1,314,611	1,277,440
	Value (1,000 dollars)		
U.S. shipments	3,422,760	4,096,689	4,055,502
Export shipments	227,203	305,696	257,151
Total shipments	3,649,963	4,402,385	4,312,653
	Unit value (dollars per short ton)		
U.S. shipments	2,941	3,338	3,371
Export shipments	3,007	3,505	3,461
Total shipments	2,945	3,349	3,376
	Share of quantity (percent)		
U.S. shipments	93.9	93.4	94.2
Export shipments	6.1	6.6	5.8
Total shipments	100.0	100.0	100.0
	Share of value (percent)		
U.S. shipments	93.8	93.1	94.0
Export shipments	6.2	6.9	6.0
Total shipments	100.0	100.0	100.0

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

U.S. producers' inventories

Table III-8 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. U.S. producers' end-of-period inventories increased in 2018 and in 2019, by quantity. Similarly, the ratio of inventories to U.S. production, U.S. shipments, and total shipments increased in both 2018 and 2019. This was largely driven by an increase in end-of-period inventories reported by one company, ***, which was responsible for *** percent of the increase from 2017 to 2019.

Table III-8
CAAS: U.S. producers' inventories, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
U.S. producers' end-of-period inventories	180,627	221,909	236,465
	Ratio (percent)		
Ratio of inventories to.--			
U.S. production	14.4	16.4	18.3
U.S. shipments	15.5	18.1	19.7
Total shipments	14.6	16.9	18.5

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

U.S. producers' imports and purchases

U.S. producers' imports and purchases of CAAS are presented in tables III-9 and III-10. Several U.S. producers imported CAAS from subject sources. Arconic's ratio to U.S. production of imports from subject sources was not greater than *** percent in any period. In 2019, Jupiter's, J.W Aluminum's, Novelis', and Texarkana's ratios to U.S. production of imports from subject source were ***, ***, ***, and ***, respectively. For every U.S. producer that reported imports of CAAS from subject sources, 2019 was the year with the *** ratio to U.S. production of imports from subject sources during 2017-19.

Table III-9
CAAS: U.S. producers' direct imports, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
	Ratio (percent)		
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
	Narrative		
***	***		

Table continued on next page.

Table III-9--Continued
CAAS: U.S. producers' direct imports, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
***	***	***	***
***	***	***	***
	Ratio (percent)		
***	***	***	***
	Narrative		
***	***		
	Quantity (short tons)		
***	***	***	***
***	***	***	***
	Ratio (percent)		
***	***	***	***
	Narrative		
***	***		

Table continued on next page.

Table III-9--Continued
CAAS: U.S. producers' direct imports, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
	Ratio (percent)		
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
	Narrative		
***	***		
	Quantity (short tons)		
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
	Ratio (percent)		
***	***	***	***
***	***	***	***
***	***	***	***
	Narrative		
***	***		

Table continued on next page.

Table III-9--Continued
CAAS: U.S. producers' direct imports, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
	Ratio (percent)		
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
	Narrative		
***	***		

Table continued on next page.

Table III-9--Continued
CAAS: U.S. producers' direct imports, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
***	***	***	***
***	***	***	***
	Ratio (percent)		
***	***	***	***
	Narrative		
***	***		

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

Table III-10
CAAS: U.S. producers' purchases, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
	Quantity (short tons)		
***	***	***	***
***	***	***	***
***	Quantity (short tons)		
***	***	***	***
***	***	***	***
***	***	***	***
	Quantity (short tons)		
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
	Quantity (short tons)		
***	***	***	***
***	***	***	***

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

U.S. employment, wages, and productivity

Table III-11 shows U.S. producers' employment-related data. The number of production and related workers ("PRWs") remained relatively stable between 2017 and 2019, with a net decline of 48 from 4,779 to 4,731, while hours worked by PRWs increased modestly. Wages increased more rapidly than hours worked, as hourly wages for PRWs increased by 4.7 percent from 2017 to 2019, while productivity increased by 2.7 percent. Consistent with the more rapid growth in wage rates than in productivity, unit labor costs increased by 1.9 percent during 2017-19.

Table III-11
CAAS: U.S. producers' employment related data, 2017-19

Item	Calendar year		
	2017	2018	2019
Production and related workers (PRWs) (number)	4,779	4,784	4,731
Total hours worked (1,000 hours)	10,033	10,138	10,035
Hours worked per PRW (hours)	2,099	2,119	2,121
Wages paid (\$1,000)	325,483	336,490	340,903
Hourly wages (dollars per hour)	\$32.44	\$33.19	\$33.97
Productivity (short tons per 1,000 hours)	125.3	133.8	128.8
Unit labor costs (dollars per short ton)	\$258.83	\$248.10	\$263.83

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

Part IV: U.S. imports, apparent U.S. consumption, and market shares

U.S. importers

The Commission issued importer questionnaires to 389 firms believed to be importers of subject CAAS, as well as to all U.S. producers of CAAS.¹ Usable questionnaire responses were received from 80 companies,² representing the following percentage of imports from individual subject countries in 2019.³

- 97.8 percent of U.S. imports from Bahrain
- 96.4 percent of U.S. imports from Brazil
- 138.4 percent of U.S. imports from Croatia
- 89.4 percent of U.S. imports from Egypt
- 33.7 percent of U.S. imports from Germany⁴
- 60.3 percent of U.S. imports from Greece
- 93.5 percent of U.S. imports from India
- 100.8 percent of U.S. imports from Indonesia
- 118.5 percent of U.S. imports from Italy
- 79.5 percent of U.S. imports from Korea
- 54.3 percent of U.S. imports from Oman
- 78.6 percent of U.S. imports from Romania

¹ The Commission issued questionnaires to those firms identified in the petition, along with firms that, based on a review of data provided by U.S. Customs and Border Protection (“Customs”), may have accounted for more than one percent of total 2019 imports from each subject country under the HTS statistical reporting numbers identified in the scope.

² Sixty-nine firms reported that they did not import CAAS into the United States.

³ The response rates presented are calculated based on a comparison of the quantity of 2019 U.S. imports of CAAS as reported in the responses to the Commission’s U.S. importer questionnaires with total quantity of 2019 U.S. official import statistics.

⁴ Coverage of CAAS imports from Germany was affected by several factors. Some firms reported a smaller quantity of CAAS imports ***. Some firms who reported that they did not import CAAS into the United States are counted in official import statistics and ***. The Commission did not receive responses from a number of firms that were sent questionnaires – this was partly due to the number of firms that potentially import CAAS from Germany and to the COVID19 pandemic which has resulted in the shutdown or reduced operations of many firms in Germany during the questionnaire response period.

- 234.5 percent of U.S. imports from Serbia
- 43.4 percent of U.S. imports from Slovenia
- 105.2 percent of U.S. imports from South Africa
- 61.4 percent of U.S. imports from Spain
- 107.8 percent of U.S. imports from Taiwan
- 82.2 percent of U.S. imports from Turkey
- 81.6 percent of U.S. imports from Subject Sources
- 15.0 percent of U.S. imports from Nonsubject Sources⁵
- 61.5 percent from All Import Sources

Import quantities and values presented in this report are derived from official U.S. import statistics using HTS statistical reporting numbers 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.3091, 7606.12.3096, 7606.12.6000, 7606.91.3090, 7606.91.3095, 7606.91.6080, 7606.91.6095, 7606.92.3035, 7606.92.3090, 7606.92.6080, and 7606.92.6095, except as otherwise noted.⁶ Table IV-1 lists all responding U.S. importers of CAAS from subject

⁵ Staff requested information on certain large volume of imports from *** to confirm whether they are in-scope CAAS but did not receive a response at the time of the submission of the staff report.

⁶ From January 1, 2017 through June 30, 2019, imports of CAAS entered the United States under HTSUS statistical reporting numbers: 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.6000, 7606.91.3090, 7606.91.6080, 7606.92.3090, and 7606.92.6080. Effective July 1, 2019, the following changes to the HTSUS were made: (1) statistical reporting number 7606.91.3090 was consolidated with statistical reporting number 7606.91.3075 into current HTSUS statistical reporting number 7606.91.3095; (2) statistical reporting number 7606.91.6080 was consolidated with statistical reporting number 7606.91.6060 into current HTSUS statistical reporting number 7606.91.6095; (3) statistical reporting number 7606.92.3090 was consolidated with statistical reporting number 7606.92.3075 into current HTSUS statistical reporting number 7606.92.3035; and (4) statistical reporting number 7606.92.6080 was consolidated with statistical reporting number 7606.92.6060 into current HTSUS statistical reporting number 7606.92.6095. Given these various changes, the quantity and value of imports for calendar year 2019 include imports under the following HTSUS statistical reporting numbers: 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.6000, 7606.91.3090, 7606.91.3095, 7606.91.6080, 7606.91.6095, 7606.92.3035, 7606.92.3090, 7606.92.6080, and 7606.92.6095. Effective January 1, 2020, statistical reporting number 7606.12.3090, which covered not clad aluminum alloy sheet and strip with a thickness exceeding 0.2 millimeters and 6.3 millimeters or less (not including aluminum can stock), was sub-divided into two new categories, HTSUS statistical reporting numbers 7606.12.3091 and 7606.12.3096. These statistical reporting numbers cover imports of out-of-scope heat-treatable sheet, and in-scope CAAS, respectively. As a result, CAAS imports under HTSUS statistical reporting number 7606.12.3090 for calendar years 2017-2019 are somewhat overstated and contain some volume of out-of-scope heat-treatable sheet.

(continued...)

and nonsubject sources, their locations, and their shares of U.S. imports (compiled from data submitted in response to Commission questionnaires), in 2019.

**Table IV-1
CAAS: U.S. importers, their headquarters, and share of total imports by source, 2019**

Firm	Headquarters	Share of imports by source (percent)		
		Subject sources	Nonsubject sources	All import sources
AA Metals	Orlando, FL	***	***	***
AKG	Mebane, NC	***	***	***
Aludium	Amorebieta, Vizcaya, Spain,	***	***	***
AMAG	Ranshofen, Germany	***	***	***
Architectural Building	South Windsor, CT	***	***	***
Arconic	Pittsburgh, PA	***	***	***
ASO	Rockaway, NJ	***	***	***
Ayres Composite Panels	Theodore, AL	***	***	***
Bayou Metal	Slidell, LA	***	***	***
BFCC US	Chester, SC	***	***	***
Big Apple	New York, NY	***	***	***
Burr Oak	Sturgis, MI	***	***	***
Buyers Products	Mentor, OH	***	***	***
Calstrip	Mira Loma, CA	***	***	***
Cascadia	Longview, WA	***	***	***
Central National	Purchase, NY	***	***	***
Century Metals	Carolina, PR	***	***	***
Champagne Metals	Glenpool, OK	***	***	***
Chart	Ballground, GA	***	***	***
CME	Twinsburg, OH	***	***	***
Constellium	Ravenswood, WV	***	***	***
CPW America	Houston, TX	***	***	***
Custom Metalcrafters	Albertson, NY	***	***	***
Far East Metals	Carson, CA	***	***	***
Federal-Mogul	Southfield, MI	***	***	***

Table continued on next page.

(...continued)

The petitioner states the Commission should use official import statistics to estimate the volume of imports of CAAS from the subject countries and that data provided in the U.S. importer questionnaires received by the Commission significantly understate the import volumes of subject merchandise. Petitioner postconference brief, exh. 1, Petitioners' Responses to ITC Staff Conference Questions, p.34. All respondents that submitted postconference comments (***), except for ***, supported the use of official import statistics or used official import statistics in their briefs. *** stated that ***. *** postconference brief, Responses to ITC Staff Conference Questions, p.7. *** did not comment.

Table IV-1--Continued

CAAS: U.S. importers, their headquarters, and share of total imports by source, 2019

Firm	Headquarters	Share of imports by source (percent)		
		Subject sources	Nonsubject sources	All import sources
Flack	Cleveland, OH	***	***	***
Florida Aluminum	Miami, FL	***	***	***
Garmco USA	Winter Garden, FL	***	***	***
Global Metal	La Crescenta, CA	***	***	***
Granges	Franklin, TN	***	***	***
Grimco	Sunset Hills, MO	***	***	***
H&D	North Royalton, OH	***	***	***
Hadco	Bensalem, PA	***	***	***
High End	Huntingdon Valley, PA	***	***	***
HMT	The Woodlands, TX	***	***	***
Hudson	Morristown, NJ	***	***	***
Hulamin	Pietermaritzburg, South Africa	***	***	***
Hydro Aluminum	Baltimore, MD	***	***	***
Icon	Plattsburgh, NY	***	***	***
Johns Manville	Denver, CO	***	***	***
Jupiter	Hammond, IN	***	***	***
JW Aluminum	Daniel Island, SC	***	***	***
Ken-Mac	Middleburg Heights, OH	***	***	***
Kloekner	Roswell, GA	***	***	***
KP Resources	Lawrenceville, GA	***	***	***
Lorin	Muskegon, MI	***	***	***
Lou-Jan	Cheshire, CT	***	***	***
LWB-ISE	Piqua, OH	***	***	***
Manakin	Manakin-Sabot, VA	***	***	***
Marquis	Plattsburgh, NY	***	***	***
Materialech	Morristown, NJ	***	***	***
Medalco	So. Hadley, MA	***	***	***
Metal Exchange	Saint Louis, MO	***	***	***
Meyer Aluminium	Sheboygan Falls, WI	***	***	***
Midwest Metals	Louisville, KY	***	***	***
MM Technics	Prosperity, SC	***	***	***
Modine	Racine, WI	***	***	***
National Kwikmetal	Des Plaines, IL	***	***	***
Nexgen	Gardena, CA	***	***	***
Novelis	Atlanta, GA	***	***	***
Novelis Deutschland	Goettingen, Germany	***	***	***
Novelis Korea	Seoul, Korea	***	***	***
Olbert	Mississauga, ON	***	***	***
Olympic	Bedford Heights, OH	***	***	***
Premier	Beachwood, OH	***	***	***
Prysmian	Highland Heights, KY	***	***	***
Quality Metals	St. Paul, MN	***	***	***
R. M. CREATIONS	South Plainfield, NJ	***	***	***

Table continued on next page.

Table IV-1--Continued

CAAS: U.S. importers, their headquarters, and share of total imports by source, 2019

Firm	Headquarters	Share of imports by source (percent)		
		Subject sources	Nonsubject sources	All import sources
Sinobec	Pompano Beach, FL	***	***	***
Southern Lithoplate	Wake Forest, NC	***	***	***
Ta Chen	Long Beach, CA	***	***	***
TCT	Placencia, CA	***	***	***
Tempo	Homewood, IL	***	***	***
Texarkana	Texarkana, TX	***	***	***
Three D Metals	Valley City, OH	***	***	***
Toyota Tsusho	Georgetown, KY	***	***	***
United Aluminum Corporation	North Haven, CT	***	***	***
Vail	New York, NY	***	***	***
Wirth-Brand	Montreal, QC	***	***	***
Yarde Metals	Southington, CT	***	***	***
Total		***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

U.S. imports

Table IV-2 and figure IV-1 present data for U.S. imports of CAAS from subject sources and all other sources. U.S. imports of CAAS from subject sources more than doubled from 2017 to 2019, increasing 113.7 percent by quantity, and 150.6 percent by value. During the same period, U.S. imports of CAAS from nonsubject sources declined by more than half, decreasing by 51.6 percent by quantity, and 39.7 percent by value. The largest nonsubject sources of U.S. imports of CAAS during 2017-19 were China and Canada. Imports of CAAS from China decreased by 57.7 percent by quantity (52.4 percent by value) from 2017 to 2018, and by 70.2 percent by quantity (62.6 percent by value) from 2018 to 2019, as investigations on CAAS from China were instituted in late 2017 and completed in early 2019. As detailed earlier in Part I, CAAS imports from China are currently subject to antidumping and countervailing duty orders, issued by Commerce in February 2019.⁷ Overall, U.S. imports of CAAS from all sources increased by 5.4 percent by quantity, and 23.6 percent by value, between 2017 and 2019.

Average unit values of U.S. imports from subject sources increased by 17.2 percent from 2017 to 2019. Average unit values in U.S. import from nonsubject sources increased by 24.5

⁷ 84 FR 2157, February 8, 2019; 84 FR 2813, February 8, 2019.

percent. Overall, the increase in average unit values from all import sources was 17.4 percent during the same time period.

Germany and Oman were the largest sources of subject U.S. imports of CAAS, each accounting for 8.5 percent of all import sources, by quantity, in 2019. Serbia and Croatia were the smallest sources of subject imports, accounting for 0.4 percent and 0.9 percent, respectively, of all import sources, by quantity, in 2019. U.S. imports of CAAS from nonsubject sources were 30.1 percent by quantity in 2019.

U.S. imports of CAAS as a ratio to U.S. production increased by *** percentage points for subject sources and decreased by *** percentage points for nonsubject sources from 2017 to 2019. Overall, the ratio of total U.S. imports of CAAS to U.S. production increased by *** percentage points from 2017 to 2019.

Table IV-2
CAAS: U.S. imports, by source, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
U.S. imports from:--			
Bahrain	65,162	64,486	76,467
Brazil	24,533	28,331	36,773
Croatia	---	2,816	9,183
Egypt	19	12,636	15,626
Germany	32,998	45,048	88,779
Greece	14,202	24,090	32,234
India	45,855	46,165	50,962
Indonesia	72,170	83,674	58,893
Italy	3,084	14,540	28,588
Korea	12,003	21,637	42,313
Oman	27,798	68,033	89,145
Romania	1,457	4,807	11,126
Serbia	---	74	3,771
Slovenia	---	10,818	12,437
South Africa	33,947	48,883	45,611
Spain	1,683	5,537	20,567
Taiwan	581	35,625	57,173
Turkey	6,676	24,913	51,679
Subject sources	342,167	542,114	731,327
Nonsubject sources	651,341	444,417	315,346
All import sources	993,508	986,531	1,046,673
Direct imports by U.S. producers from:--			
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***

Table continued on next page.

Table IV-2--Continued
CAAS: U.S. imports, by source, 2017-19

Item	Calendar year		
	2017	2018	2019
	Value (\$1,000)		
U.S. imports from.--			
Bahrain	172,117	213,988	265,118
Brazil	60,409	89,645	113,699
Croatia	---	9,918	29,192
Egypt	49	40,290	50,555
Germany	118,500	188,922	329,752
Greece	43,402	86,980	117,493
India	105,093	129,053	140,629
Indonesia	167,315	231,176	159,738
Italy	13,673	55,598	99,733
Korea	30,623	69,346	142,590
Oman	65,731	184,631	225,178
Romania	4,652	17,116	34,753
Serbia	---	268	11,315
Slovenia	---	37,133	41,786
South Africa	96,566	159,628	131,274
Spain	6,118	21,447	67,474
Taiwan	2,765	103,501	163,720
Turkey	18,278	78,887	144,237
Subject sources	905,291	1,717,528	2,268,236
Nonsubject sources	1,813,651	1,521,342	1,093,553
All import sources	2,718,941	3,238,870	3,361,789

Table continued on next page.

Table IV-2--Continued
CAAS: U.S. imports, by source, 2017-19

Item	Calendar year		
	2017	2018	2019
	Unit value (dollars per short ton)		
U.S. imports from.--			
Bahrain	2,641	3,318	3,467
Brazil	2,462	3,164	3,092
Croatia	---	3,522	3,179
Egypt	2,594	3,189	3,235
Germany	3,591	4,194	3,714
Greece	3,056	3,611	3,645
India	2,292	2,795	2,759
Indonesia	2,318	2,763	2,712
Italy	4,433	3,824	3,489
Korea	2,551	3,205	3,370
Oman	2,365	2,714	2,526
Romania	3,194	3,561	3,124
Serbia	---	3,611	3,001
Slovenia	---	3,432	3,360
South Africa	2,845	3,266	2,878
Spain	3,635	3,873	3,281
Taiwan	4,759	2,905	2,864
Turkey	2,738	3,166	2,791
Subject sources	2,646	3,168	3,102
Nonsubject sources	2,784	3,423	3,468
All import sources	2,737	3,283	3,212

Table continued on next page.

Table IV-2--Continued
CAAS: U.S. imports, by source, 2017-19

Item	Calendar year		
	2017	2018	2019
	Share of quantity (percent)		
U.S. imports from:--			
Bahrain	6.6	6.5	7.3
Brazil	2.5	2.9	3.5
Croatia	---	0.3	0.9
Egypt	0.0	1.3	1.5
Germany	3.3	4.6	8.5
Greece	1.4	2.4	3.1
India	4.6	4.7	4.9
Indonesia	7.3	8.5	5.6
Italy	0.3	1.5	2.7
Korea	1.2	2.2	4.0
Oman	2.8	6.9	8.5
Romania	0.1	0.5	1.1
Serbia	---	0.0	0.4
Slovenia	---	1.1	1.2
South Africa	3.4	5.0	4.4
Spain	0.2	0.6	2.0
Taiwan	0.1	3.6	5.5
Turkey	0.7	2.5	4.9
Subject sources	34.4	55.0	69.9
Nonsubject sources	65.6	45.0	30.1
All import sources	100.0	100.0	100.0
Direct imports by U.S. producers from:--			
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***

Table continued on next page.

Table IV-2--Continued
CAAS: U.S. imports, by source, 2017-19

Item	Calendar year		
	2017	2018	2019
	Share of value (percent)		
U.S. imports from.--			
Bahrain	6.3	6.6	7.9
Brazil	2.2	2.8	3.4
Croatia	---	0.3	0.9
Egypt	0.0	1.2	1.5
Germany	4.4	5.8	9.8
Greece	1.6	2.7	3.5
India	3.9	4.0	4.2
Indonesia	6.2	7.1	4.8
Italy	0.5	1.7	3.0
Korea	1.1	2.1	4.2
Oman	2.4	5.7	6.7
Romania	0.2	0.5	1.0
Serbia	---	0.0	0.3
Slovenia	---	1.1	1.2
South Africa	3.6	4.9	3.9
Spain	0.2	0.7	2.0
Taiwan	0.1	3.2	4.9
Turkey	0.7	2.4	4.3
Subject sources	33.3	53.0	67.5
Nonsubject sources	66.7	47.0	32.5
All import sources	100.0	100.0	100.0

Table continued on next page.

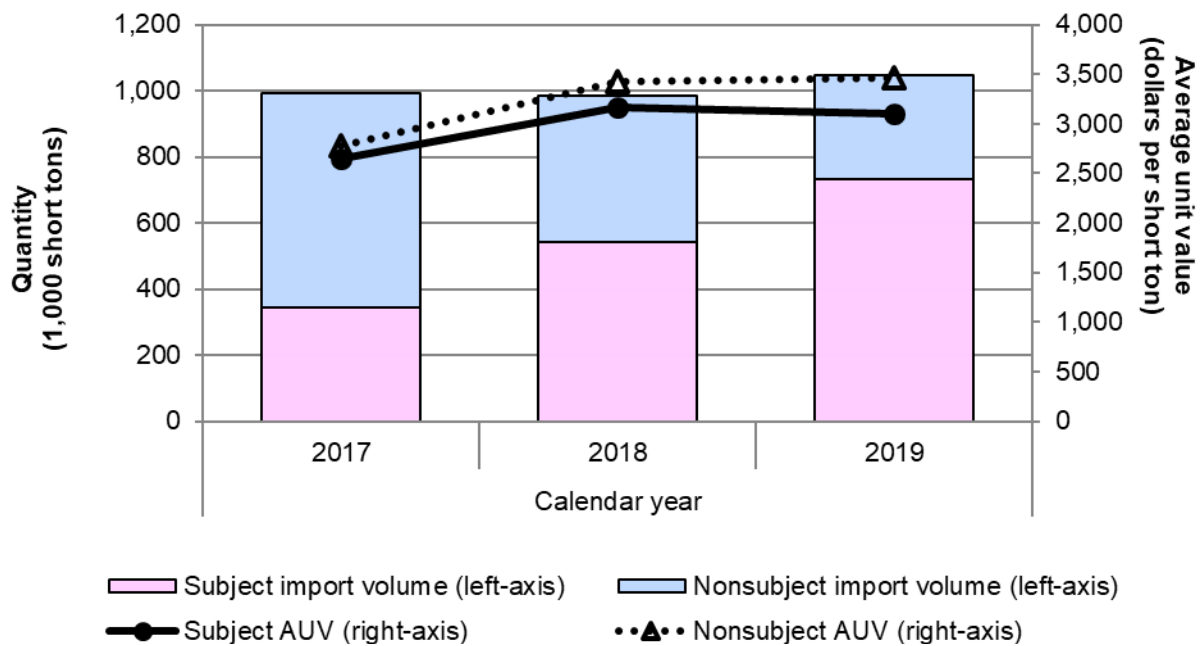
Table IV-2--Continued
CAAS: U.S. imports, by source, 2017-19

Item	Calendar year		
	2017	2018	2019
	Ratio to U.S. production (percent)		
U.S. imports from.--			
Bahrain	***	***	***
Brazil	***	***	***
Croatia	***	***	***
Egypt	***	***	***
Germany	***	***	***
Greece	***	***	***
India	***	***	***
Indonesia	***	***	***
Italy	***	***	***
Korea	***	***	***
Oman	***	***	***
Romania	***	***	***
Serbia	***	***	***
Slovenia	***	***	***
South Africa	***	***	***
Spain	***	***	***
Taiwan	***	***	***
Turkey	***	***	***
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Imports of CAAS from China totaled 390,891 short tons (\$972.7 million) (2,489 dollars per short ton) in 2017, 165,438 short tons (\$462.7 million) (2,797 dollars per short ton) in 2018, and 49,228 short tons (\$173.3 million) (3,520 dollars per short ton) in 2019. Investigations on CAAS from China were instituted in December 2017 and antidumping and countervailing duty orders were issued by Commerce in February 2019.

Source: Compiled from official U.S. import statistics using HTS statistical reporting numbers 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.3091, 7606.12.3096, 7606.12.6000, 7606.91.3090, 7606.91.3095, 7606.91.6080, 7606.91.6095, 7606.92.3035, 7606.92.3090, 7606.92.6080, and 7606.92.6095, accessed April 6, 2020.

Figure IV-1
CAAS: U.S. import quantity and average unit value, 2017-19



Source: Compiled from official U.S. import statistics using HTS statistical reporting numbers 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.3091, 7606.12.3096, 7606.12.6000, 7606.91.3090, 7606.91.3095, 7606.91.6080, 7606.91.6095, 7606.92.3035, 7606.92.3090, 7606.92.6080, 7606.92.6095, accessed April 6, 2020.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.⁸ Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all

⁸ Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Act (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.

From March 2019 to February 2020, the most recent 12-month period preceding the filing of the petitions in these investigations, imports from Bahrain, Brazil, Germany, India, Indonesia, Korea, Oman, South Africa, Taiwan, and Turkey individually accounted for more than three percent of total U.S. imports of CAAS. While imports from Croatia, Egypt, Greece, Italy, Romania, Serbia, Slovenia, and Spain individually accounted for less than 3 percent of the total volume, collectively they accounted for 12.4 percent of the quantity of total U.S. imports of CAAS during March 2019 to February 2020. Table IV-3 presents the individual shares of total imports accounted for by subject countries by quantity during March 2019 to February 2020 based on official U.S. import statistics.

Table IV-3
CAAS: U.S. imports in the twelve-month period preceding the filing of the petition, March 2019 to February 2020

Item	March 2019 to February 2020		
	Quantity (short tons)	Share quantity (percent)	Share of quantity of individually negligible sources (percent)
U.S. imports from.--			
Bahrain	75,906	7.7	---
Brazil	32,208	3.3	---
Croatia	8,739	0.9	0.9
Egypt	11,601	1.2	1.2
Germany	88,094	9.0	---
Greece	28,811	2.9	2.9
India	46,806	4.8	---
Indonesia	45,500	4.6	---
Italy	25,672	2.6	2.6
Korea	38,651	3.9	---
Oman	83,327	8.5	---
Romania	10,893	1.1	1.1
Serbia	4,375	0.4	0.4
Slovenia	10,089	1.0	1.0
South Africa	40,323	4.1	---
Spain	21,464	2.2	2.2
Taiwan	50,745	5.2	---
Turkey	44,913	4.6	---
Subject sources	668,118	68.0	12.4
Nonsubject sources	314,064	32.0	
All import sources	982,182	100.0	

Source: Compiled from official U.S. import statistics using HTS statistical reporting numbers 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.3091, 7606.12.3096, 7606.12.6000, 7606.91.3090, 7606.91.3095, 7606.91.6080, 7606.91.6095, 7606.92.3035, 7606.92.3090, 7606.92.6080, 7606.92.6095, accessed April 6, 2020.

Cumulation considerations

In assessing whether imports should be cumulated, the Commission determines whether U.S. imports from the subject countries compete with each other and with the domestic like product and has generally considered four factors: (1) fungibility, (2) presence of sales or offers to sell in the same geographical markets, (3) common or similar channels of distribution, and (4) simultaneous presence in the market. Information regarding channels of distribution, market areas, and interchangeability appear in Part II. Additional information concerning fungibility, geographical markets, and simultaneous presence in the market is presented below.

Fungibility

The Commission requested information concerning U.S. producers' and U.S. importers' U.S. shipments of CAAS, by product type, for calendar year 2019. These data are presented in table IV-4 and figure IV-2.

The vast majority of shares of reported U.S. shipments of U.S. producers were non-clad 3XXX series, followed by non-clad 5XXX series, accounting for *** percent and *** percent of total U.S. producer shipments, respectively. The largest share of reported U.S. shipments of U.S. imports from subject sources were non-clad 5XXX series, followed by non-clad 3XXX series, non-clad 1XXX series, clad or multi-alloy, and other products. All 18 subject import sources included U.S. shipments of non-clad 3XXX series and non-clad 5XXX series, although four (***, did not supply non-clad 1XXX series, and only three (*** supplied clad or multi-alloy, or other products).

The largest share of U.S. shipments of U.S. imports from nonsubject sources were non-clad 5XXX series, followed by non-clad 3XXX series, clad or multi-alloy, and non-clad 1XXX series.

Table IV-4
CAAS: U.S. producers' and U.S. importers' U.S. shipments by type, 2019

Item	U.S. shipments					
	Non-clad			Clad or multi-alloy	Other products	Total
	1XXX	3XXX	5XXX			
	Quantity (short tons)					
U.S. producers	***	***	***	***	***	***
Imports from:						
Bahrain	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
Croatia	***	***	***	***	***	***
Egypt	***	***	***	***	***	***
Germany	***	***	***	***	***	***
Greece	***	***	***	***	***	***
India	***	***	***	***	***	***
Indonesia	***	***	***	***	***	***
Italy	***	***	***	***	***	***
Korea	***	***	***	***	***	***
Oman	***	***	***	***	***	***
Romania	***	***	***	***	***	***
Serbia	***	***	***	***	***	***
Slovenia	***	***	***	***	***	***
South Africa	***	***	***	***	***	***
Spain	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***
Turkey	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import sources	***	***	***	***	***	***
U.S. producers and U.S. importers	***	***	***	***	***	***

Table continued on next page.

Table IV-4--Continued
CAAS: U.S. producers' and U.S. importers' U.S. shipments by type, 2019

Item	U.S. shipments					
	Non-clad			Clad or multi-alloy	Other products	Total
	1XXX	3XXX	5XXX			
	Share down (percent)					
U.S. producers	***	***	***	***	***	***
Imports from:						
Bahrain	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
Croatia	***	***	***	***	***	***
Egypt	***	***	***	***	***	***
Germany	***	***	***	***	***	***
Greece	***	***	***	***	***	***
India	***	***	***	***	***	***
Indonesia	***	***	***	***	***	***
Italy	***	***	***	***	***	***
Korea	***	***	***	***	***	***
Oman	***	***	***	***	***	***
Romania	***	***	***	***	***	***
Serbia	***	***	***	***	***	***
Slovenia	***	***	***	***	***	***
South Africa	***	***	***	***	***	***
Spain	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***
Turkey	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import sources	***	***	***	***	***	***

Table continued.

Table IV-4--Continued
CAAS: U.S. producers' and U.S. importers' U.S. shipments by type, 2019

Item	U.S. shipments					
	Non-clad			Clad or multi-alloy	Other products	Total
	1XXX	3XXX	5XXX			
	Share across (percent)					
U.S. producers	***	***	***	***	***	***
Imports from:						
Bahrain	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
Croatia	***	***	***	***	***	***
Egypt	***	***	***	***	***	***
Germany	***	***	***	***	***	***
Greece	***	***	***	***	***	***
India	***	***	***	***	***	***
Indonesia	***	***	***	***	***	***
Italy	***	***	***	***	***	***
Korea	***	***	***	***	***	***
Oman	***	***	***	***	***	***
Romania	***	***	***	***	***	***
Serbia	***	***	***	***	***	***
Slovenia	***	***	***	***	***	***
South Africa	***	***	***	***	***	***
Spain	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***
Turkey	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import sources	***	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Figure IV-2
CAAS: U.S. producers' and U.S. importers' U.S. shipments by type, 2019

* * * * *

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

Geographical markets

CAAS produced in the United States is shipped nationwide.⁹ In 2019, official import statistics show that 60.2 percent of subject imports entered through the Eastern border of entry of the United States, followed by the Southern, Western, and Northern borders of entry with 16.4, 15.6, and 7.8 percent, respectively. Imports from subject sources entered each U.S. region in 2019, with the exception of Bahrain, where subject imports did not enter the United States through the Northern border of entry in 2019. In 2019, four subject sources (Croatia, Romania, Serbia, South Africa) and two subject sources (Croatia, Serbia) supplied the United States with less than 500 short tons of CAAS individually through the Northern and Western borders of entry, respectively. Table IV-5 presents U.S. import quantities of CAAS sources and border of entry during 2019.¹⁰

⁹ See Part II for additional information on geographic markets.

¹⁰ The “East” border of entry includes the following Customs entry districts for fabricated structural steel: Baltimore, MD; Boston, MA; Buffalo, NY; Charleston, SC; Charlotte, NC; New York, NY; Norfolk, VA; Ogdensburg, NY; Philadelphia, PA; Portland, ME; Providence, RI; San Juan, PR; Savannah, GA; St. Albans, VT; Virgin Islands; and Washington, DC. The “North” border of entry includes the following Customs entry districts for fabricated structural steel: Chicago, IL; Cleveland, OH; Detroit, MI; Duluth, MN; Great Falls, MT; Milwaukee, WI; Minneapolis, MN; Pembina, ND; and St. Louis, MO. The “South” border of entry includes the following Customs entry districts for fabricated structural steel: Dallas-Fort Worth, TX; El Paso, TX; Houston-Galveston, TX; Laredo, TX; Miami, FL; Mobile, AL; New Orleans, LA; Port Arthur, TX; and Tampa, FL. The “West” border of entry includes the following Customs entry districts for fabricated structural steel: Anchorage, AK; Columbia-Snake, OR; Honolulu, HI; Los Angeles, CA; Nogales, AZ; San Diego, CA; San Francisco, CA; and Seattle, WA.

Table IV-5
CAAS: U.S. imports by border of entry, 2019

Item	Border of entry				
	East	North	South	West	All borders
	Quantity (short tons)				
U.S. imports from.--					
Bahrain	48,108	---	18,193	10,166	76,467
Brazil	26,676	2,145	6,337	1,615	36,773
Croatia	7,862	339	786	196	9,183
Egypt	9,936	1,260	2,011	2,419	15,626
Germany	64,587	10,704	6,416	7,072	88,779
Greece	16,864	6,852	5,670	2,848	32,234
India	30,861	6,675	5,161	8,265	50,962
Indonesia	22,955	2,265	7,283	26,390	58,893
Italy	16,938	6,148	3,860	1,642	28,588
Korea	27,179	827	6,390	7,917	42,313
Oman	65,998	7,942	12,092	3,113	89,145
Romania	8,600	211	1,482	832	11,126
Serbia	2,336	104	1,022	309	3,771
Slovenia	7,500	954	2,952	1,031	12,437
South Africa	23,092	13	12,658	9,848	45,611
Spain	11,722	3,870	2,062	2,914	20,567
Taiwan	22,186	1,062	7,168	26,757	57,173
Turkey	26,818	5,632	18,431	799	51,679
Subject sources	440,216	57,003	119,973	114,135	731,327
Nonsubject sources	151,633	103,422	17,193	43,099	315,346
All import sources	591,849	160,425	137,166	157,234	1,046,673

Table continued on next page.

Table IV-5--Continued
CAAS: U.S. imports by border of entry, 2019

Item	Border of entry				
	East	North	South	West	All borders
	Share across (percent)				
U.S. imports from.--					
Bahrain	62.9	---	23.8	13.3	100.0
Brazil	72.5	5.8	17.2	4.4	100.0
Croatia	85.6	3.7	8.6	2.1	100.0
Egypt	63.6	8.1	12.9	15.5	100.0
Germany	72.7	12.1	7.2	8.0	100.0
Greece	52.3	21.3	17.6	8.8	100.0
India	60.6	13.1	10.1	16.2	100.0
Indonesia	39.0	3.8	12.4	44.8	100.0
Italy	59.2	21.5	13.5	5.7	100.0
Korea	64.2	2.0	15.1	18.7	100.0
Oman	74.0	8.9	13.6	3.5	100.0
Romania	77.3	1.9	13.3	7.5	100.0
Serbia	61.9	2.8	27.1	8.2	100.0
Slovenia	60.3	7.7	23.7	8.3	100.0
South Africa	50.6	0.0	27.8	21.6	100.0
Spain	57.0	18.8	10.0	14.2	100.0
Taiwan	38.8	1.9	12.5	46.8	100.0
Turkey	51.9	10.9	35.7	1.5	100.0
Subject sources	60.2	7.8	16.4	15.6	100.0
Nonsubject sources	48.1	32.8	5.5	13.7	100.0
All import sources	56.5	15.3	13.1	15.0	100.0

Table continued on next page.

Table IV-5--Continued
CAAS: U.S. imports by border of entry, 2019

Item	Border of entry				
	East	North	South	West	All borders
	Share down (percent)				
U.S. imports from.--					
Bahrain	8.1	---	13.3	6.5	7.3
Brazil	4.5	1.3	4.6	1.0	3.5
Croatia	1.3	0.2	0.6	0.1	0.9
Egypt	1.7	0.8	1.5	1.5	1.5
Germany	10.9	6.7	4.7	4.5	8.5
Greece	2.8	4.3	4.1	1.8	3.1
India	5.2	4.2	3.8	5.3	4.9
Indonesia	3.9	1.4	5.3	16.8	5.6
Italy	2.9	3.8	2.8	1.0	2.7
Korea	4.6	0.5	4.7	5.0	4.0
Oman	11.2	5.0	8.8	2.0	8.5
Romania	1.5	0.1	1.1	0.5	1.1
Serbia	0.4	0.1	0.7	0.2	0.4
Slovenia	1.3	0.6	2.2	0.7	1.2
South Africa	3.9	0.0	9.2	6.3	4.4
Spain	2.0	2.4	1.5	1.9	2.0
Taiwan	3.7	0.7	5.2	17.0	5.5
Turkey	4.5	3.5	13.4	0.5	4.9
Subject sources	74.4	35.5	87.5	72.6	69.9
Nonsubject sources	25.6	64.5	12.5	27.4	30.1
All import sources	100.0	100.0	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from official U.S. import statistics using HTS statistical reporting numbers 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.3091, 7606.12.3096, 7606.12.6000, 7606.91.3090, 7606.91.3095, 7606.91.6080, 7606.91.6095, 7606.92.3035, 7606.92.3090, 7606.92.6080, 7606.92.6095, accessed April 6, 2020.

