

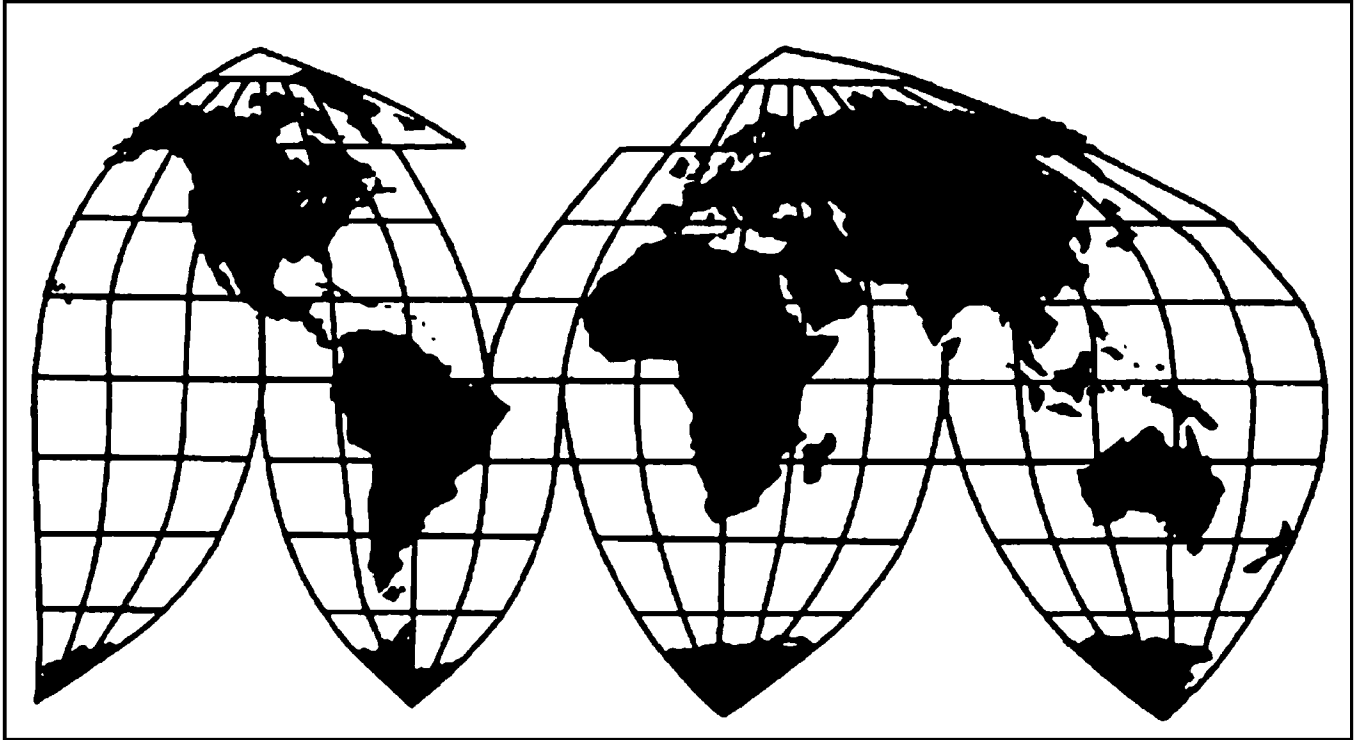
Steel Concrete Reinforcing Bar from Mexico and Turkey

Investigation Nos. 701-TA-502 and 731-TA-1227 (Review)

Publication 5122

October 2020

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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CONTENTS

	Page
Determinations	1
Views of the Commission	3
Part I: Introduction	I-1
Background.....	I-1
The original investigations.....	I-2
Previous and related investigations	I-4
Summary data	I-6
Statutory criteria	I-10
Organization of report.....	I-13
Commerce’s reviews	I-14
Administrative reviews.....	I-14
Circumvention rulings	I-17
Five-year reviews.....	I-17
The subject merchandise	I-19
Commerce’s scope	I-19
Tariff treatment.....	I-19
The product.....	I-22
Description and applications.....	I-22
Manufacturing processes	I-26
Domestic like product issues.....	I-28
U.S. market participants.....	I-30
U.S. producers	I-30
U.S. importers.....	I-32
U.S. purchasers.....	I-34
Apparent U.S. consumption and U.S. market shares.....	I-34

CONTENTS

	Page
Part II: Conditions of competition in the U.S. market.....	II-1
U.S. market characteristics.....	II-1
U.S. purchasers.....	II-3
Independent Steel Alliance	II-4
Related producers and suppliers.....	II-4
Channels of distribution	II-10
Geographic distribution	II-11
Supply and demand considerations.....	II-11
U.S. supply	II-11
U.S. demand	II-18
Substitutability issues.....	II-24
Lead times	II-24
Knowledge of country sources	II-24
Factors affecting purchasing decisions.....	II-25
Comparisons of domestic products, subject imports, and nonsubject imports.....	II-30
Comparison of U.S.-produced and imported rebar	II-32
Elasticity estimates.....	II-34
U.S. supply elasticity.....	II-34
U.S. demand elasticity.....	II-34
Substitution elasticity.....	II-34

CONTENTS

	Page
Part III: Condition of the U.S. industry.....	III-1
Overview	III-1
Changes experienced by the industry	III-1
Developments in the U.S. industry.....	III-4
Anticipated changes in operations.....	III-6
U.S. production, capacity, and capacity utilization	III-8
Constraints on capacity	III-14
U.S. producers' U.S. shipments and exports.....	III-14
U.S. producers' inventories.....	III-17
U.S. producers' imports.....	III-17
U.S. producers' purchases.....	III-20
U.S. employment, wages, and productivity	III-21
Financial experience of U.S. producers.....	III-22
Background.....	III-22
Operations on rebar	III-23
Net sales	III-34
Cost of goods sold and gross profit or (loss)	III-34
SG&A expenses and operating income or (loss)	III-37
All other expenses and net income or (loss).....	III-38
Variance analysis	III-39
Capital expenditures, research and development expenses, assets, & return on assets	III-40

CONTENTS

	Page
Part IV: U.S. imports and the foreign industries.....	IV-1
U.S. imports.....	IV-1
Overview.....	IV-1
Imports from subject and nonsubject sources.....	IV-1
Cumulation considerations	IV-6
Fungibility	IV-7
Geographical markets	IV-13
Presence in the market	IV-14
U.S. importers' imports subsequent to March 31, 2020	IV-20
U.S. importers' inventories	IV-20
Subject country producers	IV-23
The industry in Mexico	IV-23
The industry in Turkey.....	IV-31
Subject countries combined.....	IV-39
Antidumping or countervailing duty orders in third-country markets.....	IV-43
Safeguard measures in third-country markets	IV-45
Global market.....	IV-46
Prices	IV-47

CONTENTS

	Page
Part V: Pricing data	V-1
Factors affecting prices	V-1
Raw material costs	V-1
Transportation costs to the U.S. market.....	V-2
U.S. inland transportation costs.....	V-2
Pricing practices	V-2
Pricing methods.....	V-2
Sales terms and discounts.....	V-3
Price leadership	V-4
Price data.....	V-4
Price trends.....	V-15
Price comparisons	V-17
Appendixes	
A. <i>Federal Register</i> notices	A-1
B. List of hearing witnesses	B-1
C. Summary data	C-1
D. Narrative responses: impacts of the order and the likely impacts of revocation.....	D-1
E. Supplemental shipment data	E-1
F. Narrative responses: domestic like product	F-1
G. Section 232 actions by country	G-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-502 and 731-TA-1227 (Review)

Steel Concrete Reinforcing Bar from Mexico and Turkey

DETERMINATION

On the basis of the record¹ developed in the subject five-year reviews, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that revocation of the countervailing duty order on steel concrete reinforcing bar from Turkey and the antidumping duty order on steel concrete reinforcing bar from Mexico would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

BACKGROUND

The Commission instituted these reviews on October 1, 2019 (84 FR 52126) and determined on January 6, 2020 that it would conduct full reviews (85 FR 5036, January 28, 2020). Notice of the scheduling of the Commission’s reviews and of a public hearing 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* on April 16, 2020 (85 FR 21266). In light of the restrictions on access to the Commission building due to the COVID–19 pandemic, the Commission conducted its hearing through written testimony and video conference on August 6, 2020. All persons who requested the opportunity were permitted to participate.

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

Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the countervailing duty order on steel concrete reinforcing bar (“rebar”) from Turkey and the antidumping duty order on rebar from Mexico would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

I. Background

Original Investigations. The Rebar Trade Action Coalition (“RTAC”) filed petitions with Commerce and the Commission on September 4, 2013, alleging that an industry in the United States was materially injured and threatened with material injury by reason of subsidized imports of rebar from Turkey and less than fair value (“LTFV”) imports of rebar from Mexico and Turkey. In its final antidumping duty determinations, Commerce made an affirmative antidumping duty determination with respect to subject imports from Mexico and a negative antidumping duty determination with respect to subject imports from Turkey.¹ Accordingly, the Commission terminated its antidumping duty investigation with respect to imports of rebar from Turkey.² Further, Commerce made an affirmative final countervailing duty determination with respect to subject imports from Turkey other than exports by Turkish producer Habas Sinai ve Tibbi Gazlar Istihsal Endustrisi A.S. (“Habas”) which Commerce determined had a *de minimis* countervailable subsidy rate.³ Accordingly, Habas was treated as a nonsubject source for rebar in the final phase of the original investigations and it continues to be a nonsubject source in the current reviews.⁴

In October 2014, the Commission determined that an industry in the United States was materially injured by reason of imports of rebar from Mexico that were being sold at LTFV and imports of rebar from Turkey that were being subsidized by the government of Turkey.⁵ On

¹ Confidential Report (“CR”)/Public Report (“PR”) at I-2. *Steel Concrete Reinforcing Bar from Mexico: Final Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances*, 79 Fed. Reg. 54967, 54968 (Dep’t Commerce, Sept. 15, 2014); *Steel Concrete Reinforcing Bar From Turkey: Final Negative Determination of Sales at Less Than Fair Value and Final Determination of Critical Circumstances*, 79 Fed. Reg. 54965, 54966 (Dep’t Commerce, Sept. 15, 2014).

² *Steel Concrete Reinforcing Bar from Turkey; Termination of Investigation*, 79 Fed. Reg. 57131 (Sept. 24, 2014).

³ *Steel Concrete Reinforcing Bar from the Republic of Turkey: Final Affirmative Countervailing Duty Determination Final Affirmative Critical Circumstances Determination*, 79 Fed. Reg. 54963, 54964 (Dep’t Commerce, Sept. 15, 2014).

⁴ Confidential Report from the Original Investigations, EDIS Doc. No. 695739 at Table I-1; CR/PR at Table I-6.

⁵ *Steel Concrete Reinforcing Bar from Mexico and Turkey; Determinations*, 79 Fed. Reg. 65246 (Nov. 3, 2014); *Steel Concrete Reinforcing Bar from Mexico and Turkey*, Inv. Nos. 701-TA-502 and 731-TA-1227 (Final), USITC Pub. 4496 (Oct. 2014) (“Original Determinations”).