Presence in the market

Table IV-6 and figure IV-3 present monthly official U.S. import statistics for subject countries and nonsubject sources. The monthly import statistics indicate that U.S. imports of CAAS from each subject country were present in each month during January 2017 to February 2020, with the exception of Croatia (21 of 38 months), Egypt (24 of 38 months), Serbia (13 of 38 months), and Slovenia (23 of 38 months). With respect to subject imports, only imports from Serbia entered the United States in less than half the months during January 2017 to February 2020, and only imports from Serbia did not enter the United States in every month of 2019.

Table IV-6
CAAS: U.S. imports by month, January 2017 through February 2020

U.S. imports	Bahrain	Brazil	Croatia	Egypt	Germany	Greece
	Quantity (short tons)					
2017:						
January	4,566	1,615	---	---	2,921	1,290
February	3,728	1,063	---	---	3,444	1,180
March	6,290	1,514	---	---	4,015	1,601
April	3,759	2,190	---	---	2,936	973
May	7,427	1,227	---	---	2,224	1,033
June	2,902	1,398	---	---	1,995	1,190
July	5,618	1,725	---	---	2,679	1,277
August	6,191	2,262	---	---	2,712	905
September	4,756	2,330	---	---	2,584	1,402
October	7,608	2,271	---	19	1,965	1,522
November	8,455	5,185	---	---	2,906	1,207
December	3,863	1,752	---	---	2,616	622
2018:						
January	4,959	1,522	---	---	2,508	1,098
February	4,462	2,797	---	---	1,893	537
March	5,312	1,867	4	235	1,834	1,092
April	8,406	1,720	---	804	2,349	1,588
May	8,417	1,709	---	1,660	4,110	1,983
June	3,860	480	---	1,188	2,411	2,177
July	5,335	2,999	387	1,052	3,095	1,808
August	3,773	2,428	434	1,056	4,533	2,156
September	4,341	2,857	318	1,703	4,937	2,582
October	6,313	3,839	333	2,088	5,079	2,878
November	4,505	3,905	526	975	6,689	2,816
December	4,802	2,209	815	1,875	5,612	3,375
2019:						
January	5,170	4,083	557	2,537	5,716	4,148
February	3,721	4,516	285	1,509	5,001	1,956
March	6,835	3,659	1,226	2,686	8,434	3,662
April	6,827	3,680	885	2,183	8,957	3,677
May	10,077	3,541	981	3,445	8,883	3,532
June	5,703	3,227	870	767	10,011	3,368
July	7,831	1,851	1,399	1,492	8,612	3,030
August	7,656	1,642	533	321	9,236	2,115
September	9,184	2,611	1,020	69	5,352	2,940
October	5,614	2,331	341	371	6,357	1,528
November	5,161	2,404	404	195	5,050	1,348
December	2,689	3,227	682	51	7,169	928
2020:						
January	5,690	2,325	148	20	4,461	1,357
February	2,640	1,710	251	---	5,571	1,324

Table continued on next page.

Table IV-6--Continued
CAAS: U.S. imports by month, January 2017 through February 2020

U.S. imports	India	Indonesia	Italy	Korea	Oman	Romania
	Quantity (short tons)					
2017:						
January	3,328	5,794	257	134	1,972	63
February	3,203	4,242	81	1,275	1,387	47
March	4,382	5,621	226	705	2,278	209
April	4,363	6,264	269	889	1,910	191
May	5,638	7,661	267	1,462	1,303	111
June	4,903	6,086	334	612	1,702	96
July	4,134	5,769	187	1,199	2,673	85
August	3,963	4,680	376	767	2,441	281
September	1,557	6,273	172	1,186	1,910	80
October	3,657	6,617	180	1,225	3,133	189
November	2,000	7,228	294	1,731	3,403	13
December	4,727	5,935	440	817	3,686	92
2018:						
January	2,961	6,373	581	924	2,603	89
February	3,391	4,051	195	1,073	2,557	128
March	4,642	6,631	514	2,087	5,829	169
April	3,196	6,897	558	1,892	6,138	221
May	4,349	6,048	481	1,848	4,876	244
June	3,583	8,394	616	2,209	7,102	356
July	4,411	5,635	894	1,940	6,125	381
August	4,531	7,523	1,033	1,315	4,744	615
September	3,439	6,745	1,550	1,727	5,415	395
October	3,508	9,550	2,400	1,898	6,698	758
November	3,513	8,485	3,143	2,407	8,282	571
December	4,640	7,341	2,576	2,315	7,665	880
2019:						
January	5,007	7,147	3,319	3,575	6,857	971
February	4,319	7,724	2,131	3,383	8,295	935
March	6,502	6,408	3,154	6,255	9,762	1,315
April	4,077	8,183	3,106	5,259	11,797	1,478
May	5,834	8,640	2,292	2,791	6,797	1,157
June	5,119	5,943	2,173	4,815	6,593	570
July	4,305	5,235	3,472	3,657	5,061	804
August	4,237	4,398	2,211	3,251	6,911	503
September	3,081	3,028	1,437	2,541	9,464	1,486
October	3,501	1,122	1,687	2,916	8,159	666
November	2,601	248	1,762	1,961	4,577	600
December	2,379	820	1,843	1,909	4,872	641
2020:						
January	2,719	578	1,441	2,257	5,786	1,166
February	2,452	899	1,094	1,039	3,549	507

Table continued on next page.

Table IV-6--Continued
CAAS: U.S. imports by month, January 2017 through February 2020

U.S. imports	Serbia	Slovenia	South Africa	Spain	Taiwan	Turkey
	Quantity (short tons)					
2017:						
January	---	---	3,739	118	64	655
February	---	---	4,484	28	68	957
March	---	---	3,410	167	44	419
April	---	---	3,077	119	74	457
May	---	---	1,978	168	109	642
June	---	---	1,806	279	22	621
July	---	---	5,484	147	13	669
August	---	---	3,260	133	23	325
September	---	---	1,644	11	89	487
October	---	---	1,501	157	17	510
November	---	---	1,023	120	34	426
December	---	---	2,542	235	24	510
2018:						
January	---	---	4,875	142	185	762
February	---	---	1,282	134	468	958
March	---	---	3,536	326	1,758	760
April	---	651	2,249	113	2,910	1,257
May	---	563	3,629	436	2,979	1,337
June	---	834	4,282	267	4,063	1,509
July	---	1,235	4,571	264	4,270	2,153
August	---	1,639	4,339	238	3,416	1,977
September	25	1,541	3,332	496	2,838	2,708
October	25	1,351	2,716	701	4,411	3,530
November	24	1,244	7,073	1,248	4,371	3,154
December	---	1,760	6,998	1,173	3,955	4,808
2019:						
January	24	1,877	6,859	1,841	5,379	6,219
February	43	1,094	3,900	1,409	5,318	5,399
March	---	2,229	3,402	1,759	8,140	6,153
April	---	1,771	5,210	2,440	7,364	3,697
May	---	1,459	3,939	1,773	5,145	5,238
June	---	774	3,385	2,748	3,378	5,216
July	527	876	1,701	3,339	3,267	4,916
August	750	710	2,494	1,417	6,234	2,244
September	513	443	4,574	949	4,417	2,669
October	644	529	2,940	664	4,025	3,113
November	221	470	4,738	975	2,839	4,509
December	1,049	205	2,468	1,254	1,666	2,307
2020:						
January	129	382	2,844	2,496	1,706	2,579
February	543	241	2,627	1,651	2,563	2,272

Table continued on next page.

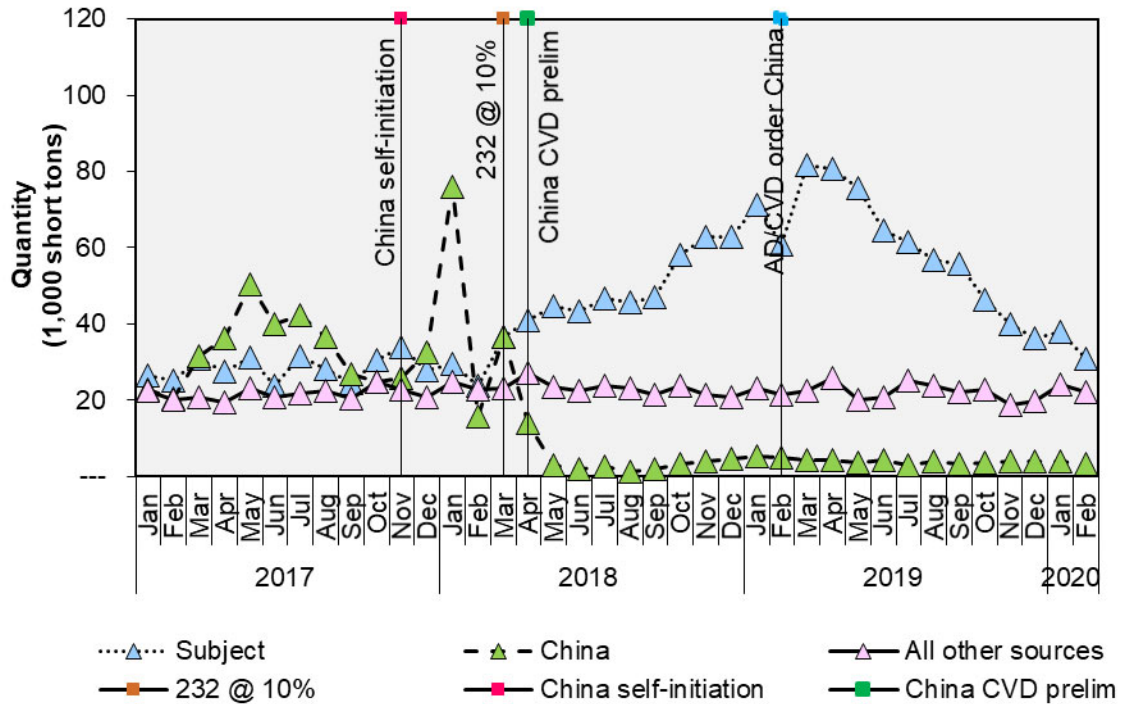
Table IV-6--Continued
CAAS: U.S. imports by month, January 2017 through February 2020

U.S. imports	Subject sources	Nonsubject sources	All import sources
	Quantity (short tons)		
2017:			
January	26,516	45,348	71,864
February	25,186	40,727	65,914
March	30,881	52,474	83,356
April	27,469	55,884	83,353
May	31,250	73,287	104,537
June	23,947	60,762	84,709
July	31,659	64,309	95,968
August	28,318	59,428	87,746
September	24,482	47,251	71,732
October	30,571	49,667	80,238
November	34,027	48,669	82,696
December	27,861	53,535	81,395
2018:			
January	29,580	100,630	130,211
February	23,926	38,612	62,538
March	36,596	59,874	96,470
April	40,950	41,288	82,238
May	44,670	26,227	70,897
June	43,332	24,740	68,072
July	46,555	26,717	73,272
August	45,750	24,478	70,228
September	46,947	23,391	70,338
October	58,076	27,264	85,340
November	62,933	25,425	88,358
December	62,798	25,771	88,569
2019:			
January	71,287	28,585	99,872
February	60,939	26,325	87,264
March	81,583	26,988	108,571
April	80,592	29,955	110,547
May	75,525	23,968	99,492
June	64,659	25,143	89,803
July	61,374	28,003	89,378
August	56,862	27,780	84,642
September	55,776	25,346	81,122
October	46,509	26,374	72,883
November	40,061	22,923	62,984
December	36,161	23,955	60,116
2020:			
January	38,085	28,050	66,135
February	30,932	25,578	56,510

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from official U.S. import statistics using HTS statistical reporting numbers 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.3091, 7606.12.3096, 7606.12.6000, 7606.91.3090, 7606.91.3095, 7606.91.6080, 7606.91.6095, 7606.92.3035, 7606.92.3090, 7606.92.6080, 7606.92.6095, accessed April 6, 2020.

Figure IV-3
CAAS: Monthly U.S. imports by source, 2019



Source: Compiled from official U.S. import statistics using HTS statistical reporting numbers 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.3091, 7606.12.3096, 7606.12.6000, 7606.91.3090, 7606.91.3095, 7606.91.6080, 7606.91.6095, 7606.92.3035, 7606.92.3090, 7606.92.6080, 7606.92.6095, accessed April 6, 2020.

Apparent U.S. consumption

Table IV-7 and figure IV-4 present data on apparent U.S. consumption CAAS for 2017 to 2019, based on questionnaire responses from U.S. producers and official import statistics. Apparent U.S. consumption increased by 4.3 percent by quantity, and 20.8 percent, by value, from 2017 to 2019.

Table IV-7
CAAS: Apparent U.S. consumption, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
U.S. producers' U.S. shipments	1,163,843	1,227,391	1,203,141
U.S. imports from.--			
Bahrain	65,162	64,486	76,467
Brazil	24,533	28,331	36,773
Croatia	---	2,816	9,183
Egypt	19	12,636	15,626
Germany	32,998	45,048	88,779
Greece	14,202	24,090	32,234
India	45,855	46,165	50,962
Indonesia	72,170	83,674	58,893
Italy	3,084	14,540	28,588
Korea	12,003	21,637	42,313
Oman	27,798	68,033	89,145
Romania	1,457	4,807	11,126
Serbia	---	74	3,771
Slovenia	---	10,818	12,437
South Africa	33,947	48,883	45,611
Spain	1,683	5,537	20,567
Taiwan	581	35,625	57,173
Turkey	6,676	24,913	51,679
Subject sources	342,167	542,114	731,327
Nonsubject sources	651,341	444,417	315,346
All import sources	993,508	986,531	1,046,673
Apparent U.S. consumption	2,157,351	2,213,922	2,249,814

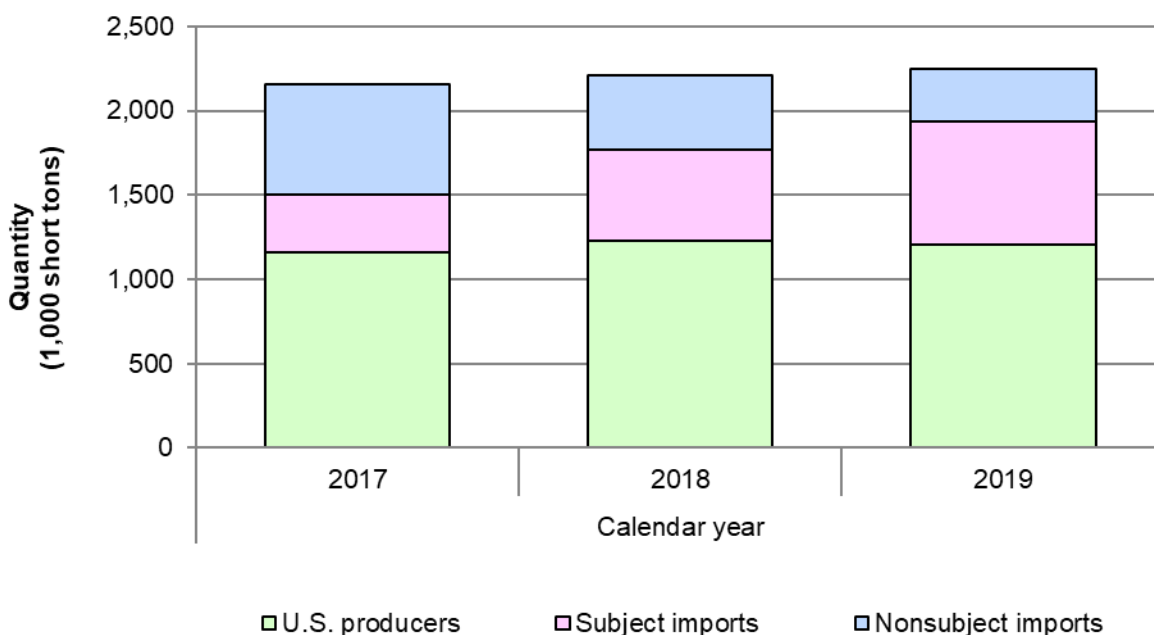
Table continued on next page.

Table IV-7--Continued
CAAS: Apparent U.S. consumption, 2017-19

Item	Calendar year		
	2017	2018	2019
	Value (1,000 dollars)		
U.S. producers' U.S. shipments	3,422,760	4,096,689	4,055,502
U.S. imports from.--			
Bahrain	172,117	213,988	265,118
Brazil	60,409	89,645	113,699
Croatia	---	9,918	29,192
Egypt	49	40,290	50,555
Germany	118,500	188,922	329,752
Greece	43,402	86,980	117,493
India	105,093	129,053	140,629
Indonesia	167,315	231,176	159,738
Italy	13,673	55,598	99,733
Korea	30,623	69,346	142,590
Oman	65,731	184,631	225,178
Romania	4,652	17,116	34,753
Serbia	---	268	11,315
Slovenia	---	37,133	41,786
South Africa	96,566	159,628	131,274
Spain	6,118	21,447	67,474
Taiwan	2,765	103,501	163,720
Turkey	18,278	78,887	144,237
Subject sources	905,291	1,717,528	2,268,236
Nonsubject sources	1,813,651	1,521,342	1,093,553
All import sources	2,718,941	3,238,870	3,361,789
Apparent U.S. consumption	6,141,701	7,335,559	7,417,291

Source: Compiled from official U.S. import statistics using HTS statistical reporting numbers 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.3091, 7606.12.3096, 7606.12.6000, 7606.91.3090, 7606.91.3095, 7606.91.6080, 7606.91.6095, 7606.92.3035, 7606.92.3090, 7606.92.6080, 7606.92.6095, accessed April 6, 2020.

Figure IV-4
CAAS: Apparent U.S. consumption, 2017-19



Source: Compiled from official U.S. import statistics using HTS statistical reporting numbers 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.3091, 7606.12.3096, 7606.12.6000, 7606.91.3090, 7606.91.3095, 7606.91.6080, 7606.91.6095, 7606.92.3035, 7606.92.3090, 7606.92.6080, 7606.92.6095, accessed April 6, 2020.

U.S. market shares

U.S. market share data for CAAS are presented in table IV-8. U.S. producers' share of apparent U.S. consumption, by quantity, increased from 53.9 percent in 2017 to 55.4 percent in 2018 before decreasing to 53.5 in 2019. U.S. producers' share of apparent U.S. consumption, by value, increased from 55.7 percent in 2017 to 55.8 percent in 2018 before decreasing to 54.7 in 2019. Subject imports' share of the U.S. market, by quantity, increased from 15.9 percent in 2017 to 24.5 percent in 2018 and 32.5 percent in 2019. Their share of the U.S. market, by value, increased from 14.7 percent in 2017 to 23.4 percent in 2018 and 30.6 percent in 2019. Meanwhile, the share of nonsubject imports declined from 30.2 percent in 2017 to 20.1 percent in 2018 and 14.0 percent in 2019, by quantity, and from 29.5 percent in 2017 to 20.7 percent in 2018 and 14.7 percent in 2019, by value. Based on the import figures of CAAS from China discussed earlier, the market share accounted for by imports of CAAS from China decreased from 18.1 to 2.2 percent in quantity and from 15.8 percent to 2.3 percent in value during 2017-19, as investigations on CAAS from China were instituted in December 2017 and antidumping and countervailing duty orders were issued by Commerce in February 2019.

Table IV-8
CAAS: Market shares, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Apparent U.S. consumption	2,157,351	2,213,922	2,249,814
	Share of quantity (percent)		
U.S. producers' U.S. shipments	53.9	55.4	53.5
U.S. imports from.--			
Bahrain	3.0	2.9	3.4
Brazil	1.1	1.3	1.6
Croatia	---	0.1	0.4
Egypt	0.0	0.6	0.7
Germany	1.5	2.0	3.9
Greece	0.7	1.1	1.4
India	2.1	2.1	2.3
Indonesia	3.3	3.8	2.6
Italy	0.1	0.7	1.3
Korea	0.6	1.0	1.9
Oman	1.3	3.1	4.0
Romania	0.1	0.2	0.5
Serbia	---	0.0	0.2
Slovenia	---	0.5	0.6
South Africa	1.6	2.2	2.0
Spain	0.1	0.3	0.9
Taiwan	0.0	1.6	2.5
Turkey	0.3	1.1	2.3
Subject sources	15.9	24.5	32.5
Nonsubject sources	30.2	20.1	14.0
All import sources	46.1	44.6	46.5

Table continued on next page.

Table IV-8--Continued
CAAS: Market shares, 2017-19

Item	Calendar year		
	2017	2018	2019
	Value (1,000 dollars)		
Apparent U.S. consumption	6,141,701	7,335,559	7,417,291
	Share of value (percent)		
U.S. producers' U.S. shipments	55.7	55.8	54.7
U.S. imports from.--			
Bahrain	2.8	2.9	3.6
Brazil	1.0	1.2	1.5
Croatia	---	0.1	0.4
Egypt	0.0	0.5	0.7
Germany	1.9	2.6	4.4
Greece	0.7	1.2	1.6
India	1.7	1.8	1.9
Indonesia	2.7	3.2	2.2
Italy	0.2	0.8	1.3
Korea	0.5	0.9	1.9
Oman	1.1	2.5	3.0
Romania	0.1	0.2	0.5
Serbia	---	0.0	0.2
Slovenia	---	0.5	0.6
South Africa	1.6	2.2	1.8
Spain	0.1	0.3	0.9
Taiwan	0.0	1.4	2.2
Turkey	0.3	1.1	1.9
Subject sources	14.7	23.4	30.6
Nonsubject sources	29.5	20.7	14.7
All import sources	44.3	44.2	45.3

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Apparent U.S. consumption shares of quantity of imports of CAAS from China (in percent) were 18.1 in 2017, 7.5 in 2018, and 2.2 in 2019. Apparent U.S. consumption shares of value of imports of CAAS from China (in percent) were 15.8 in 2017, 6.3 in 2018, and 2.3 in 2019. Investigations on CAAS from China were instituted in December 2017 and antidumping and countervailing duty orders were issued by Commerce in February 2019.

Source: Compiled from official U.S. import statistics using HTS statistical reporting numbers 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.3091, 7606.12.3096, 7606.12.6000, 7606.91.3090, 7606.91.3095, 7606.91.6080, 7606.91.6095, 7606.92.3035, 7606.92.3090, 7606.92.6080, 7606.92.6095, accessed April 6, 2020.

Part V: Pricing data

Factors affecting prices

Raw material costs

The primary raw materials used to manufacture CAAS are primary aluminum and aluminum sheet scrap.¹ Other raw materials include alloying metals. CAAS is manufactured to one of three alloy series (1XXX; 3XXX; and 5XXX). 1XXX series alloys are 99 percent or more aluminum by weight. Manganese is the primary alloying metal for the 3XXX series alloys and magnesium is the primary alloying metal for the 5XXX series.² Raw materials accounted for approximately 67.8 percent of the cost of goods sold (“COGS”) for CAAS in 2019.

The large majority of U.S. producers (seven of nine) reported that raw material prices fluctuated since 2017. Thirty-one of 68 importers reported that the price of raw materials fluctuated, while 23 importers reported that raw material prices increased since 2017. The London Metal Exchange (“LME”) plus the Midwest premium were the two most commonly reported sources for aluminum prices in the United States.³ As shown in figure V-1, the LME price of high-grade aluminum increased from January 2017 until May 2018, at which point it decreased until February 2020, the most recent data available. From January 2017 to December 2019, the LME price of high-grade aluminum decreased by *** percent. From December 2019 to February 2020, the LME price decreased by *** percent.

The Midwest premium is a daily premium added to the LME price applicable to U.S. producers of primary unwrought aluminum.⁴ ⁵ The Midwest premium price increased sharply

¹ *Common Alloy Aluminum Sheet from China, Inv. Nos. 701-TA-591 and 731-TA-1399 (Final)*. USITC Publication 4861, January 2019 (“USITC Publication 4861”), p. V-1.

² Petition, p. 7.

³ The price of U.S.-produced CAAS reportedly consists of three components: the LME price for high-grade (“HG”) unwrought aluminum, the Midwest premium, and the fabrication or conversion price. USITC Publication 4861, p. V-3.

⁴ USITC Publication 4861, p. V-1.

⁵ Prices of imported CAAS do not include the Midwest premium, but could include a regional premium for primary unwrought aluminum in the foreign producer’s home market. Foreign producer and Respondent ElvalHalcor noted that there is a regional premium for producers in Europe, which is included in the price to customers. There were *** ElvalHalcor’s postconference brief, Exhibit 1, p. 3. Respondent Alro noted that there is no regional premium for primary aluminum in Romania. Alro’s postconference brief, Attachment A, p. 5. Respondent HARP noted that it bases its sales prices on the LME (Rotterdam) price, plus a premium. In Europe, HARP applies the regional Rotterdam premium,

(continued...)

between December 2017 and April 2018, increasing by *** percent.⁶ The LME plus Midwest premium has fluctuated since 2017, although the LME plus Midwest premium increased overall by *** percent from January 2017 to December 2019. From December 2019 to February 2020, the LME plus Midwest premium decreased by *** percent.

Figure V-1
Aluminum price indices: LME (High Grade) and LME plus Midwest premium price index of aluminum, monthly, January 2017-February 2020

* * * * *

Source: Metal Bulletin.

which unlike the Midwest premium, does not include transport costs and is based on cash terms. HARP's postconference brief, Attachment 8, p. 3. Respondent Hulamin noted that there is no regional premium in South Africa and that it applies a combination of international premiums into the local market. The applied premium peaked in H1 2018 in line with other geographic premiums, most notably the Midwest premium. Hulamin's postconference brief, Exhibit 1, p. 5. Respondent OARC indicated that it has not experienced a regional premium for primary aluminum. OARC's postconference brief, Exhibit 1, p. 5.

⁶ The substantial price change in 2018 was due to uncertainty in the aluminum market from a Mexican antidumping investigation on Chinese aluminum foil, falling Japanese aluminum premium offers, tariffs, sanctions, and supply concerns. USITC Publication 4861, p. V-1.

Old aluminum sheet scrap (non-cast aluminum scrap items for consumption by secondary smelters) is also used as a raw material input in the production of CAAS.⁷ Aluminum sheet scrap prices decreased by *** percent from January 2017 to December 2019, with the largest decrease occurring between June 2018 and September 2018 (figure V-2). From December 2019 to February 2020, old aluminum sheet scrap prices have increased by *** percent.

Figure V-2

Old aluminum sheet scrap: Aluminum sheet scrap prices, monthly, January 2017-February 2020

* * * * *

Source: Platts Metals Week price notification monthly reports.

Transportation costs to the U.S. market

Transportation costs for CAAS shipped from subject countries to the United States ranged from 2.1 percent (Bahrain) to 5.8 percent (Egypt), and averaged 3.8 percent for subject

⁷ USITC Publication 4861, p. V-2 S&P Global Platts, “Specifications Guide: Nonferrous,” March 2020, <https://www.spglobal.com/platts/plattscontent/assets/files/en/our-methodology/methodology-specifications/nonferrous.pdf>, retrieved April 14, 2020.

countries. These estimates were derived from official import data and represent transportation and other charges on imports.⁸

U.S. inland transportation costs

Almost all responding U.S. producers and importers reported that they typically arrange transportation to their customers. Most U.S. producers reported that their U.S. inland transportation costs ranged from 2.4 to 5.0 percent while most importers reported costs of 1.0 to 5.0 percent.⁹

Pricing practices

Pricing methods

As presented in table V-1, U.S. producers and importers sell primarily on a transaction-by-transaction basis and through contracts.

Table V-1

CAAS: U.S. producers' and importers' reported price setting methods, by number of responding firms

Method	U.S. producers	Importers
Transaction-by-transaction	8	51
Contract	8	32
Set price list	3	11
Other	---	7
Responding firms	9	66

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.

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

U.S. producers reported selling most of their CAAS under annual contracts, while importers reported selling the vast majority of their CAAS under short-term contracts. As shown in table V-2, U.S. producers and importers reported their 2019 U.S. commercial shipments of CAAS by type of sale.

⁸ The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2017 and then dividing by the customs value based on the HTS subheading 7303.00.0030.

⁹ U.S. producers reported inland transportation costs up to 7.0 percent and importers reported inland transportation costs up to 8.0 percent. U.S. producer *** reported inland transportation costs of 18 percent, this has not been included.

Table V-2
CAAS: U.S. producers' and importers' shares of U.S. commercial shipments by type of sale, 2019

Type of sale	U.S. producers	Importers
Long-term contracts	14.4	---
Annual contracts	69.8	10.3
Short-term contracts	4.2	89.4
Spot sales	11.5	0.3
Total	100.0	100.0

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

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

All eight responding U.S. producers reported selling under annual contracts, and the fourth quarter is contracting season for shipments for the following year.¹⁰ U.S. producers' annual contracts do not allow for price renegotiations, and most firms (five of eight) fix the price and quantity. Most U.S. producers' annual contracts are indexed to raw materials.^{11 12}

Twenty-six of 35 responding importers reported selling CAAS from subject countries through short-term contracts, with the contract duration ranging from an average of 30 to 180 days. Most importers selling subject CAAS through short-term contracts reported that prices are not renegotiated, contracts have fixed prices and quantities, and prices are indexed to raw materials. Importers selling through annual contracts reported similar contract provisions to the short-term contracts.

Petitioners alleged that there has been a shift in the U.S. market from contracts to spot sales, due to subject imports driving down prices.¹³ Petitioners additionally noted that customers with contracts are choosing to purchase imported CAAS in 2020 because they can obtain "contract-like volumes at lower prices."¹⁴ U.S. producer Aleris re-started its "depot program" in which customers can purchase CAAS from its inventory. The depot program allows Aleris to "replace {its} substantial lost sales to distributors by acting as {its} own distributor."¹⁵

¹⁰ Petitioners' postconference brief, p. 38.

¹¹ As discussed above, the LME plus Midwest premium were the most cited price index.

¹² In response to the allegation that purchasers are interested in multi-year contracts, Petitioners noted that U.S. producers *** also sell CAAS through long-term contracts, some of which have a duration of more than *** years. Petitioners' postconference brief, Exhibit 1, p. 14.

¹³ Petitioners noted that "spot pricing from the large subject inventories that have built up over the period of investigation has become the low-priced alternative to contract sales." Petitioners' postconference brief, Exhibit 1, pp. 47-48.

¹⁴ Written Testimony of Buddy Stemple of Constellium Rolled Products Ravenswood LLC, (March 27, 2020), p. 7.

¹⁵ Written Testimony of Michael Keown of Aleris (March 27, 2020), pp. 5-6.

U.S. producer ***,¹⁶

Sales terms and discounts

U.S. producers and importers typically quote prices on a delivered basis, although 20 of 64 importers reported quoting prices on an f.o.b. basis. Five of nine U.S. producers offer a total volume discount, four offer no discounts, and two offer a quantity discount.¹⁷ Most importers (49 of 65) reported offering no discounts, 9 offer a quantity discount, 7 offer a total volume discount, and 9 reported other types of discounts including payment term discounts and early payment discounts.¹⁸

Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following CAAS products shipped to unrelated U.S. customers during January 2017 to December 2019.¹⁹

Product 1.-- Alloy 3003, H-14 temper, 0.125" thick, 48" wide

Product 2.-- Alloy 5052, H-32 temper, 0.125" thick, 48" wide

Product 3.-- Alloy 3105, H-26 temper, 0.016" thick, 24" wide

Product 4.-- Alloy 3003, H-14 temper, 0.063" thick, 48" wide

Six U.S. producers and 28 importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.^{20 21}

¹⁶ Petitioners' postconference brief, Exhibit 1, pp. 47-48.

¹⁷ Three U.S. producers reported more than one type of discount policy.

¹⁸ Eight importers reported more than one type of discount policy.

¹⁹ Petitioners requested the Commission collect 8 pricing products. The products for which the Commission collected price data were deemed by Petitioners to be the four most important proposed pricing products. Petition, pp. 26-27.

²⁰ 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.

²¹ Petitioners noted several firms reported unusable pricing data because the data do not match the pricing product descriptions, including

(continued...)

Pricing data reported by these firms accounted for approximately 1.5 percent of U.S. producers' shipments of CAAS, 13.0 percent of combined subject countries' U.S. shipments of CAAS, and the following percentages of U.S. shipments of subject imports from each subject country in 2019:

- Bahrain – *** percent
- Brazil – *** percent
- Croatia – *** percent
- Egypt – *** percent
- Germany – *** percent
- Greece – *** percent
- India – *** percent
- Indonesia – *** percent
- Italy – *** percent
- Korea – *** percent
- Oman – *** percent
- Romania – *** percent
- Serbia – *** percent
- Slovenia – *** percent
- South Africa – *** percent
- Spain – *** percent
- Taiwan – *** percent
- Turkey – *** percent

Price data for products 1-4 are presented in tables V-3 to V-6 and figures V-3 to V-6. Values and quantities from the 18 subject countries have been consolidated into a combined subject import group in the figures.

***. Data from these firms have not been included. *** provided revised pricing data in the correct units. Petitioners also stated that pricing data from importers ***. *** provided revised pricing data and are included in the dataset. Lastly, petitioners argued that data from *** is higher than other importers' pricing data, which petitioners stated does not reconcile with other data on the record. Staff believes the data provided by *** are consistent with the pricing product definitions and has included them in the tables and figures below.

Table V-3

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter, January 2017 through December 2019

Period	United States		Bahrain			Brazil			
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	
Apr.-Jun.	***	***	***	***	***	***	***	***	
Jul.-Sep.	***	***	***	***	***	***	***	***	
Oct.-Dec.	***	***	***	***	***	***	***	***	
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	
Apr.-Jun.	***	***	***	***	***	***	***	***	
Jul.-Sep.	***	***	***	***	***	***	***	***	
Oct.-Dec.	***	***	***	***	***	***	***	***	
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	
Apr.-Jun.	***	***	***	***	***	***	***	***	
Jul.-Sep.	***	***	***	***	***	***	***	***	
Oct.-Dec.	***	***	***	***	***	***	***	***	
Period	Croatia			Egypt			Germany		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***

Product 1: Alloy 3003, H-14 temper, 0.125" thick, 48" wide

Table continued on next page.

Table V-3 – Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter, January 2017 through December 2019

Period	Greece			India			Indonesia		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
Period	Italy			Korea			Oman		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***

Product 1: Alloy 3003, H-14 temper, 0.125" thick, 48" wide

Table continued on next page.

Table V-3 – Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter, January 2017 through December 2019

Period	Romania			Serbia		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
Period	Slovenia			South Africa		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***

Product 1: Alloy 3003, H-14 temper, 0.125" thick, 48" wide

Table continued on next page.

Table V-3 – Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter, January 2017 through December 2019

Period	Spain			Taiwan		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
Period	Turkey			Subject sources		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***

Product 1: Alloy 3003, H-14 temper, 0.125" thick, 48" wide

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

Table V-4

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by quarter, January 2017 through December 2019

Period	United States		Bahrain			Brazil			
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	
Apr.-Jun.	***	***	***	***	***	***	***	***	
Jul.-Sep.	***	***	***	***	***	***	***	***	
Oct.-Dec.	***	***	***	***	***	***	***	***	
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	
Apr.-Jun.	***	***	***	***	***	***	***	***	
Jul.-Sep.	***	***	***	***	***	***	***	***	
Oct.-Dec.	***	***	***	***	***	***	***	***	
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	
Apr.-Jun.	***	***	***	***	***	***	***	***	
Jul.-Sep.	***	***	***	***	***	***	***	***	
Oct.-Dec.	***	***	***	***	***	***	***	***	
Period	Croatia			Egypt			Germany		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***

Product 2: Alloy 5052, H-32 temper, 0.125" thick, 48" wide

Table continued on next page.

Table V-4 – Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by quarter, January 2017 through December 2019

Period	Greece			India			Indonesia		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
Period	Italy			Korea			Oman		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***

Product 2: Alloy 5052, H-32 temper, 0.125" thick, 48" wide

Table continued on next page.

Table V-4 – Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by quarter, January 2017 through December 2019

Period	Romania			Serbia		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
Period	Slovenia			South Africa		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***

Product 2: Alloy 5052, H-32 temper, 0.125" thick, 48" wide

Table continued on next page.

Table V-4 – Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by quarter, January 2017 through December 2019

Period	Spain			Taiwan		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
Period	Turkey			Subject sources		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***

Product 2: Alloy 5052, H-32 temper, 0.125" thick, 48" wide

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

Table V-5

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by quarter, January 2017 through December 2019

Period	United States		India			Oman		
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2018:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2019:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
Period	Turkey			Subject sources				
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Quantity (pounds)	Quantity (pounds)	Margin (percent)		
2017:								
Jan.-Mar.	***	***	***	***	***	***		
Apr.-Jun.	***	***	***	***	***	***		
Jul.-Sep.	***	***	***	***	***	***		
Oct.-Dec.	***	***	***	***	***	***		
2018:								
Jan.-Mar.	***	***	***	***	***	***		
Apr.-Jun.	***	***	***	***	***	***		
Jul.-Sep.	***	***	***	***	***	***		
Oct.-Dec.	***	***	***	***	***	***		
2019:								
Jan.-Mar.	***	***	***	***	***	***		
Apr.-Jun.	***	***	***	***	***	***		
Jul.-Sep.	***	***	***	***	***	***		
Oct.-Dec.	***	***	***	***	***	***		

Product 3.-- Alloy 3105, H-26 temper, 0.016" thick, 24" wide

Note:-- Importers did not report data for product 3 from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, Indonesia, Italy, Korea, Romania, Serbia, Slovenia, South Africa, or Taiwan.

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

Table V-6

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by quarter, January 2017 through December 2019

Period	United States		Bahrain			Brazil			
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	
Apr.-Jun.	***	***	***	***	***	***	***	***	
Jul.-Sep.	***	***	***	***	***	***	***	***	
Oct.-Dec.	***	***	***	***	***	***	***	***	
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	
Apr.-Jun.	***	***	***	***	***	***	***	***	
Jul.-Sep.	***	***	***	***	***	***	***	***	
Oct.-Dec.	***	***	***	***	***	***	***	***	
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	
Apr.-Jun.	***	***	***	***	***	***	***	***	
Jul.-Sep.	***	***	***	***	***	***	***	***	
Oct.-Dec.	***	***	***	***	***	***	***	***	
Period	Croatia			Egypt			Germany		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***

Product 4.-- Alloy 3105, H-26 temper, 0.016" thick, 24" wide

Table continued on next page.

Table V-6 - Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by quarter, January 2017 through December 2019

Period	Greece			India			Indonesia		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
Period	Italy			Korea			Oman		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2018:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
2019:									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***

Product 4.-- Alloy 3105, H-26 temper, 0.016" thick, 24" wide

Table continued on next page.

Table V-6 - Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by quarter, January 2017 through December 2019

Period	Romania			Serbia		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
Period	Slovenia			South Africa		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***

Product 4.-- Alloy 3105, H-26 temper, 0.016" thick, 24" wide

Table continued on next page.

Table V-6 - Continued

CAAS: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by quarter, January 2017 through December 2019

Period	Spain			Taiwan		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
Period	Turkey			Subject sources		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***

Product 4.-- Alloy 3105, H-26 temper, 0.016" thick, 24" wide

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

Figure V-3
CAAS: Weighted-average prices and quantities of domestic and combined subject sources,
product 1, by quarter, January 2017 through December 2019

* * * * *

* * * * *

Product 1: Alloy 3003, H-14 temper, 0.125" thick, 48" wide

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

Figure V-4
CAAS: Weighted-average prices and quantities of domestic and combined subject sources,
product 2, by quarter, January 2017 through December 2019

* * * * *

* * * * *

Product 2: Alloy 5052, H-32 temper, 0.125" thick, 48" wide

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

Figure V-5
CAAS: Weighted-average prices and quantities of domestic and combined subject sources, product 3, by quarter, January 2017 through December 2019

* * * * *

* * * * *

Product 3.-- Alloy 3105, H-26 temper, 0.016" thick, 24" wide

Note:-- Importers did not report data for product 3 from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, Indonesia, Italy, Korea, Romania, Serbia, Slovenia, South Africa, or Taiwan.

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

Figure V-6
CAAS: Weighted-average prices and quantities of domestic and combined subject sources,
product 4, by quarter, January 2017 through December 2019

* * * * *

* * * * *

Product 4.-- Alloy 3105, H-26 temper, 0.016" thick, 24" wide

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

Price trends

In general, prices increased during 2017-19. Table V-7 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from *** to *** percent during 2017-19, while import price increases ranged from *** to *** percent.²²

Indexed U.S. producer and subject import prices for products 1-4 show how prices increased from January 2017 to December 2019 (figures V-7 and V-8). Indexed U.S. producer prices of products 1, 2, and 4 rose steadily throughout the period. Prices of product 3 increased until the third quarter of 2018 before decreasing until the first quarter of 2019, after which prices of product 3 remained relatively stable. Subject import prices of products 1 to 4 were stable throughout 2017 and increased beginning in the first quarter of 2018. Prices of products 1 to 4 from subject countries increased from the first quarter of 2018 until the third quarter of 2018, after which they began to fall but were still higher than at the beginning of 2017.

²² The increase of *** of *** was due to a lower price reported by the only reporting importer of *** product in the first quarter of 2017. *** explained that it was awarded with new business and had to procure “additional safety stock to be prepared for the new businesses launch”. ***. *** email message to USITC staff, April 2, 2020 and April 13, 2020.

Table V-7

CAAS: Number of quarters containing observations low price, high price, and change in price over period, by product and source, January 2017 through December 2019

Item	Number of quarters	Low price (dollars per pound)	High price (dollars per pound)	Change in price over period (percent)
Product 1: United States	***	***	***	***
Bahrain	***	***	***	***
Brazil	***	***	***	***
Croatia	***	***	***	***
Egypt	***	***	***	***
Germany	***	***	***	***
Greece	***	***	***	***
India	***	***	***	***
Indonesia	***	***	***	***
Italy	***	***	***	***
Korea	***	***	***	***
Romania	***	***	***	***
Serbia	***	***	***	***
Slovenia	***	***	***	***
South Africa	***	***	***	***
Spain	***	***	***	***
Taiwan	***	***	***	***
Turkey	***	***	***	***
Subject	***	***	***	***

Table continued on next page.

Table V-7 - Continued

CAAS: Number of quarters containing observations low price, high price, and change in price over period, by product and source, January 2017 through December 2019

Item	Number of quarters	Low price (dollars per pound)	High price (dollars per pound)	Change in price over period (percent)
Product 2: United States	***	***	***	***
Bahrain	***	***	***	***
Brazil	***	***	***	***
Croatia	***	***	***	***
Egypt	***	***	***	***
Germany	***	***	***	***
Greece	***	***	***	***
India	***	***	***	***
Indonesia	***	***	***	***
Italy	***	***	***	***
Korea	***	***	***	***
Romania	***	***	***	***
Serbia	***	***	***	***
Slovenia	***	***	***	***
South Africa	***	***	***	***
Spain	***	***	***	***
Taiwan	***	***	***	***
Turkey	***	***	***	***
Subject	***	***	***	***
Product 3: United States	***	***	***	***
India	***	***	***	***
Oman	***	***	***	***
Turkey	***	***	***	***
Subject	***	***	***	***

Table continued on next page.

Table V-7 - Continued

CAAS: Number of quarters containing observations low price, high price, and change in price over period, by product and source, January 2017 through December 2019

Item	Number of quarters	Low price (dollars per pound)	High price (dollars per pound)	Change in price over period (percent)
Product 4: United States	***	***	***	***
Bahrain	***	***	***	***
Brazil	***	***	***	***
Croatia	***	***	***	***
Egypt	***	***	***	***
Germany	***	***	***	***
Greece	***	***	***	***
India	***	***	***	***
Indonesia	***	***	***	***
Italy	***	***	***	***
Korea	***	***	***	***
Romania	***	***	***	***
Serbia	***	***	***	***
Slovenia	***	***	***	***
South Africa	***	***	***	***
Spain	***	***	***	***
Taiwan	***	***	***	***
Turkey	***	***	***	***
Subject	***	***	***	***

Note: Importers did not report any data for products 1, 2, or 4 from Oman. Importers did not report any data for product 3 from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, Indonesia, Italy, Korea, Romania, Serbia, Slovenia, South Africa, or Taiwan.

Note: Change in price over period calculated when data was reported in the first quarter of 2017 and the last quarter of 2019.

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

Figure V-7

CAAS: Indexed U.S. producer prices, January 2017 through December 2019

* * * * *

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

Figure V-8

CAAS: Indexed subject importer prices, January 2017 through December 2019

* * * * *

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

Price comparisons

As shown in table V-8, prices for product imported from subject countries were below those for U.S.-produced product in 228 of 405 instances (183.7 million pounds, or 91.7 thousand short tons); margins of underselling ranged from 0.4 to 21.9 percent. Prices of product from Bahrain, India, Indonesia, Korea, Oman, South Africa, and Spain were below those for U.S.-produced product in the majority of comparisons.²³ In the remaining 177 instances (82.4 million pounds, or 41.2 thousand short tons), prices for product from subject countries were between 0.03 and 57.0 percent above prices for the domestic product. Prices of product from Brazil, Croatia, Egypt, Germany, Greece, Italy, Romania, Serbia, Slovenia, Taiwan, and Turkey were above those for U.S.-produced product in the majority of comparisons.

²³ There were only *** total comparisons of product from Oman and U.S.-produced product, all in product 3.

Table V-8

CAAS: Instances of underselling/overselling and the range and average of margins, by product and by country, January 2017 through December 2019

Source	Underselling				
	Number of quarters	Quantity (pounds)	Average margin (percent)	Margin Range (percent)	
				Min	Max
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Total, underselling	228	183,738,206	8.4	0.4	21.9
Bahrain	***	***	***	***	***
Brazil	***	***	***	***	***
Croatia	***	***	***	***	***
Egypt	***	***	***	***	***
Germany	***	***	***	***	***
Greece	***	***	***	***	***
India	***	***	***	***	***
Indonesia	***	***	***	***	***
Italy	***	***	***	***	***
Korea	***	***	***	***	***
Oman	***	***	***	***	***
Romania	***	***	***	***	***
Serbia	***	***	***	***	***
Slovenia	***	***	***	***	***
South Africa	***	***	***	***	***
Spain	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
Total, underselling	228	183,738,206	8.4	0.4	21.9

Table continued on next page.

Table V-8 - Continued

CAAS: Instances of underselling/overselling and the range and average of margins, by product and by country, January 2017 through December 2019

Source	(Overselling)				
	Number of quarters	Quantity (pounds)	Average margin (percent)	Margin Range (percent)	
				Min	Max
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Total, overselling	177	82,423,963	(12.4)	(0.03)	(57.0)
Bahrain	***	***	***	***	***
Brazil	***	***	***	***	***
Croatia	***	***	***	***	***
Egypt	***	***	***	***	***
Germany	***	***	***	***	***
Greece	***	***	***	***	***
India	***	***	***	***	***
Indonesia	***	***	***	***	***
Italy	***	***	***	***	***
Korea	***	***	***	***	***
Oman	***	***	***	***	***
Romania	***	***	***	***	***
Serbia	***	***	***	***	***
Slovenia	***	***	***	***	***
South Africa	***	***	***	***	***
Spain	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
Total, overselling	177	82,423,963	(12.4)	(0.03)	(57.0)

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Note: Importers did not report any data for products 1, 2, or 4 from Oman. Importers did not report any data for product 3 from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, Indonesia, Italy, Korea, Romania, Serbia, Slovenia, South Africa, or Taiwan.

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

Lost sales and lost revenue

The Commission requested that U.S. producers of CAAS report purchasers with which they experienced lost sales or revenue due to competition from imports of CAAS from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, or Turkey during 2017-19. Of the nine responding U.S. producers, eight reported that they had to either reduce prices or roll back announced price increases, and all nine firms reported that they had lost sales.

Seven U.S. producers submitted lost sales and lost revenue allegations. These seven U.S. producers identified 45 firms with which they lost sales or revenue (21 consisting of lost sales allegations, 3 consisting of lost revenue allegations, and 21 consisting of both types of allegations). Countries listed in one or more lost sales or lost revenue include Bahrain (28), Brazil (13), Croatia (1), Egypt (4), Germany (18), Greece (15), India (22), Indonesia (13), Italy (4), Korea (37), Oman (32), Slovenia (7), South Africa (11), Spain (19), Taiwan (14), and Turkey (28).²⁴ Allegations covered 2017 to 2019 and almost all lost sales were reported as occurring during contract negotiations.

Staff contacted 45 purchasers and received responses from 21 purchasers. Responding purchasers reported purchasing and importing 1.9 million short tons of CAAS during 2017-19 (table V-9). Responding firms' purchases and import shares by country for 2019 are reported in table V-10.

Purchasers were asked about changes in their purchasing patterns from different sources since 2017. Of the responding purchasers, four reported decreasing purchases from domestic producers, eight reported increasing purchases, three reported no change, four reported fluctuating purchases, and one did not purchase any domestic product.²⁵ Table V-11 shows the changes in purchases reported by country.

Explanations for increasing purchases of domestic product included increased demand, a new domestic mill, shortage of foreign material, and tariffs and trade actions. Explanations for decreasing purchases of domestic product included limited capacity and availability from U.S. producers, U.S. producers no longer offering *** CAAS on a spot basis, and importers offering just in time delivery. Two purchasers reported that their purchases of U.S. product fluctuated because of U.S. producers' capacity constraints. One reported its purchases of U.S. product fluctuated because U.S. producers could not provide CAAS that was previously sourced from China causing a supply shortage, and in late 2018 and early 2019 the price of imports was higher than the price of U.S. CAAS.

²⁴ This may include multiple allegations against the same purchaser. No lost sales or lost revenue allegations were made against product from Romania and Serbia.

²⁵ Of the 17 responding purchasers, 9 purchasers indicated that they did not know the source of some of the CAAS they purchased.

Table V-11
CAAS: Purchasers' responses to purchasing patterns

Source of purchases	Did not purchase	Decreased	Increased	Constant	Fluctuated
United States	1	4	8	3	4
Bahrain	7	3	5	3	1
Brazil	12	2	1	---	1
Croatia	13	1	---	---	2
Egypt	12	1	1	---	2
Germany	10	---	5	---	2
Greece	9	---	6	1	1
India	9	3	2	1	1
Indonesia	11	---	3	1	1
Italy	8	---	7	---	1
Korea	9	---	5	1	1
Oman	9	2	2	1	2
Romania	13	---	3	---	---
Serbia	15	---	1	---	---
Slovenia	14	---	2	---	---
South Africa	12	---	---	---	4
Spain	12	---	4	---	1
Taiwan	12	---	3	---	1
Turkey	11	---	5	---	---
All other sources	8	5	2	1	1
Sources unknown	8	1	3	2	3

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

Of the 20 responding purchasers, 18 reported that, since 2017, they had purchased imported CAAS from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and/or Turkey instead of U.S.-produced product. Fourteen²⁶ of these purchasers reported that subject import prices were lower than U.S.-produced product, and nine²⁷ of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product.

Seven purchasers estimated the quantity of CAAS from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and/or Turkey purchased instead of domestic product; quantities ranged from *** short tons to *** short tons (table V-12). Thirteen purchasers identified

²⁶ This includes *** that did not respond directly to this question but reported it purchased imports because of lower prices.

²⁷ This includes *** which did not respond to the yes/no question but reported in its explanation that its response was both yes and no.

availability²⁸ as the reason for purchasing imported rather than U.S.-produced CAAS. Some of these purchasers also reported that they had sometimes purchased imports because of price. Other non-price reasons purchasers reported for purchasing imports instead of U.S. product included: service (support and claims resolution); quality; customer preference for imported product; and reducing risk by diversification of suppliers. Responses by country are provided in table V-13.

Of the 20 responding purchasers, 4 reported that U.S. producers had reduced prices in order to compete with lower-priced imports from subject countries; 11 reported that they did not know (table V-14). The reported estimated price reductions ranged from *** to *** percent, responses by country are presented in table V-15. In describing the price reductions, one purchaser reported that U.S. producers reduced prices to compete with imports in 2019.

Table V-12
CAAS: Purchasers' responses to purchasing subject imports instead of domestic product

Purchaser	Subject imports purchased instead of domestic (Y/N)	Imports priced lower (Y/N)	If purchased subject imports instead of domestic, was price a primary reason		
			Y/N	If Yes, quantity (short tons)	If No, non-price reason
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued on next page.

²⁸ Responses citing on time delivery, willingness to quote, alloy not available from domestic sources, consistent supply, domestics were at capacity, and domestics sold out, were considered as availability.

Table V-12 - Continued

CAAS: Purchasers' responses to purchasing subject imports instead of domestic product

Purchaser	Subject imports purchased instead of domestic (Y/N)	Imports priced lower (Y/N)	If purchased subject imports instead of domestic, was price a primary reason		
			Y/N	If Yes, quantity (short tons)	If No, non-price reason
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued on next page.

Table V-12 - Continued

CAAS: Purchasers' responses to purchasing subject imports instead of domestic product

Purchaser	Subject imports purchased instead of domestic (Y/N)	Imports priced lower (Y/N)	If purchased subject imports instead of domestic, was price a primary reason		
			Y/N	If Yes, quantity (short tons)	If No, non-price reason
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued on next page.

Table V-12 - Continued

CAAS: Purchasers' responses to purchasing subject imports instead of domestic product

Purchaser	Subject imports purchased instead of domestic (Y/N)	Imports priced lower (Y/N)	If purchased subject imports instead of domestic, was price a primary reason		
			Y/N	If Yes, quantity (short tons)	If No, non-price reason
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
Total	Yes--18; No--2	Yes--13; No--4	Yes--8; No--9	191,840	

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

Table V-13

CAAS: Purchasers' responses to purchasing subject instead of domestic, by country

Source	Count of purchasers reporting subject instead of domestic	Count of purchasers reported that imports were priced lower	Count of purchasers reporting that price was a primary reason for shift	Quantity subject purchased (short tons)
Bahrain	12	8	3	***
Brazil	4	4	2	***
Croatia	3	2	---	***
Egypt	4	3	1	***
Germany	6	4	1	***
Greece	7	2	2	***
India	7	5	3	***
Indonesia	5	3	1	***
Italy	8	5	1	***
Korea	7	4	2	***
Oman	6	5	4	***
Romania	3	2	1	***
Serbia	1	1	---	***
Slovenia	2	1	---	***
South Africa	4	3	2	***
Spain	5	4	2	***
Taiwan	4	3	1	***
Turkey	4	2	1	***
Any subject source	18	13	8	191,840

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

Table V-14

CAAS: Purchasers' responses to U.S. producer price reductions, by firm

Purchaser	Producers reduced price (Y/N)	If produced reduced prices:	
		Estimated U.S. price reduction (percent)	Additional information, if available
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***

Table continued on next page.

Table V-14 – Continued

CAAS: Purchasers' responses to U.S. producer price reductions, by firm

Purchaser	Producer's reduced price (Y/N)	If produced reduced prices:	
		Estimated U.S. price reduction (percent)	Additional information, if available
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
Total / average	Yes--4; No--5	***	

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

Table V-15

CAAS: Purchasers' responses to U.S. producer price reductions, by country

Source	Count of purchasers reporting U.S. producers reduced prices	Simple average of estimated U.S. price reduction (percent)	Range of estimated U.S. price reductions (percent)
Bahrain	1	***	***
Brazil	---	***	***
Croatia	---	***	***
Egypt	---	***	***
Germany	---	***	***
Greece	---	***	***
India	1	***	***
Indonesia	1	***	***
Italy	1	***	***
Korea	---	***	***
Oman	1	***	***
Romania	---	***	***
Serbia	---	***	***
Slovenia	---	***	***
South Africa	1	***	***
Spain	1	***	***
Taiwan	---	***	***
Turkey	---	***	***
Any subject source	4	17.2	***

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

In responding to the lost sales lost revenue survey, nine purchasers provided additional information on purchases and market dynamics. Most purchasers providing additional information reported issues with domestic capacity and availability. *** reported that it has been unable to source domestic CAAS in *** over the past three years, and that it is concerned there is still not enough domestic capacity.²⁹ *** also reported limited capacity of domestically-produced direct cast CAAS and a “shortage/unwillingness” of U.S. mills to produce certain alloys. *** indicated that it imported CAAS due to domestic supply constraints. *** said there was a “dramatic shift” of U.S capacity toward special automotive grades and it could not buy standard non-automotive CAAS.

Other purchasers providing additional information discussed CAAS pricing since 2017. *** reported that U.S. producers would not lower prices significantly or supply enough CAAS. *** indicated that prices “skyrocketed” due to limited domestic capacity, which was exacerbated by the Chinese AD and CVD orders. *** added distributors were “forced” to buy imported CAAS after U.S. producers filled up, and at very high prices for 2018 into September of 2019 with pricing “well beyond” the 10 percent section 232 tariff. It also reported that pricing did not start to decline until September 2019. *** also reported that Chinese product was shipped to other countries, and these other countries would export to the U.S. market, which had a high LME and Midwest premium. It added that there were “huge” exemptions of section 232 tariffs granted to many brokers.

*** provided additional information on multiple points. It objected to trade actions against imported CAAS and stated that U.S. producers’ failures are due to their facilities which are old, inefficient, and expensive. It also noted that domestic producers do not provide quality service while foreign producers have “robust supply chains with excellent service performance.” *** added that pricing has leveled off and that the section 232 tariff acted as an “equalizer” for imported product. It noted that annual supply agreements are made three to six months prior to the supplying year, which allows for a “view” of the market and that supply strategies are built to suit that “view.” Moreover, it noted that the last 3 years have been turbulent in terms of both market capacity and commercial arrangements.³⁰ Lastly, it mentioned that demand for CAAS slowed in the second half of 2019 which resulted in a “glut” of CAAS in the market.

²⁹ *** also noted that without imports of CAAS it would have had to lay off its employees and would have suffered negative business consequences.

³⁰ This included uncertainty about ***.

(continued...)

Respondent Hulamin argued that purchasers' responses to the lost sales and lost revenue allegations showed that purchasers relied on imports due to limited availability of product from domestic producers.³¹

³¹ Hulamin cited responses from purchasers ***. Respondent Hulamin's postconference brief, pp. 22-25.

Part VI: Financial experience of U.S. producers

Background

Nine U.S. producers (Aleris, Arconic, Constellium, Golden, Granges, Jupiter, JW Aluminum, Novelis, and Texarkana) reported their financial results on CAAS operations for January 2017 through December 2019.¹ Total CAAS sales are relatively concentrated with *** and *** accounting for *** percent and *** percent, respectively, of the period's total reported sales quantity. The remaining U.S. producers' shares of total sales quantity ranged from *** percent (***) to *** percent (***).²

With regard to changes in the U.S. industry's operations during the period, Texarkana began operations in early 2019, restarting assets previously owned by Arconic.³ In addition to

¹ With the exception of ***, which reported their financial results on the basis of International Financial Reporting Standards (IFRS), U.S. producers reported their financial results on the basis of generally accepted accounting principles (GAAP). All U.S. producers reported their financial results for calendar-year periods.

A number of U.S. producers are part of large multinational corporations: Aleris' U.S. CAAS operations are included in its North America segment operations. Aleris 2019 Q3 10-Q, p. 12. Arconic's CAAS operations are included in its Global Rolled Products segment, which will reportedly be spun off to form a stand-alone publicly traded company in the early second quarter 2020. Arconic 2019 10-K, p. 8, p. 12, p. 37. Constellium's U.S. CAAS operations are included in its Aerospace & Transportation segment (Ravenswood, West Virginia facility). Constellium's 2018 20-F, pp. 34-35. The U.S. CAAS operations of Granges are part of the company's Americas segment. Granges 2018 Annual Report, p. 16, p. 52, p. 75. Novelis' U.S. CAAS operations are part of the company's North America segment. Novelis 2019 10-Q (Q-3), p. 38. Texarkana is a subsidiary of Ta Chen International. The company's ultimate parent company, Ta Chen Stainless Pipe, is a publicly traded company. Ta Chen Stainless Pipe 2019 Annual Report, p. 8. Jupiter and JW Aluminum are privately-held companies.

² On July 26, 2018, Aleris announced that it has entered into a definitive agreement to be acquired by Novelis. Aleris 2019 Q3 10-Q, p. 21.

³ As described in a public news article published in 2018, "Ta Chen Stainless Pipe will acquire an {idled} aluminum processing plant in the U.S. state of Texas from Arconic, moving some production to America in response to the Trump administration's tariffs. The Taiwanese company said Tuesday that U.S.-based unit Ta Chen International, a distributor of aluminum and stainless steel products, will spend up to \$350 million to purchase the entire facility from Arconic, which was spun off from American aluminum giant Alcoa in 2016. The deal is expected to close by the end of the year. The acquisition marks the first foray into U.S. production for Ta Chen, which procures aluminum products from China and elsewhere and sells them to American companies for final processing." *Taiwan company buys US aluminum plant to skirt Trump tariffs*, Nikkei Asian Review, <https://asia.nikkei.com/Business/Business-deals/Taiwan-company-buys-US-aluminum-plant-to-skirt-Trump-tariffs>, retrieved on March 31, 2020.

***. Email submission by *** on behalf of ***, response to USITC staff questions, April 2, 2020.

Texarkana’s start-up operations, CAAS financial results, as described below, reflect other producer-specific initiatives, such as reduction and/or idling of certain operations, as well as expansion activity and plant upgrades.

Operations on CAAS

Table VI-1 and table VI-2 present income-and-loss data for U.S. producers’ CAAS operations and corresponding changes in average per short ton values, respectively. Table VI-3 presents a variance analysis of these financial results and table VI-4 presents selected firm-specific financial information.⁴

Revenue

The majority of CAAS revenue reflects commercial sales with a relatively small amount representing transfers and internal consumption.⁵ Given the predominance of commercial sales, a single revenue line item is presented in the tables below.

⁴ The Commission’s variance analysis is calculated in three parts: sales variance, cost of goods sold (COGS) variance, and sales, general, and administrative (SG&A) expenses variance. Each part consists of a price variance (in the case of the sales variance) or a cost or expense variance (in the case of the COGS and SG&A expenses variance), and a volume variance. The sales or cost/expense variance is calculated as the change in unit price or per-unit cost/expense times the new volume, while the volume variance is calculated as the change in volume times the old unit price or per-unit cost/expense. As summarized at the bottom of the table, the price variance is from sales, the cost/expense variance is the sum of those items from COGS and SG&A variances, respectively, and the volume variance is the sum of the volume components of the net sales, COGS, and SG&A expenses variances. In general, the utility of the Commission’s variance analysis is enhanced when product mix remains the same throughout the period. Changes in the U.S. industry’s CAAS product mix and/or customer mix were reportedly minimal and did not substantially impact the trend of average unit values. Petitioners’ postconference brief, Exhibit 1 (response to USITC staff questions), p. 8.

⁵ ***. *** U.S. producer questionnaire, II-11. ***. Email submission from *** on behalf of ***, response to USITC staff questions, April 2, 2020.

Table VI-1
CAAS: Results of operations of U.S. producers, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Total net sales quantity	1,239,390	1,314,612	1,277,440
	Value (1,000 dollars)		
Total net sales value	3,652,576	4,402,170	4,311,421
Cost of goods sold.--			
Raw materials	2,309,884	2,765,184	2,589,629
Direct labor	370,139	391,468	396,414
Other factory costs	737,425	849,726	834,359
Total COGS	3,417,448	4,006,378	3,820,402
Gross profit	235,128	395,792	491,019
SG&A expense	199,563	182,861	223,020
Operating income or (loss)	35,565	212,931	267,999
Interest expense	***	***	***
All other expenses	***	***	***
All other income	***	***	***
Net income or (loss)	(101,941)	42,075	101,350
Depreciation/amortization	152,592	168,314	193,367
Estimated cash flow from operations	50,651	210,389	294,717
	Ratio to net sales (percent)		
Cost of goods sold.--			
Raw materials	63.2	62.8	60.1
Direct labor	10.1	8.9	9.2
Other factory costs	20.2	19.3	19.4
Cost of goods sold	93.6	91.0	88.6
Gross profit	6.4	9.0	11.4
SG&A expense	5.5	4.2	5.2
Operating income or (loss)	1.0	4.8	6.2
Net income or (loss)	(2.8)	1.0	2.4
	Ratio to total COGS (percent)		
Cost of goods sold.--			
Raw materials	67.6	69.0	67.8
Direct labor	10.8	9.8	10.4
Other factory costs	21.6	21.2	21.8

Table continued on next page.

Table VI-1—Continued
CAAS: Results of overall operations of U.S. producers, 2017-19

Item	Calendar year		
	2017	2018	2019
	Unit value (dollars per short ton)		
Total net sales ¹	2,947	3,349	3,375
Cost of goods sold.--			
Raw materials	1,864	2,103	2,027
Direct labor	299	298	310
Other factory costs	595	646	653
Total cost of goods sold	2,757	3,048	2,991
Gross profit	190	301	384
SG&A expense	161	139	175
Operating income or (loss)	29	162	210
Net income or (loss)	(82)	32	79
	Number of firms reporting		
Operating losses	***	***	***
Net losses	***	***	***
Data	8	8	9

¹ Based on the information presented in this table, average per short ton effective conversion price (average sales value minus average raw material cost) was \$1,083 (2017), \$1,245 (2018), and \$1,348 (2019). Effective conversion price as ratio of sales was 36.8 percent (2017), 37.2 percent (2018), and 39.9 percent (2019). In this context, “effective conversion price” indicates that the amount is a function of average sales and average raw material cost and therefore does not directly reflect transaction-specific conversion prices charged by U.S. producers.

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

Table VI-2
CAAS: Changes in AUVs, 2017-19

Item	Between calendar years		
	2017-19	2017-18	2018-19
	Changes in average unit values (dollars per short ton)		
Total net sales	428	402	26
Cost of goods sold.--			
Raw materials	163	240	(76)
Direct labor	12	(1)	13
Other factory costs	58	51	7
Total cost of goods sold	233	290	(57)
Gross profit	195	111	83
SG&A expense	14	(22)	35
Operating income or (loss)	181	133	48
Net income or (loss)	162	114	47

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

Table VI-3**CAAS: Variance analysis of the overall financial results of U.S. producers, 2017-19**

Item	Between calendar years		
	2017-19	2017-18	2018-19
	Value (dollars)		
Total net sales:			
Price variance	546,709	527,909	33,727
Volume variance	112,136	221,685	(124,476)
Total net sales variance	658,845	749,594	(90,749)
Net cost of sales:			
Cost variance	(298,036)	(381,516)	72,692
Volume variance	(104,918)	(207,414)	113,284
Total net cost of sales variance	(402,954)	(588,930)	185,976
Gross profit variance	255,891	160,664	95,227
SG&A expenses:			
Cost/expense variance	(17,330)	28,814	(45,330)
Volume variance	(6,127)	(12,112)	5,171
Total SG&A variance	(23,457)	16,702	(40,159)
Operating income variance	232,434	177,366	55,068
Summarized as:			
Price variance	546,709	527,909	33,727
Net cost/expense variance	(315,367)	(352,702)	27,362
Net volume variance	1,092	2,159	(6,021)

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

Table VI-4**CAAS: Results of operations of U.S. producers, 2017-19**

Item	Calendar year		
	2017	2018	2019
	Total net sales quantity (short tons)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(1)	(1)	***
All firms	1,239,390	1,314,612	1,277,440

Table continued on next page.

Table VI-4—Continued
CAAS: Results of operations of U.S. producers, 2017-19

Item	Calendar year		
	2017	2018	2019
	Total net sales (1,000 dollars)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(1)	(1)	***
All firms	3,652,576	4,402,170	4,311,421
	COGS (1,000 dollars)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(1)	(1)	***
All firms	3,417,448	4,006,378	3,820,402
	Gross profit or (loss) (1,000 dollars)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(1)	(1)	***
All firms	235,128	395,792	491,019

Table continued on next page.

Table VI-4—Continued
CAAS: Results of operations of U.S. producers, 2017-19

Item	Calendar year		
	2017	2018	2019
	SG&A expenses (1,000 dollars)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(1)	(1)	***
All firms	199,563	182,861	223,020
	Operating income or (loss) (1,000 dollars)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(1)	(1)	***
All firms	35,565	212,931	267,999
	Net income or (loss) (1,000 dollars)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(1)	(1)	***
All firms	(101,941)	42,075	101,350

Table continued on next page.

Table VI-4—Continued
CAAS: Results of operations of U.S. producers, 2017-19

Item	Calendar year		
	2017	2018	2019
	COGS to net sales value (percent)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(1)	(1)	***
All firms	93.6	91.0	88.6
	Gross profit or (loss) to net sales (percent)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(1)	(1)	***
All firms	6.4	9.0	11.4
	SG&A expense to net sales (percent)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(1)	(1)	***
All firms	5.5	4.2	5.2

Table continued on next page.

Table VI-4—Continued
CAAS: Results of operations of U.S. producers, 2017-19

Item	Calendar year		
	2017	2018	2019
	Operating income or (loss) to net sales (percent)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(¹)	(¹)	***
All firms	1.0	4.8	6.2
	Net income or (loss) to net sales (percent)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(¹)	(¹)	***
All firms	(2.8)	1.0	2.4
	Unit net sales value (dollars per short ton)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(¹)	(¹)	***
All firms	2,947	3,349	3,375

Table continued on next page.

Table VI-4—Continued
CAAS: Results of operations of U.S. producers, 2017-19

Item	Calendar year		
	2017	2018	2019
	Unit raw materials (dollars per short ton)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(¹)	(¹)	***
All firms	1,864	2,103	2,027
	Unit direct labor (dollars per short ton)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(¹)	(¹)	***
All firms	299	298	310
	Unit other factory costs (dollars per short ton)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(¹)	(¹)	***
All firms	595	646	653

Table continued on next page.

Table VI-4—Continued
CAAS: Results of operations of U.S. producers, 2017-19

Item	Calendar year		
	2017	2018	2019
	Unit conversion costs² (dollars per short ton)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(¹)	(¹)	***
All firms	894	944	963
	Unit COGS (dollars per short ton)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(¹)	(¹)	***
All firms	2,757	3,048	2,991
	Unit gross profit or (loss) (dollars per short ton)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(¹)	(¹)	***
All firms	190	301	384

Table continued on next page.

Table VI-4—Continued
CAAS: Results of operations of U.S. producers, 2017-19

Item	Calendar year		
	2017	2018	2019
	Unit SG&A expense (dollars per short ton)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(¹)	(¹)	***
All firms	161	139	175
	Unit operating income or (loss) (dollars per short ton)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(¹)	(¹)	***
All firms	29	162	210
	Unit net income or (loss) (dollars per short ton)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(¹)	(¹)	***
All firms	(82)	32	79

¹ Texarkana did not have CAAS operations prior to 2019.

² Conversion cost is the sum of direct labor and other factory costs.

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

Sales quantity

On an overall basis, the U.S. industry's total CAAS sales volume increased to its highest level in 2018 and then declined in 2019. With some exceptions and while magnitudes varied, most U.S. producers reported the same directional pattern of higher sales quantity in 2018 followed by lower sales quantity in 2019. *** companies, ***, reported increasing sales quantities throughout the period. *** was the *** company that reported declines in sales quantity throughout the period. As noted previously, Texarkana began operations in 2019 and therefore had no sales prior to that year.

Value

On an overall basis, the U.S. industry's average per short ton sales value increased throughout the period with the larger increase taking place between 2017 and 2018. While most U.S. producers followed the same directional trend of higher average sales value between 2017 and 2018, U.S. producers reported a more mixed directional pattern of higher and lower average sales values between 2018 and 2019.

Average sales value and average raw material cost both increased between 2017 and 2018 but diverged on an overall basis between 2018 and 2019 with average sales value continuing to increase somewhat while average raw material cost decreased. In general, average sales value and raw material cost share the same directional pattern due to the common industry practice of passing through raw material cost (i.e., aluminum) in CAAS sales value.⁶ On the revenue side and notwithstanding the decline in corresponding average raw material cost, the overall increase in average sales value in 2019 is consistent with higher conversion prices established earlier in the year, but which reportedly declined later in the year.⁷ Effective conversion price (see note to table VI-1) increased to its highest share of sales value in 2019.

⁶ As described in Petitioners' postconference brief, "Domestic producers rely on a number of different pricing formulas in selling CAAS. The two principal elements in the pricing formula, however, are: (1) the fabrication price (the price charged to the customer for converting primary aluminum, scrap, and alloying elements into a finished CAAS product), and (2) the mechanism for pricing the aluminum content of the finished product. The mechanism for pricing the aluminum content of the finished product may be fixed for the duration of the contract, lagged to reflect the average price for the month prior to the date of invoice, or established as of the date of invoice. Most companies (including ***) fix the cost of a product's aluminum content based on the London Metal Exchange ("LME") value, plus the Midwest Transaction Premium ("MWTP") as of the date that is ***. Petitioners' postconference brief, Exhibit 1 (response to USITC staff questions), p. 8.

⁷ Petitioners' postconference brief, Exhibit 1 (response to USITC staff questions), p. 19.

Table VI-4 also shows that company-specific average per short ton sales values covered a relatively wide range with *** (2017-18) and *** (2019) reporting the highest average sales value and *** (2017-19) reporting the lowest average sales values.

Cost of goods sold and gross profit or loss

Raw materials

The largest component of COGS is raw material costs, which ranged from a low of 67.6 percent of total COGS (2017) to a high of 69.0 percent (2018).⁸ CAAS raw material costs in large part represent a combination of primary aluminum and scrap aluminum, but also include secondary inputs. On a company-specific basis and with respect to the metal component specifically, U.S. producers varied in terms of their relative shares of scrap versus primary aluminum, as well as the extent to which they used semi-finished inputs.⁹

As noted above, U.S. producers often use a pass through formula to better match CAAS sales values and the cost of raw material consumed in production. A number of U.S. producers also reported using derivative financial instruments, in various forms, to minimize the impact of fluctuations in the cost of primary and scrap aluminum, as well as other inputs. While most U.S.

⁸ ***. *** U.S. producer questionnaire, III-7.

⁹ ***. *** U.S. producer questionnaire, III-9b (note 1). ***. Email submission by *** on behalf of ***, response to USITC staff questions, April 2, 2020.

producers use derivatives to some extent for hedging purposes, the classification of related hedging gains or losses in reported financial results varies.^{10 11}

In addition to hedging, U.S. producers' management of input costs also includes activity such as the procurement of primary and scrap aluminum by personnel with specialized experience and the use of LME index to correlate both revenue and cost.¹²

Table VI-4 shows that, while magnitudes varied, virtually all U.S. producers reported the same directional pattern with regard to changes in average per short ton raw material costs: increasing in 2018 and decreasing in 2019.¹³ Similar to the pattern of company-specific average per short ton sales values, average company-specific raw material costs covered a relatively wide range.

Direct labor and other factory costs

On an overall basis, direct labor cost is the smallest component of total COGS, ranging from 9.8 percent of total COGS (2018) to 10.8 percent (2017). While average per short ton direct labor cost fluctuated somewhat, it remained within a relatively narrow range throughout the period. Other factory costs, the second largest component of COGS, accounted for 21.2 percent (2018) to 21.8 percent (2019), covering a somewhat broader range on an average per short ton basis compared to direct labor cost.

While magnitudes varied, most U.S. producers reported the same directional trend of increasing average per short ton conversion costs (direct labor and other factory costs combined) in 2018 and 2019. While the U.S. industry's average conversion cost increased on an

¹⁰ Of those companies that reported hedging gains and losses, these items were included primarily as components of raw materials and/or other factory costs. The exceptions were ***: *** classified unrealized hedging gains and losses as other income and expenses; *** classified realized hedging gains or losses as other income and expenses; *** classified realized and unrealized hedging gains and losses as other income and expenses. *** U.S. producer questionnaires, III-9f.

¹¹ ***. *** U.S. producer questionnaire, III-9c. ***. Email submission by *** on behalf of ***, response to USITC staff questions, April 2, 2020.

¹² ***. *** U.S. producer questionnaire, III-9c. ***. *** U.S. producer questionnaire, III-9c.

¹³ ***.

overall basis, effective conversion price (average sales value minus average raw material cost) also increased on an average per short ton basis and as a percent of sales (see note 1 to table VI-1). (Note: Conversion price refers the amount charged to the customer for conversion and does not include the underlying metal cost. Conversion costs are the combined direct labor and other factory costs incurred by the U.S. producer.) As noted below, U.S. producers report that there was a pronounced decline in conversion price in the fourth quarter of 2019, which is not directly evident in full-year 2019 financial results.