November 6, 2014, Commerce issued an antidumping duty order (“AD order”) covering rebar from Mexico and a countervailing duty order (“CVD order”) covering subject imports of rebar from Turkey.⁶

NAFTA Panel Review and Remand. On December 1, 2014, Deacero filed a request for a NAFTA Panel Review of the Commission’s Original Determinations. The NAFTA Panel affirmed the Commission’s cross-cumulation of subject imports from Mexico that were subject to the AD order with subject imports from Turkey subject to the CVD order, based on U.S. law and the Commission’s underselling and causation analyses.⁷ The Panel remanded the Commission’s finding regarding the inclusion in a single domestic like product of deformed steel wire meeting ASTM International (“ASTM”) standard A1064/A1064M with bar markings or subject to an elongation test for further explanation. After the Commission provided additional information on remand, the Panel affirmed the Commission’s original domestic like product finding.⁸

Current Reviews. On October 1, 2019, the Commission instituted these reviews.⁹ RTAC and its members as well as Mexican producers/exporters, Turkish producers/exporters, Çelik İhracatçileri Birliği – Steel Exporters Association (“CIB”), and the government of Turkey responded to the notice of institution.¹⁰ On January 6, 2020, the Commission determined that the individual responses submitted on behalf of RTAC, Nucor Corporation (“Nucor”), Gerdau Ameristeel US Inc. (“Gerdau”), Commercial Metals Company (“CMC”), and Steel Dynamics, Inc. (“SDI”) were adequate and that the domestic interested party group response to its notice of institution was adequate; the Commission also determined that the individual responses filed on behalf of Mexican producer/exporter Deacero S.A.P.I. de C.V. and its related importer Deacero USA, Inc. (collectively “Deacero”); Mexican producer/exporter Grupo Simec (“Simec”);

⁶ 79 Fed. Reg. 65925 (Dep’t Commerce, Nov. 6, 2014) (the final weighted-average dumping margins for subject imports from Mexico ranged from 20.58 to 66.70 percent); 79 Fed. Reg. 65926 (Dep’t Commerce, Nov. 6, 2014) (the net subsidy rate was 1.25 percent for imports of rebar subsidized by the government of Turkey).

⁷ *In the Matter of Steel Concrete Reinforcing Bar from Mexico and Turkey: Final Affirmative Antidumping Injury Determination*, Secretariat File No. USA-MEX 2014-1904-02, Interim Decision and Order of the Panel, issued July 14, 2016 (“NAFTA Panel Interim Decision”) at 27-35 and 46-58.

⁸ *Steel Concrete Reinforcing Bar from Mexico*, Inv. No. 731-TA-1227 (Final) (Remand) USITC Pub. 4645 (Oct. 2016) (“Remand Views”) at 3, 32-33. The Panel affirmed the Commission’s Remand Views on February 2, 2017. *Antidumping Injury Determination, Secretariat File No. USA-MEX 2014-1904-02, Final Decision issued February 2, 2017.*

⁹ *Steel Concrete Reinforcing Bar from Mexico and Turkey; Institution of Five-Year Reviews*, 84 Fed. Reg. 52126 (Oct. 1, 2019). Commerce initiated its five-year reviews of these two orders the same day. 84 Fed. Reg. 52067 (Oct. 1, 2019). Commerce issued the results of its expedited reviews thereafter. 85 Fed. Reg. 4945 (Jan. 28, 2020).

¹⁰ CR/PR at I-29 and Explanation of Commission Determination on Adequacy, EDIS Doc. No. 699154. Turkish Respondents stated that CIB is a Turkish trade association composed of 872 members and that 173 of its members are producers/exporters of rebar in Turkey. Colakoglu, Icdas, and Kaptan are members of CIB. Turkish Producers’ Response to Notice of Institution (Oct. 31, 2019) at 2-3, EDIS No. 692902. CIB is not an interested party as a majority of its members are not producers, exporters, or importers of rebar from Turkey. 19 U.S.C. § 1677 (9)(A).

Turkish producers/exporters Colakoglu Metalurji A.Ş. (“Colakoglu”), Icdas Celik Enerji Tersane ve Ulasim Sanayi A.S. (“Icdas”), and Kaptan Demir Celik Endustrisi ve Ticaret, A.S. (“Kaptan”); and the government of Turkey were adequate, and that the respondent interested party group response was adequate in each review.¹¹ The Commission determined to conduct full reviews of the 2014 orders on rebar from Mexico and Turkey pursuant to section 751(c)(5) of the Tariff Act.¹²

Several domestic producers of rebar have participated in these reviews. The Commission received prehearing and posthearing submissions and final comments from the RTAC, an interested party, filed on behalf of its five members, domestic producers Nucor, Gerdau, CMC, SDI, and Byer Steel (“Byer”).¹³ The Commission also received joint prehearing and posthearing submissions and final comments from Deacero and Simec (collectively, “Mexican Respondents”),¹⁴ and received joint prehearing and posthearing submissions as well as final comments from Turkish producers/exporters Colakoglu, Icdas, and Kaptan (collectively “Turkish Respondents”).¹⁵ Representatives of RTAC, Mexican Respondents, and Turkish Respondents appeared at the Commission’s hearing accompanied by counsel.¹⁶ Representatives of purchasers/fabricators Southwestern Suppliers, Inc., Suncoast Post-Tension, and PJ’s Rebar also appeared at the Commission’s hearing and presented testimony.

Data/Response Coverage. U.S. industry data are based on the questionnaire responses of seven U.S. producers of rebar that are believed to have accounted for virtually all domestic production of rebar in 2019.¹⁷ U.S. import data and related information are based on

¹¹ Explanation of Commission Determination on Adequacy, EDIS Doc. No. 699154.

¹² *Steel Concrete Reinforcing Bar from Mexico and Turkey; Notice of Commission Determination to Conduct Full Five-Year Reviews*, 85 Fed. Reg. 5036 (Jan. 28, 2020); Explanation of Commission Determination on Adequacy, EDIS Doc. No. 699154.

¹³ RTAC Prehearing Brief dated July 29, 2020 (“RTAC Prehearing Brief”); RTAC Posthearing Brief dated August 14, 2020 (“RTAC Posthearing Brief”). The petitions in the original investigations were filed by RTAC, whose individual members at that time were Byer, Cascade Steel Rolling Mills, Inc. (“Cascade”) CMC, Gerdau, and Nucor, all U.S. rebar producers. Confidential Report from the Original Investigations, EDIS Doc. No. 695739 at 3. Cascade and Byer were not members of RTAC in the adequacy phase of these reviews, and Cascade is not currently shown as a member of RTAC in RTAC’s briefs. However, Byer, CMC, Gerdau, Nucor, and SDI (which was not an original member) are all currently members of RTAC. Domestic Interested Parties Response to Notice of Institution (Oct. 30, 2019) at 2, Exhibit 1 and Exhibit 33. EDIS Doc. No. 692774. See RTAC Prehearing Brief at 1.

¹⁴ Mexican Respondents Prehearing Brief dated July 29, 2020 (“Mexican Respondents Prehearing Brief”); Mexican Respondents Posthearing Brief dated August 14, 2020 (“Mexican Respondents Posthearing Brief”).

¹⁵ Turkish Respondents Prehearing Brief dated July 29, 2020 (“Turkish Respondents Prehearing Brief”); Turkish Respondents Posthearing Brief dated August 14, 2020 (“Turkish Respondents Posthearing Brief”). The Turkish submissions are also filed on behalf of CIB.

¹⁶ In light of the restrictions on access to the Commission building due to the COVID-19 pandemic, the Commission conducted its hearing via videoconference and written testimony, as set forth in procedures provided to the parties.

¹⁷ CR/PR at I-13, I-30-31.

Commerce's official import statistics and the questionnaire responses of eleven U.S. importers of rebar which accounted for 77.2 percent of total subject U.S. imports during 2019, including virtually all subject U.S. imports from Mexico and 28.7 percent of subject U.S. imports from Turkey.¹⁸ Foreign industry data and related information are based on the questionnaire responses of eight rebar producers; four producers of subject merchandise in Mexico estimated to account for 77 percent of total rebar production in Mexico and four producers of subject merchandise in Turkey reported to account for 29 percent of total rebar production in Turkey.¹⁹

II. Domestic Like Product and Industry

A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the "domestic like product" and the "industry."²⁰ The Tariff Act defines "domestic like product" as "a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this subtitle."²¹ The Commission's practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.²²

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

{S}teel concrete reinforcing bar imported in either straight length or coil form (rebar) regardless of metallurgy, length, diameter, or grade. The subject merchandise is classifiable in the Harmonized Tariff Schedule of the United States (HTSUS) primarily under item numbers 7213.10.0000, 7214.20.0000, and 7228.30.8010.

The subject merchandise may also enter under other HTSUS numbers including 7215.90.1000, 7215.90.5000, 7221.00.0015, 7221.00.0030, 7221.00.0045, 7222.11.0001, 7222.11.0057, 7222.11.0059, 7222.30.0001, 7227.20.0080, 7227.90.6085, 7228.20.1000, and 7228.60.6000. Specifically excluded are plain

¹⁸ CR/PR at I-13.

¹⁹ CR/PR at I-13.

²⁰ 19 U.S.C. § 1677(4)(A).

²¹ 19 U.S.C. § 1677(10); see, e.g., *Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. 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); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int'l Trade 1990), *aff'd*, 938 F.2d 1278 (Fed. Cir. 1991); see also S. Rep. No. 249, 96th Cong., 1st Sess. 90-91 (1979).

²² See, e.g., *Internal Combustion Industrial Forklift Trucks from Japan*, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8-9 (Dec. 2005); *Crawfish Tail Meat from China*, Inv. No. 731-TA-752 (Review), USITC Pub. 3614 at 4 (July 2003); *Steel Concrete Reinforcing Bar from Turkey*, Inv. No. 731-TA-745 (Review), USITC Pub. 3577 at 4 (Feb. 2003).

rounds (*i.e.*, non-deformed or smooth rebar). Also excluded from the scope is deformed steel wire meeting ASTM A1064/A1064M with no bar markings (*e.g.*, mill mark, size, or grade) and without being subject to an elongation test. HTSUS numbers are provided for convenience and customs purposes; however, the written description of the scope remains dispositive.²³

Rebar is a long-rolled steel product commonly used in construction projects to provide strength to concrete. The rebar subject to these investigations is deformed rebar, which is the type of rebar used almost exclusively in the United States because its ridges provide greater adherence to concrete than plain rebar. Rebar sold in the U.S. market is generally manufactured to conform to ASTM standards with respect to weight, dimensions, chemical composition, strength, deformation, and elongation requirements. Rebar is available in sizes 3 through 18 as specified by ASTM standards. To conform to ASTM specifications, deformed rebar is identified by bar markings.²⁴ Guidelines for use of deformed rebar in building construction are provided by the American Concrete Institute (ACI) 318 Code. Guidelines for the use of deformed rebar in highway and bridge construction are provided by the American Association of State and Highway and Transportation Officials (“AASHTO”) Standard Specifications.²⁵

Original Investigations. In the original investigations, petitioners argued that the Commission should define a single domestic like product that is coextensive with the scope of the investigations, including deformed steel wire within the scope. Deacero argued that the Commission should find that deformed steel wire within the scope is a separate domestic like product from rebar, arguing that it had different physical characteristics from rebar and that it was manufactured through a different process. The Commission considered Deacero’s arguments and concluded that domestically produced deformed steel wire within the scope was similar to domestically produced rebar in characteristics and uses, channels of distribution, interchangeability, and customer and producer perceptions, although it was usually produced on different equipment using a different production process and was considered more costly to produce. The Commission defined the domestic like product to be coextensive with the scope of the investigations.²⁶

²³ *Steel Concrete Reinforcing Bar from the Republic of Turkey: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order*, 85 Fed. Reg. 4945, 4946 (Jan. 28, 2020); *Steel Concrete Reinforcing Bars (Rebar) From Mexico: Final Results of Expedited Sunset Review of Antidumping Duty Order*, 85 Fed. Reg. 6512, 6512-13 (Feb. 5, 2020). On June 8, 2020, Commerce determined that rebar from Mexico produced and/or exported by Deacero that is bent on one or both ends but otherwise meets the description of in-scope merchandise is circumventing the AD order on rebar from Mexico. CR/PR at I-15; 85 Fed. Reg. 35065 (June 8, 2020).