COGS

Most U.S. producers reported the same directional pattern of increasing average COGS during 2017-18 followed by declines in 2019. In addition to the pattern of underlying aluminum costs, which impacted all U.S. producers to some extent, the COGS of U.S. producers also reflect the impact of company-specific costs/expenses associated with plant upgrades, expansions, and other changes in manufacturing activity.^{14 15}

¹⁴ ***. Email submission from *** on behalf of ***, response to USITC staff questions, April 2, 2020.

***. Email submission by *** on behalf of ***, response to USITC staff questions, April 2, 2020. ***. *** U.S. producer questionnaire, III-10.

¹⁵ ***. Email submission by *** on behalf of ***, response to USITC questions, April 2, 2020.

***. Email submission by *** on behalf of ***, response to USITC staff questions, April 2, 2020.

Gross profit or loss

The increase in total gross profit reflects a combination of changes in sales volume (increasing between 2017 and 2018 and declining between 2018 and 2019) and corresponding gross profit ratios (total gross profit divided by total revenue) (increasing throughout the period). The expanding gross profit ratio in 2018 reflects average sales value that increased by a greater percentage than average COGS. In 2019, it reflects a continued increase in average sales value and a decline in average COGS.¹⁶

While most U.S. producers reported gross profit throughout the period, directional changes in total gross profit were mixed. ***, the *** U.S. producer to report gross losses in both 2017 and 2018, transitioned to gross profit in 2019. *** was the *** U.S. producer to report a gross loss in 2019, the year which it ***.¹⁷

SG&A expenses and operating income or loss

Company-specific SG&A expense ratios (total SG&A expenses divided by total revenue) covered a relatively wide range but, with some exceptions, generally exhibited limited period-to-period fluctuations. While the level of company-specific SG&A expenses was a contributing factor to some extent, those companies reporting *** also reported relatively *** corresponding gross profit ratios.

The U.S. industry's operating income (on an absolute basis and as a share of sales) increased to its highest level in 2019.¹⁸ When asked to describe the primary factors impacting their financial results during the period, U.S. producers generally described an improved pricing

¹⁶ Conversion prices reportedly decreased in the fourth quarter of 2019 (see footnotes 7, 18, and 19), which, all things being equal, would have resulted in a decline in gross profit ratio compared to the first three quarters of 2019.

¹⁷ ***. Email submission by *** on behalf of ***, response to USITC staff questions, April 2, 2020. ***. Ibid.

¹⁸ The increase in 2019 full-year operating income reportedly masks a substantial decline in fourth quarter 2019 operating results. As compared to the full-year 2019 operating income ratio (total operating income divided by total revenue) of 6.2 percent (see table VI-1), information submitted in Petitioners' postconference brief indicates that the fourth quarter 2019 operating income ratio declined to essentially breakeven (***& percent). Petitioners' postconference brief, Exhibit 1 (response to USITC staff questions), p. 50. USITC auditor preliminary-phase notes.

environment early in 2019, which reportedly deteriorated later in the year with that deterioration projected to continue in 2020.¹⁹

Interest expense, other expenses and income, and net income or loss

While net losses would generally be expected for U.S. producers reporting low and/or negative operating results, the magnitude of company-specific net losses also reflects the presence of interest expense and/or other expenses.^{20 21}

The U.S. industry's net results followed the same directional pattern as operating results with absolute differences between the two amounts reflecting combined interest expense and

¹⁹ ***. Email submission by *** on behalf of ***, response to USITC staff questions, April 2, 2020. ***. Email submission by *** on behalf of ***, response to USITC staff questions, April 2, 2020. ***.

²⁰ *** were the *** U.S. producers that reported net losses throughout the period. ***. Email submission from *** on behalf of ***, response to USITC staff questions, April 2, 2020.

***. Email submission from *** on behalf of ***, response to USITC staff questions, April 2, 2020.

²¹ ***. Email submission by *** on behalf of ***, response to USITC staff questions, April 2, 2020.

other expenses, which were partially offset, to a greater or lesser degree, by corresponding other income.

Capital expenditures and research and development expenses

Table VI-5 presents U.S. producers' capital expenditures and research and development (R&D) expenses related to their CAAS operations.

Table VI-5
CAAS: Capital expenditures and research and development (R&D) expenses of U.S. producers, 2017-19

Item	Calendar year		
	2017	2018	2019
	Capital expenditures (1,000 dollars)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(¹)	***	***
All firms	168,909	190,720	294,595
	R&D expenses (1,000 dollars)		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(¹)	***	***
All firms	8,321	10,262	13,187

¹ The facility now operated by Texarkana was purchased in 2018. The company's reported capital expenditures do not include the initial investment of around \$350 million to purchase the idled mill (see footnote 3).

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

All U.S. producers reported capital expenditures of varying magnitudes during the period with most reporting their highest capital expenditure levels in 2019. While narrative descriptions of capital expenditures indicate that they include expansion and plant upgrades, a number of U.S. producers also indicated that reported capital expenditures represent capitalized maintenance. JW Aluminum (accounting for *** percent of the U.S. industry's total capital expenditures reported substantial investments related to a large-scale expansion project.²² Aleris (accounting for *** percent of the U.S. industry's total capital expenditures) reported a range of capital expenditure activity including maintenance, ***.²³ Arconic (accounting for *** percent of the U.S. industry's capital expenditures) reported that its capital expenditures reflect ***.²⁴ As shares of total reported capital expenditures, the remaining U.S. producers ranged from *** percent (***) to *** percent (***)).

The U.S. industry's total R&D expenses increased throughout the period with a number of U.S. producers reporting R&D expenses. Underlying R&D activity reportedly included the development of new product manufacturing capability and the broadening CAAS end use

²² As described by a JW Aluminum company official, "In anticipation of improved market conditions, {JW Aluminum's} Board of Directors approved substantial capital investments to expand significantly our company's capabilities. Specifically, in June 2018, our company announced the start of a two-phase expansion project at our Goose Creek facility. The first phase - involving an investment of \$207 million - includes construction of a new 220,000-square-foot building -the size of nearly four football fields - that will house new melting, casting, and rolling equipment. The new equipment will increase JW Aluminum's capacity to produce common alloy sheet by approximately 50 million pounds a year. This project is the fourth largest economic development announcement in South Carolina, and we expect it to add 50 new jobs when it is fully operational. The new equipment will have the capability of producing IXXX-, 3XXX-, and 5XXX-series common alloy sheet in widths greater than 75 inches in an extremely efficient manner." Petitioners' public opening remarks and witness testimonies (Testimony of Lee McCarter, CEO, JW Aluminum).

²³ *** U.S. producer questionnaire, III-13 (note 1). ***.

²⁴ Arconic U.S. producer questionnaire, III-13 (note 1). As described by an Arconic company official, ". . . in February 2019, Arconic announced plans to invest approximately \$110 million in our Alcoa, Tennessee, facility. These investments were focused on expanding that facility's hot mill capabilities and adding downstream equipment. Arconic's addition of these capabilities represented a long-term commitment to our Tennessee facility, diversifying its product mix into the common alloy market. For most of its modern history, Tennessee Operations had only produced aluminum can sheet - a product that is suitable for use only in manufacturing beverage cans." Petitioners' public opening remarks and witness testimonies (Testimony of Mark Vrablec, Commercial Vice President, Global Rolled Products and Extrusions Division, Arconic).

product applications.²⁵ *** reported the largest share of total reported R&D expenses (*** percent). The remaining U.S. producers that reported R&D expenses accounted for shares ranging from *** percent of total R&D expenses (***) to *** percent (***)).

Assets and return on assets

Table VI-6 presents data on the U.S. producers' total net assets and operating return on net assets related to operations on CAAS.²⁶

Table VI-6
CAAS: Total net assets and operating return on net assets of U.S. producers, 2017-19

Firm	Calendar years		
	2017	2018	2019
Value (1,000 dollars)			
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(¹)	(¹)	***
All firms	2,437,937	3,327,319	3,473,525

Table continued on next page.

²⁵ ***. *** U.S. producer questionnaire, III-13 (note 2). ***. Email submission by *** on behalf of ***, response to USITC staff questions April 2, 2020. ***. Email submission by *** on behalf of ***, response to USITC staff questions, April 2, 2020.

²⁶ With respect to a company's overall operations, staff notes that a total asset value (i.e., the bottom line value on the asset side of a company's balance sheet) reflects an aggregation of a number of current and non-current assets, which, in many instances, are not product specific. Allocation factors were presumably necessary to report total asset values specific to U.S. producers' CAAS operations. The ability of U.S. producers to assign total asset values to discrete product lines affects the meaningfulness of operating return on net assets.

Table VI-6—Continued

CAAS: Total net assets and operating return on net assets of U.S. producers, 2017-19

Firm	Calendar years		
	2017	2018	2019
	Operating return on assets (percent)²		
Aleris	***	***	***
Arconic	***	***	***
Constellium	***	***	***
Golden	***	***	***
Granges	***	***	***
Jupiter	***	***	***
JW Aluminum	***	***	***
Novelis	***	***	***
Texarkana	(1)	(1)	***
All firms	1.5	7.1	7.7

¹ Texarkana did not have CAAS operations prior to 2019.

² ***.

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

Capital and investment

The Commission requested the U.S. producers of CAAS to describe any actual or potential negative effects on its return on investment or its growth, investment, ability to raise capital, existing development and production efforts (including efforts to develop a derivative or more advanced version of the product), or the scale of capital investments as a result of imports of CAAS from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey. Table VI-7 tabulates the responses regarding actual negative effects on investment, growth, and development, as well as anticipated negative effects. Table VI-8 presents the narrative responses of U.S. producers regarding actual and anticipated negative effects on investment, growth, and development.²⁷

²⁷ With regard to table VI-7 and the impact of subject imports, *** reported a negative response regarding actual negative effects on investment or the scale of capital investments and *** reported a negative response regarding actual negative effects on growth, ability to raise capital, or existing development and production efforts. *** reported affirmative responses that they anticipated negative effects due to subject imports.

Table VI-7

CAAS: Negative effects of imports from subject sources on investment, growth, and development since January 1, 2017

Item	No	Yes
Negative effects on investment	1	8
Cancellation, postponement, or rejection of expansion projects		6
Denial or rejection of investment proposal		1
Reduction in the size of capital investments		4
Return on specific investments negatively impacted		7
Other		2
Negative effects on growth and development		1
Rejection of bank loans		0
Lowering of credit rating		1
Problem related to the issue of stocks or bonds		0
Ability to service debt		1
Other		7
Anticipated negative effects of imports		0

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

Table VI-8

CAAS: Narrative responses of U.S. producers regarding actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2017

Effects/Firm	Narrative
Negative impact on investment:	
Cancellation, postponement, or rejection of expansion projects	
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

Table VI-8—Continued

CAAS: Narrative responses of U.S. producers regarding actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2017

Effects/Firm	Narrative
Negative impact on investment--Continued	
Denial or rejection of investment proposal	
***	***
Reduction in the size of capital investments	
***	***
***	***
***	***
***	***
Return on specific investments negatively impacted	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
Other:	
***	***

Table continued on next page.

Table VI-8—Continued

CAAS: Narrative responses of U.S. producers regarding actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2017

Effects/Firm	Narrative
Negative impact on investment--Continued	
Other:	
***	***
Negative impact on growth and development:	
Lowering of credit rating	
***	***
Ability to service debt	
***	***
Other	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
Anticipated effects of imports:	
***	***

Table continued on next page.

Table VI-8—Continued

CAAS: Narrative responses of U.S. producers regarding actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2017

Effects/Firm	Narrative
Anticipated effects of imports--Continued	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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

Part VII: Threat considerations and information on nonsubject countries

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors¹--

- (I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
- (II) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
- (III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,*
- (IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,*
- (V) inventories of the subject merchandise,*

¹ Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that “The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition.”

- (VI) *the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,*
- (VII) *in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),*
- (VIII) *the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and*
- (IX) *any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).²*

Information on the nature of the alleged subsidies was presented earlier in this report; information on the volume and pricing of imports of the subject merchandise is presented in *Parts IV and V*; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in *Part VI*. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

² Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, ". . . the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

The industry in Bahrain

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export CAAS from Bahrain.³ The Commission received a useable questionnaire response from one firm: Gulf Aluminium Rolling Mill B.S.C (c) ("Gulf Aluminium"). This firm's exports to the United States accounted for all or virtually all U.S. imports of CAAS from Bahrain in 2019. According to estimates requested of the responding Bahraini producer, Gulf Aluminium, its production of CAAS in Bahrain accounts for all production of CAAS in Bahrain. Table VII-1 presents information on the CAAS operations of Gulf Aluminium in Bahrain.

Table VII-1
CAAS: Summary data for Bahraini producer Gulf Aluminium, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Gulf Aluminium	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Changes in operations

Gulf Aluminium reported no operational or organizational changes since January 1, 2017.

Operations on CAAS

Table VII-2 presents information on the CAAS operations of Bahraini producer Gulf Aluminium. During 2017-19, Gulf Aluminium's capacity to produce CAAS remained constant, while its production of CAAS decreased by *** percent from 2017 to 2019. This decrease in production is consistent with Gulf Aluminium's reported ***.⁴

³ This firm was identified through a review of information submitted in the petition and contained in *** records.

⁴ Gulf Aluminium reported that ***. Gulf Aluminium's foreign producer questionnaire, revision 04.07.2020.

Capacity utilization also decreased by *** percentage points during 2017-19. Capacity is projected to remain constant during 2020 and 2021, while production is projected to increase by *** percent between 2019 and 2021.

During 2017-19, Bahrain's export shipments accounted for *** shipments of CAAS. Export shipments to the United States increased during 2017-19 by *** percent, while export shipments to all other markets decreased by *** percent during 2017-19.⁵ Export shipments to the United States as a share of total shipments increased from *** percent to *** percent during 2017-19, while export shipments to other markets as a share of total shipments decreased, falling by *** percentage points. Export shipments to the United States are projected to fluctuate but decrease overall by *** percent between 2019 and 2021. Export shipments to all other markets as a share of total shipments are projected to increase from *** percent in 2019 to *** percent in 2021.

⁵ Gulf Aluminium reported that its other principle export markets included ***. Gulf Aluminium's foreign producer questionnaire, II-8.

Table VII-2

CAAS: Data for Bahraini producer Gulf Aluminium, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	Ratios and shares (percent)				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Alternative products

Gulf Aluminium reported that CAAS ***.

Gulf Aluminium was asked about constraints on production capacity. Gulf Aluminium reported that its overall capacity is limited by ***.⁶

Exports

Data on Bahrain's exports of aluminum plates, sheets and strip (of a thickness exceeding 02.mm) are presented in table VII-3. According to GTA, the leading export markets for CAAS from Bahrain are the United States, France and Australia. During 2019, the United States was the top export market for aluminum plates, sheet and strip from Bahrain, accounting for 76.1 percent of Bahrain's total exports. France and Australia accounted for 5.9 percent and 5.4 percent of Bahrain's total exports, respectively.

⁶ Gulf Aluminium's foreign producer questionnaire, II-3d.

Table VII-3
Aluminum plates, sheets and strip: Exports from Bahrain by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	65,267	64,869	76,562
France	5,006	6,476	5,984
Australia	6,903	6,623	5,401
Malaysia	3,020	2,651	2,410
Netherlands	4,777	3,045	2,206
Italy	6,322	7,154	1,819
Singapore	4,960	4,172	1,252
Turkey	1,194	1,813	1,056
Japan	1,392	870	994
All other destination markets	20,762	27,589	2,892
Total exports	119,603	125,262	100,575
	Share of quantity (percent)		
United States	54.6	51.8	76.1
France	4.2	5.2	5.9
Australia	5.8	5.3	5.4
Malaysia	2.5	2.1	2.4
Netherlands	4.0	2.4	2.2
Italy	5.3	5.7	1.8
Singapore	4.1	3.3	1.2
Turkey	1.0	1.4	1.0
Japan	1.2	0.7	1.0
All other destination markets	17.4	22.0	2.9
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics of imports from Bahrain (constructed export statistics for Bahrain) under HS subheading 7606.11, 7606.12, 7606.91, and 7606.92 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed March 30 and 31, 2020.

The industry in Brazil

The Commission issued foreign producers' or exporters' questionnaires to six firms believed to produce and/or export CAAS from Brazil.⁷ Usable responses to the Commission's questionnaire were received from three firms: Novelis do Brasil Ltda ("Novelis do Brasil"), Companhia Brasileira de Alumínio ("Companhia Brasileira"), and CBA Itapissuma Ltda ("CBA").⁸ These firms' exports to the United States accounted for all or virtually all U.S. imports of CAAS from Brazil in 2019. According to estimates requested of the responding Brazilian producers, the production of CAAS in Brazil reported in questionnaires accounts for approximately *** percent of overall production of CAAS in Brazil. Table VII-4 presents information on the CAAS operations of the responding producers and exporters in Brazil.

Table VII-4
CAAS: Summary data for producers in Brazil, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Novelis do Brasil	***	***	***	***	***	***
Companhia Brasileira	***	***	***	***	***	***
CBA	***	***	***	***	***	***
Total	***	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Changes in operations

As presented in table VII-5 producers in Brazil reported several operational and organizational changes since January 1, 2017.

⁷ These firms were identified through a review of information submitted in the petition and contained in *** records.

⁸ The Commission also received a response from ***, certifying that it had not produced or exported CAAS since January 1, 2017.

**Table VII-5
CAAS: Brazil producers' reported changes in operations, since January 1, 2017**

Item / Firm	Reported changed in operations
Expansions:	
***	***
Acquisitions:	
***	***
***	***
Prolonged shutdowns or curtailments:	
***	***
Other:	
***	***

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

Operations on CAAS

Table VII-6 presents information on the CAAS operations of the responding producers and exporters in Brazil. CAAS capacity fluctuated but decreased overall by *** percent during 2017-19. Production similarly decreased by *** percent during the same period. These decreases in capacity and production reflect the reported changes in *** operations (see table VII-5). These trends reflect *** offsetting ***.⁹ Capacity utilization fluctuated but decreased overall by *** percentage points during 2017-19. Capacity is projected to increase by *** percent during 2019-21, while production is projected to increase by *** percent between 2019 and 2021. These projections are consistent with ***.¹⁰

Total home market shipments and export shipments to other markets both decreased during 2017-19, by *** percent and by *** percent respectively, while export shipments to the United States increased by *** percent. Export shipments to the United States as a share of total shipments increased from *** percent to *** percent during 2017-19. Total home market shipments as a share of total shipments decreased by *** percentage points during 2017-19, while export shipments to other markets as a share of total shipments decreased by

⁹ Foreign producer questionnaire, II-2a, responses of ***.

¹⁰ *** foreign producer questionnaire, II-2a.

*** percentage points.¹¹ Export shipments to the United States are projected to fluctuate, but increase overall by *** percent between 2019 and 2021. Export shipments to the United States as a share of total shipments are projected to decrease between 2019 and 2021 by *** percentage points.

Table VII-6
CAAS: Data for producers in Brazil, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	Ratios and shares (percent)				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

¹¹ Other reported major export markets include ***. Foreign producer questionnaire, II-8, responses of Companhia Brasileira, CBA and Novelis do Brasil.

Alternative products

As shown in table VII-7, responding Brazilian firms produced other products on the same equipment and machinery used to produce CAAS. Products included out-of-scope aluminum can stock, aluminum foil, and other products.¹²

Table VII-7
CAAS: Overall capacity and production on the same equipment as in-scope production by producers in Brazil, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Overall capacity	***	***	***
Production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	Ratios and shares (percent)		
Overall capacity utilization	***	***	***
Share of production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Firms were asked about constraints on production capacity and the ability to switch production between CAAS to other products. Companhia Brasileira explained that its capacity is constrained by ***. CBA explained that its capacity is

¹² Other products include ***. Foreign producer questionnaire, II-3a, responses of CBA and Novelis do Brasil. ***. Novelis do Brasil's Foreign producer questionnaire, II-4b.

constrained by ***. Novelis do Brasil explained that its capacity is constrained by ***.¹³

All three responding firms reported that they are *** to shift production between CAAS and other products using the same equipment and labor due to the capabilities of their machines. ***, *** and *** reported being ***.¹⁴

Exports

Data on Brazil's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2mm) are presented in table VII-8. According to GTA, the leading export markets for aluminum plates, sheets and strip from Brazil are the United States, Argentina and Chile. During 2019, the United States was the top export market for aluminum plates, sheets and strip from Brazil, accounting for 40.3 percent of Brazil's total exports. Argentina and Chile accounted for 29.8 percent and 13.9 percent of Brazil's total exports, respectively.

¹³ Foreign producer questionnaire, II-3d, responses of Companhia Brasileira, CBA and Novelis do Brasil.

¹⁴ Foreign producer questionnaire, II-4, responses of Companhia Brasileira, CBA and Novelis do Brasil.

Table VII-8
Aluminum plates, sheets and strip: Exports from Brazil by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	25,091	31,150	34,993
Argentina	12,199	17,660	25,885
Chile	17,065	14,196	12,072
Bolivia	389	3,041	4,242
Colombia	11,088	7,402	3,440
Panama	5,898	6,021	2,417
Guatemala	0	524	1,849
Paraguay	380	346	972
Nigeria	15,490	4,409	518
All other destination markets	8,815	579	354
Total exports	96,417	85,327	86,741
	Share of quantity (percent)		
United States	26.0	36.5	40.3
Argentina	12.7	20.7	29.8
Chile	17.7	16.6	13.9
Bolivia	0.4	3.6	4.9
Colombia	11.5	8.7	4.0
Panama	6.1	7.1	2.8
Guatemala	0.0	0.6	2.1
Paraguay	0.4	0.4	1.1
Nigeria	16.1	5.2	0.6
All other destination markets	9.1	0.7	0.4
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.91, and 7606.92, as reported by SECEX Foreign Trade Secretariat in the Global Trade Atlas database, accessed March 30 and 31, 2020.

The industry in Croatia

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export CAAS from Croatia.¹⁵ The Commission received a usable questionnaire response from one firm: Impol TLM. This firm's exports to the United States accounted for all or virtually all U.S. imports of CAAS from Croatia in 2019. According to estimates requested of the responding Croatian producer, Impol TLM, its production of CAAS in Croatia reported in questionnaire response accounts for all production of CAAS in Croatia. Table VII-9 presents information on the CAAS operations of Impol TLM.

Table VII-9
CAAS: Summary data for Croatian producer Impol TLM, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Impol TLM	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Changes in operations

As presented in table VII-10 Impol TLM reported several operational and organizational changes since January 1, 2017.

Table VII-10
CAAS: Croatian producer Impol TLM's reported changes in operations, since January 1, 2017

Item / Firm	Reported changes in operations
Other:	
Impol TLM	

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

¹⁵ This firm was identified through a review of information submitted in the petition and contained in *** records.

Operations on CAAS

Table VII-11 presents information on the CAAS operations of Croatian producer Impol TLM. During 2017-19, Impol TLM's capacity to produce CAAS remained constant, while its production of CAAS fluctuated, but increased by *** percent from 2017 to 2019. Capacity utilization also fluctuated, but increased by *** percentage points during 2017-19. Capacity is projected to remain constant during 2020 and 2021, while production is projected to increase by *** percent between 2019 and 2020 and remain constant during 2020-21.

Impol TLM *** export shipments to the United States in 2017, while during 2018-19, export shipments to the United States increased by *** percent.¹⁶ During 2017-19, total export shipments fluctuated but increased overall by *** percent, while export shipments to all other markets decreased by *** percent.¹⁷ Export shipments to the United States as a share of total shipments increased from *** percent to *** percent during 2017-19, while total export shipments to all other markets as a share of total shipments decreased from *** percent to *** percent during the same period. Export shipments to the United States are projected to decrease by *** percent between 2019 and 2021. Similarly, export shipments to the United States as a share of total shipments are projected to decrease by *** percentage points.

¹⁶ Impol TLM reported that ***. Impol TLM's foreign producer questionnaire, II-10.

¹⁷ Other principal export markets include ***. Impol TLM's foreign producer questionnaire, II-8.

Table VII-11

CAAS: Data for Croatian producer Impol TLM, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	Ratios and shares (percent)				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Alternative products

As shown in table VII-12, Impol TLM produced other products on the same equipment and machinery used to produce CAAS.¹⁸

Table VII-12

CAAS: Overall capacity and production on the same equipment as in-scope production by Croatian producer Impol TLM, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Overall capacity	***	***	***
Production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	Ratios and shares (percent)		
Overall capacity utilization	***	***	***
Share of production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Impol TLM was asked about constraints on production capacity and the ability to switch production between CAAS and other products. Impol TLM reported that its overall capacity is limited by ***.¹⁹

¹⁸ Other products included ***. Impol TLM's foreign producer questionnaire, II-3a.

¹⁹ Impol TLM foreign producer questionnaire response, II-3d.

Impol TLM reported being ***.²⁰

Exports

Data on Croatia's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2mm) are presented in table VII-13. According to GTA, the leading export markets for aluminum plates, sheets and strip from Croatia are Slovenia, Germany and the United States. During 2019, the United States was the third largest export market for aluminum plates, sheets and strip from Croatia, accounting for 10.1 percent of Croatia's total exports. Slovenia and Germany accounted for 65.2 percent and 11.6 percent of Croatia's total exports, respectively.

²⁰ Impol TLM's foreign producer questionnaire, II-4.

Table VII-13**Aluminum plates, sheets and strip: Exports from Croatia by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	---	8,083	9,474
Slovenia	25,208	37,793	61,289
Germany	18,972	10,348	10,867
Czech Republic	5,764	5,031	5,124
Italy	4,253	2,692	2,769
Netherlands	1,995	2,029	1,765
Austria	2,242	2,503	1,205
France	1,299	745	735
Slovakia	577	399	210
All other destination markets	5,510	948	550
Total exports	65,819	70,572	93,987
	Share of quantity (percent)		
United States	---	11.5	10.1
Slovenia	38.3	53.6	65.2
Germany	28.8	14.7	11.6
Czech Republic	8.8	7.1	5.5
Italy	6.5	3.8	2.9
Netherlands	3.0	2.9	1.9
Austria	3.4	3.5	1.3
France	2.0	1.1	0.8
Slovakia	0.9	0.6	0.2
All other destination markets	8.4	1.3	0.6
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.91, and 7606.92 as reported by Croatian Bureau of Statistics in the Global Trade Atlas database, accessed March 30 and 31, 2020.

The industry in Egypt

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export CAAS from Egypt.²¹ The Commission received a usable questionnaire response from one firm: The Aluminum Company of Egypt ("Egyptalum"). This firm's exports to the United States accounted for all or virtually all U.S. imports of CAAS from Egypt in 2019. According to estimates requested of the responding Egyptian producers, the production of CAAS in Egypt reported in questionnaires accounts for all production of CAAS in Egypt. Table VII-14 presents information on the CAAS operations of Egyptalum in Egypt.

Table VII-14
CAAS: Summary data for Egyptian producer Egyptalum, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Egyptalum	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Changes in operations

Egyptalum reported no operational and organizational changes since January 1, 2017.

Operations on CAAS

Table VII-15 presents information on the CAAS operations of Egyptian producer Egyptalum. During 2017-19, Egyptalum's capacity to produce CAAS remained constant, while its production of CAAS fluctuated, but increased overall by *** percent from 2017 to 2019. Capacity utilization also fluctuated, but increased by *** percentage points during 2017-19. Capacity is projected to remain constant during 2020 and 2021, while production is projected to increase by *** percent between 2019 and 2021.

²¹ This firm was identified through a review of information submitted in the petition and contained in *** records.

Export shipments to the United States increased from *** short tons to *** short tons in 2018. During 2018-19, export shipments to the United State decreased by *** percent. During 2017-19, home market shipments and export shipments to all other markets decreased by *** percent and by *** percent, respectively.²² Export shipments to the United States as a share of total shipments increased from *** percent to *** percent during 2017-19, while total home market shipments as a share of total shipments and export shipments to other markets as a share of total shipments both decreased, falling by *** percentage points and by *** percentage points, respectively.²³ Export shipments to the United States are projected to fluctuate but decrease overall by *** percent between 2019 and 2021. During 2019-21, export shipments to all other markets and home market shipments are projected to increase by *** percent and by *** percent, respectively.

²² Egyptalum reported that it ***. Egyptalum's foreign producer questionnaire revisions, April 2, 2020.

²³ Other major export markets include ***. Egyptalum's foreign producer questionnaire revisions, April 2, 2020.

Table VII-15

CAAS: Data for Egyptian producer Egyptalum, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	Ratios and shares (percent)				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Alternative products

As shown in table VII-16, Egyptalum produced other products on the same equipment and machinery used to produce CAAS. Products included out-of-scope aluminum plate and other products.²⁴

Table VII-16
CAAS: Overall capacity and production on the same equipment as in-scope production by Egyptian producer Egyptalum, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Overall capacity	***	***	***
Production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	Ratios and shares (percent)		
Overall capacity utilization	***	***	***
Share of production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Egyptalum was asked about constraints on production capacity and the ability to switch production between CAAS and other products. Egyptalum reported that its overall capacity is limited by ***.²⁵

²⁴ Other out-of-scope products produced on the same machinery as CAAS included ***. Egyptalum's foreign producer questionnaire revisions, 04.02.2020.

²⁵ Egyptalum's foreign producer questionnaire revisions, 04.02.2020.

Egyptalum reported that ***.²⁶

Exports

Data on Egypt's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2mm) are presented in table VII-17. According to GTA, the leading export markets for aluminum plates, sheets and strip from Egypt are Italy, the United States and Spain. During 2019, the United States was the second largest export market for aluminum plates, sheets and strip from Egypt, accounting for 20.1 percent of Egypt's total exports. Italy and Spain accounted for 71.9 percent, and 3.3 percent of Egypt's total exports, respectively.

²⁶ Egyptalum's foreign producer questionnaire, II-4.

Table VII-17**Aluminum plates, sheets and strip: Exports from Egypt by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	20	13,262	15,810
Italy	43,613	47,496	56,497
Spain	1,757	2,858	2,567
Germany	6,794	5,357	1,052
Turkey	1,302	1,576	771
Slovenia	2,849	908	701
France	652	557	648
Morocco	692	674	272
United Kingdom	2,101	1,365	165
All other destination markets	2,500	1,062	128
Total exports	62,279	75,114	78,613
	Share of quantity (percent)		
United States	0.0	17.7	20.1
Italy	70.0	63.2	71.9
Spain	2.8	3.8	3.3
Germany	10.9	7.1	1.3
Turkey	2.1	2.1	1.0
Slovenia	4.6	1.2	0.9
France	1.0	0.7	0.8
Morocco	1.1	0.9	0.3
United Kingdom	3.4	1.8	0.2
All other destination markets	4.0	1.4	0.2
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics of imports from Egypt (constructed export statistics for Egypt) under HS subheading 7606.11, 7606.12, 7606.91, and 7606.92 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed March 30 and 31, 2020.

The industry in Germany

The Commission issued foreign producers' or exporters' questionnaires to 38 firms believed to produce and/or export CAAS from Germany.²⁷ Usable responses to the Commission's questionnaire were received from six firms: Albko Metallhandel GmbH & Co. KG ("Albko"), Aleris Rolled Products Germany GmbH ("Aleris Germany"), Constellium Rolled Products Singen GmbH & Co. KG ("Constellium"), Hydro Aluminium Rolled Products GmbH ("Hydro Aluminium"), Kalzip GmbH ("Kalzip"), and Novelis Deutschland GmbH ("Novelis Deutschland").²⁸ These firms' exports to the United States accounted for the large majority of U.S. imports of CAAS from Germany in 2019. According to estimates requested of the responding German producers, the production of CAAS in Germany reported in questionnaires accounts for approximately all production of CAAS in Germany. Table VII-18 presents information on the CAAS operations of the responding producers and exporters in Germany.

Table VII-18
CAAS: Summary data for firms in Germany, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Albko	***	***	***	***	***	***
Aleris Germany	***	***	***	***	***	***
Constellium	***	***	***	***	***	***
Hydro Aluminium	***	***	***	***	***	***
Kalzip	***	***	***	***	***	***
Novelis Deutschland	***	***	***	***	***	***
Total	***	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

²⁷ These firms were identified through a review of information submitted in the petition and contained in *** records.

²⁸ The Commission also received responses from four firms, ***, certifying that they had not produced or exported CAAS since January 2017.

The Commission received questionnaire responses from two German resellers of CAAS. Export data provided by these firms are presented in table VII-19.

Table VII-19
CAAS: Data for resellers in Germany, 2019

Resellers	Resales exported to the United States (short tons)	Share of resales exported to the United States (percent)
Albko	***	***
Kalzip	***	***
Total	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Changes in operations

As presented in table VII-20 producers and exporters in Germany reported several operational and organizational changes since January 1, 2017.

Table VII-20
CAAS: German firm's reported changes in operations, since January 1, 2017

Item / Firm	Reported changed in operations
Plant closings:	
***	***
***	***
Consolidations:	
***	***
Revised labor agreements:	
***	***
Other:	
***	***

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

Operations on CAAS

Table VII-21 presents information on the CAAS operations of the responding producers and exporters in Germany. Capacity decreased by *** percent during 2017-19, while production fluctuated but decreased overall by *** percent during the same period. The decreased capacity is consistent with ***.²⁹ Capacity utilization decreased by *** percentage points during 2017-19. Capacity is projected to fluctuate during 2019-21 but decrease overall by *** percent, while production is projected to decrease by *** percent during the same period.

Total home market shipments and export shipments to other markets decreased during 2017-19, by *** percent and by *** percent, respectively, while export shipments to the United States increased by *** percent. Hydro Aluminium attributed increased export shipments to the United States to a market shortage resulting from the antidumping duty order against CAAS imports from China.³⁰ Export shipments to the United States as a share of total shipments increased from *** percent to *** percent during 2017-19. Total home market shipments as a share of total shipments decreased by *** percentage points during 2017-19, while export shipments to other markets as a share of total shipments decreased by *** percentage points.³¹ Export shipments to the United States are projected to decrease by *** percent between 2019 and 2021. Export shipments to the United States as a share of total shipments are also projected to decrease from *** percent in 2019 to *** percent in 2020 and *** percent in 2021.

²⁹ Novelis Deutschland's foreign producer questionnaire, II-8.

³⁰ Written Testimony of Peter Ohlendorf, Vice President of Rolled Products, Hydro Aluminum Metals USA, March 27, 2020, p. 1.

³¹ Other major export markets include ***. Foreign producer questionnaire, II-8, responses of Aleris, Constellium, Hydro Aluminium and Novelis Deutschland.

Table VII-21

CAAS: Data for producers in Germany, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	Ratios and shares (percent)				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

Table continued on next page.

Table VII-21 --Continued

CAAS: Data for producers in Germany, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Resales exported to the United States	***	***	***	***	***
Total exports to the United States	***	***	***	***	***
	Ratios and shares (percent)				
Share of total exports to the United States:					
Exported by producers	***	***	***	***	***
Exported by resellers	***	***	***	***	***
Adjusted share of total shipments exported to the United States	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Alternative products

As shown in table VII-22, responding German firms produced other products on the same equipment and machinery used to produce CAAS. Products included out of scope aluminum can stock, aluminum foil, aluminum plate and other aluminum products.³²

³² Other aluminum products include ***. Foreign producer questionnaire, II-3a, responses of Aleris Germany, Constellium, Hydro Aluminium and Novelis Deutschland.

Table VII-22

CAAS: German producers' overall capacity and production on the same equipment as in-scope production, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Overall capacity	***	***	***
Production: CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	Ratios and shares (percent)		
Overall capacity utilization	***	***	***
Share of production: CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Firms were asked about constraints on production capacity and the ability to switch production between CAAS to other products. Aleris Germany reported that its capacity is constrained by ***. Constellium reported that its capacity is constrained by ***. Hydro Aluminium reported that its capacity is constrained by ***, and Novelis Deutschland reported that its capacity is constrained by ***.³³

One firm reported that it is *** to shift production between CAAS and other products using the same equipment and labor, while *** reported being able to switch production between ***. ***

³³ Foreign producer questionnaire, II-3d, responses of Aleris Germany, Constellium, Hydro Aluminium and Novelis Deutschland.

reported being able to switch production between *** and *** reported being able to switch production between ***.³⁴

Exports

Data on Germany's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2mm) are presented in table VII-23. According to GTA, the leading export markets for aluminum plates, sheets and strip from Germany are the United Kingdom, Poland, France and Belgium. During 2019, the United States was the fifth largest export market for aluminum plates, sheets and strip from Germany, accounting for 6.5 percent of Germany's total exports. The United Kingdom, Poland, France and Belgium accounted for 20.7 percent, 7.6 percent, 7.3 percent, and 7.3 percent of total German exports, respectively.

³⁴ Foreign producer questionnaire, II-4, responses of Aleris, Constellium, Hydro Aluminium and Novelis Deutschland.

Table VII-23**Aluminum plates, sheets and strip: Exports from Germany by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	61,087	69,925	120,504
United Kingdom	425,603	389,064	381,281
Poland	98,769	121,131	140,155
France	116,607	127,093	135,336
Belgium	136,506	145,392	134,952
Netherlands	101,147	107,635	110,037
Italy	74,065	73,900	96,197
Austria	80,688	80,306	92,510
Switzerland	57,891	60,377	51,742
All other destination markets	580,073	583,210	580,094
Total exports	1,732,436	1,758,035	1,842,807
	Share of quantity (percent)		
United States	3.5	4.0	6.5
United Kingdom	24.6	22.1	20.7
Poland	5.7	6.9	7.6
France	6.7	7.2	7.3
Belgium	7.9	8.3	7.3
Netherlands	5.8	6.1	6.0
Italy	4.3	4.2	5.2
Austria	4.7	4.6	5.0
Switzerland	3.3	3.4	2.8
All other destination markets	33.5	33.2	31.5
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.91, and 7606.92, as reported by Eurostat in the Global Trade Atlas database, accessed April 2, 2020.

The industry in Greece

The Commission issued foreign producers' or exporters' questionnaires to two firms believed to produce and/or export CAAS from Greece.³⁵ The Commission received a useable questionnaires response from one firm: Evalhalcor Hellenic Copper and Aluminum Industry SA ("Evalhalcor").³⁶ This firm's exports to the United States accounted for all or virtually all of U.S. imports of CAAS from Greece in 2019. According to estimates requested of the responding Greek producer, Evalhalcor, its production of CAAS in Greece accounts for all production of CAAS in Greece. Table VII-24 presents information on the CAAS operations of Evalhalcor in Greece.

Table VII-24
CAAS: Summary data for Greek producer Evalhalcor, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Elvahalcor	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Changes in operations

As presented in table VII-25 Evalhalcor reported one operational and organizational changes since January 1, 2017.

³⁵ These firms were identified through a review of information submitted in the petition and contained in *** records.

³⁶ The Commission also received correspondence from ***. Correspondence from ***, April 2, 2020.