²⁴ CR/PR at I-22-23. Deformed steel wire sold in the U.S. market is manufactured to conform to ASTM standards and is often used to produce welded wire mesh for concrete reinforcement. CR/PR at I-25.

²⁵ CR/PR at I-23-24.

²⁶ Original Determinations at 6-9.

The Current Reviews. In these reviews, RTAC argues that the Commission should adopt the domestic like product definition from the original determinations.²⁷ Turkish Respondents indicated in their response to the Commission’s notice of institution that they did not object to the Commission’s like product definition from the original investigations.²⁸

Mexican Respondents voiced concerns in their response to the Commission’s notice of institution and in their comments on the draft questionnaires that Commerce may modify the scope in these reviews to include fabricated rebar, which they claimed would impact the Commission’s domestic like product definition. The Mexican Respondents also requested that the Commission gather information sufficient to determine whether in-scope deformed steel wire should be a separate domestic like product from rebar.²⁹ Commerce did not modify the scope when it issued its expedited results of its first sunset reviews.³⁰ Moreover, the Commission issued questionnaires to rebar producers and to any known U.S. producers of deformed wire. No U.S. producer reported producing in-scope deformed steel wire meeting ASTM A1064/A1064M with bar markings or subject to an elongation test during the period of review.³¹ Given that in-scope deformed steel wire was not produced in the United States during the period of review, it cannot be a separate domestic like product.³² Therefore, there is no information on the record to indicate that we should revisit the domestic like product definition from the original determinations, which was upheld on appeal.³³ We define the domestic like product to be coextensive with the scope of these reviews, as the Commission did in the original determinations.

B. Domestic Industry and Related Parties

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of

²⁷ RTAC Prehearing Brief at 3; CR/PR at I-29.

²⁸ CR/PR at I-29; Turkish Response to Notice of Institution at 17.

²⁹ Mexican Response to Notice of Institution at 14; Mexican Respondents Comments on Draft Questionnaires dated April 21, 2020 at 2-3. Mexican Respondents made no domestic like product arguments in their prehearing or posthearing briefs.

³⁰ CR/PR at I-19. The scope of these reviews is the same as the scope of the original investigations. Original Determinations at 5.

³¹ CR/PR at I-25. The period of review is from January 1, 2014 to March 30, 2020.

³² See *Petroleum Wax Candles from China*, Inv. No. 731-TA-282 (Second Review), USITC Pub. 3790 (July 2005) at n.42.

³³ See *generally*, CR/PR at I-28-I-30. Although deformed steel wire is not produced by the domestic industry and therefore cannot be a separate domestic like product from rebar, we include it in our definition of the domestic like product since deformed steel wire meeting ASTM A1064/A1064M with bar markings or subject to an elongation test is included in Commerce’s scope of investigation.

the product.”³⁴ In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.³⁵

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 or which are themselves importers.³⁶ Exclusion of such a producer is within the Commission’s discretion based upon the facts presented in each investigation.³⁷

In the original investigations, the Commission did not exclude any related parties under 19 U.S.C. § 1677(4)(B). The Commission found that domestic producer *** qualified as a related party because it imported subject merchandise during the original investigations and ArcelorMittal USA qualified as a related party because it was related to a Mexican rebar producer. The Commission found that appropriate circumstances did not exist to exclude

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

³⁵ RTAC argues that the Commission should adopt its domestic industry definition from the original investigations and include all domestic producers of the domestic like product in the domestic industry. RTAC Prehearing Brief at 4-5. In its response to the notice of institution, Turkish Respondents did not object to the Commission’s definition of the domestic industry from the original investigations. Turkish Response to Notice of Institution at 17. Mexican Respondents do not address the Commission’s definition of the domestic industry in their briefs; their arguments in their response to the notice of institution and comments on the draft questionnaires regarding inclusion of rebar fabricators in the domestic industry became moot when Commerce did not include fabricated rebar in the scope of these investigations. Mexican Response to Notice of Institution at 14; Mexican Respondents Comments on Draft Questionnaires dated April 21, 2020 at 2.

³⁶ *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).

³⁷ 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 Co. v. United States*, 790 F. Supp. at 1168.

either U.S. producer from the domestic industry because *** domestic production of rebar was *** than its imports of subject merchandise and ArcelorMittal USA's domestic production of rebar was *** than the rebar exports to the United States by its Mexican affiliate. Moreover, ArcelorMittal USA *** financial benefit from its affiliation with its related subject producer. The Commission concluded that the primary interest of both producers appeared to be in domestic production.³⁸

We find that U.S. producers *** and *** are subject to possible exclusion from the domestic industry under the related parties provision in these reviews. *** imported subject merchandise over the period of review,³⁹ and *** imported subject merchandise.⁴⁰ We find that appropriate circumstances do not exist to exclude *** or *** from the domestic industry based on the following analysis.

***. *** accounted for *** of U.S. rebar production in 2019, it was a petitioner in the original investigations, it is a member of RTAC, and it supports continuation of the orders.⁴¹ Its imports of subject merchandise were *** as a share of its domestic production from 2014 to 2017, then ceased altogether. *** domestic production ranged between *** short tons from 2014 to 2017; its imports of subject merchandise during that time were *** short tons in 2014, *** short tons in 2015, *** short tons in 2016, and *** short tons in 2017.⁴² Its ratio of subject imports to production was *** percent in 2014, *** percent in 2015, *** percent in 2016, and *** percent in 2017. *** reported that ***.⁴³

Given *** low and decreasing ratio of subject imports to its U.S. production from 2014 to 2017, the fact that it ceased importing subject imports after 2017, and its assertion that it imported subject imports ***, we find that *** principal interest lies in domestic production.

³⁸ Confidential Original Determinations at 13-16, EDIS Doc. Number 545234 ("Confidential Original Determinations"). The Commission also determined that U.S. producer Gerdau was affiliated with a Mexican producer but that that Mexican producer ***. Therefore, Gerdau was not a related party. *Id.* at 14.

³⁹ CR/PR at Table I-8. *** also has a *** that is an importer of rebar but the record reflects that ***, imports subject merchandise. CR/PR at Table III-8. *** over the period of review from 2014 to 2016; it purchased *** short tons in 2014, *** short tons in 2015, and *** short tons in 2016, after which it ceased purchasing these imports. These purchases were *** of *** U.S. production in each of those years. CR/PR at Table III-9. Given that these purchases do not involve large volumes of imports, we do not consider these purchases to constitute direct or indirect control over a large volume of subject imports and thus they are not a basis for finding *** to be a related party.

⁴⁰ CR/PR at Table I-8 and Table III-8. As in the original investigations, U.S. producer *** is affiliated with a Mexican producer, ***, but the record reflects that *** to the United States during the period of review so we find that *** is not a related party. CR/PR at I-31 n.70 and Table I-8.

⁴¹ CR/PR at I-2 and Table I-7.

⁴² CR/PR at Table III-8. ***. *Id.*

⁴³ CR/PR at Table III-8. *** further reported that after antidumping duty orders were imposed on rebar from Turkey, Japan, and Taiwan in 2017 (along with a countervailing duty order on Turkish producer Habas), it made a company-wide decision not to encourage further dumped/subsidized imports through either purchases or imports. *Id.*

Therefore, we find that appropriate circumstances do not exist to exclude *** from the domestic industry as a related party.

***. *** accounted for *** of U.S. rebar production in 2019, it was a petitioner in the original investigations, it is a member of RTAC, and it supports continuation of the orders.⁴⁴ *** imported subject merchandise from 2017 to the first quarter of 2020 (January to March (“interim”) 2020); *** imports of subject merchandise were *** as a share of *** domestic production. *** domestic production ranged between *** short tons from 2017 to 2019 and it was *** short tons in interim 2020; *** imports of subject merchandise were *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, and *** short tons in interim 2020.⁴⁵ The ratio of *** subject imports to *** production was *** percent in 2017, 2018, and 2019 and interim 2020. ***.⁴⁶

Given the very low ratio of *** imports of subject merchandise to *** U.S. production, and the fact that *** did not import subject merchandise for much of the period of review, we find that *** principal interest lies in domestic production. We therefore find that appropriate circumstances do not exist to exclude *** from the domestic industry as a related party.

Accordingly, based on our definition of the domestic like product, we define the domestic industry as all domestic producers of rebar.⁴⁷

III. Cumulation

A. Legal Standard

With respect to five-year reviews, section 752(a) of the Tariff Act provides as follows: the Commission may cumulatively assess the volume and effect of imports of the subject merchandise from all countries with respect to which reviews under section 1675(b) or (c) of this title were initiated on the same day, if such imports would be likely to compete with each other and with domestic like products in the United States market. The Commission shall not cumulatively assess the volume and effects of imports of the subject merchandise in a case in which it determines that such imports are likely to have no discernible adverse impact on the domestic industry.⁴⁸

Cumulation therefore is discretionary in five-year reviews, unlike original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.⁴⁹ The Commission may exercise its

⁴⁴ CR/PR at I-2 and Table I-7.

⁴⁵ CR/PR at Table III-8.

⁴⁶ CR/PR at Table III-8.

⁴⁷ CR/PR at Table I-7.

⁴⁸ 19 U.S.C. § 1675a(a)(7).

⁴⁹ 19 U.S.C. § 1677(7)(G)(i); *see also, e.g., Nucor Corp. v. United States*, 601 F.3d 1291, 1293 (Fed. Cir. 2010) (Commission may reasonably consider likely differing conditions of competition in deciding whether to cumulate subject imports in five-year reviews); *Allegheny Ludlum Corp. v. United States*, 475 (Continued...)

discretion to cumulate, however, only if the reviews are initiated on the same day, the Commission determines that the subject imports are likely to compete with each other and the domestic like product in the U.S. market, and imports from each such subject country are not likely to have no discernible adverse impact on the domestic industry in the event of revocation. Our focus in five-year reviews is not only on present conditions of competition, but also on likely conditions of competition in the reasonably foreseeable future.

Original Investigations. In the original investigations, the Commission cumulated subject imports from Mexico and Turkey for purposes of its material injury determinations. The Commission rejected Deacero's cross-cumulation arguments, stating that its longstanding practice of cross-cumulating subject imports subject to Commerce's affirmative subsidy determinations with imports subject to Commerce's affirmative dumping determinations, when the conditions for cumulation were otherwise met, was consistent with U.S. law.⁵⁰

The Commission also found a reasonable overlap of competition between and among subject imports from Mexico and Turkey and the domestic like product.⁵¹ It found that the record indicated that the domestic like product, subject imports from Mexico, and subject imports from Turkey were fungible, and that there was an overlap between domestically produced rebar and subject imports from Mexico and Turkey with respect to lengths, sizes, and grades of rebar offered.⁵² The Commission found that an appreciable share of domestically produced rebar, subject imports from Mexico, and subject imports from Turkey were sold to distributors, that they had a substantial overlap in geographic markets, and that they were simultaneously in the U.S. market *** the period of investigations.⁵³ Having found a reasonable overlap of competition, the Commission cumulated subject imports from Mexico and Turkey for purposes of its material injury analysis.⁵⁴

Parties' Arguments. RTAC argues that the Commission should cumulatively assess subject imports from Mexico and Turkey. It argues that subject imports from Mexico and Turkey will likely have a discernible adverse impact in the event of revocation because subject producers/exporters in each country have excess rebar supply, are traditionally export-oriented, have continuously shipped rebar to the U.S. market, have increased exports to the U.S. market in 2020, and undersold the U.S. product throughout the period of review.⁵⁵ RTAC asserts that there would likely be a reasonable overlap of competition between subject imports from Mexico, subject imports from Turkey, and the domestic product because rebar from all three sources is highly fungible, competes in the distributor segment of the market, was

(...Continued)

F. Supp. 2d 1370, 1378 (Ct. Int'l Trade 2006) (recognizing the wide latitude the Commission has in selecting the types of factors it considers relevant in deciding whether to exercise discretion to cumulate subject imports in five-year reviews); *Nucor Corp. v. United States*, 569 F. Supp. 2d 1328, 1337-38 (Ct. Int'l Trade 2008).