Table VII-25

CAAS: Greek producer Evalhalcor's reported changes in operations, since January 1, 2017

Item / Firm	Reported changed in operations
Consolidations:	
***	***

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

Operations on CAAS

Table VII-26 presents information on the CAAS operations of Greek producer Evalhalcor. During 2017-19, Evalhalcor's capacity to produce CAAS fluctuated, but decreased overall by *** percent, while its production of CAAS also fluctuated and decreased overall by *** percent. These decreases in capacity and production are consistent with Evalhalcor's reported ***.³⁷ Capacity utilization also fluctuated, but decreased by *** percentage points during 2017-19. Capacity is projected to increase by *** percent during 2019-21, while production is projected to increase by *** during the same period.

Export shipments to the United States increased by *** percent during 2017-19, while home market shipments and export shipments to all other markets decreased by *** percent and by *** percent, respectively.³⁸ Export shipments to the United States as a share of total shipments increased from *** percent to *** percent during 2017-19, while total home market shipments as a share of total shipments and export shipments to other markets as a share of total shipments both decreased, falling by *** percentage points and by *** percentage points, respectively.³⁹ Export shipments to the United States are projected to increase by *** percent between 2019 and 2021. During 2019-21, export shipments to all other markets and home market shipments are both projected to increase by *** percent.

³⁷ Evalhalcor's foreign producer questionnaire revisions, March 30, 2020.

³⁸ Evalhalcor reported that it ***. Evalhalcor's foreign producer questionnaire revisions, March 30, 2020.

³⁹ Other major export markets include ***. Evalhalcor's foreign producer questionnaire revisions, March 30, 2020.

Table VII-26

CAAS: Data for Greek producer Evalhalcor, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	Ratios and shares (percent)				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Alternative products

As shown in table VII-27, Evalhalcor produced other products on the same equipment and machinery used to produce CAAS. Products include out-of-scope aluminum can stock, aluminum foil, aluminum plate and other products.⁴⁰

Table VII-27

CAAS: Overall capacity and production on the same equipment as in-scope production by Greek producer Evalhalcor, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Overall capacity	***	***	***
Production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	Ratios and shares (percent)		
Overall capacity utilization	***	***	***
Share of production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Evalhalcor was asked about constraints on production capacity and the ability to switch production between CAAS to other products. Evalhalcor reported that its overall capacity is limited by ***.⁴¹

⁴⁰ Other out of scope products Evalhalcor reported producing on the same machinery as CAAS included ***. Evalhalcor's foreign producer questionnaire, II-3a.

⁴¹ Evalhalcor's foreign producer questionnaire response, II-3d.

Evalhalcor reported ***. Evalhalcor further reported that its ability to shift production capacity between CAAS and other products is ***.⁴²

Exports

Data on Greece's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) are presented in table VII-28. According to GTA, the leading export markets for aluminum plates, sheets and strip from Greece are the United States, Germany and France. During 2019, the United States was the top export market for aluminum plates, sheets and strip from Greece, accounting for 17.0 percent of exports from Greece. Germany and France accounted for 12.1 percent and 11.0 percent of total Greek exports, respectively.

⁴² Evalhalcor's foreign producer questionnaire response, II-4; and Evalhalcor's postconference brief, p. 28.

Table VII-28**Aluminum plates, sheets and strip: Exports from Greece by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	19,814	37,047	40,032
Germany	33,056	32,431	28,590
France	24,707	26,885	26,055
Poland	20,376	21,137	22,836
Turkey	17,120	17,414	16,561
Italy	18,578	16,055	16,185
Netherlands	12,274	11,922	12,939
Czech Republic	9,323	9,398	9,608
Spain	6,125	6,450	6,268
All other destination markets	61,511	60,575	56,982
Total exports	222,886	239,315	236,055
	Share of quantity (percent)		
United States	8.9	15.5	17.0
Germany	14.8	13.6	12.1
France	11.1	11.2	11.0
Poland	9.1	8.8	9.7
Turkey	7.7	7.3	7.0
Italy	8.3	6.7	6.9
Netherlands	5.5	5.0	5.5
Czech Republic	4.2	3.9	4.1
Spain	2.7	2.7	2.7
All other destination markets	27.6	25.3	24.1
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7606.11, 7606.12, 7606.91, and 7606.92 as reported by Eurostat in the Global Trade Atlas database, accessed March 30 and 31, 2020.

The industry in India

The Commission issued foreign producers' or exporters' questionnaires to 14 firms believed to produce and/or export CAAS from India.⁴³ Usable responses to the Commission's questionnaire were received from three firms: Hindalco Industries Limited ("Hindalco"), Jindal Aluminium Limited ("Jindal Aluminium") and Manaksia Aluminium Co., Ltd. ("Manaksia").⁴⁴ These firms' exports to the United States accounted for the large majority of U.S. imports of CAAS from India in 2019. According to estimates requested of the responding Indian producers, the production of CAAS in India reported in questionnaires accounts for approximately *** percent of overall production of CAAS in India. Table VII-29 presents information on the CAAS operations of the responding producers and exporters in India.

Respondent Hindalco stated that it ***.⁴⁵ Hindalco has five plants for the manufacture of flat-rolled aluminum products, which are located in Hirakud, Belur, Mouda, Renukoot, and Taloja, in India.⁴⁶ The company acquired Novelis in 2007.⁴⁷ Novelis is the self-identified "leading producer of flat-rolled aluminum products" in the world.⁴⁸

Respondent Manaksia stated that it ***.⁴⁹

Respondent Jindal Aluminum, located outside of Bangalore, India is the self-identified second largest manufacturer of aluminum rolled products in India. According to the company's website, it produces aluminum alloy sheet with thicknesses ranging from 0.009 mm to 5 mm.

⁴³ These firms were identified through a review of information submitted in the petition and contained in *** records.

⁴⁴ The Commission also received correspondence from *** stating that they had not produced or exported CAAS since January 1, 2017.

⁴⁵ Taken from Foreign Producers'/Exporters' Questionnaire.

⁴⁶ Hindalco, "Aluminium Downstream," <http://hindalco.com/operations/aluminium-downstream>, retrieved March 31, 2020.

⁴⁷ Novelis, "Hindalco Industries Completes Acquisition Of Novelis Inc," <http://investors.novelis.com/2007-05-15-hindalco-industries-completes-acquisition-of-novelis-inc>, retrieved March 31, 2020.

⁴⁸ Novelis, "About Us," <https://novelis.com/about-us/>, retrieved March 31, 2020.

⁴⁹ Taken from Foreign Producers'/Exporters' Questionnaire.

Its total capacity for all aluminum rolled products is 50,000 metric tons per annum⁵⁰ (or 55,116 short tons).

Guajarat Foils produces aluminum foil, stock, and sheet at their manufacturing facility in Guajarat, India. The firm's aluminum sheet and coil range in thicknesses from 0.3 mm to 3 mm, and its total production capacity is 12,600 metric tons per annum⁵¹ (or 13,889 short tons).

Paragon Aluminum, headquartered in New Dehli is another major producer of aluminum coils, checkered sheets (five bar and diamond), corrugated sheets, and PP cap closure stocks. Its aluminum coil is produced in thicknesses ranging between 0.25 mm to 0.71 mm, while its aluminum sheet is produced in thicknesses from 0.65 mm to 3.25 mm. The firm's production facility houses three casters with 3,000 metric tons of monthly production capacity. The company has sold over 1,800 metric tons per month since its inception in 2008. Paragon sources its aluminum from BALCO and NALCO, both Indian firms, as well as a few other firms outside of India that are not specified.⁵²

National Aluminum Company Limited, or NALCO is another large producer of CAAS. The company also operates bauxite mines and works in alumina refining and smelting, and power generation. Nalco's smelter plant in Angul, India "has set up a 50,000 MT per annum (55,116 short tons) Rolled Products Unit".⁵³ According to the company's website, this unit is "export-oriented".⁵⁴

⁵⁰ Jindal Aluminium Limited, "Flat Rolled Product," <https://jindalaluminium.com/flat-rolled-products/>, retrieved March 31, 2020.

⁵¹ Guajarat, "Products," <http://www.gujaratfoils.com/products-overview.html>, retrieved March 31, 2020.

⁵² Paragon, "Paragon Industries," <http://www.paragonaluminium.com/profile.html>, retrieved March 31, 2020.

⁵³ NALCO – "Rolled Products Unit," <https://nalcoindia.com/business/operation/rolled-products-unit/>, retrieved March 31, 2020.

⁵⁴ NALCO – "Aluminium Smelter," <https://nalcoindia.com/business/operation/aluminium-smelter/>, retrieved March 31, 2020.

Table VII-29
CAAS: Summary data for producers in India, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Hindalco	***	***	***	***	***	***
Jindal Aluminium	***	***	***	***	***	***
Manaskia	***	***	***	***	***	***
Total	***	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Changes in operations

As presented in table VII-30 producers in India reported several operational and organizational changes since January 1, 2017.

Table VII-30
CAAS: India producers' reported changes in operations, since January 1, 2017

Item / Firm	Reported changed in operations
Revised labor agreements:	
***	***
Other:	
***	***

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

Operations on CAAS

Table VII-31 presents information on the CAAS operations of the responding producers and exporters in India. Capacity decreased by *** percent during 2017-19, while production fluctuated but increased overall by *** percent during the same period. The decreased capacity is consistent with ***.⁵⁵ Capacity utilization increased by *** percentage points during 2017-19. Capacity is projected to remain constant during 2020 and increase by

⁵⁵ Hindalco's foreign producer questionnaire, II-8.

*** percent during 2020-21, while production is projected to increase by *** percent between 2019 and 2021.⁵⁶

Total home market shipments and export shipments to other markets increased during 2017-19, by *** percent and by *** percent, respectively, while export shipments to the United States increased by ***. Export shipments to the United States as a share of total shipments decreased from *** percent to *** percent during 2017-19. Total home market shipments as a share of total shipments increased by *** percentage points during 2017-19, while export shipments to other markets as a share of total shipments decreased by *** percentage points.⁵⁷ Export shipments to the United States are projected to decrease by *** percent between 2019 and 2021. Export shipments to the United States as a share of total shipments are also projected to decrease from *** percent in 2019 to *** percent in 2021.

⁵⁶ The projected increase by in capacity and production is consistent with ***. Hindalco's foreign producer questionnaire, II-8.

⁵⁷ Other major export markets include ***. Foreign producer questionnaire, II-8, responses of Hindalco and Manaksia.

Table VII-31

CAAS: Data for producers in India, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	Ratios and shares (percent)				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Alternative products

As shown in table VII-32, responding Indian firms produced other products on the same equipment and machinery used to produce CAAS. Products included out of scope aluminum foil, aluminum plate and other aluminum products.⁵⁸

Table VII-32
CAAS: Overall capacity and production on the same equipment as in-scope production by producers in India, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Overall capacity	***	***	***
Production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	Ratios and shares (percent)		
Overall capacity utilization	***	***	***
Share of production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Firms were asked about constraints on production capacity and the ability to switch production between CAAS to other products. Hindalco reported that its capacity is constrained by ***. Manaksia reported that its capacity is constrained by ***. Jindal Aluminium

⁵⁸ Other aluminum products include ***. Hindalco's foreign producer questionnaire, II-3a.

reported that its capacity is constrained by ***.⁵⁹

Two firms reported that they *** to shift production between CAAS and other products using the same equipment and labor, while *** reported being able to switch production between ***. *** further reported its ability to switch production is constrained ***.⁶⁰

Exports

Data on India's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) are presented in table VII-33. According to GTA, the leading export markets for aluminum plates, sheets and strip from India are the United States, the United Arab Emirates and Italy. During 2019, the United States was the top export market for aluminum plates, sheets and strip from India, accounting for 50.0 percent of exports from India. The United Arab Emirates and Italy, accounted for 9.0 percent and 4.9 percent of total Indian exports, respectively.

⁵⁹ Foreign producer questionnaire, II-3, responses of Hindalco, Manaksia and Jindal Aluminium.

⁶⁰ Foreign producer questionnaire, II-4, responses of Hindalco, Manaksia and Jindal Aluminium.

Table VII-33**Aluminum plates, sheets and strip: Exports from India by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	45,657	49,419	47,475
United Arab Emirates	12,413	8,948	8,517
Italy	1,155	3,856	4,668
Nepal	2,673	3,389	3,703
Spain	390	5,197	3,465
Taiwan	1,770	2,355	3,013
Bangladesh	2,344	1,921	2,707
Ethiopia	2,306	1,500	2,546
Australia	2,459	2,138	1,695
All other destination markets	23,353	15,398	17,146
Total exports	94,519	94,122	94,933
	Share of quantity (percent)		
United States	48.3	52.5	50.0
United Arab Emirates	13.1	9.5	9.0
Italy	1.2	4.1	4.9
Nepal	2.8	3.6	3.9
Spain	0.4	5.5	3.6
Taiwan	1.9	2.5	3.2
Bangladesh	2.5	2.0	2.9
Ethiopia	2.4	1.6	2.7
Australia	2.6	2.3	1.8
All other destination markets	24.7	16.4	18.1
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7606.11, 7606.12, 7606.91, and 7606.92 as reported by Ministry of Commerce in the Global Trade Atlas database, accessed March 30 and 31, 2020.

The industry in Indonesia

The Commission issued foreign producers' or exporters' questionnaires to four firms believed to produce and/or export CAAS from Indonesia.⁶¹ The Commission did not receive a foreign producer/exporter questionnaire response from any firms in Indonesia.

PT Intibumi Alumindotama Industry produces aluminum sheet, coil, strip, thread plate and borders, circle, and foil at its processing plant in Medan, North Sumatra, Indonesia. According to its website, PT Intibumi Alumindotama and its rolling plant are subsidiaries of PT Damai Abadi,⁶² an aluminum extrusion company with processing plants in Medan and Jakarta.⁶³ The firm's aluminum sheet ranges in thickness from 0.18 mm to 3 mm while its aluminum coil is produced in thicknesses between 0.2 mm and 4 mm. These products are available in 1XXX, 3XXX, and 8XXX series alloys.⁶⁴ PT Intibumi's products serve the transportation, building, consumer durables, packaging, and electrical industries,⁶⁵ among others, in both the domestic and international markets.⁶⁶

PT Alumindo Light Metal Industry produces aluminum sheet and coil, aluminum circle, embossed aluminum and aluminum roofing, and aluminum foil at its factory in Sidoarjo, East Java, Indonesia. Product applications for PT Alumindo's aluminum include cooking products, packaging, building, and transportation parts.⁶⁷ According to the company website, PT Alumindo, the self-identified "largest flat rolled aluminum manufacturer in the South East Asia Region," has a production capacity of 144,000 metric tons (158,732 short tons) per annum of aluminum sheet,⁶⁸ which appears to make up the majority of its wrought production. The firm's products are available in several different alloy series including 1050, 1100, 1235, 3003, 3105,

⁶¹ These firms were identified through a review of information submitted in the petition and contained in *** records.

⁶² Pt Intibumi, "About Us," http://www.intibumi.com/default/about_us, retrieved March 31, 2020.

⁶³ Damai Abadi, "Contact Us," <https://www.damaiabadi.com/contact>, retrieved March 31, 2020.

⁶⁴ Pt Intibumi, "Product Specification," http://www.intibumi.com/default/product_specification, retrieved March 31, 2020.

⁶⁵ Pt Intibumi, "Product Applications," http://www.intibumi.com/default/product_applications, retrieved March 31, 2020.

⁶⁶ Pt Intibumi, "About Us," http://www.intibumi.com/default/about_us, retrieved March 31, 2020.

⁶⁷ Pt Alumindo, "Products – Applications," <http://www.alumindo.com/application.php>, retrieved March 31, 2020.

⁶⁸ Pt Alumindo, "Brief Profile – Overview," <http://www.alumindo.com/profil.php>, retrieved March 31, 2020.

5005, 5052, 8011 and 8079, with coils ranging in thickness from 0.3 mm to 3.2 mm and sheet ranging from 0.15 mm to 3.2 mm.⁶⁹

Pt Starmas Inti Aluminium Industries, headquartered in Tangerang, Indonesia produces aluminum flat sheet, coil, foil, extrusion, and finished goods. Its “three continuous casters have a total output of 3,000 metric tons (3,307 short tons) per month”.⁷⁰ The firm’s aluminum coil and sheet are produced in thicknesses ranging from 0.2 mm to 5 mm.⁷¹

Exports

Data on Indonesia’s exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) are presented in table VII-34. According to GTA, the leading export markets for aluminum plates, sheets and strip from Indonesia are the United States, Korea and Canada. During 2019, the United States was the top export market for aluminum plates, sheets and strip from Indonesia, accounting for 95.5 percent of Indonesia’s total exports. Korea and Canada accounted for 1.4 percent and 0.9 percent of total Indonesian exports, respectively.

⁶⁹ Pt Alumindo, “Product Specification,” http://www.alumindo.com/product_specification.php, retrieved March 31, 2020.

⁷⁰ PT Starmas Inti Aluminium Industry, “Company Profile – About US,” <http://starmas.com/about-us-eng>, retrieved March 31, 2020.

⁷¹ PT Starmas Inti Aluminium Industry, “Aluminium Rolling Mill,” <http://starmas.com/rolling-mill-eng/#aluminium-coil-eng>, retrieved March 31, 2020.

Table VII-34**Aluminum plates, sheets and strip: Exports from Indonesia by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	72,307	85,093	47,483
Korea	6,254	4,560	689
Canada	785	191	470
Malaysia	560	156	399
Taiwan	280	175	312
Singapore	74	130	94
Philippines	165	97	87
New Zealand	164	117	52
Thailand	68	---	33
All other destination markets	2,068	1,850	114
Total exports	82,726	92,369	49,732
	Share of quantity (percent)		
United States	87.4	92.1	95.5
Korea	7.6	4.9	1.4
Canada	0.9	0.2	0.9
Malaysia	0.7	0.2	0.8
Taiwan	0.3	0.2	0.6
Singapore	0.1	0.1	0.2
Philippines	0.2	0.1	0.2
New Zealand	0.2	0.1	0.1
Thailand	0.1	---	0.1
All other destination markets	2.5	2.0	0.2
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7606.11, 7606.12, 7606.91, and 7606.92 as reported by Statistics Indonesia in the Global Trade Atlas database, accessed March 30 and 31, 2020.

The industry in Italy

The Commission issued foreign producers' or exporters' questionnaires to 19 firms believed to produce and/or export CAAS from Italy.⁷² Usable responses to the Commission's questionnaire were received from six firms: Almecco S.P.A ("Almecco"), Laminazione Sottile SPA ("Laminazione"), Novelis Italia SPA ("Novelis Italia"), Profilglass S.P.A. ("Profilglass"), Slim Aluminum S.P.A. ("Slim Aluminum") and Slim Fusina Rolling Srl ("Slim Fusina").⁷³ These firms' exports to the United States accounted for all or virtually all U.S. imports of CAAS from Italy in 2019. According to estimates requested of the responding Italian producers, the production of CAAS in Italy reported in questionnaires accounts for approximately all production of CAAS in Italy. Table VII-35 presents information on the CAAS operations of the responding producers and exporters in Italy.

Table VII-35
CAAS: Summary data for producers in Italy, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Almecco	***	***	***	***	***	***
Laminazione	***	***	***	***	***	***
Novelis Italia	***	***	***	***	***	***
Profilglass	***	***	***	***	***	***
Slim Aluminium	***	***	***	***	***	***
Slim Fusina	***	***	***	***	***	***
Total	***	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

⁷² These firms were identified through a review of information submitted in the petition and contained in *** records.

⁷³ The Commission also received a response from ***, certifying that they had not produced or exported CAAS since January 1, 2017.

The Commission received a questionnaire response from one Italian reseller of CAAS: Almeco.⁷⁴ Export data provided by this firm are presented in table VII-36.

Table VII-36
CAAS: Data for Italian reseller Almeco, 2019

Resellers	Resales exported to the United States (short tons)	Share of resales exported to the United States (percent)
Almeco	***	***
Total	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Changes in operations

As presented in table VII-37 producers and exporters in Italy reported several operational and organizational changes since January 1, 2017.

Table VII-37
CAAS: Italian producers' reported changes in operations, since January 1, 2017

Item / Firm	Reported changed in operations
Expansions:	
***	***
***	***
Acquisitions:	
***	***
***	***
Other:	
***	***

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

⁷⁴ Almeco reported that it ***. Almeco reported ***. Almeco's foreign producer questionnaire revisions, March 31, 2020.

Operations on CAAS

Table VII-38 presents information on the CAAS operations of the responding producers in Italy. Capacity increased by *** percent during 2017-19, while production increased by *** percent during the same period. The increased capacity is consistent with ***.⁷⁵ Capacity utilization increased by *** percentage points during 2017-19. Capacity is projected to increase by *** percent during 2019-21, while production is projected to increase by *** percent during the same period. These projections are consistent with ***.⁷⁶

Export shipments to the United States increased from *** short tons in 2017 to *** short tons in 2018. During 2018-19, export shipments to the United States increased *** percent. Total home market shipments and export shipments to other markets increased during 2017-19 by *** percent and by *** percent, respectively. Increased exports to the United States are largely attributable to ***, who reported ***.⁷⁷ Export shipments to the United States as a share of total shipments increased from *** percent to *** percent during 2017-19. Total home market shipments as a share of total shipments decreased by *** percentage points during 2017-19, while export shipments to other markets as a share of total shipments decreased by *** percentage points.⁷⁸ Export shipments to the United States are projected to fluctuate during 2019-21, but increase overall by *** percent. Export shipments to the United States as a share of total shipments are also projected to decrease from *** percent in 2019 to *** percent in 2020, but increase to *** percent in 2021.

⁷⁵ Profilglass' foreign producer questionnaire revision request, II-2a.

⁷⁶ Slim Aluminium's foreign producer questionnaire revisions, April 9, 2020.

⁷⁷ Foreign producer questionnaire, responses of Profilglass and Novelis Italia.

⁷⁸ Other major export markets include ***. Foreign producer questionnaire, II-8, responses of Laminazione, Novelis Italia, Profilglass, Slim Aluminum and Slim Fusina.

Table VII-38

CAAS: Data for producers in Italy, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	Ratios and shares (percent)				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

Table continued on next page.

Table VII-38--Continued

CAAS: Data for producers in Italy, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Resales exported to the United States	***	***	***	***	***
Total exports to the United States	***	***	***	***	***
	Ratios and shares (percent)				
Share of total exports to the United States:					
Exported by producers	***	***	***	***	***
Exported by resellers	***	***	***	***	***
Adjusted share of total shipments exported to the United States	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Alternative products

As shown in table VII-39, responding Italian firms produced other products on the same equipment and machinery used to produce CAAS. Products included out of scope aluminum foil, aluminum plate and other aluminum products.⁷⁹

⁷⁹ Other aluminum products include ***. Foreign producer questionnaire, II-3a, responses of Laminazione, Novelis Italia, Profilglass, Slim Aluminum and Slim Fusina.

Table VII-39

CAAS: Overall capacity and production on the same equipment as in-scope production by producers in Italy, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Overall capacity	***	***	***
Production: CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	Ratios and shares (percent)		
Overall capacity utilization	***	***	***
Share of production: CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Firms were asked about constraints on production capacity and the ability to switch production between CAAS to other products. Laminazione reported that its capacity is ***. Novelis Italia reported its capacity is ***, Slim Aluminum reported that its capacity is ***, and Slim Fusina reported that its capacity is ***.⁸⁰

Two firms reported being *** to shift production between CAAS and other products using the same equipment and labor. *** reported being able to switch production between ***, *** reported being able to

⁸⁰ Foreign producer questionnaire, II-3d, responses of Laminazione, Novelis Italia, Profilglass, Slim Aluminum and Slim Fusina.

switch production between *** and *** reported being able to switch production between ***.⁸¹

Exports

Data on Italy's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) are presented in table VII-40. According to GTA, the leading export markets for aluminum plates, sheets and strip from Italy are Germany, France and Spain. During 2019, the United States was the fourth largest export market for aluminum plates, sheets and strip from Italy, accounting for 10.7 percent of Italy's total exports. Germany, France and Spain accounted for 21.1 percent, 13.9 percent and 12.6 percent of total Italian exports, respectively.

⁸¹ Foreign producer questionnaire, II-4, responses of Laminazione, Novelis Italia, Profilglass, Slim Aluminum, and Slim Fusina.

Table VII-40**Aluminum plates, sheets and strip: Exports from Italy by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	3,467	17,604	41,556
Germany	68,013	80,093	82,092
France	51,961	51,524	54,283
Spain	46,115	45,527	49,225
Austria	17,162	19,515	20,371
Switzerland	19,324	21,314	18,816
United Kingdom	9,185	10,111	12,625
Poland	9,602	12,603	12,066
Slovakia	4,832	7,377	7,337
All other destination markets	103,644	95,611	91,133
Total exports	333,305	361,280	389,505
	Share of quantity (percent)		
United States	1.0	4.9	10.7
Germany	20.4	22.2	21.1
France	15.6	14.3	13.9
Spain	13.8	12.6	12.6
Austria	5.1	5.4	5.2
Switzerland	5.8	5.9	4.8
United Kingdom	2.8	2.8	3.2
Poland	2.9	3.5	3.1
Slovakia	1.4	2.0	1.9
All other destination markets	31.1	26.5	23.4
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7606.11, 7606.12, 7606.91, and 7606.92 as reported by Eurostat in the Global Trade Atlas database, accessed March 30 and 31, 2020.

The industry in Korea

The Commission issued foreign producers' or exporters' questionnaires to 25 firms believed to produce and/or export CAAS from Korea.⁸² The Commission received a usable questionnaire response from one firm: Novelis Korea, Ltd ("Novelis Korea"). This firm's exports to the United States accounted for the large majority of U.S. imports of CAAS from Korea in 2019. According to estimates requested of the responding Korean producer, Novelis Korea, its production of CAAS in Korea accounts for approximately *** percent of overall production of CAAS in Korea. Table VII-41 presents information on the CAAS operations of the Novelis Korea in Korea.

Novelis Korea, Ltd. is a major Korean CAAS producer and an exporter to the United States. The company has two production facilities in Korea—one in Ulsan and another in Yeongju. The Ulsan plant supplies rolled aluminum sheet used in aluminum beverage cans, electronics, and the transportation and construction markets principally in Asia, while the Yeongju plant produces flat-rolled aluminum products for the food packaging, beverage can, construction, and electronic markets principally in Asia.⁸³ In 2017, Kobe Steel, Ltd. announced that it entered into a definitive agreement to establish a joint venture in South Korea that will produce aluminum sheet to meet growing demand for aluminum can stock, aluminum panel material (used in building and construction), and aluminum automotive body sheet in China and Japan. Kobe Steel acquired a 50 percent stake in Novelis' Ulsan plant for \$315 million, and the joint venture (named "Ulsan Aluminum Ltd.") was expected to have an annual production capacity of 300,000 metric tons (330,693 short tons).⁸⁴

Ajusteel Co., Ltd. is a Korean producer of flat-rolled aluminum products. In 2011, major Korean steel producer Posco acquired a 4.8 percent stake in the company.⁸⁵ Ajusteel specializes in the manufacture of a variety of aluminum alloy products, including 1XXX, 3XXX, and 5XXX

⁸² These firms were identified through a review of information submitted in the petition and contained in *** records.

⁸³ Novelis, "About Us: Geographic Locations (Asia)," <https://novelis.com/about-us/locations/>, retrieved March 30, 2020.

⁸⁴ Kobe Steel, "Kobe Steel and Novelis Korea to Establish Joint Venture," May 10, 2017, https://www.kobelco.co.jp/english/releases/1196942_15581.html, retrieved March 30, 2020.

⁸⁵ AJUSTEEL Co., Ltd., "History," <http://ajusteel.com/html/company02.html?lang=eng>, retrieved April 3, 2020.

series alloys for construction materials, electronic equipment, aluminum can stock, and structural materials for ships, among other products.⁸⁶

Daeho AL Inc. is a Korean producer of flat-rolled aluminum products. Daeho specializes in the manufacture of aluminum coils, sheet, and high-quality circle sheet that meet 1XXX, 3XXX, and 5XXX series alloy specifications. These products are used in a variety of applications, including kitchen appliances, interior and exterior materials for construction, materials for electronic devices, beverage cans, and automobiles, among others.⁸⁷

Choil Aluminum is a Korean producer of flat-rolled aluminum and aluminum alloy coils and sheet products. These products are used primarily in aluminum foil stock, fin stock, condenser cases, electrical wire covers, construction applications, and household goods. In 2013, Choil Aluminum announced that it would increase production capacity by building a new hot rolling mill. This mill was expected to produce 1XXX, 5XXX, and 6XXX series aluminum alloy strip (i.e., sheet) to as low as a 3mm gauge.⁸⁸

Nspace Co., Ltd. is another Korean producer of flat-rolled aluminum products. The firm's website indicates that it primarily supplies aluminum sheet used in building and construction (i.e., architectural design) and honeycomb paneling for railway cars. Major customers in the railway industry are located in Australia, Brazil, Egypt, India, and Turkey.⁸⁹

⁸⁶ AJUSTEEL Co., Ltd., "Special Steel: Aluminum," http://ajusteel.com/html/product02-2_2.html?lang=eng, retrieved April 3, 2020.

⁸⁷ Daeho AL Inc., "Product Information," <http://www.daeho-al.com/ENGLISH/product/alru.asp>, retrieved April 3, 2020.

⁸⁸ MINO, "Choil Aluminum," http://www.mino.it/index.php?option=com_content&view=category&layout=blog&id=36&Itemid=154, retrieved April 3, 2020.

⁸⁹ Nspace provides honeycomb material used in ceiling panels, end panels, access covers, partitions, grille, and moldings for railway cars. Nspace, "Railway Vehicle," <http://nspace.kr/en/railway-vehicle/#03>, retrieved April 3, 2020.

Table VII-41

CAAS: Summary data for Korean producer Novelis Korea, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Novelis Korea	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

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

Changes in operations

As presented in table VII-42 Novelis Korea reported several operational or organizational change since January 1, 2017.

Table VII-42

CAAS: Korean producer Novelis Korea's reported changes in operations, since January 1, 2017

Item / Firm	Reported changed in operations
Plant openings:	
***	***
Revised labor agreements:	
***	***

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

Operations on CAAS

Table VII-43 presents information on the CAAS operations of Korean producer Novelis Korea. During 2017-19, Novelis Korea's capacity to produce CAAS fluctuated but decreased overall by *** percent, while its production of CAAS fluctuated, but increased by *** percent. Capacity utilization increased by *** percentage points during 2017-19. Capacity is projected to fluctuate during 2019-21 but increase overall by *** percent, while production is also projected to fluctuate and increase overall by *** percent during the same period.

Export shipments to the United States increased by *** during 2017-19, while home market shipments and export shipments to other markets decreased by *** percent and by *** percent respectively. Export shipments to the United States as a share of total shipments increased from *** percent to *** percent during 2017-19, while total home market shipments as a share of total shipments and export shipments to other markets as a share of total shipments both decreased, falling by *** percentage points and by *** percentage

points, respectively.⁹⁰ Export shipments to the United States are projected to fluctuate but decrease overall by *** percent between 2019 and 2021. Total export shipments as a share of total shipments are also projected to decrease from *** percent in 2019 to *** percent in 2021.

⁹⁰ Other major export markets include ***. Novelis Korea's foreign producer questionnaire, II-8.

Table VII-43

CAAS: Data for Korean producer Novelis Korea, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	Ratios and shares (percent)				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Alternative products

As shown in table VII-44, Novelis Korea produced other products on the same equipment and machinery used to produce CAAS. Products included out-of-scope aluminum can stock, aluminum plate and other products.⁹¹

Table VII-44

CAAS: Overall capacity and production on the same equipment as in-scope production by Korean producer Novelis Korea, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Overall capacity	***	***	***
Production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	Ratios and shares (percent)		
Overall capacity utilization	***	***	***
Share of production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Novelis Korea was asked about constraints on production capacity and the ability to switch production between CAAS to other products. Novelis Korea reported that its overall capacity is limited by ***.⁹²

Novelis Korea reported the ***.⁹³

⁹¹ Other products include ***. Novelis Korea's foreign producer questionnaire, II-3a.

⁹² Novelis Korea's foreign producer questionnaire response, II-3d.

⁹³ Novelis Korea's foreign producer questionnaire response, II-4.

Exports

Data on Korea's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) are presented in table VII-45. According to GTA, the leading export markets for aluminum plates, sheets and strip from Korea are Vietnam, China and the United States. During 2019, the United States was the third largest export market for aluminum plates, sheets and strip from Korea, accounting for 6.7 percent of Korea's total exports. Vietnam and China accounted for 21.8 percent and 12.1 percent of total Korean exports, respectively.

Table VII-45**Aluminum plates, sheets and strip: Exports from Korea by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	12,632	24,397	45,540
Vietnam	140,198	151,518	148,616
China	79,291	88,873	82,442
Australia	40,851	39,404	43,144
Mexico	10,657	22,331	40,957
Thailand	42,932	31,427	37,399
Japan	28,034	32,071	36,186
India	24,386	34,120	27,738
Turkey	1,274	8,035	20,912
All other destination markets	172,906	176,198	198,359
Total exports	553,161	608,376	681,293
	Share of quantity (percent)		
United States	2.3	4.0	6.7
Vietnam	25.3	24.9	21.8
China	14.3	14.6	12.1
Australia	7.4	6.5	6.3
Mexico	1.9	3.7	6.0
Thailand	7.8	5.2	5.5
Japan	5.1	5.3	5.3
India	4.4	5.6	4.1
Turkey	0.2	1.3	3.1
All other destination markets	31.3	29.0	29.1
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7606.11, 7606.12, 7606.91, and 7606.92 as reported by Korea Customs and Trade Development Institution in the Global Trade Atlas database, accessed March 30 and 31, 2020.

The industry in Oman

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export CAAS from Oman.⁹⁴ The Commission received a usable questionnaire response from one firm: Oman Aluminium Rolling Company LLC ("Oman Aluminium"). This firm's exports to the United States accounted for all or virtually all U.S. imports of CAAS from Oman in 2019. According to estimates requested of the responding Oman producer, Oman Aluminium, its production of CAAS in Oman accounts for all production of CAAS in Oman. Table VII-46 presents information on the CAAS operations of Oman Aluminium in Oman.

Table VII-46
CAAS: Summary data for Oman producer Oman Aluminium, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Oman Aluminium	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Changes in operations

Oman Aluminium reported no operational and organizational changes since January 1, 2017.

Operations on CAAS

Table VII-47 presents information on the CAAS operations of Oman producer Oman Aluminium. During 2017-19, Oman Aluminium's capacity to produce CAAS remained constant, while its production of CAAS increased by *** percent. This increase in production is consistent with ***

⁹⁴ This firm was identified through a review of information submitted in the petition and contained in *** records.

***.⁹⁵ Capacity utilization increased by *** percentage points during 2017-19. Capacity is projected to remain constant during 2020 and 2021, while production is projected to increase by *** percent between 2019 and 2021.

During 2017-19, export shipments to the United States and home market shipments increased by *** percent and by *** percent respectively, while export shipments to other markets decreased by *** percent.⁹⁶ Export shipments to the United States as a share of total shipments increased from *** percent to *** percent during 2017-19, while total home market shipments as a share of total shipments and export shipments to other markets as a share of total shipments both decreased, falling by *** percentage points and by *** percentage points, respectively.⁹⁷ Export shipments to the United States are projected to fluctuate but decrease overall by *** percent between 2019 and 2021.

⁹⁵ Oman Aluminium's foreign producer questionnaire revisions, March 31, 2020.

⁹⁶ Oman Aluminium attributed its increased exports to the United States to ***, and reported that ***. Oman Aluminium's foreign producer questionnaire revisions, March 31, 2020.

⁹⁷ Other principal export markets include ***. Oman Aluminium's foreign producer questionnaire, II-8.

Table VII-47

CAAS: Data for Oman producer Oman Aluminium, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	Ratios and shares (percent)				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Alternative products

As shown in table VII-48, Oman Aluminium produced other products on the same equipment and machinery used to produce CAAS. Products included other out-of-scope aluminum products.⁹⁸

Table VII-48

CAAS: Overall capacity and production on the same equipment as in-scope production by Oman producer Oman Aluminium, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Overall capacity	***	***	***
Production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	Ratios and shares (percent)		
Overall capacity utilization	***	***	***
Share of production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Oman Aluminium was asked about constraints on capacity and the ability to switch production between CAAS to other products. Oman reported that its overall capacity is ***.⁹⁹

Oman Aluminium reported it is ***. Oman Aluminium further reported that its ability to shift production capacity

⁹⁸ Other products included ***. Oman Aluminium's foreign producer questionnaire, II-3a.

⁹⁹ Oman Aluminium's foreign producer questionnaire response, II-3d.

between CAAS and other products is ***.¹⁰⁰

Exports

Data on Oman's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) are presented in table VII-49. According to GTA, the leading export markets for aluminum plates, sheets and strip from Oman are the United States, the United Arab Emirates and Qatar. During 2018, the United States was the top export market for aluminum plates, sheets and strip from Oman, accounting for 92.6 percent of Oman's total exports.¹⁰¹ The United Arab Emirates and Qatar accounted for 4.5 percent and 1.2 percent of Oman's total exports, respectively.

¹⁰⁰ Oman Aluminium's foreign producer questionnaire response, II-4.

¹⁰¹ Complete 2019 export data is not yet available.

Table VII-49**Aluminum plates, sheets and strip: Exports from Oman by destination market, 2017-18**

Destination market	Calendar year	
	2017	2018
	Quantity (short tons)	
United States	29,007	144,863
United Arab Emirates	3,222	7,078
Qatar	1,471	1,919
India	2,463	1,091
Lebanon	---	486
Egypt	---	402
Jordan	---	135
Bahrain	435	128
Kuwait	144	104
All other destination markets	1,146	288
Total exports	37,889	156,494
	Share of quantity (percent)	
United States	76.6	92.6
United Arab Emirates	8.5	4.5
Qatar	3.9	1.2
India	6.5	0.7
Lebanon	---	0.3
Egypt	---	0.3
Jordan	---	0.1
Bahrain	1.1	0.1
Kuwait	0.4	0.1
All other destination markets	3.0	0.2
Total exports	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2018 data.

Source: Official exports statistics under HS subheading 7606.11, 7606.12, 7606.91, and 7606.92 as reported by UN Comtrade in the Global Trade Atlas database, accessed March 30 and 31, 2020.

The industry in Romania

The Commission issued foreign producers' or exporters' questionnaires to two firms believed to produce and/or export CAAS from Romania.¹⁰² The Commission received a usable questionnaire response from one firm: S.C. Alro SA ("Alro"). This firm's exports to the United States accounted for the large majority of U.S. imports of CAAS from Romania in 2019. According to estimates requested of the responding Romanian producer, Alro, its production of CAAS in Romania accounts for all production of CAAS in Romania. Table VII-50 presents information on the CAAS operations of Alro in Romania.