⁵⁰ Original Determinations at 12-13.

⁵¹ Original Determinations at 13-15.

⁵² Original Determinations at 13-14.

⁵³ Original Determinations at 14-15, Confidential Original Determinations at 22.

⁵⁴ Original Determinations at 15.

⁵⁵ RTAC Prehearing Brief at 5-33.

present in most months of the period of review, and overlaps geographically.⁵⁶ RTAC also asserts that subject imports from Mexico and Turkey would likely compete under similar conditions of competition if the orders were revoked because subject producers in both countries face declining capacity utilization rates, excess rebar supply, and face what is claimed to be depressed demand for rebar in their home markets; RTAC asserts that subject imports from both countries will be attracted to the U.S. market because of its large size, its higher prices relative to other markets, and the fact that producers in both Mexico and Turkey have U.S.-based selling arms to maintain and grow their U.S. customer base.⁵⁷

Mexican Respondents argue that the Commission should not cumulate subject imports.⁵⁸ They argue that in the event of revocation subject imports are likely to have no discernible adverse impact on the domestic industry. In support, Mexican respondents maintain that there were low volumes of subject imports from Mexico during the original investigations and the period of review and that these volumes had no discernible adverse impact on the domestic industry. The Mexican Respondents assert that this pattern will continue for the foreseeable future; therefore, subject imports from Mexico will not likely have a discernible adverse impact if the order is revoked. They also note in support that, despite underselling the domestic like product throughout the period of review and applicable administrative antidumping duty rates frequently at or near zero, subject imports from Mexico comprised a small share of the U.S. market and did not gain market share at the expense of the domestic industry to any significant degree. In addition, they assert that the Mexican industry remains focused on its domestic market and has a low export orientation with a high capacity utilization. Further, they argue that neither the exit of subject imports from Mexico from the U.S. market between 2014 to 2016 nor their return from 2017 forward had a measurable positive or negative impact on the domestic industry.⁵⁹ Mexican Respondents also argue that the Joint Section 232 Agreement between Mexico and the United States entered into in May

⁵⁶ RTAC Prehearing Brief at 34-38.

⁵⁷ RTAC Prehearing Brief at 38-41.

⁵⁸ Deacero argues, as it did in the original investigations and before the NAFTA Panel in *In the Matter of Steel Concrete Reinforcing Bar from Mexico and Turkey: Final Affirmative Antidumping Injury Determination*, Secretariat File No. USA-MEX 2014-1904-02, that the Commission should not cross-cumulate subject imports from Mexico and Turkey. Mexican Respondents Prehearing Brief at 3-5. Consistent with U.S. law, we follow our longstanding practice of cross-cumulating imports subject to Commerce's affirmative subsidy determinations with imports subject to Commerce's affirmative dumping determinations, when the conditions for cumulation are otherwise met. *See Polyethylene Terephthalate (PET) Resin from Canada, China, India, and Oman*, Inv. Nos. 701-TA-531-532 and 731-TA-1270-1273 (Final), USITC Pub. 4604 at 9-11 (April 2016); *Circular Welded Carbon-Quality Steel Pipe from India, Oman, the United Arab Emirates, and Vietnam*, Inv. Nos. 701-TA-482 to 484 (Final), USITC Pub. 4362 at 12 n.59 (Dec. 2012); *Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Final), USITC Pub. 3509 at 29-31 (May 2009); *Bingham & Taylor v. United States*, 815 F.2d 982 (Fed. Cir. 1987).

⁵⁹ Mexican Respondents Prehearing Brief at 5-8; Mexican Respondents Posthearing Brief at 2-4, Responses to Commissioner Questions at 13-18.

2019 (“the Section 232 Agreement”) limits subject imports from Mexico, adding to the likelihood that subject imports from Mexico will have no discernible adverse impact on the domestic industry upon revocation.⁶⁰

Further, Mexican Respondents argue that there would likely not be a reasonable overlap in competition between subject imports from Mexico and subject imports from Turkey in the U.S. market because rebar producers in Mexico, Turkey, and the United States compete in different ranges of length and size of rebar which limits their fungibility;⁶¹ Mexican rebar producers are more focused on the distributor channel than are U.S. and Turkish suppliers;⁶² and the actual geographic penetration of subject imports from Mexico is much more limited than the regional-based data collected by the Commission suggests.⁶³

Mexican Respondents also claim that subject imports from Mexico and Turkey would compete under different conditions of competition if the orders were revoked. They contend that the Mexican industry focuses on its home market and regional export markets, whereas Turkey’s rebar industry is a much larger, export-oriented industry that ships rebar worldwide and faces more trade measures in third-country markets than Mexico.⁶⁴ In addition, they point to significant differences in the trade measures faced by Turkish and Mexican exporters in the U.S. market – Mexican producers operate under the volume restraining effects of the Joint Section 232 Agreement while subject Turkish producers remain subject to Section 232 tariffs as well as the antidumping duty order imposed on rebar from Turkey in 2017.⁶⁵

Turkish Respondents argue that subject imports are not likely to increase and will not have a significant impact on the domestic rebar industry because only a portion of the Turkish industry is subject to the CVD order and the rates under the annual administrative reviews of the CVD order have been low or *de minimis*.⁶⁶ Moreover, the Turkish Respondents assert that the 2017 antidumping duty order on rebar from Turkey, which applies to all

⁶⁰ Mexican Respondents Prehearing Brief at 6-8. A Joint Statement by the United States and Mexico on Section 232 states those countries’ agreement to eliminate the tariffs the United States imposed under Section 232 of the Trade Expansion Act of 1962, as amended (“Section 232 tariffs”) on imports of aluminum and steel products (including rebar) from Mexico, to monitor trade between them, and that in the event that imports of aluminum or steel products “surge meaningfully beyond historic volumes of trade,” the importing country may request consultations with the exporting country, and after such consultations, the importing party may impose duties of 25 percent for steel. Joint Statement by the United States and Mexico on Section 232 Duties on Steel and Aluminum dated May 17, 2019. CR/PR at II-2 n.4.

⁶¹ Mexican Respondents Prehearing Brief at 9-10.

⁶² Mexican Respondents Prehearing Brief at 12-13.

⁶³ Mexican Respondents Prehearing Brief at 10-12.

⁶⁴ Mexican Respondents Prehearing Brief at 13-16.

⁶⁵ Mexican Respondents Prehearing Brief at 13,16; Mexican Respondents Posthearing Brief at 2.

⁶⁶ Turkish Respondents Prehearing Brief at 8. Turkish producers also argue that Turkish producers and exports have shifted away from the U.S. market in favor of strong home and regional markets, contrasting the share of total exports of rebar from Turkey to the United States (1.7 percent) with the share of total exports of rebar from Mexico to the United States (18 percent). *Id.* at 9.

producers/exporters in that country, is much more impactful than the CVD order under review here.⁶⁷ In addition, according to Turkish Respondents, subject imports from Turkey and Mexico will likely compete under different conditions of competition in the U.S. market if the orders are revoked due to differences in the trade measures against them in the U.S. market. Turkish Respondents argue that subject imports from Mexico are no longer subject to Section 232 steel tariffs, while subject imports from Turkey remain subject to them, and, in fact, the Section 232 tariffs on Turkey were raised to 50 percent during part of the review period. And, as noted above, the Turkish Respondents point to the antidumping duty order on rebar from Turkey as another condition of competition in the United States not faced by the Mexican Respondents. As a result of the heightened trade measures on subject imports from Turkey, they have had different volume trends over the period of review than subject imports from Mexico: subject imports from Mexico increased from 2014 to 2019, while subject imports from Turkey decreased.⁶⁸

B. Likelihood of No Discernible Adverse Impact

The statute precludes cumulation if the Commission finds that subject imports from a country are likely to have no discernible adverse impact on the domestic industry.⁶⁹ Neither the statute nor the Uruguay Round Agreements Act (“URAA”) Statement of Administrative Action (“SAA”) provides specific guidance on what factors the Commission is to consider in determining that imports “are likely to have no discernible adverse impact” on the domestic industry.⁷⁰ With respect to this provision, the Commission generally considers the likely volume of subject imports and the likely impact of those imports on the domestic industry within a reasonably foreseeable time if the orders are revoked. Our analysis for each of the subject countries takes into account, among other things, the nature of the product and the behavior of subject imports in the original investigations.

Mexico. In the original investigations, the volume of subject imports from Mexico was 283,285 short tons in 2011; 293,749 short tons in 2012; 338,200 short tons in 2013; 77,482 short tons in January-March 2013; and 83,281 short tons in January-March 2014.⁷¹ Over the period of review, the volume of subject imports from Mexico was 99,319 short tons in 2014; 5,370 short tons in 2015; 3,494 short tons in 2016; 26,928 short tons in 2017; 102,866 short tons in 2018; 140,995 short tons in 2019; 13,939 short tons in interim 2019; and 61,466 short tons in interim 2020.⁷² As a share of apparent U.S. consumption, subject imports from Mexico accounted for 1.2 percent in 2014, 0.1 percent in 2015, 0.0 percent in 2016, 0.3 percent in

⁶⁷ Turkish Respondents Prehearing Brief at 8.

⁶⁸ Turkish Respondents Prehearing Brief at 8-10.

⁶⁹ 19 U.S.C. § 1675a(a)(7).

⁷⁰ SAA, H.R. Rep. No. 103-316, vol. I at 887 (1994).

⁷¹ Confidential Report from the Original Investigations, EDIS Doc. No. 695739, at Table IV-2.

⁷² CR/PR at Table I-10.

2017, 1.2 percent in 2018, 1.7 percent in 2019, 0.7 percent in interim 2019, and 2.8 percent in interim 2020.⁷³

All four leading producers of rebar in Mexico (ArcelorMittal, Deacero, Grupo Acerero, and Grupo Simec) provided questionnaire responses in these reviews and are believed to account for most of the rebar production in Mexico.⁷⁴ Responding Mexican producers reported producing *** short tons in 2019; according to *** data, *** short tons of rebar were produced in Mexico in 2019.⁷⁵

Responding Mexican producers' production capacity increased from *** short tons in 2014 to *** short tons in 2019 and was *** in interim 2020, at *** short tons, than in interim 2019, at *** short tons. Capacity utilization for the responding producers was *** percent in 2014, *** percent in 2015, *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in interim 2019, and *** percent in interim 2020.⁷⁶ Responding Mexican producers had excess capacity to produce *** short tons of rebar in 2019, and *** short tons in interim 2020 and had end-of-period inventories of *** short tons in interim 2020.⁷⁷

Based on the data provided by the responding Mexican producers, most rebar produced in Mexico was consumed domestically, with home market shipments accounting for *** percent of all shipments in 2019.⁷⁸ Export shipments as a share of total shipments were *** percent in 2014, *** percent in 2015, *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in interim 2019 and *** percent in interim 2020.⁷⁹ Forty-three percent of all 2019 exports measured by value were destined for Colombia.⁸⁰ Responding Mexican producers' exports to the United States increased overall from 2014 to 2019 and were higher in interim 2020 than in interim 2019.⁸¹ Responding Mexican producers continuously exported to the United States during the period of review notwithstanding the order and their exports to the United States were more than *** percent higher in interim 2020 (*** short tons) than in interim 2019 (*** short tons).⁸² Subject imports from Mexico

⁷³ CR/PR at Table I-11.