Table VII-50
CAAS: Summary data for Romanian producer Alro, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Alro	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Changes in operations

As presented in table VII-51 Alro reported one operational and organizational change since January 1, 2017.

Table VII-51
CAAS: Romanian producer Alro's reported changes in operations, since January 1, 2017

Item / Firm	Reported changed in operations
Revised labor agreements:	
***	***

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

¹⁰² These firms were identified through a review of information submitted in the petition and contained in *** records.

Operations on CAAS

Table VII-52 presents information on the CAAS operations of Romanian producer Alro. During 2017-19, Alro's capacity to produce CAAS fluctuated and but decreased overall by *** percent, while its production of CAAS fluctuated, but decreased by *** percent. Capacity utilization also fluctuated, but increased by *** percentage points during 2017-19. Capacity is projected to fluctuate, but increase overall by *** percent during 2019-21, while production is projected to increase by *** percent during the same period.

During 2017-19, export shipments to the United States and home market shipments increased by *** percent and by *** percent respectively, while export shipments to other markets decreased by *** percent.¹⁰³ Export shipments to the United States as a share of total shipments increased from *** percent to *** percent during 2017-19, while export shipments to other markets as a share of total shipments decreased by *** percentage points during the same period.¹⁰⁴ Export shipments to the United States are projected to fluctuate but decrease overall by *** percent between 2019 and 2021. Export shipments to the United States as a share of total shipments are also projected to decrease from *** percent in 2019 to *** percent in 2020 and 2021.

¹⁰³ Alro reported that it ***. Alro also reported that its ***. Alro's postconference brief, p. 11.

¹⁰⁴ Other major export markets included ***. Alro's foreign producer questionnaire, II-8.

Table VII-52

CAAS: Data for Romanian producer Alro, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	Ratios and shares (percent)				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Alternative products

As shown in table VII-53, Alro produced other products on the same equipment and machinery used to produce CAAS. Products included out-of-scope aluminum plate and other products.¹⁰⁵

Table VII-53
CAAS: Overall capacity and production on the same equipment as in-scope production by Romanian producer Alro, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Overall capacity	***	***	***
Production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	Ratios and shares (percent)		
Overall capacity utilization	***	***	***
Share of production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Alro was asked about constraints on production capacity and the ability to switch production between CAAS to other products. Alro reported that its overall capacity is ***, while ***,¹⁰⁶

Alro reported it is *** shift production between CAAS other products. Alro further reported that its ability to shift production capacity between CAAS and other products is

¹⁰⁵ Other products included ***. Alro's foreign producer questionnaire, II-3a.

¹⁰⁶ Alro's foreign producer questionnaire response, II-3d.

Exports

Data on Romania's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) are presented in table VII-54. According to GTA, the leading export markets for aluminum plates, sheets and strip from Romania are Germany, the United States and Turkey. During 2019, the United States was the second largest export market for aluminum plates, sheets and strip from Romania, accounting for 16.2 percent of Romania's total exports. Germany and Turkey accounted for 16.6 percent and 8.1 percent of total Romanian exports, respectively.

¹⁰⁷ Alro's foreign producer questionnaire response, II-4 and II-3d.

Table VII-54**Aluminum plates, sheets and strip: Exports from Romania by destination markets, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	3,242	7,808	13,540
Germany	15,739	13,958	13,875
Turkey	7,386	6,563	6,740
Italy	7,324	6,525	5,980
France	7,125	6,785	5,745
Czech Republic	5,356	5,564	5,716
Poland	7,879	5,922	5,651
United Kingdom	4,906	4,566	4,300
Spain	5,847	5,040	3,839
All other destination markets	18,797	18,108	18,326
Total exports	83,602	80,838	83,712
	Share of quantity (percent)		
United States	3.9	9.7	16.2
Germany	18.8	17.3	16.6
Turkey	8.8	8.1	8.1
Italy	8.8	8.1	7.1
France	8.5	8.4	6.9
Czech Republic	6.4	6.9	6.8
Poland	9.4	7.3	6.8
United Kingdom	5.9	5.6	5.1
Spain	7.0	6.2	4.6
All other destination markets	22.5	22.4	21.9
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7606.11, 7606.12, 7606.91, and 7606.92 as reported by Eurostat in the Global Trade Atlas database, accessed March 30 and 31, 2020.

The industry in Serbia

The Commission issued foreign producers' or exporters' questionnaires to two firms believed to produce and/or export CAAS from Serbia.¹⁰⁸ The Commission received a usable questionnaire response from one firm: Impol Seval Aluminum Rolling Mill ("Impol Seval"). This firm's exports to the United States accounted for all or virtually all U.S. imports of CAAS from Serbia in 2019. According to estimates requested of the responding Serbian producer, Impol Seval, its production of CAAS in Serbia accounts for all production of CAAS in Serbia. Table VII-55 presents information on the CAAS operations of Impol Seval in Serbia.

Table VII-55
CAAS: Summary data for Serbian producer Impol Seval, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Impol Seval	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Changes in operations

Impol Seval did not report any operational and organizational changes since January 1, 2017.

Operations on CAAS

Table VII-56 presents information on the CAAS operations of Serbian producer Impol Seval. During 2017-19, Impol Seval's capacity to produce CAAS remained constant, while its production of CAAS fluctuated, but increased overall by *** percent. Capacity utilization also fluctuated, but increased by *** percentage points during 2017-19. Capacity is projected to remain constant, during 2020 and 2021, while production is projected to decrease by *** percent during between 2019 and 2021.

¹⁰⁸ These firms were identified through a review of information submitted in the petition and contained in *** records.

In 2017, Impol Seval *** export shipments to the United States. During 2018-19, export shipments to the United States increased by *** percent.¹⁰⁹ During 2017-19 home market shipments increased by *** percent, while export shipments to other markets decreased by *** percent. Export shipments to the United States as a share of total shipments increased from *** to *** percent during 2018-19. During 2017-19, export shipments to other markets as a share of total shipments decreased by *** percentage points.¹¹⁰ Export shipments to the United States are projected to decrease by *** percent between 2019 and 2021. Export shipments to the United States as a share of total shipments are also projected to decrease *** percentage points during the same period.

¹⁰⁹ Impol Seval attributed the increased exports to the United States to ***. Impol Seval reported ***. Impol Seval's foreign producer questionnaire revisions, II-10

¹¹⁰ Other major export markets included ***. Impol Seval's foreign producer questionnaire, II-8.

Table VII-56

CAAS: Data for Serbian producer Impol Seval, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	Ratios and shares (percent)				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Alternative products

As shown in table VII-57, Impol Seval produced other products on the same equipment and machinery used to produce CAAS. Products include out-of-scope aluminum plate and other products.¹¹¹

Table VII-57

CAAS: Overall capacity and production on the same equipment as subject production by Serbian producer Impol Seval, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Overall capacity	***	***	***
Production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	Ratios and shares (percent)		
Overall capacity utilization	***	***	***
Share of production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Impol Seval was asked about constraints on production capacity and the ability to switch production between CAAS to other products. Impol Seval reported that its overall capacity is limited by ***.¹¹²

Impol Seval reported a ***. Impol Seval further reported that its ability to shift production capacity between CAAS

¹¹¹ Other products included ***. Impol Seval's foreign producer questionnaire, II-3a.

¹¹² Impol Seval's foreign producer questionnaire, II-3d.

and ***,¹¹³

Exports

Data on Serbia's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) are presented in table VII-58. According to GTA, the leading export markets for aluminum plates, sheets and strip from Serbia are Slovenia, Germany and (as of 2019) the United States. During 2019, the United States was the third largest export market for aluminum plates, sheets and strip from Serbia, accounting for 7.0 percent of Serbia's total exports. Slovenia and Germany accounted for 60.7 percent and 12.6 percent of total Serbian exports, respectively.

¹¹³ Impol Seval's foreign producer questionnaire, II-4. Impol Seval reported being able to ***. Ibid.

Table VII-58**Aluminum plates, sheets and strip: Exports from Serbia by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	---	74	3,772
Slovenia	22,108	33,714	32,713
Germany	8,505	9,297	6,787
Russia	7,685	3,493	2,677
Poland	1,729	2,133	1,674
Italy	1,521	1,292	1,259
Netherlands	984	1,300	1,126
Switzerland	539	627	529
Slovakia	463	308	517
All other destination markets	5,558	4,482	2,849
Total exports	49,094	56,720	53,903
	Share of quantity (percent)		
United States	---	0.1	7.0
Slovenia	45.0	59.4	60.7
Germany	17.3	16.4	12.6
Russia	15.7	6.2	5.0
Poland	3.5	3.8	3.1
Italy	3.1	2.3	2.3
Netherlands	2.0	2.3	2.1
Switzerland	1.1	1.1	1.0
Slovakia	0.9	0.5	1.0
All other destination markets	11.3	7.9	5.3
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official imports statistics of imports from Serbia (constructed export statistics for Serbia) under HS subheading 7606.11, 7606.12, 7606.91, and 7606.92 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed March 30 and 31, 2020.

The industry in Slovenia

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export CAAS from Slovenia.¹¹⁴ The Commission received a usable questionnaire response from one firm: Impol d.o.o. This firm's exports to the United States accounted for the large majority of U.S. imports of CAAS from Slovenia in 2019. According to estimates requested of the responding Slovenian producer, Impol d.o.o., its production of CAAS in Slovenia accounts all production of CAAS in Slovenia. Table VII-59 presents information on the CAAS operations of the Impol d.o.o. in Slovenia.

Table VII-59
CAAS: Summary data for Slovenian producer Impol d.o.o., 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Impol d.o.o.	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

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

Changes in operations

As presented in table VII-60 Impol d.o.o. reported several operational and organizational changes since January 1, 2017.

Table VII-60
CAAS: Slovenian producer Impol d.o.o.'s reported changes in operations, since January 1, 2017

Item / Firm	Reported changed in operations
Other:	
***	***

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

¹¹⁴ These firms were identified through a review of information submitted in the petition and contained in *** records.

Operations on CAAS

Table VII-61 presents information on the CAAS operations of Slovenian producer Impol d.o.o. During 2017-19, Impol d.o.o.'s capacity to produce CAAS increased by *** percent while its production of CAAS increased by *** percent. The increases in capacity and production are consistent with Impol d.o.o.'s reported ***.¹¹⁵ Capacity utilization increased by *** percentage points during 2017-19. Capacity is projected to remain constant, during 2020 and 2021, while production is projected to increase by *** percent during between 2019 and 2021.

During 2017-18, export shipment to the United States increased from *** short tons in 2017 to *** short tons in 2018. During 2018-19, export shipments to the United States decreased by *** percent. During 2017-19, home market shipments increased by *** percent, while export shipments to all other markets decreased overall by *** percent. Export shipments to the United States as a share of total shipments increased during 2017-19, ranging from *** percent to *** percent.¹¹⁶ During 2017-19, export shipments to other markets as a share of total shipments decreased by *** percentage points.¹¹⁷ Export shipments to the United States are projected to decrease by *** percent between 2019 and 2021. Export shipments to the United States as a share of total shipments are projected to decrease by *** percentage points during the same period.

¹¹⁵ Impol d.o.o.'s foreign producer questionnaire, II-2a.

¹¹⁶ Impol d.o.o attributed the increased exports to the United States to ***. Impol d.o.o. reported ***. Impol d.o.o.'s foreign producer questionnaire revisions, II-10

¹¹⁷ Other major export markets included ***. Impol d.o.o.'s foreign producer questionnaire, II-8.

Table VII-61

CAAS: Data for Slovenian producer Impol d.o.o., 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	Ratios and shares (percent)				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Alternative products

As shown in table VII-62, Impol d.o.o. produced other products on the same equipment and machinery used to produce CAAS.¹¹⁸

¹¹⁸ Other products included ***. Impol d.o.o.'s foreign producer questionnaire, II-3a.

Table VII-62

CAAS: Overall capacity and production on the same equipment as in-scope production by Slovenian producer Impol d.o.o., 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Overall capacity	***	***	***
Production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	Ratios and shares (percent)		
Overall capacity utilization	***	***	***
Share of production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Impol d.o.o. was asked about constraints on production capacity and the ability to switch production between CAAS to other products. Impol d.o.o reported that its overall capacity is ***.¹¹⁹

Impol d.o.o reported a ***. Impol d.o.o further reported that its ability to shift production capacity between CAAS and ***.¹²⁰

¹¹⁹ Impol d.o.o.'s foreign producer questionnaire, II-3d.

¹²⁰ Impol d.o.o.'s foreign producer questionnaire, II-4.

Exports

Data on Slovenia's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) are presented in table VII-63. According to GTA, the leading export markets for aluminum plates, sheets and strip from Slovenia are Germany, Italy, and the Czech Republic. During 2019, the United States was the fifth largest export market for aluminum plates, sheets and strip from Slovenia, accounting for 5.1 percent of Slovenia's total exports. Germany, Italy and the Czech Republic accounted for 21.5 percent, 15.7 percent and 10.9 percent of total exports, respectively.

Table VII-63
Aluminum plates, sheets and strip: Exports from Slovenia by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	32	7,399	5,092
Germany	12,282	16,995	21,548
Italy	10,438	13,188	15,760
Czech Republic	2,267	6,959	10,915
France	2,698	5,588	8,160
Slovakia	251	2,155	4,890
Austria	2,058	2,877	4,017
Spain	2,267	2,431	3,885
United Kingdom	290	1,029	3,823
All other destination markets	11,174	14,715	22,185
Total exports	43,756	73,334	100,274
	Share of quantity (percent)		
United States	0.1	10.1	5.1
Germany	28.1	23.2	21.5
Italy	23.9	18.0	15.7
Czech Republic	5.2	9.5	10.9
France	6.2	7.6	8.1
Slovakia	0.6	2.9	4.9
Austria	4.7	3.9	4.0
Spain	5.2	3.3	3.9
United Kingdom	0.7	1.4	3.8
All other destination markets	25.5	20.1	22.1
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7606.11, 7606.12, 7606.91, and 7606.92 as reported by Statistics Serbia and Montenegro in the Global Trade Atlas database, accessed March 30 and 31, 2020..

The industry in South Africa

The Commission issued a foreign producers' or exporters' questionnaire to one firm believed to produce and/or export CAAS from South Africa.¹²¹ The Commission received a usable questionnaire response from one firm: Hulamin Operations Proprietary Limited ("Hulamin"). This firm's exports to the United States accounted for the large majority of U.S. imports of CAAS from South Africa in 2019. According to estimates requested of the responding South Africa producer, Hulamin, its production of CAAS in South Africa accounts all production of CAAS in South Africa. Table VII-64 presents information on the CAAS operations of Hulamin in South Africa.

Table VII-64
CAAS: Summary data from South African producer Hulamin, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Hulamin	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

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

Changes in operations

As presented in table VII-65 Hulamin reported one operational or organizational change since January 1, 2017.

Table VII-65
CAAS: South African producer Hulamin reported changes in operations, since January 1, 2017

Item / Firm	Reported changes in operations
Other:	
Hulamin	***

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

¹²¹ This firm was identified through a review of information submitted in the petition and contained in *** records.

Operations on CAAS

Table VII-66 presents information on the CAAS operations of South African producer Hulamin. During 2017-19, Hulamin's capacity to produce CAAS remained constant, while its production of CAAS fluctuated, but increased by *** percent from 2017 to 2019. Capacity utilization also fluctuated, but increased by *** percentage points during 2017-19. Capacity is projected to remain constant during 2020 and 2021, while production is projected to fluctuate but decrease overall by *** percent between 2019 and 2021.

Export shipments to the United States fluctuated during 2017-19, but increased overall by *** percent, while home market shipments decreased by *** percent during 2017-19.¹²² Export shipments to the United States as a share of total shipments increased from *** percent to *** percent during 2017-19, while total home market shipments as a share of total shipments and export shipments to other markets as a share of total shipments both decreased, falling by *** percentage points and by *** percentage points, respectively.¹²³ Export shipments to the United States are projected to fluctuate but decrease overall by *** percent between 2019 and 2021. Total Export shipments as a share of total shipments are also projected to decrease from *** percent in 2019 to *** percent in 2020 and 2021.

¹²² Hulamin reported that ***. Hulamin's foreign producer questionnaire, II-10.

¹²³ Other principal export markets include ***. Hulamin's foreign producer questionnaire, II-8.

Table VII-66

CAAS: Data for South African producer Hulamin, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	Ratios and shares (percent)				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Alternative products

As shown in table VII-67, Hulamin produced other products on the same equipment and machinery used to produce CAAS. Products include out-of-scope aluminum can stock, aluminum foil, aluminum plate and other products.¹²⁴

Table VII-67

CAAS: Overall capacity and production on the same equipment as in-scope production by South African producer Hulamin 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Overall capacity	***	***	***
Production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	Ratios and shares (percent)		
Overall capacity utilization	***	***	***
Share of production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Hulamin was asked about constraints on production capacity and the ability to switch production between CAAS to other products. Hulamin reported that its overall capacity is limited by ***, while ***.¹²⁵

¹²⁴ Other out of scope products Hulamin reported producing on the same machinery as CAAS included ***. Hulamin's foreign producer questionnaire, II-3a.

¹²⁵ Hulamin's foreign producer questionnaire response, II-3d.

Hulamin reported a ***. Hulamin further reported that its ability to shift production capacity between CAAS and other products is ***.¹²⁶

Exports

Data on South Africa's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) are presented in table VII-68. According to GTA, the leading export markets for aluminum plates, sheets and strip from South Africa are the United States, Belgium and the United Kingdom. During 2019, the United States was the top export market for aluminum plates, sheets and strip from South Africa, accounting for 42.9 percent of South Africa's total exports. Belgium and the United Kingdom accounted for 12.3 percent and 11.3 percent of total South African exports, respectively.

¹²⁶ Hulamin's foreign producer questionnaire response, II-4. Hulamin reported being able to shift ***. Ibid.

Table VII-68**Aluminum plates, sheets and strip: Exports from South Africa by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	55,301	79,801	60,006
Belgium	20,298	18,335	17,252
United Kingdom	6,354	9,276	15,833
Germany	11,506	10,394	8,631
Brazil	4,258	5,886	8,363
Australia	6,030	5,862	5,521
France	1,850	2,361	5,092
Ireland	154	352	3,227
Poland	1,737	4,346	2,941
All other destination markets	38,666	29,510	13,104
Total exports	146,153	166,122	139,971
	Share of quantity (percent)		
United States	37.8	48.0	42.9
Belgium	13.9	11.0	12.3
United Kingdom	4.3	5.6	11.3
Germany	7.9	6.3	6.2
Brazil	2.9	3.5	6.0
Australia	4.1	3.5	3.9
France	1.3	1.4	3.6
Ireland	0.1	0.2	2.3
Poland	1.2	2.6	2.1
All other destination markets	26.5	17.8	9.4
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7606.11, 7606.12, 7606.91, and 7606.92 as reported by South African Revenue Service in the Global Trade Atlas database, accessed March 30 and 31, 2020.

The industry in Spain

The Commission issued foreign producers' or exporters' questionnaires to 16 firms believed to produce and/or export CAAS from Spain.¹²⁷ Usable responses to the Commission's questionnaire were received from two firms: Aludium Transformacion De Productos S.L. ("Aludium") and Jose Maria Ucin S.A. U. ("Jose Maria").¹²⁸ These firms' exports to the United States accounted for the large majority of U.S. imports of CAAS from Spain in 2019. According to estimates requested of the responding Spanish producers, the production of CAAS in Spain reported in questionnaires accounts for approximately *** percent of overall production of CAAS in Spain. Table VII-69 presents information on the CAAS operations of the responding producers and exporters in Spain.

According to information provided in questionnaire responses, ***. According to the company website, Aludium has two aluminum manufacturing facilities in Spain (in Amorebieta and Alicante), as well as an aluminum research and development and prototyping facility (Alicante), in Spain.¹²⁹

José María Ucin Sau, also known as "UCIN Alumino" produces 30,000 metric tons (or 33,069 short tons) of aluminum products a year. Approximately 80 percent of this product is exported and 90 percent is made from recycled aluminum.¹³⁰ The firm's aluminum sheet factory is located in Usúrbil, Spain.¹³¹ According to the questionnaire ***

¹²⁷ These firms were identified through a review of information submitted in the petition and contained in *** records.

¹²⁸ The Commission also received a response from one firm ***, certifying that they had not produced or exported CAAS since January 1, 2017.

¹²⁹ Aludium, "About Us," <https://aludium.com/aludium/supplier-of-aluminium/>, retrieved March 31, 2020.

¹³⁰ José María Ucin Sau, "Home – Manufacturer of Rolled Aluminum Since 1967," <https://www.ucinaluminio.com/en/>, retrieved March 31, 2020.

¹³¹ José María Ucin Sau, "Aluminium Sheets," <https://www.ucinaluminio.com/en/products/aluminium-sheets/>, retrieved March 31, 2020.

*** The company’s products are available in 1XXX, 3XXX, 5XXX, and 8XXX series alloys and are produced with thicknesses ranging between 0.25 mm and 2.5 mm.¹³²

Compania Valencia De Aluminio is the aluminum manufacturing branch of the Baux Group which also includes an aluminum coating business, Bancolor. In December 2018, Baux group was acquired by Jupiter Aluminum Corporation, headquartered in the United States. Compania Valencia De Aluminio’s production facility is located in Segorbe, Castellón, Spain. The factory uses 100 percent scrap metal and a twin-belt casting process to produce almost 50,000 metric tons of aluminum coil. The factory has a production capacity of 70,000 metric tons. The company currently exports to twelve countries.¹³³

Many Spanish firms within the industry appear to focus on more downstream production including aluminum coating, coloring, and surface treatment – such as Alucoat,¹³⁴ and Aluminios Andalucia,¹³⁵ or the manufacturing of packaging products such as those made by Constania Topebal Logrono.¹³⁶

Table VII-69
CAAS: Summary data for producers in Spain, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Jose Maria	***	***	***	***	***	***
Aludium	***	***	***	***	***	***
Total	***	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

¹³² Ibid.

¹³³ Baux, “Home,” <https://baux.es/en/>, retrieved March 31, 2020.

¹³⁴ Alucoat, “Home,” <https://www.alucoat-conversion.com/>, retrieved March 31, 2020.

¹³⁵ Aluminios Andalucia, “Home,” <http://grupoandalucia.es/?lang=en#>, retrieved March 31, 2020.

¹³⁶ Constania Topebal Logrono, “Who We Are,” <https://www.cflex.com/locations/constantia-tobepal-logrono-spain>, retrieved March 31, 2020.

Changes in operations

As presented in table VII-70 producers in Spain reported several operational and organizational changes since January 1, 2017.

Table VII-70

CAAS: Spanish producers' reported changes in operations, since January 1, 2017

Item / Firm	Reported changed in operations
Expansions:	
***	***
Revised labor agreements:	
***	***
***	***

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

Operations on CAAS

Table VII-71 presents information on the CAAS operations of the responding producers and exporters in Spain. CAAS production capacity remained constant during 2017-19, while production fluctuated but decreased overall by *** percent during the same period. Capacity utilization decreased by *** percentage points during 2017-19. Capacity is projected to remain constant during 2020 and 2021, while production is projected to fluctuate but decrease overall by *** percent between 2019 and 2021.

Aludium and Jose Maria ***. During 2018-19 export shipments to the United States increased by *** percent. Total home market shipments and export shipments to other markets both decreased during 2017-19, by *** percent and by *** percent respectively. Export shipments to the United States as a share of total shipments increased from *** percent to *** percent during 2017-19. Total home market shipments as a share of total shipments decreased by *** percentage points during 2017-19, while export shipments to other markets as a share of total shipments decreased by *** percentage points.¹³⁷ Export shipments to the United States are projected to increase by *** percent between 2019 and 2021. Export shipments to the United States as a share of total shipments are also projected to increase by *** percentage points during 2019-21.

¹³⁷ Other principal export markets include ***. Foreign producer questionnaire, II-8, responses of Aludium and Jose Maria.

Table VII-71

CAAS: Data for producers in Spain, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	Ratios and shares (percent)				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Alternative products

As shown in table VII-72, responding Spanish firms produced other products on the same equipment and machinery used to produce CAAS. Other products include out-of-scope aluminum foil, aluminum plate and other products.¹³⁸

Table VII-72

CAAS: Spanish producers' overall capacity and production on the same equipment as in-scope production, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Overall capacity	***	***	***
Production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	Ratios and shares (percent)		
Overall capacity utilization	***	***	***
Share of production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Firms were asked about constraints on production capacity and the ability to switch production between CAAS to other products. Aludium reported that its capacity is constrained by ***. Jose Maria reported that its capacity is constrained by ***.¹³⁹

¹³⁸ Other products included ***. Aludium's foreign producer questionnaire, II-3a.

¹³⁹ Foreign producer questionnaire, II-3d, responses of Aludium and Jose Maria.

*** reported being ***, while *** reported being ***.¹⁴⁰

Exports

Data on Spain's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) are presented in table VII-73. According to GTA, the leading export markets for aluminum plates, sheets and strip from Spain are France, Germany, Italy and the Netherlands. During 2019, the United States was the fifth largest export market for aluminum plates, sheets and strip from Spain, accounting for 7.4 percent of Spain's total exports. France, Germany, Italy and the Netherlands accounted for 28.9 percent, 23.5 percent, 7.9 percent and 7.5 percent of total Spanish exports, respectively.

¹⁴⁰ Foreign producer questionnaire, II-4, responses of Aludium and Jose Maria.

Table VII-73**Aluminum plates, sheets and strip: Exports from Spain by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	1,679	6,115	20,798
France	78,798	78,539	81,391
Germany	75,791	83,678	66,261
Italy	19,779	19,132	22,298
Netherlands	19,937	20,432	21,148
United Kingdom	21,277	21,983	12,426
Portugal	9,311	9,526	11,236
Switzerland	12,936	8,004	8,451
Algeria	2,159	2,439	3,403
All other destination markets	34,006	35,568	34,175
Total exports	275,674	285,416	281,586
	Share of quantity (percent)		
United States	0.6	2.1	7.4
France	28.6	27.5	28.9
Germany	27.5	29.3	23.5
Italy	7.2	6.7	7.9
Netherlands	7.2	7.2	7.5
United Kingdom	7.7	7.7	4.4
Portugal	3.4	3.3	4.0
Switzerland	4.7	2.8	3.0
Algeria	0.8	0.9	1.2
All other destination markets	12.3	12.5	12.1
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7606.11, 7606.12, 7606.91, and 7606.92 as reported by Eurostat in the Global Trade Atlas database, accessed March 30 and 31, 2020.

The industry in Taiwan

The Commission issued foreign producers' or exporters' questionnaires to eleven firms believed to produce and/or export CAAS from Taiwan.¹⁴¹ The Commission received a usable questionnaire response from one firm: C.S. Aluminium Corporation ("C.S. Aluminium").¹⁴² This firm's exports to the United States accounted for all or virtually all U.S. imports of CAAS from Taiwan in 2019. According to estimates requested of the responding producer in Taiwan, C.S. Aluminium, its production of CAAS in Taiwan accounts for approximately *** percent of overall production of CAAS in Taiwan. Table VII-74 presents information on the CAAS operations of C.S. Aluminium in Taiwan.

Table VII-74
CAAS: Summary data for Taiwan producer C.S. Aluminium, 2019

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
C. S. Aluminium	***	100.0	***	100.0	***	***
Total	***	100.0	***	100.0	***	***

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

Changes in operations

C.S. Aluminium reported no operational and organizational changes since January 1, 2017.

Operations on CAAS

Table VII-75 presents information on the CAAS operations of Taiwan producer C.S. Aluminium. During 2017-19, C.S. Aluminium's capacity to produce CAAS remained constant, while its production of CAAS fluctuated but increased by *** percent from 2017 to 2019. Capacity utilization also fluctuated but increased by *** percentage points during 2017-19.

¹⁴¹ These firms were identified through a review of information submitted in the petition and contained in *** records.

¹⁴² The Commission also received responses from two firms, ***, certifying that they had not produced or exported CAAS since January 2017.

Capacity is projected to remain constant during 2020 and 2021, while production is projected to decrease by *** percent between 2019 and 2021.

Export shipments to the United States increased from *** short tons in 2017 to *** short tons in 2019. During 2017-19, home market shipments and export shipments to other markets decreased by *** percent and by *** percent, respectively. Export shipments to the United States as a share of total shipments increased from *** percent to *** percent during 2017-19, while total home market shipments as a share of total shipments and export shipments to other markets as a share of total shipments both decreased, falling by *** percentage points and by *** percentage points, respectively.¹⁴³ Export shipments to the United States are projected to decrease by *** percent between 2019 and 2021. Total export shipments as a share of total shipments are also projected to decrease from *** percent in 2019 to *** percent in 2020 and 2021.

¹⁴³ Other principal export markets include ***. C.S. Aluminum's foreign producer questionnaire, II-8.

Table VII-75

CAAS: Data for Taiwan producer C.S. Aluminium, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	Ratios and shares (percent)				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Alternative products

As shown in table VII-76, C.S. Aluminium produced other products on the same equipment and machinery used to produce CAAS. Other products include out-of-scope aluminum can stock, aluminum foil, aluminum plate and other products.¹⁴⁴

Table VII-76

CAAS: Overall capacity and production on the same equipment as in-scope production by C.S. Aluminium in Taiwan, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Overall capacity	***	***	***
Production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	Ratios and shares (percent)		
Overall capacity utilization	***	***	***
Share of production:			
CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

C.S. Aluminium was asked about constraints on production capacity and the ability to switch production between CAAS to other products. C.S. Aluminium reported that its overall capacity is limited by ***.¹⁴⁵

¹⁴⁴ C.S. Aluminium reported other products included ***. C.S. Aluminium's foreign producer questionnaire, II-3a.

¹⁴⁵ C.S. Aluminium's foreign producer questionnaire, II-3d.

C.S. Aluminium reported it is ***. C.S. Aluminium further reported that its ability to shift production capacity between CAAS and ***.¹⁴⁶

Exports

Data on Taiwan's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) are presented in table VII-77. According to GTA, the leading export markets for aluminum plates, sheets and strip from Taiwan are the United States, China and Japan. During 2019, the United States was the top export market for aluminum plates, sheets and strip from Taiwan, accounting for 53.5 percent of Taiwan's total exports. China and Japan accounted for 19.5 percent and 10.5 percent of total Taiwanese exports, respectively.

¹⁴⁶ C.S. Aluminum's foreign producer questionnaire, II-4.

Table VII-77**Aluminum plates, sheets and strip: Exports from Taiwan by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	670	44,744	57,837
China	37,290	21,256	21,063
Japan	8,432	8,691	11,364
Thailand	9,208	9,627	5,866
Vietnam	5,407	4,320	2,495
Malaysia	2,599	3,184	2,382
Hong Kong	5,316	5,660	2,110
Singapore	785	1,274	1,415
Korea	1,636	1,585	1,018
All other destination markets	3,858	2,825	2,631
Total exports	75,201	103,165	108,180
	Share of quantity (percent)		
United States	0.9	43.4	53.5
China	49.6	20.6	19.5
Japan	11.2	8.4	10.5
Thailand	12.2	9.3	5.4
Vietnam	7.2	4.2	2.3
Malaysia	3.5	3.1	2.2
Hong Kong	7.1	5.5	2.0
Singapore	1.0	1.2	1.3
Korea	2.2	1.5	0.9
All other destination markets	5.1	2.7	2.4
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.91, and 7606.92, as reported by Taiwan Directorate General of Customs in the Global Trade Atlas database, accessed March 30 and 31, 2020.

The industry in Turkey

The Commission issued foreign producers' or exporters' questionnaires to 19 firms believed to produce and/or export CAAS from Turkey.¹⁴⁷ Usable responses to the Commission's questionnaire were received from five firms: Almesan Aluminyum San VE TIC A.S. ("Almesan"), ASAS Aluminyum Sanayi ve Ticart A.S. ("ASAS"), Assan Aluminyum Sanayi ve Ticart A.S. ("Assan"), Teknik Aluminyum San A.S. ("Teknik"), and VIG Metal San. TIC. A.S. ("VIG Metal").¹⁴⁸ These firms' exports to the United States accounted for the large majority of U.S. imports of CAAS from Turkey in 2019. According to estimates requested of the responding producers, the production of CAAS in Turkey reported in questionnaires accounts for approximately *** percent of overall production of CAAS in Turkey. Table VII-78 presents information on the CAAS operations of the responding producers and exporters in Turkey.

Table VII-78
CAAS: Summary data for producers in Turkey, 2017-19

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Almesan	***	***	***	***	***	***
ASAŞ	***	***	***	***	***	***
Assan.	***	***	***	***	***	***
Teknik	***	***	***	***	***	***
VIG Metal	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

Changes in operations

As presented in table VII-79 producers in Turkey reported several operational and organizational changes since January 1, 2017.

¹⁴⁷ These firms were identified through a review of information submitted in the petition and contained in *** records.

¹⁴⁸ The Commission also received responses from two firms, ***, certifying that they had not produced or exported CAAS since January 2017.

Table VII-79

CAAS: Reported changes in operations by producers in Turkey, since January 1, 2017

Item / Firm	Reported changed in operations
Expansions:	
***	***
***	***
Acquisitions:	
***	***
Prolonged shutdowns or curtailments:	
***	***
Revised labor agreements:	
***	***

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

Operations on CAAS

Table VII-80 presents information on the CAAS operations of the responding producers and exporters in Turkey. Capacity increased by *** percent during 2017-19. Production similarly increased by *** percent during the same period. These increases in capacity and production were consistent with changes in *** operations. These trends primarily reflect developments at *** as well as ***, which reported the ***. *** also reported that their ***.¹⁴⁹ Capacity utilization increased by *** percentage points during 2017-19. Capacity is projected to remain constant during 2020 and 2021, while production is projected to increase by *** percent between 2019 and 2021.

Total home market shipments, export shipments to the United States and export shipments to other markets all increased during 2017-19, by *** percent, by *** percent and by *** percent respectively. Export shipments to the United States as a share of total shipments increased from *** percent to *** percent during 2017-19. Total home market shipments as a share of total shipments decreased by *** percentage points during 2017-19, while export shipments to other markets as a share of total shipments decreased by ***

¹⁴⁹ Foreign producer questionnaire, II-2a, responses of ***.

percentage points.¹⁵⁰ Export shipments to the United States are projected to increase by *** percent between 2019 and 2021.¹⁵¹ Export shipments to the United States as a share of total shipments are also projected to fluctuate but increase overall from *** percent in 2019 to *** percent in 2021.

¹⁵⁰ Other principal export markets include ***. Foreign producer questionnaire, II-8, responses of Almesan, ASAS, Assan, VIG Metal and Teknik.

¹⁵¹ *** reported projected exports of *** to the United States in 2020. *** foreign producer questionnaire, II-9.

Table VII-80

CAAS: Data for producers in Turkey, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	Ratios and shares (percent)				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

Table continued on next page.

Table VII-80--Continued

CAAS: Data for producers in Turkey, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Resales exported to the United States	***	***	***	***	***
Total exports to the United States	***	***	***	***	***
	Ratios and shares (percent)				
Share of total exports to the United States:					
Exported by producers	***	***	***	***	***
Exported by resellers	***	***	***	***	***
Adjusted share of total shipments exported to the United States	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Alternative products

As shown in table VII-81, responding Turkish firms produced other products on the same equipment and machinery used to produce CAAS. Products included out-of-scope, aluminum foil, and other products.

Table VII-81

CAAS: Overall capacity and production on the same equipment as in-scope production by producers in Turkey, 2017-19

Item	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
Overall capacity	***	***	***
Production: CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	Ratios and shares (percent)		
Overall capacity utilization	***	***	***
Share of production: CAAS	***	***	***
Can stock	***	***	***
Foil	***	***	***
Plate	***	***	***
Other	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Firms were asked about their constraints on production capacity and the ability to switch production between CAAS to other products. Almesan reported that its capacity is constrained by ***. ASAS reported that its capacity is constrained by ***. Assan reported that its capacity is constrained by ***. Teknik reported that its capacity is constrained by ***. Vig Metal reported that its capacity is constrained by ***.¹⁵²

Three firms reported that they ***, while *** and *** reported being able to switch production between ***.¹⁵³

¹⁵² Foreign producer questionnaire, II-3d, responses of Almesan, ASAS, Assan, VIG Metal and Teknik.

¹⁵³ Foreign producer questionnaire, II-4, responses of Almesan, ASAS, Assan, VIG Metal and Teknik.

Exports

Data on Turkey's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2 mm) are presented in table VII-82. According to GTA, the leading export markets for aluminum plates, sheets and strip from Turkey are the United States, Germany and the United Kingdom. During 2019, the United States was the top export market for aluminum plates, sheets and strip from Turkey, accounting for 16.9 percent of Turkey's total exports. Germany and the United Kingdom accounted for 14.3 percent and 11.3 percent of total Turkish exports, respectively. During 2017-19, CAAS exports to the United States increased 658.7 percent.

Table VII-82**Aluminum plates, sheets and strip: Exports from Turkey by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	5,938	34,164	45,052
Germany	36,999	33,337	38,006
United Kingdom	24,861	26,754	30,220
Switzerland	23,714	18,448	21,180
Italy	13,528	15,333	19,074
Spain	14,145	16,996	17,641
Poland	10,359	10,396	14,736
Austria	12,193	10,199	13,153
France	11,423	12,769	12,524
All other destination markets	50,122	52,073	55,013
Total exports	203,283	230,468	266,598
	Share of quantity (percent)		
United States	2.9	14.8	16.9
Germany	18.2	14.5	14.3
United Kingdom	12.2	11.6	11.3
Switzerland	11.7	8.0	7.9
Italy	6.7	6.7	7.2
Spain	7.0	7.4	6.6
Poland	5.1	4.5	5.5
Austria	6.0	4.4	4.9
France	5.6	5.5	4.7
All other destination markets	24.7	22.6	20.6
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheadings 7606.11, 7606.12, 7606.91, and 7606.92, as reported by State Institute in the Global Trade Atlas database, accessed March 30 and 31, 2020.

Subject countries combined

Table VII-83 presents summary data on CAAS operations of the reporting subject producers in the subject countries. Aggregate subject producers CAAS capacity increased by 1.4 percent during 2017-19, while aggregate CAAS production increased by 5.7 percent during the same period. Aggregate capacity utilization increased by 3.6 percentage points between 2017 and 2019. During 2019-21, aggregate capacity and aggregate production are both projected to fluctuate but increase overall by 1.6 percent and by 3.2 percent respectively.