⁷⁴ CR/PR at IV-23.

⁷⁵ CR/PR at IV-22 and Table IV-12.

⁷⁶ CR/PR at Table IV-12. The record reflects that Mexican producers produce other products on the same equipment used to produce rebar. Overall capacity utilization on that equipment was *** percent in 2014, *** percent in 2015, *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in interim 2019 and *** percent in interim 2020. CR/PR at Table IV-13.

⁷⁷ Calculated from CR/PR at Table IV-12.

⁷⁸ CR/PR at Table IV-12.

⁷⁹ CR/PR at Table IV-12.

⁸⁰ CR/PR at IV-30. Based on Global Trade Atlas data and measured by value, Mexican exports to Colombia constituted 59.7 percent of its exports in 2017, 54.2 percent of its exports in 2018, and 43.0 percent of its exports in 2019. CR/PR at Table IV-14.

⁸¹ CR/PR at Table IV-12.

⁸² CR/PR at Table IV-12.

undersold the domestic like product in *** of *** quarterly comparisons during the original investigations and *** of *** quarterly comparisons in these reviews.⁸³

We find that subject producers in Mexico have excess capacity to ship additional exports of rebar to the United States, that they export a substantial share of their total shipments, that they have an interest in and established relationships for exporting subject merchandise to the United States given their near-continuous presence in the U.S. market notwithstanding the order,⁸⁴ and that they increased their exports to the United States in 2017, 2018, 2019, and interim 2020.⁸⁵ Based on the record in these reviews, including evidence of underselling in the original investigations and these reviews, we find that the volume of subject imports from Mexico would likely increase if the AD order on rebar from Mexico were revoked, as Mexican producers use excess capacity or inventories, or divert exports from third country markets to ship additional exports to the United States.⁸⁶ We find that this volume would likely have a discernible adverse impact on the domestic industry through lower sales and market share and/or the inability to gain higher prices in the face of heightened import competition.⁸⁷ Therefore, we do not find that subject imports from Mexico would likely have no discernible adverse impact on the domestic industry if the order on subject imports from Mexico were revoked.⁸⁸

⁸³ Confidential Report from the Original Investigations, EDIS Doc. No. 695739, at Table V-10; CR/PR at V-17 and Table V-9.

⁸⁴ CR/PR at Table IV-6. As further discussed in section IV.C.2, below, we find it likely that the large U.S. market would appear more attractive upon revocation of the AD order on Mexico, particularly given its generally higher prices relative to the Mexican home markets and other global markets.

⁸⁵ CR/PR at Table IV-12. In addition, as further discussed below, as their third-country markets for rebar become less attractive due to factors including new local supply, we find it likely that the large U.S. market would appear more attractive to subject producers in Mexico if the AD order were revoked, particularly given its generally higher prices relative to other global markets.

⁸⁶ We further discuss the likely volume of subject imports from Mexico if the order were revoked in Section IV.C.2., below.

⁸⁷ We are not persuaded by Mexican Respondents' argument that low import volumes and market share during the period of review despite underselling and low administrative antidumping duty margins, is indicative of likely import volumes or impact in the event of revocation. As stated above and in section IV.E.2., below, in the event of revocation, we find that Mexican producers would likely increase exports to the United States, continuing or intensifying underselling on a larger volume of subject imports to gain further sales and market share once freed of the discipline of the AD order, and that this increased volume and underselling would have a significant adverse impact on the domestic industry.

⁸⁸ As further discussed in Section IV.C.2., below, although Mexican Respondents argue that the Section 232 Agreement will limit subject imports from Mexico, we note that by eliminating the Section 232 tariffs on Mexico, and setting up a process to monitor imports that may after consultations between the parties lead to re-imposition of duties if imports "surge meaningfully" "beyond historic trade volumes," the Section 232 Agreement is likely to be less of a restraint on subject import volume from Mexico than the Section 232 tariffs. This conclusion of lessened restraint is consistent with the sharply (Continued...)

Turkey. In the original investigations, the volume of subject imports from Turkey (which excluded rebar from Turkish producer Habas) was *** short tons in 2011; *** short tons in 2012; *** short tons in 2013; *** short tons in January-March 2013; and *** short tons in January-March 2014.⁸⁹ Over the period of review, the volume of subject imports from Turkey was *** short tons in 2014, *** short tons in 2015, *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in interim 2019 and *** short tons in interim 2020.⁹⁰ As a share of apparent U.S. consumption, subject imports from Turkey accounted for *** percent in 2014, *** percent in 2015, *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in interim 2019 and *** percent in interim 2020.⁹¹

Four Turkish firms (Colakoglu, Icdas, Izmir Demir, and Kroman) provided foreign producer questionnaire responses. These four firms report that they represent only 28.7 percent of all subject production of rebar in Turkey. Other evidence confirms they account for only a minority of Turkey's rebar production and capacity. *** data estimate that Turkey had a total production capacity of *** short tons of rebar in 2019 and that Habas represented *** percent of Turkish rebar production capacity; subtracting out Habas' capacity leaves an estimated *** short tons of production capacity in Turkey in 2019.⁹² In comparison, responding Turkish producers reported production capacity of *** short tons in 2019.⁹³ Similarly, the government of Turkey estimated in the adequacy phase of these reviews that 25 Turkish firms produced *** short tons of rebar in 2018 and *** data estimate that Turkey's rebar production was *** short tons of rebar in 2019, but both of these estimates would include production by Habas.⁹⁴ In comparison, the four responding Turkish producers reported producing *** short tons of rebar in 2019.⁹⁵ Therefore, because of the limited number of responses to the Commission's questionnaire, our record does not contain responses from firms accounting for most of the rebar production in Turkey.

Responding Turkish producers' production capacity increased from *** short tons in 2014 to *** short tons in 2019 and was *** higher in interim 2020, at *** short tons, than in interim 2019, at *** short tons. Capacity utilization of the responding producers was *** percent in 2014, *** percent in 2015, *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in interim 2019, and *** percent in interim 2020.⁹⁶

(...Continued)

higher subject imports from Mexico in interim 2020 after the Section 232 Agreement came into effect compared to interim 2019.

⁸⁹ Confidential Report from the Original Investigations, EDIS Doc. No. 695739 at Table IV-2.

⁹⁰ CR/PR at Table I-10.

⁹¹ CR/PR at Table I-11.

⁹² CR/PR at IV-31. As a point of reference, U.S. production capacity for rebar was *** short tons in 2019. CR/PR at Table III-4.

⁹³ CR/PR at Table IV-17.

⁹⁴ CR/PR at IV-31.

⁹⁵ CR/PR at IV-30 and Table IV-15.

⁹⁶ CR/PR at Table IV-17. The record reflects that Turkish producers produce other products on the same equipment used to produce rebar. Overall capacity utilization on that equipment was *** (Continued...)

Responding Turkish producers had excess capacity to produce *** short tons of rebar in 2019, and *** short tons in interim 2020, and had end-of-period inventories of *** short tons in interim 2020.⁹⁷ Given that a large number of Turkish producers have not responded to questionnaires, it is likely that the total industry in Turkey possesses even more excess capacity.

Based on the data provided by the responding Turkish producers, export shipments as a share of total shipments were *** percent in 2014, *** percent in 2015, *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in interim 2019, and *** percent in interim 2020.⁹⁸ From 2014 to 2019, exports of Turkish rebar by responding Turkish producers to Asia more than doubled from slightly more than *** short tons to almost *** short tons, accounting for *** percent of all reported shipments in 2019.⁹⁹ Responding Turkish producers' exports to the United States decreased overall from 2014 to 2019 (although their exports increased from 2014 to 2015) and were higher in interim 2020 than in interim 2019, when exports to the United States were ***.¹⁰⁰

***, responding Turkish producers continuously exported to the United States during the period of review notwithstanding the order; their exports to the United States were *** in interim 2019 and *** short tons in interim 2020.¹⁰¹ Subject imports from Turkey undersold the domestic like product in *** of *** quarterly comparisons during the original investigations and *** of *** quarterly comparisons in these reviews.¹⁰²

We find that subject producers in Turkey have excess capacity to ship additional exports of rebar to the United States, that they export a substantial share of their total shipments, that they have an interest in exporting subject merchandise to the United States given their near-continuous presence in the U.S. market notwithstanding the order,¹⁰³ and that they increased their exports to the United States in interim 2020 compared to interim 2019. Based on the record in these reviews, including evidence of underselling in the original investigations and these reviews, we find that the volume of subject imports from Turkey would likely increase if the CVD order on subject imports from Turkey were revoked, as Turkish producers use excess capacity or divert exports from third country markets to ship additional exports to the United

(...Continued)

percent in 2014, *** percent in 2015, *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in interim 2019 and *** percent in interim 2020. CR/PR at Table IV-18.

⁹⁷ Calculated from CR/PR at Table IV-17.

⁹⁸ CR/PR at Table IV-17.

⁹⁹ CR/PR at IV-32.

¹⁰⁰ CR/PR at Table IV-17.

¹⁰¹ CR/PR at Table IV-17. As further discussed below, subject imports from Turkey were subject to lower section 232 tariffs of 25 percent in interim 2020 rather than 50 percent during interim 2019.

¹⁰² Confidential Report from the Original Investigations, EDIS Doc. No. 695739, at Table V-10; CR/PR at V-17 and Table V-9.

¹⁰³ CR/PR at Table IV-6. As further discussed in section IV.C.2, below, we find it likely that the large U.S. market would appear more attractive upon revocation of the CVD order on Turkey, particularly given its generally higher prices relative to the Turkish home market and other global markets.

States.¹⁰⁴ We find that this volume would likely have a discernible adverse impact on the domestic industry through lower sales and market share and/or the inability to gain higher prices in the face of heightened import competition. Therefore, we do not find that subject imports from Turkey would likely have no discernible adverse impact on the domestic industry if the order on subject imports from Turkey were revoked.¹⁰⁵

C. Likelihood of a Reasonable Overlap of Competition

The Commission generally has considered four factors intended to provide a framework for determining whether subject imports compete with each other and with the domestic like product.¹⁰⁶ Only a “reasonable overlap” of competition is required.¹⁰⁷ In five-year reviews, the relevant inquiry is whether there likely would be competition even if none currently exists because the subject imports are absent from the U.S. market.¹⁰⁸

Fungibility. The record of the reviews indicates that there is a high degree of substitutability between subject imports from Mexico and Turkey, and subject imports from

¹⁰⁴ We further discuss the likely volume of subject imports from Turkey if the order were revoked in Section IV.C.2., below.

¹⁰⁵ The Turkish Respondents assert that Turkish subject imports are “sufficiently regulated” by the antidumping duty order on rebar from Turkey, in addition to the Section 232 tariffs that apply to those imports. Turkey Prehearing Brief at 2. As further discussed in Section E.2., below, we find that the CVD order under review has had a restraining effect on subject imports of rebar from Turkey, as evidenced for example by its restraining effects before the antidumping duty order on Turkey was imposed. The CVD order covers the vast majority of the Turkish rebar industry and that industry is large.

¹⁰⁶ The four factors generally considered by the Commission in assessing whether imports compete with each other and with the domestic like product are as follows: (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 geographical markets of 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 subject imports are simultaneously present in the market with one another and the domestic like product. *See, e.g., Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

¹⁰⁷ *See Mukand Ltd. v. United States*, 937 F. Supp. 910, 916 (Ct. Int’l Trade 1996); *Wieland Werke*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”); *United States Steel Group v. United States*, 873 F. Supp. 673, 685 (Ct. Int’l Trade 1994), *aff’d*, 96 F.3d 1352 (Fed. Cir. 1996). We note, however, that there have been investigations where the Commission has found an insufficient overlap in competition and has declined to cumulate subject imports. *See, e.g., Live Cattle from Canada and Mexico*, Inv. Nos. 701-TA-386 and 731-TA-812-13 (Preliminary), USITC Pub. 3155 at 15 (Feb. 1999), *aff’d sub nom, Ranchers-Cattlemen Action Legal Foundation v. United States*, 74 F. Supp. 2d 1353 (Ct. Int’l Trade 1999); *Static Random Access Memory Semiconductors from the Republic of Korea and Taiwan*, Inv. Nos. 731-TA-761-62 (Final), USITC Pub. 3098 at 13-15 (Apr. 1998).

¹⁰⁸ *See generally, Cheflene Corp. v. United States*, 219 F. Supp. 2d 1313, 1314 (Ct. Int’l Trade 2002).

each source and domestically produced rebar.¹⁰⁹ All responding domestic producers reported that subject imports from Mexico and Turkey are always used interchangeably with each other and with domestically produced rebar, while nearly all responding importers reported that subject imports from Mexico and Turkey are always or frequently used interchangeably with each other and with domestically produced rebar.¹¹⁰ A majority of responding purchasers reported that subject imports from Mexico and Turkey are always used interchangeably with each other and a plurality reported that subject imports from Mexico and Turkey are always used interchangeably with domestically produced rebar.¹¹¹ Most responding purchasers reported that U.S., Mexican, and Turkish rebar were comparable in terms of 15 enumerated factors, such as delivery terms, quality meets industry standards, quality exceeds industry standards, and reliability of supply, with some exceptions.¹¹²

The record also contains information delineating U.S. producers' and U.S. importers' shipments by length, size, and grade. These data show an overlap between subject imports from Mexico, subject imports from Turkey and the domestic like product in three different lengths (greater than or equal to 20 inches and less than 40 inches, greater than or equal to 40 inches and less than 60 inches, and greater than 60 inches), in all sizes surveyed (Nos. 3, 4, 5, and 6), and in rebar grades 40 and 60.¹¹³

Channels of Distribution. While U.S. producers shipped rebar mainly to fabricators over the period of review (either to fabricator/distributors or fabricator/end users), approximately *** percent of domestically produced rebar was shipped to distributors over the period of review. Imports of subject merchandise from Mexico and Turkey were shipped mainly to distributors, indicating an overlap in that channel. Moreover, there was some overlap in the fabricator/end user channel. U.S. producers and importers of subject merchandise from Turkey shipped *** percent of their rebar shipments to fabricator/end users in 2019, and *** percent in interim 2020; importers of subject merchandise from Mexico shipped *** percent of their rebar shipments to fabricator/end users in 2016.¹¹⁴ U.S. producers and importers of subject

¹⁰⁹ CR/PR at II-24.

¹¹⁰ CR/PR at Table II-15.

¹¹¹ CR/PR at Table II-15.

¹¹² See CR/PR at II-30 and Table II-14. An equal number of purchasers found the domestic product superior or comparable to subject imports from Mexico and Turkey with respect to availability and either superior or comparable to subject imports from Mexico with respect to reliability of supply. One more purchaser found the domestic like product superior than found it comparable to the Turkish product in terms of delivery terms, minimum quantity requirements, and reliability of supply. Three more purchasers found the domestic like product superior than found it comparable to the Turkish product in terms of technical support/service. Most purchasers found the U.S. product comparable to the Mexican product in terms of price but inferior to the Turkish product. CR/PR at Table II-14.

¹¹³ CR/PR at Tables IV-2, IV-3, and IV-4, and Figures IV-2, IV-3, and IV-14. RTAC states that the length of the rebar is not a significant determinant of end-use applications and that fabricators use different lengths of rebar as a matter of convenience and to minimize waste and scrap in the fabrication process. RTAC Posthearing Brief, Exhibit 1 at 41.

¹¹⁴ CR/PR at Table II-5.

merchandise from Mexico both shipped a *** share of their shipments to the fabricator/distributor channel.¹¹⁵

Geographic Overlap. U.S. producers reported selling rebar to all six surveyed regions in the contiguous United States; U.S. importers reported selling subject merchandise from Mexico to all regions in the contiguous United States except the Northeast and the Southeast; and U.S. importers reported selling subject merchandise from Turkey to all regions in the contiguous United States except the Mountain Region.¹¹⁶ Thus, sales of the domestic like product, subject imports from Mexico, and subject imports from Turkey overlapped in three of the six surveyed regions: the Midwest, the Central Southwest, and the Pacific Coast.¹¹⁷

Simultaneous Presence in Market. Domestically produced rebar and subject imports were simultaneously present in the U.S. market for the vast majority of the period of review. For the period January 2014 to June 2020, subject imports from Mexico entered the United States in 77 out of 78 months and subject imports from Turkey entered the United States in 73 out of 78 months.¹¹⁸

We find that there would likely be a reasonable overlap of competition among subject imports from Mexico and Turkey and between subject imports from each source and the domestic like product, were the orders revoked. The record demonstrates a reasonable overlap between rebar from both subject sources and the domestic like product with the orders in place in terms of fungibility, channels of distribution with respect to distributors and to a lesser extent with respect to fabricator/end users, geographic overlap in three U.S. regions, and simultaneous presence in the U.S. market. There is also an absence of evidence indicating a likely change in the event the orders were revoked.

D. Likely Conditions of Competition

Although there are some differences in how subject imports from Mexico and Turkey currently compete in the U.S. market due to the differences in the trade measures against them,¹¹⁹ subject imports from both countries are present in the U.S. market despite the orders, and subject producers in both countries have excess capacity that they can use to ship

¹¹⁵ CR/PR at Table II-5.

¹¹⁶ CR/PR at Table II-6.

¹¹⁷ CR/PR at Table II-6.

¹¹⁸ CR/PR at Table IV-6.

¹¹⁹ The Mexican Respondents argue that Mexican imports are subject to “unique trade restrictions outside of the ***” that will constrain the volume of subject imports and which “substantially differentiate” the conditions of competition faced by Mexico compared to those faced by Turkey, including the Section 232 Agreement. Mexican Respondents Prehearing Brief at 16. The Turkish Respondents assert that the fact that the Section 232 duties are “expected to remain in effect” on imports from Turkey while subject imports from Mexico “remain exempt” from these duties constitute different conditions of competition in the U.S. market faced by subject producers in Mexico and in Turkey. Turkey Prehearing Brief at 9.

additional rebar to the United States. Subject producers in both countries also export substantial volumes to third country export markets. Exporters in both subject countries have shown by exporting appreciably more subject merchandise to the United States in interim 2020 than in interim 2019 that they are interested in exporting subject merchandise to the United States and able to increase exports to the United States in a relatively short time frame. Although the Turkish industry is larger than the Mexican industry, and generally exports to more distant markets, we find that subject producers in both countries would be attracted to the U.S. market due to its size and its relatively higher prices compared to their respective home markets and other global markets.¹²⁰ We note that that producers in both subject countries have continued to ship rebar to the United States despite the orders. We find that subject imports from Mexico and Turkey would likely compete under similar conditions in the U.S. market in the event of revocation.

E. Conclusion

In sum, we determine that subject imports from Mexico and Turkey are not likely to have no discernible adverse impact on the domestic industry in the event of revocation and that there would likely be a reasonable overlap of competition between the subject imports from each country and the domestic like product. We also determine that subject imports from Mexico and Turkey would be likely to compete under similar conditions of competition in the U.S. market in the event of revocation. Accordingly, for the reasons discussed above, we exercise our discretion to cumulate subject imports from Mexico and Turkey.

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

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”¹²¹ The SAA states that “under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the

¹²⁰ CR/PR at Table IV-12, Table IV-17 and Table IV-24.

¹²¹ 19 U.S.C. § 1675a(a).

elimination of its restraining effects on volumes and prices of imports.”¹²² Thus, the likelihood standard is prospective in nature.¹²³ The U.S. Court of International Trade has found that “likely,” as used in the five-year review provisions of the Act, means “probable,” and the Commission applies that standard in five-year reviews.¹²⁴

The statute states that “the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time.”¹²⁵ According to the SAA, a “‘reasonably foreseeable time’ will vary from case-to-case, but normally will exceed the ‘imminent’ timeframe applicable in a threat of injury analysis in original investigations.”¹²⁶

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to “consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated.”¹²⁷ It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce

¹²² SAA at 883-84. The SAA states that “{t}he likelihood of injury standard applies regardless of the nature of the Commission’s original determination (material injury, threat of material injury, or material retardation of an industry). Likewise, the standard applies to suspended investigations that were never completed.” *Id.* at 883.

¹²³ While the SAA states that “a separate determination regarding current material injury is not necessary,” it indicates that “the Commission may consider relevant factors such as current and likely continued depressed shipment levels and current and likely continued {sic} prices for the domestic like product in the U.S. market in making its determination of the likelihood of continuation or recurrence of material injury if the order is revoked.” SAA at 884.

¹²⁴ See *NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int’l Trade 2003) (“‘likely’ means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)”), *aff’d mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) (“more likely than not” standard is “consistent with the court’s opinion;” “the court has not interpreted ‘likely’ to imply any particular degree of ‘certainty’”); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) (“standard is based on a likelihood of continuation or recurrence of injury, not a certainty”); *Usinor v. United States*, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

¹²⁵ 19 U.S.C. § 1675a(a)(5).

¹²⁶ SAA at 887. Among the factors that the Commission should consider in this regard are “the fungibility or differentiation within the product in question, the level of substitutability between the imported and domestic products, the channels of distribution used, the methods of contracting (such as spot sales or long-term contracts), and lead times for delivery of goods, as well as other factors that may only manifest themselves in the longer term, such as planned investment and the shifting of production facilities.” *Id.*

¹²⁷ 19 U.S.C. § 1675a(a)(1).

regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).¹²⁸ The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission's determination.¹²⁹

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.¹³⁰ In doing so, the Commission must consider "all relevant economic factors," including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.¹³¹

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.¹³²

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.¹³³ All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to

¹²⁸ 19 U.S.C. § 1675a(a)(1). Commerce has not issued any duty absorption findings since the imposition of the AD order on Mexico. CR/PR at I-14 n.19.

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

¹³⁰ 19 U.S.C. § 1675a(a)(2).

¹³¹ 19 U.S.C. § 1675a(a)(2)(A-D).

¹³² See 19 U.S.C. § 1675a(a)(3). The SAA states that "{c}onsistent with its practice in investigations, in considering the likely price effects of imports in the event of revocation and termination, the Commission may rely on circumstantial, as well as direct, evidence of the adverse effects of unfairly traded imports on domestic prices." SAA at 886.

¹³³ 19 U.S.C. § 1675a(a)(4).

which any improvement in the state of the domestic industry is related to the orders under review and whether the industry is vulnerable to material injury upon revocation.¹³⁴

B. Conditions of Competition and the Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”¹³⁵ The following conditions of competition inform our determinations.