During 2017-19, aggregate export shipments to the United States increased by 133.0 percent, while aggregate total home market shipments and aggregate export shipments to all other countries decreased by 3.8 percent and by 9.2 percent respectively. Export shipments to the United States as a share of subject producer's total shipments increased from 9.0 percent to 19.7 percent between 2017 and 2019. Export shipments to the United States are projected to decrease by 16.3 percent during 2019-21, and export shipments as a share of subject producer's total shipments are projected to decline by 1.6 percentage points during the same period.

Table VII-83

CAAS: Data on the industry in subject countries, 2017-19 and projection calendar years 2020 and 2021

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	Quantity (short tons)				
Capacity	3,426,446	3,400,657	3,474,236	3,461,346	3,528,338
Production	2,851,680	2,978,145	3,015,359	2,991,026	3,110,419
End-of-period inventories	213,833	219,398	220,549	212,823	203,694
Shipments:					
Home market shipments:					
Internal consumption/ transfers	262,358	289,840	324,191	341,582	355,086
Commercial home market shipments	1,020,394	959,818	910,369	923,324	971,177
Total home market shipments	1,282,752	1,249,658	1,234,560	1,264,906	1,326,263
Export shipments to:					
United States	255,456	485,809	595,286	468,527	498,124
All other markets	1,305,892	1,235,625	1,185,176	1,265,897	1,296,203
Total exports	1,561,348	1,721,434	1,780,462	1,734,424	1,794,327
Total shipments	2,844,100	2,971,092	3,015,022	2,999,333	3,120,590
	Ratios and shares (percent)				
Capacity utilization	83.2	87.6	86.8	86.4	88.2
Inventories/production	7.5	7.4	7.3	7.1	6.5
Inventories/total shipments	7.5	7.4	7.3	7.1	6.5
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	9.2	9.8	10.8	11.4	11.4
Commercial home market shipments	35.9	32.3	30.2	30.8	31.1
Total home market shipments	45.1	42.1	40.9	42.2	42.5
Export shipments to:					
United States	9.0	16.4	19.7	15.6	16.0
All other markets	45.9	41.6	39.3	42.2	41.5
Total exports	54.9	57.9	59.1	57.8	57.5
Total shipments	100.0	100.0	100.0	100.0	100.0
	Quantity (short tons)				
Resales exported to the United States	845	641	1,067	8,591	825
Total exports to the United States	256,301	486,450	596,353	477,118	498,949
	Ratios and shares (percent)				
Share of total exports to the United States:					
Exported by producers	99.7	99.9	99.8	98.2	99.8
Exported by resellers	0.3	0.1	0.2	1.8	0.2
Adjusted share of total shipments exported to the United States	9.0	16.4	19.8	15.9	16.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

U.S. inventories of imported merchandise

Table VII-84 presents data on U.S. importers' reported inventories of CAAS. Inventories of CAAS imports from subject countries increased by 292.5 percent between 2017 and 2019, while inventories of CAAS imports from nonsubject countries decreased by 62.5 percent. The ratio of importer's subject inventories to U.S. shipments of imports varied during 2017-19, but increased overall from 26.1 percent to 45.0 percent.

Table VII-84

CAAS: U.S. importers' end-of-period inventories of imports by source, 2017-19

Item	Calendar year		
	2017	2018	2019
	Inventories (short tons); Ratios (percent)		
Imports from Bahrain: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Brazil: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Croatia: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Egypt: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Germany: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Greece: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***

Table continued next page.

Table VII-84--Continued

CAAS: U.S. importers' end-of-period inventories of imports by source, 2017-19

Item	Calendar year		
	2017	2018	2019
	Inventories (short tons); Ratios (percent)		
Imports from India: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Indonesia: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Italy: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Korea: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Oman: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Romania: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***

Table continued next page.

Table VII-84--Continued

CAAS: U.S. importers' end-of-period inventories of imports by source, 2017-19

Item	Calendar year		
	2017	2018	2019
	Inventories (short tons); Ratios (percent)		
Imports from Serbia: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Slovenia: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from South Africa: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Spain: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Taiwan: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Turkey: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***

Table continued next page.

Table VII-84--Continued

CAAS: U.S. importers' end-of-period inventories of imports by source, 2017-19

Item	Calendar year		
	2017	2018	2019
	Inventories (short tons); Ratios (percent)		
Imports from subject sources:			
Inventories	60,166	163,698	236,173
Ratio to U.S. imports	23.8	35.2	39.6
Ratio to U.S. shipments of imports	26.1	45.5	45.0
Ratio to total shipments of imports	26.0	45.4	45.0
Imports from nonsubject sources:			
Inventories	102,854	59,346	38,558
Ratio to U.S. imports	30.6	38.0	81.6
Ratio to U.S. shipments of imports	32.3	30.0	57.4
Ratio to total shipments of imports	32.2	29.8	56.5
Imports from all import sources:			
Inventories	163,020	223,044	274,731
Ratio to U.S. imports	27.7	35.9	42.7
Ratio to U.S. shipments of imports	29.7	40.0	46.4
Ratio to total shipments of imports	29.6	39.8	46.3

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of CAAS from after January 1, 2020. 60 of 79 responding firms indicated they had arranged subject imports. These data are presented in table VII-85. Responding importers of CAAS reported that 37.4 percent of arranged import are from subject sources.

Table VII-85
CAAS: Arranged imports, January through December 2020

Item	Period				Total
	Jan-Mar 2020	Apr-Jun 2020	Jul-Sept 2020	Oct-Dec 2020	
	Quantity (short tons)				
Arranged U.S. imports from.--					
Bahrain	***	***	***	***	***
Brazil	***	***	***	***	***
Croatia	***	***	***	***	***
Egypt	***	***	***	***	***
Germany	***	***	***	***	***
Greece	***	***	***	***	***
India	***	***	***	***	***
Indonesia	***	***	***	***	***
Italy	***	***	***	***	***
Korea	***	***	***	***	***
Oman	***	***	***	***	***
Romania	***	***	***	***	***
Serbia	***	***	***	***	***
Slovenia	***	***	***	***	***
South Africa	***	***	***	***	***
Spain	***	***	***	***	***
Taiwan	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	105,136	103,331	13,096	7,502	229,065
Nonsubject sources	164,196	216,923	857	835	382,811
All import sources	269,332	320,254	13,953	8,337	611,876

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Antidumping or countervailing duty orders in third-country markets

While petitioners and certain respondents noted that no third countries have active antidumping and countervailing duty orders on the subject countries in these investigations, third countries have issued antidumping duty orders on certain flat-rolled aluminum products, including CAAS, from non-subject countries such as China and Azerbaijan.¹⁵⁴ According to the World Trade Organization's Antidumping Gateway database, members of the Eurasian Economic Union (including Armenia, Kazakhstan, Kyrgyzstan, and Russia) have issued antidumping duty orders on imports of flat-rolled aluminum products (classified under HS subheadings 7606.11 and 7606.12) from Azerbaijan and China.¹⁵⁵ In addition, Argentina has active antidumping orders in place on imports of aluminum sheet imported under HS subheadings 7606.91 and 7606.92 from China.¹⁵⁶

Information on nonsubject countries

Data on global exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2mm) are presented in table VII-86. According to GTA, China, Germany, and the United States were the leading exporters of aluminum plates, sheets and strip. During 2019, China accounted for 25.3 percent of global exports. Germany and the United States accounted for 16.2 percent and 6.6 percent of global exports, respectively.

¹⁵⁴ Alro's postconference brief, Exhibit A, p. 4; HARP's postconference brief, Attachment 8, p. 2; Hulamin's postconference brief, Exhibit 1, p. 4; Petitioners' postconference brief, Exhibit 1, p. 16.

¹⁵⁵ Belarus is also a member of the Eurasian Economic Union, however it is not a member of the WTO. World Trade Organization, "Members and Observers," https://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm, retrieved April 2, 2020.

¹⁵⁶ Individual WTO members submit quarterly notification reports which are available at the following link: https://www.wto.org/english/tratop_e/adp_e/adp_e.htm.

Table VII-86
Aluminum plates, sheets and strip: Global exports by exporter, 2017-19

Exporter	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	947,473	911,206	746,686
Bahrain	119,603	125,262	100,575
Brazil	96,417	85,327	86,741
Croatia	65,819	70,572	93,987
Egypt	62,279	75,114	78,613
Germany	1,732,436	1,758,035	1,842,807
Greece	222,886	239,315	236,055
India	94,519	94,122	94,933
Indonesia	82,726	92,369	49,732
Italy	333,305	361,280	389,505
Korea	553,161	608,376	681,293
Oman	37,889	156,494	---
Romania	83,602	80,838	83,712
Serbia	49,094	56,720	53,903
Slovenia	43,756	73,334	100,274
South Africa	146,153	166,122	139,971
Spain	275,674	285,416	281,586
Taiwan	75,201	103,165	108,180
Turkey	203,283	230,468	266,598
China	2,288,486	3,080,668	2,883,866
France	521,496	526,632	536,334
Switzerland	337,416	318,810	315,132
Belgium	299,827	325,790	295,508
Austria	214,880	219,281	202,974
Japan	230,745	215,606	198,306
United Kingdom	185,016	202,921	183,275
Norway	168,847	163,698	167,697
All other exporters	1,223,389	1,297,056	1,166,135
Total	10,695,380	11,923,999	11,384,377

Table continued on next page.

Table VII-86--Continued

Aluminum plates, sheets and strip: Global exports by exporter, 2017-19

Exporter	Calendar year		
	2017	2018	2019
	Share of quantity (percent)		
United States	8.9	7.6	6.6
Bahrain	1.1	1.1	0.9
Brazil	0.9	0.7	0.8
Croatia	0.6	0.6	0.8
Egypt	0.6	0.6	0.7
Germany	16.2	14.7	16.2
Greece	2.1	2.0	2.1
India	0.9	0.8	0.8
Indonesia	0.8	0.8	0.4
Italy	3.1	3.0	3.4
Korea	5.2	5.1	6.0
Oman	0.4	1.3	---
Romania	0.8	0.7	0.7
Serbia	0.5	0.5	0.5
Slovenia	0.4	0.6	0.9
South Africa	1.4	1.4	1.2
Spain	2.6	2.4	2.5
Taiwan	0.7	0.9	1.0
Turkey	1.9	1.9	2.3
China	21.4	25.8	25.3
Germany	4.9	4.4	4.7
France	3.2	2.7	2.8
Switzerland	2.8	2.7	2.6
Belgium	2.0	1.8	1.8
Austria	2.2	1.8	1.7
Japan	1.7	1.7	1.6
United Kingdom	1.6	1.4	1.5
All other exporters	11.4	10.9	10.2
Total	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Mirror data for Bahrain, Egypt, and Serbia have been included.

Source: Official exports statistics under HS subheading 7606.11, 7606.12, 7606.91, and 7606.92 reported by various national statistical authorities in the Global Trade Atlas database, accessed March 30 and 31, 2020.

The industry in Canada

Canada is a leading nonsubject source of U.S. imports of flat-rolled aluminum products, including CAAS, and the two countries share a highly integrated aluminum supply chain.¹⁵⁷ Certain U.S. producers of CAAS also have operations in Canada. For example, Novelis has one aluminum rolling mill in Kingston, Ontario that produces various flat-rolled aluminum products for marine, transportation, and industrial applications. The Kingston facility also possesses annealing, cold rolling, and finishing equipment.¹⁵⁸

Data on Canada's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2mm) are presented in table VII-87. According to GTA, the leading export markets for aluminum plates, sheets and strip from Canada are the United States, China, and Turkey. During 2019, the United States accounted for 97.0 percent of Canada's total exports. China and Turkey accounted for 1.5 percent and 0.3 percent of Canada's total exports, respectively.

¹⁵⁷ The Aluminum Association, "Aluminum Association to Trump Administration: Use NAFTA Negotiation Process to Resolve Section 232 Aluminum Tariffs," September 10, 2018, <https://www.aluminum.org/news/aluminum-association-trump-administration-use-nafta-negotiation-process-resolve-section-232>, retrieved April 3, 2020.

¹⁵⁸ Novelis, "About Us," <https://novelis.com/about-us/locations/>, retrieved April 2, 2020.

Table VII-87**Aluminum plates, sheets and strip: Exports from Canada by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	175,012	158,543	145,554
China	1,834	2,969	2,290
Turkey	94	202	513
Hong Kong	0	203	356
Brazil	83	60	158
Indonesia	---	68	154
Malaysia	7	29	153
France	128	159	147
Peru	0	19	74
All other destination markets	998	1,141	630
Total exports	178,157	163,392	150,029
	Share of quantity (percent)		
United States	98.2	97.0	97.0
China	1.0	1.8	1.5
Turkey	0.1	0.1	0.3
Hong Kong	0.0	0.1	0.2
Brazil	0.0	0.0	0.1
Indonesia	---	0.0	0.1
Malaysia	0.0	0.0	0.1
France	0.1	0.1	0.1
Peru	0.0	0.0	0.0
All other destination markets	0.6	0.7	0.4
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7606.11, 7606.12, 7606.91, and 7606.92 as reported by Statistics Canada in the Global Trade Atlas database, accessed March 30 and 31, 2020.

The industry in Mexico

Like Canada, Mexico also shares a highly integrated aluminum supply chain with the United States and it is a leading nonsubject source for U.S. imports of flat-rolled aluminum products, including CAAS.¹⁵⁹ Industria Mexicana Del Aluminio ("Alemexa"), one of Mexico's largest producers of flat-rolled and extruded aluminum products, operates two facilities near

¹⁵⁹ The Aluminum Association, "Aluminum Association to Trump Administration: Use NAFTA Negotiation Process to Resolve Section 232 Aluminum Tariffs," September 10, 2018, <https://www.aluminum.org/news/aluminum-association-trump-administration-use-nafta-negotiation-process-resolve-section-232>, retrieved April 3, 2020.

Mexico City—one in Cuautitlán and another in Tulpetlac. The Cuautitlán facility produces aluminum discs and sheet products, while the Tulpetlac facility produces thinner gauge aluminum foil products. Combined, the two plants employ more than 600 workers and have an annual production capacity of more than 40,000 metric tons.¹⁶⁰ Alemexa has vertically integrated operations equipped with smelting furnaces and heat treating furnaces as well as hot and cold rolling mills.¹⁶¹

Data on Mexico's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2mm) are presented in table VII-88. According to GTA, the leading export markets for aluminum plates, sheets and strip from Mexico in 2018 are the United States, Panama, and Columbia. During 2018, the United States accounted for 78.8 percent of Mexico's total exports. Panama and Columbia accounted for 7.6 percent and 6.3 percent of Mexico's total exports, respectively.

¹⁶⁰ Alemexa, "About Alemexa," <http://www.almexa.com.mx/sobre-nosotros/acerca-de-nosotros/>, retrieved April 1, 2020.

¹⁶¹ Alemexa, "Infrastructure: Plants," <http://www.almexa.com.mx/infraestructura/plantas/>, retrieved April 1, 2020.

Table VII-88**Aluminum plates, sheets and strip: Exports from Mexico by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	3,441	7,098	5,817
Panama	53	681	-
Colombia	1,071	567	-
China	196	165	-
Dominican Republic	20	130	-
Guatemala	124	90	-
Czech Republic	0	51	-
Honduras	6	39	-
All other destination markets	228	184	-
Total exports	5,139	9,006	5,817
	Share of quantity (percent)		
United States	67.0	78.8	100.0
Panama	1.0	7.6	0.0
Colombia	20.9	6.3	0.0
China	3.8	1.8	0.0
Dominican Republic	0.4	1.5	0.0
Guatemala	2.4	1.0	0.0
Czech Republic	0.0	0.6	0.0
Honduras	0.1	0.4	0.0
All other destination markets	4.4	2.1	0.0
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data. Full-year 2019 trade data for Mexico are not readily available.

The industry in China

Data on China's exports of aluminum plates, sheets and strip (of a thickness exceeding 0.2mm) are presented in table VII-89. According to GTA, the leading export markets for aluminum plates, sheets and strip from China are Mexico, Korea, and the United States. During 2019, Mexico accounted for 10.6 percent of China's total exports. Korea and the United States accounted for 9.1 percent and 5.7 percent of China's total exports, respectively.

Table VII-89**Aluminum plates, sheets and strip: Exports from China by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	553,597	272,546	163,085
Mexico	97,556	176,136	306,096
Korea	209,640	345,783	263,834
Thailand	107,700	145,670	146,692
Vietnam	76,288	123,438	138,854
Indonesia	135,200	207,034	124,774
India	79,663	198,478	123,410
Nigeria	102,507	116,325	122,605
Canada	71,681	119,550	117,617
All other destination markets	854,654	1,375,707	1,376,899
Total exports	2,288,486	3,080,668	2,883,866
	Share of quantity (percent)		
United States	24.2	8.8	5.7
Mexico	4.3	5.7	10.6
Korea	9.2	11.2	9.1
Thailand	4.7	4.7	5.1
Vietnam	3.3	4.0	4.8
Indonesia	5.9	6.7	4.3
India	3.5	6.4	4.3
Nigeria	4.5	3.8	4.3
Canada	3.1	3.9	4.1
All other destination markets	37.3	44.7	47.7
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7606.11, 7606.12, 7606.91, and 7606.92 as reported by China Customs in the Global Trade Atlas database, accessed March 30 and 31, 2020.

APPENDIX A
***FEDERAL REGISTER* NOTICES**

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

Citation	Title	Link
85 FR 14702, March 13, 2020	<i>Common Alloy Aluminum Sheet From Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey; Institution of Anti-Dumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2020-03-13/pdf/2020-05169.pdf
85 FR 19444, April 7, 2020	<i>Common Alloy Aluminum Sheet From Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Republic of Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan and the Republic of Turkey: Initiation of Less-Than-Fair-Value Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2020-03-13/pdf/2020-05169.pdf
85 FR 19449, April 7, 2020	<i>Common Alloy Aluminum Sheet From Bahrain, Brazil, India, and the Republic of Turkey: Initiation of Countervailing Duty Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2020-04-07/pdf/2020-07180.pdf

APPENDIX B

LIST OF STAFF CONFERENCE WITNESSES

CALENDAR OF PUBLIC PRELIMINARY CONFERENCE

Those listed below participated in the United States International Trade Commission's preliminary conference:

Subject: Common Alloy Aluminum Sheet from Bahrain, Brazil, Croatia, Egypt, Germany, Greece, India, Indonesia, Italy, Korea, Oman, Romania, Serbia, Slovenia, South Africa, Spain, Taiwan, and Turkey

Inv. Nos.: 701-TA-639-642 and 731-TA-1475-1492 (Preliminary)

Date: March 30, 2020

EMBASSY APPEARANCES:

**Embassy of Egypt
Washington, DC**

Ibrahim El Seginy, Head of Trade Remedies Sector

**Embassy of Indonesia
Washington, DC**

Wijayanto, Commercial Attaché

OPENING REMARKS:

In Support of Imposition (**John M. Herrmann**, Kelley Drye & Warren LLP)
In Opposition to Imposition (**Edmund W. Sim**, Appleton Luff PTE LTD)

**In Support of the Imposition of
Antidumping and Countervailing Duty Orders:**

Kelley Drye & Warren LLP
Washington, DC
on behalf of

Aluminum Association Common Alloy Aluminum Sheet
Trade Enforcement Working Group and its individual members

Tom Dobbins, President and Chief Executive Officer, Aluminum Association

Lloyd A. Stemple, Chief Executive Officer, Constellium Rolled Products
Ravenswood, LLC

**In Support of the Imposition of
Antidumping and Countervailing Duty Orders (continued):**

Michael Keown, Executive Vice President, Aleris Corporation
and President, Aleris North America

Mark Vrablec, Commercial Vice President, Arconic Inc.
Global Rolled Products and Extrusions Division

Lee McCarter, Chief Executive Officer, JW Aluminum Company

Ganesh Panneer, Vice President and General Manager,
Automotive and Specialty Products, Novelis Corporation

Roxanne Brown, International Vice President-at-Large,
United Steelworkers

John M. Herrmann) – OF COUNSEL

**In Opposition to the Imposition of
Antidumping and Countervailing Duty Orders:**

Neville Peterson LLP
Washington, DC
on behalf of

Alro, SA

Gheorghe Dobra, General Manager, Alro, SA

Lawrence J. Bogard)
) – OF COUNSEL

John B. Totaro, Jr)

Vorys, Sater, Seymour and Pease LLP
Washington, DC
on behalf of

ELVALHALCOR Hellenic Copper and Aluminum Industry S.A.

Nicolas Carabateas, Commercial Director, Aluminum Bag Division,
ELVALHALCOR Hellenic Copper and Aluminum Industry S.A.

Frederick P. Waite)
) – OF COUNSEL

Kimberly R. Young)

**In Opposition to the Imposition of
Antidumping and Countervailing Duty Orders (continued):**

Arnold & Porter Kaye Scholer LLP
Washington, DC
on behalf of

Central National-Gottesman Inc. (“CNG”)

Nathan Kahn, member of the Metals Group,
Central National-Gottesman Inc.

Lynn Fischer Fox)
Henry D. Almond)
) – OF COUNSEL
Daniel R. Wilson)
Gina M. Colarusso)

Baker & McKenzie LLP
Washington, DC
on behalf of

Gulf Aluminum Rolling Mill B.S.C. (“GARMCO”)

Jonathan Harper, President, GARMCO USA Inc.

Kevin M. O’Brien)
Christine M. Streatfeild)
) – OF COUNSEL
Pablo Bentes)
Maleena Paal)

Sandler, Travis & Rosenberg P.A
Washington, DC
on behalf of

Hulamin Operations Proprietary Limited

Ian Smith, Executive: Sales and Marketing,
Hulamin Operations Proprietary Limited

Kristen Smith)
) – OF COUNSEL
Sarah E. Yuskaitis)

**In Opposition to the Imposition of
Antidumping and Countervailing Duty Orders (continued):**

Akin Gump Strauss Hauer & Feld LLP
Washington, DC
on behalf of

Oman Aluminum Rolling Company LLC (“OARC”)

Peter Rijkoort, Chief Executive Officer, OARC

Bernd G. Janzen)
Yujin K. McNamara) – OF COUNSEL
Shana A. Hofstetter)

Appleton Luff PTE LTD
Washington, DC
on behalf of

Hydro Aluminum Rolled Products GmbH (“HARP”)

Peter Ohlendorf, Vice President for Rolled Products,
Hydro Aluminum Metals USA, a U.S. affiliate of HARP

Kelly A. Slater)
) – OF COUNSEL
Edmund W. Sim)

Doyle, Barlow & Mazard PLLC
Washington, DC
on behalf of

R.M. Creations, Inc.

Snehal Desai, Vice President, R.M. Creations, Inc.

Camelia C. Mazard)
Andre P. Barlow) – OF COUNSEL
Keith Lively)

-END-

APPENDIX C
SUMMARY DATA

Table C-1

CAAS: Summary data concerning the U.S. market, 2017-19

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data			Period changes		
	Calendar year			Comparison years		
	2017	2018	2019	2017-19	2017-18	2018-19
U.S. consumption quantity:						
Amount.....	2,157,351	2,213,922	2,249,814	▲4.3	▲2.6	▲1.6
Producers' share (fn1).....	53.9	55.4	53.5	▼(0.5)	▲1.5	▼(2.0)
Importers' share (fn1):						
Bahrain.....	3.0	2.9	3.4	▲0.4	▼(0.1)	▲0.5
Brazil.....	1.1	1.3	1.6	▲0.5	▲0.1	▲0.4
Croatia.....	---	0.1	0.4	▲0.4	▲0.1	▲0.3
Egypt.....	0.0	0.6	0.7	▲0.7	▲0.6	▲0.1
Germany.....	1.5	2.0	3.9	▲2.4	▲0.5	▲1.9
Greece.....	0.7	1.1	1.4	▲0.8	▲0.4	▲0.3
India.....	2.1	2.1	2.3	▲0.1	▼(0.0)	▲0.2
Indonesia.....	3.3	3.8	2.6	▼(0.7)	▲0.4	▼(1.2)
Italy.....	0.1	0.7	1.3	▲1.1	▲0.5	▲0.6
Korea.....	0.6	1.0	1.9	▲1.3	▲0.4	▲0.9
Oman.....	1.3	3.1	4.0	▲2.7	▲1.8	▲0.9
Romania.....	0.1	0.2	0.5	▲0.4	▲0.1	▲0.3
Serbia.....	---	0.0	0.2	▲0.2	▲0.0	▲0.2
Slovenia.....	---	0.5	0.6	▲0.6	▲0.5	▲0.1
South Africa.....	1.6	2.2	2.0	▲0.5	▲0.6	▼(0.2)
Spain.....	0.1	0.3	0.9	▲0.8	▲0.2	▲0.7
Taiwan.....	0.0	1.6	2.5	▲2.5	▲1.6	▲0.9
Turkey.....	0.3	1.1	2.3	▲2.0	▲0.8	▲1.2
Subject sources.....	15.9	24.5	32.5	▲16.6	▲8.6	▲8.0
Nonsubject sources.....	30.2	20.1	14.0	▼(16.2)	▼(10.1)	▼(6.1)
All import sources.....	46.1	44.6	46.5	▲0.5	▼(1.5)	▲2.0
U.S. consumption value:						
Amount.....	6,141,701	7,335,559	7,417,291	▲20.8	▲19.4	▲1.1
Producers' share (fn1).....	55.7	55.8	54.7	▼(1.1)	▲0.1	▼(1.2)
Importers' share (fn1):						
Bahrain.....	2.8	2.9	3.6	▲0.8	▲0.1	▲0.7
Brazil.....	1.0	1.2	1.5	▲0.5	▲0.2	▲0.3
Croatia.....	---	0.1	0.4	▲0.4	▲0.1	▲0.3
Egypt.....	0.0	0.5	0.7	▲0.7	▲0.5	▲0.1
Germany.....	1.9	2.6	4.4	▲2.5	▲0.6	▲1.9
Greece.....	0.7	1.2	1.6	▲0.9	▲0.5	▲0.4
India.....	1.7	1.8	1.9	▲0.2	▲0.0	▲0.1
Indonesia.....	2.7	3.2	2.2	▼(0.6)	▲0.4	▼(1.0)
Italy.....	0.2	0.8	1.3	▲1.1	▲0.5	▲0.6
Korea.....	0.5	0.9	1.9	▲1.4	▲0.4	▲1.0
Oman.....	1.1	2.5	3.0	▲2.0	▲1.4	▲0.5
Romania.....	0.1	0.2	0.5	▲0.4	▲0.2	▲0.2
Serbia.....	---	0.0	0.2	▲0.2	▲0.0	▲0.1
Slovenia.....	---	0.5	0.6	▲0.6	▲0.5	▲0.1
South Africa.....	1.6	2.2	1.8	▲0.2	▲0.6	▼(0.4)
Spain.....	0.1	0.3	0.9	▲0.8	▲0.2	▲0.6
Taiwan.....	0.0	1.4	2.2	▲2.2	▲1.4	▲0.8
Turkey.....	0.3	1.1	1.9	▲1.6	▲0.8	▲0.9
Subject sources.....	14.7	23.4	30.6	▲15.8	▲8.7	▲7.2
Nonsubject sources.....	29.5	20.7	14.7	▼(14.8)	▼(8.8)	▼(6.0)
All import sources.....	44.3	44.2	45.3	▲1.1	▼(0.1)	▲1.2

Table continued on next page.

Table C-1--Continued

CAAS: Summary data concerning the U.S. market, 2017-19

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data			Period changes		
	Calendar year			Comparison years		
	2017	2018	2019	2017-19	2017-18	2018-19
U.S. imports from:						
Bahrain:						
Quantity.....	65,162	64,486	76,467	▲17.3	▼(1.0)	▲18.6
Value.....	172,117	213,988	265,118	▲54.0	▲24.3	▲23.9
Unit value.....	\$2,641	\$3,318	\$3,467	▲31.3	▲25.6	▲4.5
Ending inventory quantity.....	***	***	***	▼***	▼***	▲***
Brazil:						
Quantity.....	24,533	28,331	36,773	▲49.9	▲15.5	▲29.8
Value.....	60,409	89,645	113,699	▲88.2	▲48.4	▲26.8
Unit value.....	\$2,462	\$3,164	\$3,092	▲25.6	▲28.5	▼(2.3)
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Croatia:						
Quantity.....	---	2,816	9,183	▲***	▲***	▲226.0
Value.....	---	9,918	29,192	▲***	▲***	▲194.3
Unit value.....	---	\$3,522	\$3,179	▲***	▲***	▼(9.7)
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Egypt:						
Quantity.....	19	12,636	15,626	▲82,194.6	▲66,443.7	▲23.7
Value.....	49	40,290	50,555	▲102,545.5	▲81,704.1	▲25.5
Unit value.....	\$2,594	\$3,189	\$3,235	▲24.7	▲22.9	▲1.5
Ending inventory quantity.....	***	***	***	▲***	▲***	▼***
Germany:						
Quantity.....	32,998	45,048	88,779	▲169.0	▲36.5	▲97.1
Value.....	118,500	188,922	329,752	▲178.3	▲59.4	▲74.5
Unit value.....	\$3,591	\$4,194	\$3,714	▲3.4	▲16.8	▼(11.4)
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Greece:						
Quantity.....	14,202	24,090	32,234	▲127.0	▲69.6	▲33.8
Value.....	43,402	86,980	117,493	▲170.7	▲100.4	▲35.1
Unit value.....	\$3,056	\$3,611	\$3,645	▲19.3	▲18.1	▲1.0
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
India:						
Quantity.....	45,855	46,165	50,962	▲11.1	▲0.7	▲10.4
Value.....	105,093	129,053	140,629	▲33.8	▲22.8	▲9.0
Unit value.....	\$2,292	\$2,795	\$2,759	▲20.4	▲22.0	▼(1.3)
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Indonesia:						
Quantity.....	72,170	83,674	58,893	▼(18.4)	▲15.9	▼(29.6)
Value.....	167,315	231,176	159,738	▼(4.5)	▲38.2	▼(30.9)
Unit value.....	\$2,318	\$2,763	\$2,712	▲17.0	▲19.2	▼(1.8)
Ending inventory quantity.....	***	***	***	▼***	▲***	▼***
Italy:						
Quantity.....	3,084	14,540	28,588	▲826.8	▲371.4	▲96.6
Value.....	13,673	55,598	99,733	▲629.4	▲306.6	▲79.4
Unit value.....	\$4,433	\$3,824	\$3,489	▼(21.3)	▼(13.7)	▼(8.8)
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Korea:						
Quantity.....	12,003	21,637	42,313	▲252.5	▲80.3	▲95.6
Value.....	30,623	69,346	142,590	▲365.6	▲126.4	▲105.6
Unit value.....	\$2,551	\$3,205	\$3,370	▲32.1	▲25.6	▲5.1
Ending inventory quantity.....	***	***	***	▼***	▼***	▼***

Table continued on next page.

Table C-1--Continued

CAAS: Summary data concerning the U.S. market, 2017-19

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data			Period changes		
	Calendar year			Comparison years		
	2017	2018	2019	2017-19	2017-18	2018-19
U.S. imports from:--Continued						
Oman:						
Quantity.....	27,798	68,033	89,145	▲220.7	▲144.7	▲31.0
Value.....	65,731	184,631	225,178	▲242.6	▲180.9	▲22.0
Unit value.....	\$2,365	\$2,714	\$2,526	▲6.8	▲14.8	▼(6.9)
Ending inventory quantity.....	***	***	***	▲***	▲***	▼***
Romania:						
Quantity.....	1,457	4,807	11,126	▲663.8	▲230.0	▲131.4
Value.....	4,652	17,116	34,753	▲647.1	▲267.9	▲103.0
Unit value.....	\$3,194	\$3,561	\$3,124	▼(2.2)	▲11.5	▼(12.3)
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Serbia:						
Quantity.....	---	74	3,771	▲***	▲***	▲4,987.5
Value.....	---	268	11,315	▲***	▲***	▲4,127.6
Unit value.....	---	\$3,611	\$3,001	▲***	▲***	▼(16.9)
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Slovenia:						
Quantity.....	---	10,818	12,437	▲***	▲***	▲15.0
Value.....	---	37,133	41,786	▲***	▲***	▲12.5
Unit value.....	---	\$3,432	\$3,360	▲***	▲***	▼(2.1)
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
South Africa:						
Quantity.....	33,947	48,883	45,611	▲34.4	▲44.0	▼(6.7)
Value.....	96,566	159,628	131,274	▲35.9	▲65.3	▼(17.8)
Unit value.....	\$2,845	\$3,266	\$2,878	▲1.2	▲14.8	▼(11.9)
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Spain:						
Quantity.....	1,683	5,537	20,567	▲1,122.1	▲229.0	▲271.4
Value.....	6,118	21,447	67,474	▲1,002.8	▲250.5	▲214.6
Unit value.....	\$3,635	\$3,873	\$3,281	▼(9.8)	▲6.5	▼(15.3)
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Taiwan						
Quantity.....	581	35,625	57,173	▲9,741.7	▲6,032.5	▲60.5
Value.....	2,765	103,501	163,720	▲5,821.5	▲3,643.4	▲58.2
Unit value.....	\$4,759	\$2,905	\$2,864	▼(39.8)	▼(39.0)	▼(1.4)
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Turkey						
Quantity.....	6,676	24,913	51,679	▲674.1	▲273.2	▲107.4
Value.....	18,278	78,887	144,237	▲689.1	▲331.6	▲82.8
Unit value.....	\$2,738	\$3,166	\$2,791	▲1.9	▲15.7	▼(11.9)
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Subject sources:						
Quantity.....	342,167	542,114	731,327	▲113.7	▲58.4	▲34.9
Value.....	905,291	1,717,528	2,268,236	▲150.6	▲89.7	▲32.1
Unit value.....	\$2,646	\$3,168	\$3,102	▲17.2	▲19.7	▼(2.1)
Ending inventory quantity.....	60,166	163,698	236,173	▲292.5	▲172.1	▲44.3
Nonsubject sources:						
Quantity.....	651,341	444,417	315,346	▼(51.6)	▼(31.8)	▼(29.0)
Value.....	1,813,651	1,521,342	1,093,553	▼(39.7)	▼(16.1)	▼(28.1)
Unit value.....	\$2,784	\$3,423	\$3,468	▲24.5	▲22.9	▲1.3
Ending inventory quantity.....	102,854	59,346	38,558	▼(62.5)	▼(42.3)	▼(35.0)

Table continued on next page.

Table C-1--Continued
CAAS: Summary data concerning the U.S. market, 2017-19

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data			Period changes		
	Calendar year			Comparison years		
	2017	2018	2019	2017-19	2017-18	2018-19
U.S. imports from:--Continued						
All import sources:						
Quantity.....	993,508	986,531	1,046,673	▲5.4	▼(0.7)	▲6.1
Value.....	2,718,941	3,238,870	3,361,789	▲23.6	▲19.1	▲3.8
Unit value.....	\$2,737	\$3,283	\$3,212	▲17.4	▲20.0	▼(2.2)
Ending inventory quantity.....	163,020	223,044	274,731	▲68.5	▲36.8	▲23.2
U.S. producers':						
Average capacity quantity.....	1,624,150	1,664,467	2,070,746	▲27.5	▲2.5	▲24.4
Production quantity.....	1,257,531	1,356,265	1,292,137	▲2.8	▲7.9	▼(4.7)
Capacity utilization (fn1).....	77.4	81.5	62.4	▼(15.0)	▲4.1	▼(19.1)
U.S. shipments:						
Quantity.....	1,163,843	1,227,391	1,203,141	▲3.4	▲5.5	▼(2.0)
Value.....	3,422,760	4,096,689	4,055,502	▲18.5	▲19.7	▼(1.0)
Unit value.....	\$2,941	\$3,338	\$3,371	▲14.6	▲13.5	▲1.0
Export shipments:						
Quantity.....	75,548	87,220	74,299	▼(1.7)	▲15.4	▼(14.8)
Value.....	227,203	305,696	257,151	▲13.2	▲34.5	▼(15.9)
Unit value.....	\$3,007	\$3,505	\$3,461	▲15.1	▲16.5	▼(1.3)
Ending inventory quantity.....	180,627	221,909	236,465	▲30.9	▲22.9	▲6.6
Inventories/total shipments (fn1).....	14.6	16.9	18.5	▲3.9	▲2.3	▲1.6
Production workers.....	4,779	4,784	4,731	▼(1.0)	▲0.1	▼(1.1)
Hours worked (1,000s).....	10,033	10,138	10,035	▲0.0	▲1.0	▼(1.0)
Wages paid (\$1,000).....	325,483	336,490	340,903	▲4.7	▲3.4	▲1.3
Hourly wages (dollars per hour).....	\$32.44	\$33.19	\$33.97	▲4.7	▲2.3	▲2.4
Productivity (short tons per 1,000 hours).....	125.3	133.8	128.8	▲2.7	▲6.7	▼(3.8)
Unit labor costs.....	\$259	\$248	\$264	▲1.9	▼(4.1)	▲6.3
Net sales:						
Quantity.....	1,239,390	1,314,612	1,277,440	▲3.1	▲6.1	▼(2.8)
Value.....	3,652,576	4,402,170	4,311,421	▲18.0	▲20.5	▼(2.1)
Unit value.....	\$2,947	\$3,349	\$3,375	▲14.5	▲13.6	▲0.8
Cost of goods sold (COGS).....	3,417,448	4,006,378	3,820,402	▲11.8	▲17.2	▼(4.6)
Gross profit or (loss) (fn2).....	235,128	395,792	491,019	▲108.8	▲68.3	▲24.1
SG&A expenses.....	199,563	182,861	223,020	▲11.8	▼(8.4)	▲22.0
Operating income or (loss) (fn2).....	35,565	212,931	267,999	▲653.5	▲498.7	▲25.9
Net income or (loss) (fn2).....	(101,941)	42,075	101,350	▲***	▲***	▲140.9
Capital expenditures.....	168,909	190,720	294,595	▲74.4	▲12.9	▲54.5
R&D expenses.....	8,321	10,262	13,187	▲58.5	▲23.3	▲28.5
Net assets.....	2,437,937	3,327,319	3,473,525	▲42.5	▲36.5	▲4.4
Unit COGS.....	\$2,757	\$3,048	\$2,991	▲8.5	▲10.5	▼(1.9)
Unit SG&A expenses.....	\$161	\$139	\$175	▲8.4	▼(13.6)	▲25.5
Unit operating income or (loss) (fn2).....	\$29	\$162	\$210	▲631.1	▲464.5	▲29.5
Unit net income or (loss) (fn2).....	\$(82)	\$32	\$79	▲***	▲***	▲147.9
COGS/sales (fn1).....	93.6	91.0	88.6	▼(5.0)	▼(2.6)	▼(2.4)
Operating income or (loss)/sales (fn1).....	1.0	4.8	6.2	▲5.2	▲3.9	▲1.4
Net income or (loss)/sales (fn1).....	(2.8)	1.0	2.4	▲5.1	▲3.7	▲1.4

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

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Source: Compiled from data submitted in response to Commission questionnaires and compiled from official U.S. import statistics using HTS statistical reporting numbers 7606.11.3060, 7606.11.6000, 7606.12.3090, 7606.12.3091, 7606.12.3096, 7606.12.6000, 7606.91.3090, 7606.91.3095, 7606.91.6080, 7606.91.6095, 7606.92.3035, 7606.92.3090, 7606.92.6080, 7606.92.6095, accessed April 6, 2020

APPENDIX D

SECTION 232 DEVELOPMENTS

Table D-1
Section 232 import national-security events, 2017-20

Effective date	Actions and Affected U.S. trade partner(s)
April 26, 2017	Commerce announced the institution of an investigation, by its U.S. Bureau of Industry and Security (“BIS”) into the potential impact of imported aluminum products on national security. (82 FR 21509, May 9, 2017)
January 19, 2018	The Secretary of Commerce submitted the BIS Section 232 aluminum imports report to the President. (83 FR 11619, March 15, 2018)
March 23, 2018	The President announced the imposition of 10 percent ad valorem national-security duties on U.S. aluminum imports. Initially exempted— Canada and Mexico. (83 FR 11619, March 15, 2018)
March 23 through May 1, 2018	Adjustment: Exempted— Argentina, Australia, Brazil, Canada, Mexico, South Korea, and the European Union (“EU”) member states. (83 FR 13355, March 28, 2018)
May 1 through June 1, 2018	Adjustment: Exempted— Argentina, Australia, Brazil. Exemptions continued to June 1—Canada, Mexico, and EU member states. Exemption expired—South Korea. (83 FR 20677, May 7, 2018 and 83 FR 25849, June 5, 2018)
June 1, 2018	Adjustment: Exempted—Argentina (annual quota limit), Australia. Exemptions expired—Brazil, Canada, Mexico, and EU member states. (83 FR 25849, June 5, 2018)
September 11, 2018	Exclusion Process: Presidential Proclamation 9776 grants the Secretary of Commerce the authority to exclude aluminum articles for which there is a lack of domestic production capacity of comparable production, or to exclude aluminum articles from such restrictions for specific national security-based considerations. Commerce’s Bureau of Industry and Security (“BIS”) published an interim final rule establishing this exclusion process. (83 FR 46026, September 11, 2018)
May 20, 2019	Adjustment: Exemptions reinstated— Canada and Mexico. (84 FR 23983, May 23, 2019)
January 24, 2020	Adjustment: The President expanded the scope of the Section 232 measures to include imports of certain derivative aluminum articles. (85 FR 5281, January 29, 2020).

Source: Cited *Federal Register* notices.

Section 232 exclusion requests

Individuals or organizations that use identified aluminum products and partake in U.S. business activities can submit requests to have certain products excluded from the Section 232 national-security tariffs. As of March 31, 2020, *** have been submitted to the U.S. Department of Commerce’s Bureau of Industry and Security (“BIS”) for precise products imported under the primary HTSUS reporting numbers identified in Commerce’s scope (table D-2). *** have been submitted under discontinued HTSUS reporting numbers under which CAAS previously entered.¹ Of the *** submitted under the HTSUS reporting numbers identified in table D-2, *** “insufficient U.S. availability” as the primary reason for the submission, *** “no U.S. production,” and *** cited a variety of “other” reasons.² Information presented in tables D-2, D-3, and D-4 may not reflect the current status of exclusion requests that are marked as pending. For example, a review of BIS identification numbers for exclusion requests submitted by *** for products entering under *** appear to have changed from ***.³

¹ Upon receiving a request to make additions, removals, and other revisions to Chapter 76 of the Harmonized Tariff Schedule of the United States, the Section 484(f) Committee implemented a series of changes that discontinued the use of certain HTSUS reporting numbers for which CAAS previously entered under, including: 7606.12.3090, 7606.91.3090, 7606.91.6080, 7606.92.3090, and 7606.92.6080. These changes took effect in July 2019 and January 2020. U.S. International Trade Commission, “Version: 2020 Basic Edition (Change Record),” January 1, 2020, <https://hts.usitc.gov/view/Change%20Record?release=2020HTSABasicB>, retrieved March 30, 2020.

² ***

³ ***

Table D-2**Section 232: Exclusion requests for aluminum products, by HTSUS statistical reporting number, as of March 31, 2020**

HTSUS	Granted	Denied	Pending	Total
7606.11.3060	***	***	***	***
7606.11.6000	***	***	***	***
7606.12.3090 ¹	***	***	***	***
7606.12.3091	***	***	***	***
7606.12.3096	***	***	***	***
7606.12.6000	***	***	***	***
7606.91.3090 ¹	***	***	***	***
7606.91.3095	***	***	***	***
7606.91.6080 ¹	***	***	***	***
7606.91.6095	***	***	***	***
7606.92.3035	***	***	***	***
7606.92.3090 ¹	***	***	***	***
7606.92.6080 ¹	***	***	***	***
7606.92.6095	***	***	***	***
Current HTSUS	***	***	***	***
Discontinued	***	***	***	***
Total	***	***	***	***

¹ Indicates HTSUS statistical reporting number that was discontinued as of June 2019 or January 2020.

Note: Products that previously entered under 7606.12.3090 were identified as aluminum plate, sheet, and strip with a thickness greater than 0.2 mm, rectangular, of aluminum alloys, not clad, with a thickness of 6.3 mm or less, other than aluminum can stock. Section 232 exclusion requests in the table above are defined by relevant HTSUS statistical reporting numbers. Not all subject CAAS may be represented in the table above. Additionally, certain product excluded from the scope of these investigations may also be included in the table above.

Source: ***.

Table D-3 presents the top ten firms by total number of exclusion requests, as of March 31, 2020 for products entering under the primary HTSUS reporting numbers identified in Commerce's scope as well as discontinued HTSUS reporting numbers under which CAAS previously entered.

Table D-3**Section 232: Exclusion requests for certain aluminum products, by firm, as of March 31, 2020**

Firm	Granted	Denied	Pending	Total
Novelis Corp.*	***	***	***	***
Mandel Metals	***	***	***	***
Fujifilm	***	***	***	***
Titanx Engine Cooling Inc.	***	***	***	***
AA Metals Inc.	***	***	***	***
Meyer Aluminum Blanks, Inc.	***	***	***	***
Thyssen Krupp Materials	***	***	***	***
Southern Lithoplate	***	***	***	***
AKG North America	***	***	***	***
Manakin Industries	***	***	***	***
All other	***	***	***	***
Total	***	***	***	***

Note: * Indicates a domestic producer. Section 232 exclusion requests in the table above are defined by relevant HTSUS statistical reporting numbers. Not all subject CAAS may be represented in the table above. Additionally, certain product excluded from the scope of these investigations may also be included in the table above.

Source: ***.

Table D-4 presents the number and volume of excluded product requested by U.S. producers and all other firms, and the number and volume of excluded product granted to U.S. producers and all other firms by BIS, as of March 31, 2020. These exclusions were requested for products entering under the primary HTSUS reporting numbers identified in Commerce's scope as well as discontinued HTSUS reporting numbers under which CAAS previously entered.

Table D-4**Section 232: Exclusion requests for certain aluminum products, by volume, as of March 31, 2020**

	Exclusion requests	Volume requested (short tons)			Requests granted	Volume granted (short tons)		
		2018	2019	2020		2018	2019	2020
U.S. producers	***	***	***	***	***	***	***	***
All other	***	***	***	***	***	***	***	***
Total	***	***	***	***	***	***	***	***

Note: U.S. producers that requested product exclusions from products entering under the HTSUS statistical reporting numbers previously identified include Novelis Corporation, Granges International, Constellium, JW Aluminum, Arconic, TCI Texarkana, and Jupiter Aluminum Company. Section 232 exclusion requests in the table above are defined by relevant HTSUS statistical reporting numbers. Not all subject CAAS may be represented in the table above. Additionally, certain product excluded from the scope of these investigations may also be included in the table above.

Source: ***.

Respondents argued that U.S. producers have made “about a thousand applications” for section 232 exemptions, and that 1.3 million short tons of CAAS from subject countries were imported under petitioners’ 846 approved section 232 exemptions.⁴ Multiple respondents argued that these section 232 exemptions are evidence of domestic producers’ inability to supply CAAS for the U.S. market. Specifically, respondent Hulamin stated that U.S. producers Arconic, Constellium, JW Aluminum, Novelis, and Texarkana (and its parent company importer Ta Chen), all requested 232 exclusions citing insufficient supply of CAAS.⁵

Petitioners argued that Respondents overstate the volumes of CAAS associated with U.S. producers’ section 232 exclusions. Petitioners noted that the six petitioning U.S. producers and Jupiter Aluminum have submitted 226 section 232 exclusion requests involving CAAS from subject countries and 129 were granted (involving 97,543 short tons), 54 were denied, and 42 are under review.⁶ Petitioners stated that the Commerce Department has granted section 232 exclusions for 1.76 million short tons of CAAS from subject countries from March 2018 to

⁴ Introduction to written testimony of respondents, Edmund W. Sim, Appleton Luff, counsel to Hydro Aluminum Roller Products (March 27, 2020), pp. 2-3.

⁵ Respondent Hulamin’s postconference brief, p. 13.

⁶ Petitioners’ postconference brief, Exhibit 1, pp. 27-28 and p.35.

March 2020.⁷ They also stated that the CAAS-related section 232 exclusion requests “bear no relationship to the purported inability of domestic producers” to supply CAAS, and that U.S. producers’ importing CAAS and requesting section 232 exclusions underscores the price-competitive nature of CAAS.⁸

⁷ Petitioners’ postconference brief, pp. 18-20.

⁸ Petitioners’ postconference brief, Exhibit 1, pp. 18-19.

APPENDIX E

U.S. SHIPMENTS BY PRODUCT TYPE (SERIES AND CLADDING)

Table E-1
CAAS: U.S. producers' U.S. shipments by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. producers' U.S. shipments.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. producers' U.S. shipments.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. producers' U.S. shipments.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. producers' U.S. shipments.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	100.0	100.0	100.0
	Share of value (percent)		
U.S. producers' U.S. shipments.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	100.0	100.0	100.0

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

Table E-2
CAAS: U.S. importers' U.S. shipments from Bahrain by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from Bahrain.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from Bahrain.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from Bahrain.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from Bahrain.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from Bahrain.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-3

CAAS: U.S. importers' U.S. shipments from Brazil by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from Brazil.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from Brazil.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from Brazil.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from Brazil.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from Brazil.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-4

CAAS: U.S. importers' U.S. shipments from Croatia by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from Croatia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from Croatia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from Croatia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from Croatia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from Croatia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-5

CAAS: U.S. importers' U.S. shipments from Egypt by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from Egypt.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from Egypt.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from Egypt.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from Egypt.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from Egypt.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-6

CAAS: U.S. importers' U.S. shipments from Germany by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from Germany.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from Germany.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from Germany.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from Germany.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from Germany.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-7

CAAS: U.S. importers' U.S. shipments from Greece by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from Greece.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from Greece.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from Greece.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from Greece.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from Greece.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-8

CAAS: U.S. importers' U.S. shipments from India by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from India.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from India.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from India.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from India.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from India.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-9

CAAS: U.S. importers' U.S. shipments from Indonesia by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from Indonesia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from Indonesia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from Indonesia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from Indonesia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from Indonesia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-10
CAAS: U.S. importers' U.S. shipments from Italy by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from Italy.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from Italy.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from Italy.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from Italy.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from Italy.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-11
CAAS: U.S. importers' U.S. shipments from Korea by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from Korea.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from Korea.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from Korea.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from Korea.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from Korea.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-12

CAAS: U.S. importers' U.S. shipments from Oman by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from Oman.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from Oman.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from Oman.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from Oman.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from Oman.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-13

CAAS: U.S. importers' U.S. shipments from Romania by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from Romania.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from Romania.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from Romania.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from Romania.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from Romania.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-14

CAAS: U.S. importers' U.S. shipments from Serbia by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from Serbia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from Serbia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from Serbia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from Serbia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from Serbia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-15

CAAS: U.S. importers' U.S. shipments from Slovenia by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from Slovenia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from Slovenia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from Slovenia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from Slovenia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from Slovenia.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-16

CAAS: U.S. importers' U.S. shipments from South Africa by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from South Africa.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from South Africa.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from South Africa.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from South Africa.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from South Africa.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-17

CAAS: U.S. importers' U.S. shipments from Spain by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from Spain.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from Spain.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from Spain.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from Spain.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from Spain.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-18

CAAS: U.S. importers' U.S. shipments from Taiwan by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from Taiwan.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from Taiwan.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from Taiwan.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from Taiwan.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from Taiwan.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-19
CAAS: U.S. importers' U.S. shipments from Turkey by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from Turkey.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from Turkey.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from Turkey.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from Turkey.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from Turkey.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-20

CAAS: U.S. importers' U.S. shipments from subject sources by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from subject sources.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Value (1,000 dollars)		
U.S. importers' U.S. shipments from subject sources.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Unit value (dollars per short ton)		
U.S. importers' U.S. shipments from subject sources.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of quantity (percent)		
U.S. importers' U.S. shipments from subject sources.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
	Share of value (percent)		
U.S. importers' U.S. shipments from subject sources.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-21

CAAS: U.S. importers' U.S. shipments from nonsubject sources by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from nonsubject sources.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
Value (1,000 dollars)			
U.S. importers' U.S. shipments from nonsubject sources.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
Unit value (dollars per short ton)			
U.S. importers' U.S. shipments from nonsubject sources.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
Share of quantity (percent)			
U.S. importers' U.S. shipments from nonsubject sources.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
Share of value (percent)			
U.S. importers' U.S. shipments from nonsubject sources.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

Table E-22

CAAS: U.S. importers' U.S. shipments from all import sources by product type, 2017-19

Item	2017	2018	2019
	Quantity (short tons)		
U.S. importers' U.S. shipments from all import sources.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
Value (1,000 dollars)			
U.S. importers' U.S. shipments from all import sources.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
Unit value (dollars per short ton)			
U.S. importers' U.S. shipments from all import sources.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
Share of quantity (percent)			
U.S. importers' U.S. shipments from all import sources.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***
Share of value (percent)			
U.S. importers' U.S. shipments from all import sources.--			
Non-clad 1XXX series	***	***	***
Non-clad 3XXX series	***	***	***
Non-clad 5XXX series	***	***	***
Clad or multi-alloy	***	***	***
All other products	***	***	***
All products	***	***	***

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

APPENDIX F

**U.S. PRODUCERS' AND IMPORTERS' RESPONSES TO INTERCHANGEABILITY AND
SIGNIFICANCE OF FACTORS OTHER THAN PRICE**

U.S. producers' and importers' responses comparing the interchangeability of CAAS produced in each subject country and other subject countries and nonsubject countries, by country pair, are shown in table F-1. Firms' responses regarding the significance of factors other than price, by country pair, are shown in table F-2.

Table F-1

CAAS: Interchangeability between product produced in subject countries and in other countries, by country pair

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
Bahrain vs. Brazil	6	---	---	---	5	4	1	---
Bahrain vs. Croatia	6	---	---	---	5	3	---	---
Bahrain vs. Egypt	6	---	---	---	5	4	1	---
Bahrain vs. Germany	6	---	---	---	5	4	1	---
Bahrain vs. Greece	6	---	---	---	5	3	1	---
Bahrain vs. India	6	---	---	---	5	4	1	---
Bahrain vs. Indonesia	6	---	---	---	5	4	1	---
Bahrain vs. Italy	6	---	---	---	5	4	1	---
Bahrain vs. Korea	6	---	---	---	5	4	1	---
Bahrain vs. Oman	6	---	---	---	5	3	1	---
Bahrain vs. Romania	6	---	---	---	5	3	1	---
Bahrain vs. Serbia	6	---	---	---	5	3	1	---
Bahrain vs. Slovenia	6	---	---	---	5	3	1	---
Bahrain vs. South Africa	6	---	---	---	5	4	1	---
Bahrain vs. Spain	6	---	---	---	5	4	1	---
Bahrain vs. Taiwan	6	---	---	---	5	3	1	---
Bahrain vs. Turkey	6	---	---	---	5	3	1	---
Brazil vs. Croatia	6	---	---	---	5	3	---	---
Brazil vs. Egypt	6	---	---	---	5	3	1	---
Brazil vs. Germany	6	---	---	---	5	3	---	---
Brazil vs. Greece	6	---	---	---	5	3	1	---
Brazil vs. India	6	---	---	---	5	4	1	---
Brazil vs. Indonesia	6	---	---	---	5	3	1	---
Brazil vs. Italy	6	---	---	---	5	3	1	---
Brazil vs. Korea	6	---	---	---	5	3	---	---
Brazil vs. Oman	6	---	---	---	5	3	1	---
Brazil vs. Romania	6	---	---	---	5	3	1	---
Brazil vs. Serbia	6	---	---	---	5	3	1	---
Brazil vs. Slovenia	6	---	---	---	5	3	1	---
Brazil vs. South Africa	6	---	---	---	5	3	---	---
Brazil vs. Spain	6	---	---	---	5	3	1	---
Brazil vs. Taiwan	6	---	---	---	5	3	---	---
Brazil vs. Turkey	6	---	---	---	5	3	1	---

Table continued on next page.

Table F-1--Continued

CAAS: Interchangeability between product produced in subject countries and in other countries, by country pair

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
Croatia vs. Egypt	6	---	---	---	5	3	1	---
Croatia vs. Germany	6	---	---	---	5	3	1	---
Croatia vs. Greece	6	---	---	---	5	3	1	---
Croatia vs. India	6	---	---	---	5	3	1	---
Croatia vs. Indonesia	6	---	---	---	5	3	1	---
Croatia vs. Italy	6	---	---	---	5	3	1	---
Croatia vs. Korea	6	---	---	---	5	3	1	---
Croatia vs. Oman	6	---	---	---	5	3	1	---
Croatia vs. Romania	6	---	---	---	5	3	1	---
Croatia vs. Serbia	6	---	---	---	5	3	1	---
Croatia vs. Slovenia	6	---	---	---	5	3	1	---
Croatia vs. South Africa	6	---	---	---	5	3	1	---
Croatia vs. Spain	6	---	---	---	5	3	1	---
Croatia vs. Taiwan	6	---	---	---	5	3	1	---
Croatia vs. Turkey	6	---	---	---	5	3	1	---
Egypt vs. Germany	6	---	---	---	5	3	1	---
Egypt vs. Greece	6	---	---	---	5	3	1	---
Egypt vs. India	6	---	---	---	5	3	1	---
Egypt vs. Indonesia	6	---	---	---	5	2	2	---
Egypt vs. Italy	6	---	---	---	5	3	1	---
Egypt vs. Korea	6	---	---	---	5	2	2	---
Egypt vs. Oman	6	---	---	---	5	2	2	---
Egypt vs. Romania	6	---	---	---	5	2	2	---
Egypt vs. Serbia	6	---	---	---	5	2	2	---
Egypt vs. Slovenia	6	---	---	---	5	3	1	---
Egypt vs. South Africa	6	---	---	---	5	2	2	---
Egypt vs. Spain	6	---	---	---	5	3	1	---
Egypt vs. Taiwan	6	---	---	---	5	2	2	---
Egypt vs. Turkey	6	---	---	---	5	3	1	---
Germany vs. Greece	6	---	---	---	5	4	1	---
Germany vs. India	6	---	---	---	5	2	2	---
Germany vs. Indonesia	6	---	---	---	5	2	2	---
Germany vs. Italy	6	---	---	---	6	3	1	---
Germany vs. Korea	6	---	---	---	5	2	2	---
Germany vs. Oman	5	1	---	---	3	4	2	---
Germany vs. Romania	6	---	---	---	5	3	2	---
Germany vs. Serbia	6	---	---	---	5	2	2	---
Germany vs. Slovenia	6	---	---	---	5	3	1	---
Germany vs. South Africa	6	---	---	---	5	2	2	---
Germany vs. Spain	6	---	---	---	5	3	1	---

Table continued on next page.

Table F-1--Continued

CAAS: Interchangeability between product produced in subject countries and in other countries, by country pair

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
Germany vs. Taiwan	6	---	---	---	5	2	2	---
Germany vs. Turkey	5	1	---	---	3	6	1	---
Greece vs. India	6	---	---	---	5	2	2	---
Greece vs. Indonesia	6	---	---	---	5	2	2	---
Greece vs. Italy	6	---	---	---	5	3	1	---
Greece vs. Korea	6	---	---	---	5	2	2	---
Greece vs. Oman	5	1	---	---	3	4	2	---
Greece vs. Romania	6	---	---	---	6	2	2	---
Greece vs. Serbia	6	---	---	---	5	2	2	---
Greece vs. Slovenia	6	---	---	---	5	3	1	---
Greece vs. South Africa	6	---	---	---	5	2	2	---
Greece vs. Spain	6	---	---	---	5	3	1	---
Greece vs. Taiwan	6	---	---	---	6	2	2	---
Greece vs. Turkey	5	1	---	---	3	5	1	---
India vs. Indonesia	6	---	---	---	5	3	1	---
India vs. Italy	6	---	---	---	5	3	1	---
India vs. Korea	6	---	---	---	5	3	1	---
India vs. Oman	6	---	---	---	5	3	1	---
India vs. Romania	6	---	---	---	5	3	1	---
India vs. Serbia	6	---	---	---	5	3	1	---
India vs. Slovenia	6	---	---	---	5	3	1	---
India vs. South Africa	6	---	---	---	5	3	1	---
India vs. Spain	6	---	---	---	5	3	1	---
India vs. Taiwan	6	---	---	---	5	3	1	---
India vs. Turkey	6	---	---	---	5	3	1	---
Indonesia vs. Italy	6	---	---	---	5	3	3	---
Indonesia vs. Korea	6	---	---	---	5	3	3	---
Indonesia vs. Oman	6	---	---	---	5	3	3	---
Indonesia vs. Romania	6	---	---	---	5	3	3	---
Indonesia vs. Serbia	6	---	---	---	5	3	3	---
Indonesia vs. Slovenia	6	---	---	---	5	3	3	---
Indonesia vs. South Africa	6	---	---	---	5	3	3	---
Indonesia vs. Spain	6	---	---	---	5	3	3	---
Indonesia vs. Taiwan	6	---	---	---	5	3	3	---
Indonesia vs. Turkey	6	---	---	---	5	3	3	---
Italy vs. Korea	6	---	---	---	5	3	2	---
Italy vs. Oman	6	---	---	---	5	2	2	---
Italy vs. Romania	6	---	---	---	5	2	2	---
Italy vs. Serbia	6	---	---	---	5	2	2	---
Italy vs. Slovenia	6	---	---	---	5	3	1	---

Table continued on next page.

Table F-1--Continued

CAAS: Interchangeability between product produced in subject countries and in other countries, by country pair

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
Italy vs. South Africa	6	---	---	---	5	2	2	---
Italy vs. Spain	6	---	---	---	5	3	1	---
Italy vs. Taiwan	6	---	---	---	5	2	2	---
Italy vs. Turkey	6	---	---	---	5	3	1	---
Korea vs. Oman	6	---	---	---	7	3	1	---
Korea vs. Romania	6	---	---	---	6	3	1	---
Korea vs. Serbia	6	---	---	---	6	3	1	---
Korea vs. Slovenia	6	---	---	---	6	3	1	---
Korea vs. South Africa	6	---	---	---	6	3	1	---
Korea vs. Spain	6	---	---	---	6	3	1	---
Korea vs. Taiwan	6	---	---	---	6	3	1	---
Korea vs. Turkey	6	---	---	---	6	3	1	---
Oman vs. Romania	5	1	---	---	3	5	1	---
Oman vs. Serbia	6	---	---	---	5	3	1	---
Oman vs. Slovenia	6	---	---	---	5	3	1	---
Oman vs. South Africa	5	1	---	---	3	5	1	---
Oman vs. Spain	5	1	---	---	3	5	1	---
Oman vs. Taiwan	5	1	---	---	3	5	1	---
Oman vs. Turkey	6	---	---	---	5	3	1	---
Romania vs. Serbia	6	---	---	---	5	3	1	---
Romania vs. Slovenia	6	---	---	---	5	3	1	---
Romania vs. South Africa	6	---	---	---	5	3	1	---
Romania vs. Spain	6	---	---	---	5	3	1	---
Romania vs. Taiwan	6	---	---	---	5	3	1	---
Romania vs. Turkey	6	---	---	---	5	3	1	---
Serbia vs. Slovenia	6	---	---	---	5	3	1	---
Serbia vs. South Africa	6	---	---	---	5	3	1	---
Serbia vs. Spain	6	---	---	---	5	3	1	---
Serbia vs. Taiwan	6	---	---	---	5	3	1	---
Serbia vs. Turkey	6	---	---	---	5	3	1	---
Slovenia vs. South Africa	6	---	---	---	5	2	2	---
Slovenia vs. Spain	6	---	---	---	5	3	1	---
Slovenia vs. Taiwan	6	---	---	---	5	2	2	---
Slovenia vs. Turkey	6	---	---	---	5	3	1	---
South Africa vs. Spain	6	---	---	---	5	3	1	---
South Africa vs. Taiwan	6	---	---	---	5	3	1	---
South Africa vs. Turkey	6	---	---	---	5	3	1	---
Spain vs. Taiwan	6	---	---	---	5	2	2	---
Spain vs. Turkey	6	---	---	---	5	3	1	---
Taiwan vs. Turkey	6	---	---	---	5	3	1	---
United States vs. Other	5	1	---	---	5	9	5	1

Table continued on next page.

Table F-1--Continued

CAAS: Interchangeability between product produced in subject countries and in other countries, by country pair

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
Bahrain vs. Other	5	1	---	---	3	5	1	1
Brazil vs. Other	5	1	---	---	3	6	1	1
Croatia vs. Other	5	1	---	---	3	5	1	1
Egypt vs. Other	5	1	---	---	3	4	2	1
Germany vs. Other	5	1	---	---	3	5	4	1
Greece vs. Other	5	1	---	---	4	4	2	1
India vs. Other	5	1	---	---	3	5	1	1
Indonesia vs. Other	5	1	---	---	3	5	3	1
Italy vs. Other	5	1	---	---	3	4	2	1
Korea vs. Other	5	1	---	---	4	5	1	1
Oman vs. Other	5	1	---	---	3	5	1	1
Romania vs. Other	5	1	---	---	4	6	1	1
Serbia vs. Other	5	1	---	---	3	5	1	1
Slovenia vs. Other	5	1	---	---	3	4	2	1
South Africa vs. Other	5	1	---	---	3	5	1	1
Spain vs. Other	5	1	---	---	3	4	2	1
Taiwan vs. Other	5	1	---	---	3	5	1	1
Turkey vs. Other	5	1	---	---	3	4	2	1

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

Table F-2

CAAS: Perceived importance of factors other than price between product produced in one subject country and in other countries, by country pair

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
Bahrain vs. Brazil	---	---	1	5	---	2	4	3
Bahrain vs. Croatia	---	---	1	5	---	1	3	3
Bahrain vs. Egypt	---	---	---	6	---	1	3	5
Bahrain vs. Germany	---	---	---	6	---	2	2	5
Bahrain vs. Greece	---	---	---	6	---	1	2	5
Bahrain vs. India	---	---	---	6	---	1	3	5
Bahrain vs. Indonesia	---	---	---	6	---	2	1	5
Bahrain vs. Italy	---	---	---	6	---	2	2	5
Bahrain vs. Korea	---	---	---	6	---	2	1	5
Bahrain vs. Oman	---	---	---	6	---	1	2	5
Bahrain vs. Romania	---	---	---	6	---	1	1	5
Bahrain vs. Serbia	---	---	1	5	---	1	3	3
Bahrain vs. Slovenia	---	---	1	5	---	1	4	3
Bahrain vs. South Africa	---	---	---	6	---	2	1	5
Bahrain vs. Spain	---	---	---	6	---	2	1	5
Bahrain vs. Taiwan	---	---	---	6	---	1	---	5
Bahrain vs. Turkey	---	---	---	6	---	2	2	5
Brazil vs. Croatia	---	---	---	6	---	1	2	5
Brazil vs. Egypt	---	---	---	6	---	1	3	5
Brazil vs. Germany	---	---	1	5	---	1	4	3
Brazil vs. Greece	---	---	1	5	---	1	4	3
Brazil vs. India	---	---	---	6	---	1	3	6
Brazil vs. Indonesia	---	---	---	6	---	1	2	5
Brazil vs. Italy	---	---	---	6	---	1	3	5
Brazil vs. Korea	---	---	1	5	---	1	3	3
Brazil vs. Oman	---	---	---	6	---	---	3	5
Brazil vs. Romania	---	---	1	5	---	1	4	3
Brazil vs. Serbia	---	---	---	6	---	1	2	5
Brazil vs. Slovenia	---	---	---	6	---	1	2	5
Brazil vs. South Africa	---	---	1	5	---	1	3	3
Brazil vs. Spain	---	---	1	5	---	1	4	3
Brazil vs. Taiwan	---	---	1	5	---	1	2	3
Brazil vs. Turkey	---	---	---	6	---	1	3	5
Croatia vs. Egypt	---	---	---	6	---	1	2	5
Croatia vs. Germany	---	---	---	6	---	---	2	5
Croatia vs. Greece	---	---	1	5	---	---	4	3
Croatia vs. India	---	---	---	6	---	---	3	5
Croatia vs. Indonesia	---	---	---	6	---	1	1	5
Croatia vs. Italy	---	---	---	6	---	---	3	5
Croatia vs. Korea	---	---	1	5	---	1	2	3

Table continued on next page.

Table F-2--Continued

CAAS: Perceived importance of factors other than price between product produced in one subject country and in other countries, by country pair

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
Croatia vs. Oman	---	---	---	6	---	1	2	5
Croatia vs. Romania	---	---	1	5	---	---	4	3
Croatia vs. Serbia	---	---	---	6	---	---	2	7
Croatia vs. Slovenia	---	---	---	6	---	---	1	6
Croatia vs. South Africa	---	---	1	5	---	1	2	3
Croatia vs. Spain	---	---	1	5	---	---	4	4
Croatia vs. Taiwan	---	---	1	5	---	1	2	3
Croatia vs. Turkey	---	---	---	6	---	1	2	5
Egypt vs. Germany	---	---	---	6	---	1	2	5
Egypt vs. Greece	---	---	1	5	---	1	4	3
Egypt vs. India	---	---	---	6	---	---	4	5
Egypt vs. Indonesia	---	---	---	6	---	---	3	5
Egypt vs. Italy	---	---	---	6	---	1	3	5
Egypt vs. Korea	---	---	---	6	---	---	2	5
Egypt vs. Oman	---	---	---	6	---	---	3	5
Egypt vs. Romania	---	---	---	6	---	1	2	5
Egypt vs. Serbia	---	---	---	6	---	1	2	5
Egypt vs. Slovenia	---	---	---	6	---	1	2	5
Egypt vs. South Africa	---	---	---	6	---	---	2	5
Egypt vs. Spain	---	---	---	6	---	---	3	5
Egypt vs. Taiwan	---	---	---	6	---	---	1	5
Egypt vs. Turkey	---	---	---	6	---	---	4	5
Germany vs. Greece	---	---	---	6	---	---	3	6
Germany vs. India	---	---	---	6	---	1	2	5
Germany vs. Indonesia	---	---	---	6	---	1	1	5
Germany vs. Italy	---	---	---	6	---	---	3	6
Germany vs. Korea	---	---	---	6	---	1	1	5
Germany vs. Oman	---	---	1	5	---	1	3	3
Germany vs. Romania	---	---	---	6	1	---	2	5
Germany vs. Serbia	---	---	1	5	---	---	4	3
Germany vs. Slovenia	---	---	1	5	---	---	5	3
Germany vs. South Africa	---	---	---	6	---	1	1	5
Germany vs. Spain	---	---	1	5	---	---	4	3
Germany vs. Taiwan	---	---	---	6	---	---	1	5
Germany vs. Turkey	---	---	1	5	---	1	4	4
Greece vs. India	---	---	---	6	---	1	2	5
Greece vs. Indonesia	---	---	---	6	---	1	1	5
Greece vs. Italy	---	---	---	6	---	---	3	5
Greece vs. Korea	---	---	---	6	---	1	1	6
Greece vs. Oman	---	---	1	5	---	1	3	3

Table continued on next page.

Table F-2--Continued

CAAS: Perceived importance of factors other than price between product produced in one subject country and in other countries, by country pair

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
Greece vs. Romania	---	---	1	5	---	---	5	3
Greece vs. Serbia	---	---	1	5	---	1	3	3
Greece vs. Slovenia	---	---	1	5	---	1	4	3
Greece vs. South Africa	---	---	---	6	---	---	2	5
Greece vs. Spain	---	---	1	5	---	1	3	3
Greece vs. Taiwan	---	---	---	6	---	---	1	5
Greece vs. Turkey	---	---	1	5	---	---	5	3
India vs. Indonesia	---	---	---	6	---	---	3	5
India vs. Italy	---	---	---	6	---	---	4	5
India vs. Korea	---	---	---	6	---	---	2	5
India vs. Oman	---	---	---	6	---	---	3	5
India vs. Romania	---	---	---	6	---	---	3	5
India vs. Serbia	---	---	---	6	---	---	3	5
India vs. Slovenia	---	---	---	6	---	---	3	5
India vs. South Africa	---	---	---	6	---	---	2	5
India vs. Spain	---	---	---	6	---	---	3	5
India vs. Taiwan	---	---	---	6	1	---	1	5
India vs. Turkey	---	---	---	6	---	---	4	5
Indonesia vs. Italy	---	---	---	6	---	---	5	5
Indonesia vs. Korea	---	---	---	6	---	---	4	5
Indonesia vs. Oman	---	---	---	6	---	---	4	5
Indonesia vs. Romania	---	---	---	6	---	---	5	5
Indonesia vs. Serbia	---	---	---	6	---	---	4	5
Indonesia vs. Slovenia	---	---	---	6	---	---	4	5
Indonesia vs. South Africa	---	---	---	6	---	---	4	5
Indonesia vs. Spain	---	---	---	6	---	---	5	5
Indonesia vs. Taiwan	---	---	---	6	---	---	3	5
Indonesia vs. Turkey	---	---	---	6	---	---	5	5
Italy vs. Korea	---	---	---	6	---	1	1	7
Italy vs. Oman	---	---	---	6	---	1	2	5
Italy vs. Romania	---	---	---	6	---	---	3	5
Italy vs. Serbia	---	---	---	6	---	---	3	5
Italy vs. Slovenia	---	---	---	6	---	---	3	5
Italy vs. South Africa	---	---	---	6	---	1	1	5
Italy vs. Spain	---	---	---	6	---	1	2	5
Italy vs. Taiwan	---	---	---	6	---	---	1	5
Italy vs. Turkey	---	---	---	6	---	1	3	5
Korea vs. Oman	---	---	---	6	---	---	1	5
Korea vs. Romania	---	---	---	6	---	---	2	5
Korea vs. Serbia	---	---	1	5	---	---	3	3
Korea vs. Slovenia	---	---	1	5	---	---	4	3

Table continued on next page.

Table F-2--Continued

CAAS: Perceived importance of factors other than price between product produced in one subject country and in other countries, by country pair

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
Korea vs. South Africa	---	---	---	6	---	---	2	5
Korea vs. Spain	---	---	---	6	---	---	2	5
Korea vs. Taiwan	---	---	---	6	---	---	1	5
Korea vs. Turkey	---	---	---	6	---	---	2	5
Oman vs. Romania	---	---	---	6	---	---	2	5
Oman vs. Serbia	---	---	---	6	---	---	3	5
Oman vs. Slovenia	---	---	---	6	---	---	2	5
Oman vs. South Africa	---	---	1	5	---	---	3	3
Oman vs. Spain	---	---	1	5	---	---	4	3
Oman vs. Taiwan	---	---	1	5	---	---	3	3
Oman vs. Turkey	---	---	---	6	---	---	3	5
Romania vs. Serbia	---	---	---	6	---	---	2	5
Romania vs. Slovenia	---	---	---	6	---	---	2	5
Romania vs. South Africa	---	---	---	6	---	1	1	5
Romania vs. Spain	---	---	---	6	---	---	3	5
Romania vs. Taiwan	---	---	---	6	---	1	---	5
Romania vs. Turkey	---	---	---	6	---	1	2	5
Serbia vs. Slovenia	---	---	---	6	---	1	1	5
Serbia vs. South Africa	---	---	1	5	---	1	2	3
Serbia vs. Spain	---	---	1	5	---	1	2	3
Serbia vs. Taiwan	---	---	---	6	---	1	---	5
Serbia vs. Turkey	---	---	---	6	---	1	1	5
Slovenia vs. South Africa	---	---	1	5	---	1	3	3
Slovenia vs. Spain	---	---	1	5	---	1	4	3
Slovenia vs. Taiwan	---	---	---	6	---	1	---	5
Slovenia vs. Turkey	---	---	---	6	---	1	3	5
South Africa vs. Spain	---	---	---	6	---	1	1	5
South Africa vs. Taiwan	---	---	---	6	---	1	---	5
South Africa vs. Turkey	---	---	---	6	---	1	1	5
Spain vs. Taiwan	---	---	---	6	---	---	1	5
Spain vs. Turkey	---	---	---	6	---	---	3	5
Taiwan vs. Turkey	---	---	---	6	---	---	1	5
United States vs. Other	---	---	---	5	2	3	6	6
Bahrain vs. Other	---	---	---	5	---	---	3	4
Brazil vs. Other	---	---	---	5	1	1	1	4
Croatia vs. Other	---	---	---	5	---	1	1	4
Egypt vs. Other	---	---	---	5	---	---	3	4
Germany vs. Other	---	---	---	5	2	1	2	5
Greece vs. Other	---	---	---	5	---	1	3	4
India vs. Other	---	---	---	5	---	---	3	4

Table continued on next page.

Table F-2--Continued

CAAS: Perceived importance of factors other than price between product produced in one subject country and in other countries, by country pair

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
Indonesia vs. Other	---	---	---	5	---	---	4	4
Italy vs. Other	---	---	---	5	---	1	2	4
Korea vs. Other	---	---	---	5	---	---	2	4
Oman vs. Other	---	---	---	5	---	---	2	4
Romania vs. Other	---	---	---	5	---	---	3	4
Serbia vs. Other	---	---	---	5	---	1	1	4
Slovenia vs. Other	---	---	---	5	---	1	2	4
South Africa vs. Other	---	---	---	5	---	1	1	4
Spain vs. Other	---	---	---	5	---	---	2	4
Taiwan vs. Other	---	---	---	5	---	---	1	4
Turkey vs. Other	---	---	---	5	---	1	2	4

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