1. Demand Conditions

a) Original Investigations

The Commission found that the U.S. market for rebar was tied closely to construction activity and that U.S. demand for rebar typically followed trends in the overall U.S. economy. The Commission also found that there were limited substitutes for rebar, that it generally accounted for a small share of the total cost of the applications in which it was used, and consequently, that changes in the price of rebar had a relatively small effect on total demand for rebar.¹³⁶

The Commission found that a large share of the rebar sold in the United States was sold to fabricators, that several large U.S. producers owned purchasing firms that operated as fabricators and/or distributors, and that these purchaser firms obtained a significant share of the rebar they needed from their parent companies and the remainder from other producers and import suppliers. A significant number of purchasers bought rebar from both U.S. producers and importers of subject merchandise. The Commission found that the channels of distribution in the U.S. market for rebar were varied and overlapping and that they demonstrated that distributors of all kinds, as well as domestic producers, sell rebar to fabricators.¹³⁷ Finally, apparent U.S. consumption increased over the period of investigation.¹³⁸

¹³⁴ The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, the Commission “considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.” SAA at 885.

¹³⁵ 19 U.S.C. § 1675a(a)(4).

¹³⁶ Original Determinations at 19.

¹³⁷ Original Determinations at 20-21.

¹³⁸ Original Determinations at 21.

b) Current Reviews

The primary use of rebar is concrete reinforcement. As a result, the U.S. market for rebar is tied closely to new construction activity in the United States and the overall economy. Major end-use products requiring rebar include roads, bridges, highways, tunnels, commercial and industrial construction, residential construction, and public construction.¹³⁹

Construction spending generally increased over the period of review for public construction, private non-residential construction and residential construction until January 2020 after which time it began to decline through June 2020.¹⁴⁰ Most responding U.S. producers and a plurality of responding U.S. importers and purchasers reported that demand for rebar in the U.S. market had increased since 2014; a majority of responding foreign producers reported that it had not changed. A majority of U.S. importers and foreign producers and a plurality of U.S. purchasers reported that they expected demand in the United States to remain unchanged over the next two years, whereas a majority of U.S. producers expected it to fluctuate.¹⁴¹

The American Institute of Architects' Architecture Billings Index, a leading indicator of nonresidential construction activity with lead times of 9-12 months, was at around 40.0 in June and July 2020, higher than the 29.5 minimum in April, but still below the level indicating growth, which is 50.0.¹⁴² The aggregate U.S. economy, as measured by percentage changes in real gross domestic product, fluctuated between a high of 5.5 percent in the second quarter of 2014 and a low of negative 31.7 percent in the second quarter of 2020, when the effects of COVID-19 began to affect the U.S. economy.¹⁴³ Six of seven U.S. producers, eight purchasers, and two foreign producers mentioned that the COVID-19 pandemic was beginning to have an effect on the economy, the construction sector, and/or the U.S. market for rebar.¹⁴⁴

Although some rebar is used in construction applications with no further processing, a large share of the rebar manufactured in the United States is sold to fabricators that further process the rebar before it is used in construction applications.¹⁴⁵ U.S. producers *** own purchasing firms that operate as fabricators and/or distributors. These purchasing firms obtain rebar from their parent company and other producers and import suppliers.¹⁴⁶

Rebar is sold to distributors, fabricator/distributors, fabricator/end users and end users.¹⁴⁷ The largest purchasers of rebar in the U.S. market were ***. These two firms

¹³⁹ CR/PR at II-1, II-18.

¹⁴⁰ CR/PR at Figure II-2. These data are seasonally adjusted because construction spending is seasonal in nature, typically reaching its highest yearly levels in late spring through late summer, which reduces demand for rebar in the fall and winter. CR/PR at II-19 n.24.

¹⁴¹ CR/PR at Table II-8.

¹⁴² CR/PR at II-18.

¹⁴³ CR/PR at II-18 and Figure II-1 (based on data from Commerce, Bureau of Economic Analysis).

¹⁴⁴ CR/PR at II-8.

¹⁴⁵ CR/PR at II-1.

¹⁴⁶ CR/PR at II-1.

¹⁴⁷ CR/PR at Table II-5.

accounted for nearly *** of all reported purchases of rebar in 2019.¹⁴⁸ *** large purchasers that are *** include ***.¹⁴⁹

Apparent U.S. consumption increased by 5.4 percent from 2014 to 2019; it was 8.4 percent higher in interim 2020 than in interim 2019.¹⁵⁰

2. Supply Conditions

a) Original Investigations

The Commission found that the domestic industry supplied the predominant share of the U.S. market throughout the original investigations and that its share of apparent U.S. consumption declined from 90.0 percent in 2011 to 84.4 percent in 2013.¹⁵¹ The three largest U.S. producers, CMC, Gerdau, and Nucor, accounted for *** percent of total domestic production in 2013 and the domestic industry had a capacity utilization rate of 68.4 percent in that year.¹⁵²

The Commission found that cumulated subject imports' share of apparent U.S. consumption increased throughout the period of investigation from *** percent in 2011 to *** percent in 2013. Cumulated subject imports accounted for *** percent of all U.S. imports of rebar in 2013.¹⁵³ The Commission found that nonsubject imports' share of apparent U.S. consumption increased from *** percent in 2011 to *** percent in 2013. The largest source of nonsubject imports was Turkish producer/exporter Habas, which accounted for *** percent of total U.S. imports in 2013.¹⁵⁴ The Commission further recognized that imports of rebar from seven nonsubject countries were subject to antidumping duty orders throughout the original investigations, specifically Belarus, China, Indonesia, Latvia, Moldova, Poland, and Ukraine.¹⁵⁵

b) Current Reviews

The domestic industry accounted for 87.0 percent of the U.S. market in 2019.¹⁵⁶ Two U.S. producers, CMC and Nucor, accounted for *** percent of U.S. production in 2019.¹⁵⁷ CMC

¹⁴⁸ CR/PR at II-3.

¹⁴⁹ CR/PR at II-3.

¹⁵⁰ CR/PR at Table C-1 (Summary Table). Apparent U.S. consumption was 8.0 million short tons in 2014, 8.4 million short tons in 2015, 8.7 million short tons in 2016, 8.5 million short tons in 2017, 8.7 million short tons in 2018, 8.5 million short tons in 2019, 2.0 million short tons in interim 2019 and 2.2 million short tons in interim 2020. CR/PR at Table I-10.

¹⁵¹ Original Determinations at 21.

¹⁵² Confidential Original Determinations at 31.

¹⁵³ Confidential Original Determinations at 31.

¹⁵⁴ Confidential Original Determinations at 32.

¹⁵⁵ Original Determinations at 22.

¹⁵⁶ CR/PR at Table I-11.

¹⁵⁷ Calculated from CR/PR at Table I-7.

increased its share of U.S. production when it purchased Gerdau's U.S. assets in 2018.¹⁵⁸ U.S. producers *** both reported that they consolidated production facilities in 2015 and 2016. Later in the period of review, *** opened or expanded rebar production facilities.¹⁵⁹ Overall, U.S. production capacity increased by 6.3 percentage points from 2014 to 2019; it was 0.5 percentage points higher in interim 2020 than in interim 2019.¹⁶⁰ U.S. total production capacity was approximately 10 million short tons in 2019.¹⁶¹

Cumulated subject imports accounted for *** percent of the U.S. market in 2019.¹⁶² The largest responding importers of subject merchandise were ***.¹⁶³ Nonsubject imports accounted for *** percent of the U.S. market in 2019.¹⁶⁴ According to official import statistics, the largest sources of nonsubject imports from 2014 to 2019 were Spain and Italy.¹⁶⁵

3. Substitutability and Other Conditions

a) Original Investigations

The Commission found that rebar sold in the U.S. market was generally manufactured to conform to ASTM specifications, and that rebar of the same grade and dimensions was generally interchangeable and substitutable regardless of origin. It observed that almost all responding U.S. producers and purchasers and most responding U.S. importers reported that the domestic like product, subject imports from Mexico and from Turkey were always or frequently interchangeable.¹⁶⁶ The Commission found that purchasers ranked price as by far the most important factor in their purchasing decisions; purchasers also listed quality meets industry standards as very important in their purchasing decisions.¹⁶⁷

The Commission addressed factors that respondents in the original investigations claimed limited substitutability between the domestic like product and subject imports, including differences in length, size, and grade of rebar; affiliations of U.S. producers with downstream entities; and Buy America(n) and other domestic preference programs. The Commission found significant overlap between the domestic like product and subject imports by length, size, and grade of rebar.¹⁶⁸ The Commission observed that downstream affiliates of

¹⁵⁸ CR/PR at Table III-1.

¹⁵⁹ CR/PR at Table III-1.

¹⁶⁰ CR/PR at Table III-4 and Table C-1 (Summary Data).

¹⁶¹ CR/PR at Table C-1 (Summary Data).

¹⁶² CR/PR at Table I-11.

¹⁶³ CR/PR at Table I-9.

¹⁶⁴ CR/PR at Table I-11.

¹⁶⁵ CR/PR at II-16.

¹⁶⁶ Original Determinations at 22.

¹⁶⁷ Original Determinations at 22.

¹⁶⁸ Original Determinations at 23. In support of its conclusion, the Commission noted that subject imports were concentrated primarily in lengths of 20 feet up to 40 feet, and 40 feet up to 60 feet and that the domestic producers competed head-to-head with subject imports in those length ranges (Continued...)

the principal U.S. producers *** purchase not only from their parent companies, but also from non-affiliated sources, including subject imports, indicating that subject imports were able to compete directly with the domestic like product in supplying their affiliates.¹⁶⁹ While Buy America(n) preferences may impose limits on substitutability, projects subject to such preferences accounted for a limited portion of U.S. shipments, and the share of the U.S. market covered by projects with Buy America(n) requirements declined during the original investigations as federal stimulus spending declined.¹⁷⁰ The Commission concluded that none of the factors raised by respondents in the original investigations significantly affected the substitutability of subject imports.¹⁷¹

The Commission found that the primary raw material input for rebar production was steel scrap, that raw material costs accounted for approximately two-thirds of domestic producers' cost of goods sold ("COGS") during the original investigations, and that prices for steel scrap fluctuated over the original investigations. It also observed that several U.S. producers, including CMC, Gerdau, and Nucor had upstream affiliates that processed and supplied steel scrap.¹⁷²

b) Current Reviews

There is a high degree of substitutability between domestically produced rebar and rebar imported from subject sources.¹⁷³ U.S. purchasers ranked price as the first- or second-most important purchasing factor in most instances, followed by quality.¹⁷⁴ The majority of purchasers (22 out of 28) reported that they usually purchase the lowest-priced product.¹⁷⁵ Purchasers ranked price, quality, and availability as the most important purchasing factors.¹⁷⁶ Thus, price is one of the most important factors in purchasing rebar. A majority of responding purchasers (16 out of 18) require that the rebar they buy be ASTM certified.¹⁷⁷

Most purchasers reported that at least some of their purchases were required to be U.S.-produced product based on Buy America(n) programs.¹⁷⁸ Several U.S. producers have

(...Continued)

even though the domestic industry also supplied longer lengths where subject import volumes have been more limited. *Id.*

¹⁶⁹ Confidential Original Determinations at 34-35. ***. *Id.* at 34.

¹⁷⁰ Original Determinations at 23-24. The Commission found that there was insufficient information in the record to draw any conclusion that Leadership in Energy and Environmental Design ("LEED") certification programs which encouraged sourcing of local and regional materials resulted in a significant preference in the U.S. market for U.S. rebar producers. *Id.* at 24.

¹⁷¹ Original Determinations at 24.

¹⁷² Original Determinations at 24-25.

¹⁷³ CR/PR at II-24.

¹⁷⁴ CR/PR at II-25.

¹⁷⁵ CR/PR at II-25.

¹⁷⁶ CR/PR at Table II-12.

¹⁷⁷ CR/PR at II-27.

¹⁷⁸ CR/PR at II-28-29.

affiliated scrap suppliers and some are related to U.S. fabricators.¹⁷⁹ Purchasers were asked whether relationships between U.S. producers of rebar and their affiliated scrap suppliers, fabricators, or distributors affected prices, purchase patterns, or competition in the U.S. rebar market. A majority of responding purchasers (17 of 28) indicated that such relationships had affected prices, purchase patterns, or competition, and reported increased control of the market by purchasers related to producers and discounted pricing,¹⁸⁰ but ten purchasers stated that vertical integration by the U.S. producers had not had any effect on the U.S. market; three of those firms were ***.¹⁸¹ Five purchasers who had purchased rebar from related producers or suppliers reported that there were no differences in the method of determining prices for related versus unrelated company transactions. They reported that the related producers/suppliers only gave them supply preferences that were also available from unrelated producers/suppliers.¹⁸²

Rebar is produced primarily from steel scrap.¹⁸³ Raw materials accounted for approximately 53 to 66 percent of the domestic industry's cost of goods sold for rebar over the period of review.¹⁸⁴ Fluctuations in the cost of raw materials tended to follow the price of scrap metal over the period of review.¹⁸⁵

U.S. rebar prices are usually set on a transaction-by-transaction basis.¹⁸⁶ Most U.S. producers' sales of rebar are sold through short-term contracts, although a substantial share are sold through spot sales; U.S. importers' sales of rebar are sold through spot sales.¹⁸⁷ Although purchasers identified a variety of price leaders, Nucor and CMC were identified as price leaders most often.¹⁸⁸

There are other trade measures that affect the U.S. rebar market besides the orders under review. There is an antidumping duty order on imports of rebar from Turkey and a countervailing duty order on rebar from Turkey exported by Turkish producer/exporter Habas; these orders were imposed in 2017, along with antidumping duty orders on rebar from Japan and Taiwan. In addition, there are antidumping duty orders that were continued in 2018 on rebar from Belarus, China, Latvia, Indonesia, Moldova, Poland, and Ukraine.¹⁸⁹

¹⁷⁹ CR/PR at II-4 and III-23.

¹⁸⁰ CR/PR at II-5.

¹⁸¹ CR/PR at II-5 and Table II-2.

¹⁸² CR/PR at II-5.

¹⁸³ CR/PR at V-1.

¹⁸⁴ CR/PR at Table III-11.

¹⁸⁵ CR/PR at Figure V-1.

¹⁸⁶ CR/PR at Table V-1.

¹⁸⁷ CR/PR at Table V-2.

¹⁸⁸ CR/PR at V-4.

¹⁸⁹ CR/PR at Table I-1.

Section 232 duties were imposed on U.S. imports of rebar imported on or after March 23, 2018.¹⁹⁰ Some countries, including Mexico, were exempted from these duties, although Mexico's initial exemption was short-lived. It ended on June 1, 2018 when Mexico once again became subject to the Section 232 duties of 25 percent *ad valorem*. On May 20, 2019, Mexico was once again exempted from the Section 232 duties after the Section 232 Agreement was entered into between the United States and Mexico. The Section 232 Agreement provides for monitoring steel trade between Mexico and the United States, for consultations, and potentially additional duties if there is a meaningful surge of one of the products subject to the Joint Section 232 Agreement.¹⁹¹ Six of seven producers, six of eight responding importers, and 17 of 26 responding purchasers indicated that the removal of the Section 232 duties on Mexico had an impact on the U.S. market for rebar.¹⁹²

Section 232 duties were imposed during the period of review on subject imports of rebar from Turkey imported on or after March 23, 2018. These imports remained subject to these duties throughout the remainder of the period of review, but the rate of duty increased from the initial 25 percent *ad valorem* rate to 50 percent *ad valorem* on August 10, 2018; the duty rate returned to 25 percent on May 23, 2019, where it currently remains.¹⁹³ Almost all U.S. producers and most responding importers and purchasers reported that the Section 232 tariffs had an impact on the rebar market.¹⁹⁴

¹⁹⁰ The Section 232 duties were imposed under Section 232 of the Trade Expansion Act of 1962, as amended, pursuant to Presidential Proclamation 9705. *Adjusting Imports of Steel into the United States*, Presidential Proclamation 9705, March 8, 2018, 83 Fed. Reg. 11625 (March 15, 2018).

¹⁹¹ CR/PR at I-21.

¹⁹² CR/PR at II-2. The six responding U.S. producers all reported that subject imports from Mexico had increased after the removal of the Section 232 duties on Mexico. Five of eight responding importers reported that subject imports from Mexico had increased or had become more available after the Section 232 tariffs were removed. Of the responding 20 purchasers, 11 of them reported that there had been an increase in subject imports, or an increase in availability, supply, sales, or material coming in from Mexico after the removal of the Section 232 tariffs. U.S. Producer Questionnaire Responses at IV-27(b); U.S. Importer Questionnaire Responses at III-25(b), and U.S. Purchaser Questionnaire Responses at III-37(b).

¹⁹³ CR/PR at I-21. On July 14, 2020, the U.S. Court of International Trade held that Presidential Proclamation 9772, which imposed a 50 percent *ad valorem* tariff on steel products from Turkey from August 13, 2018 to May 21, 2019, was unlawful and void. *Transpacific Steel LLC v. United States*, Slip Op. 20-98 (CIT, July 14, 2020).

¹⁹⁴ A majority of U.S. producers, importers, and purchasers reported an increase in the supply of domestic rebar after the imposition of the Section 232 tariffs. A majority of U.S. importers and purchasers reported a decrease in the supply of imported rebar and increased prices because of the tariffs. Six of seven U.S. producers indicated that the supply of imported rebar and the price of rebar fluctuated because of the tariffs. CR/PR at Table II-1.

C. Likely Volume of Subject Imports

1. The Original Investigations

The Commission found that subject imports increased during a time of rising apparent U.S. consumption, and that the volume of subject imports increased at a much greater rate than did consumption. Subject imports increased by *** percent from 2011 to 2013, while apparent U.S. consumption increased by 18.2 percent during the same period. As a result of their rapid increase, subject imports gained *** percentage points of market share from 2011 to 2013, and the domestic industry's market share declined by 5.6 percentage points.¹⁹⁵ The Commission found that the volume of cumulated subject imports, and the increase in that volume, were significant both in absolute terms and relative to consumption in the United States.¹⁹⁶

2. The Current Reviews

Cumulated subject imports of rebar from Mexico and Turkey have remained in the U.S. market throughout the review period, even with the orders in place. Cumulated subject imports increased from *** short tons in 2014 to *** short tons in 2015. Cumulated subject imports decreased to *** short tons in 2016, the year in which petitions were filed for antidumping and countervailing duty investigations on Japan, Taiwan, and Turkey, and continued to decrease to *** short tons in 2017, *** short tons in 2018, and *** short tons in 2019 after antidumping duties were imposed *inter alia* on imports of rebar from Turkey and a countervailing duty order on imports from Turkey exported by Turkish producer Habas in 2017.¹⁹⁷ Cumulated subject imports were *** short tons in interim 2019 and sharply higher, *** short tons, in interim 2020.¹⁹⁸ Cumulated subject imports decreased overall by *** percent from 2014 to 2019, but they were *** percent higher in interim 2020 than in interim 2019.¹⁹⁹ In terms of U.S. market share, subject imports accounted for *** percent of the U.S. market in 2014, *** percent in 2015, *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in interim 2019 and *** percent in interim 2020; cumulated subject imports were *** percentage points higher in interim 2020 than in interim 2019.²⁰⁰

Subject imports from Mexico were no longer subject to the Section 232 tariffs in interim 2020 and subject imports from Turkey were subject to lower Section 232 tariffs of 25 percent in interim 2020 rather than 50 percent during interim 2019. We find that these events may have played a role in the higher cumulated subject import volume in interim 2020. Moreover, official import statistics indicate that cumulated subject import volume was even

¹⁹⁵ Confidential Original Determinations at 37.

¹⁹⁶ Original Determinations at 25.

¹⁹⁷ CR/PR at I-4 and Table IV-1.

¹⁹⁸ CR/PR at Table IV-1.

¹⁹⁹ CR/PR at Table C-1 (Summary Data).

²⁰⁰ CR/PR at Table I-11 and Table C-1 (Summary Data).

higher in the second quarter of 2020 than the first quarter of 2020.²⁰¹ We find the fact that cumulated subject import volume increased when the U.S. market became more accessible to them supports our conclusion that subject imports would likely significantly increase if the orders were revoked.

Subject industries in both Mexico and Turkey have excess capacity and inventories that would enable them to increase their exports of rebar to the United States upon revocation. We have analyzed data on the industries in Mexico and Turkey based on questionnaire responses from responding subject producers; these responses underreport Turkish production capacity and production as we have limited coverage of the Turkish industry. Based on data reported in questionnaire responses, cumulated subject producers had excess capacity in 2019 of *** short tons, excess capacity in interim 2020 of *** short tons,²⁰² and end-of-period inventories in interim 2020 of *** short tons; their capacity utilization rate was *** percent in 2019 and *** percent in interim 2020.²⁰³ Subject producers also have the ability to shift production to rebar from other products manufactured on the same equipment.²⁰⁴

Subject producers in Mexico and Turkey also have the capability to divert exports currently shipped to third-country markets to the United States if the orders were revoked. Although both Mexican and Turkish Respondents argue that they are focused on their home markets and their existing third-country export markets and not on increasing their exports to the United States,²⁰⁵ on a cumulated basis, exports to their home market decreased overall from 2014 to 2019 and *** of their shipments went to their home markets in 2019 and *** percent in interim 2020.²⁰⁶ As for their third-country markets, total exports of cumulated subject merchandise to those markets declined from *** short tons in 2014 to *** short tons in 2019; they were *** short tons in interim 2019 and *** short tons in interim 2020.²⁰⁷

There are indications that these third-country markets are becoming more restrictive. Imports of rebar from Turkey are subject to antidumping duties in Egypt, Malaysia, and Canada.²⁰⁸ There are also safeguard measures in place in the European Union and Morocco.²⁰⁹ Mexico exports approximately 43 percent of its rebar exports to Colombia where a new rebar mill built by Mexican producer Ternium is about to start production.²¹⁰ Although Deacero

²⁰¹ CR/PR at Table IV-6.

²⁰² We note that subject producers' excess capacity in 2019 was equivalent to 40 percent of total U.S. production of rebar that year; subject producers' excess capacity in interim 2020 was equivalent to 69 percent of total U.S. production in that quarter. Calculated from data set forth at CR/PR at Table IV-20 and Table C-1 (Summary Data).

²⁰³ CR/PR at Table IV-20.

²⁰⁴ CR/PR at Table IV-13 (Mexico) and Table IV-18 (Turkey).

²⁰⁵ Mexican Respondents Prehearing Brief at 2, 8; Turkish Respondents Prehearing Brief at 3.

²⁰⁶ CR/PR at Table IV-20.

²⁰⁷ CR/PR at Table IV-20.

²⁰⁸ CR/PR at Table IV-21.

²⁰⁹ CR/PR at Table IV-22.

²¹⁰ CR/PR at IV-24 and Table IV-14. RTAC Prehearing Brief, Exhibit 25.

argues that this new mill will not impact its exports to Colombia,²¹¹ the new mill could still create an incentive for Mexican producers to further diversify their export markets. As their third-country markets for rebar become less attractive due to new local supply or restrictive trade measures, we find it likely that the large U.S. market would appear more attractive upon revocation of the orders, particularly given its generally higher prices relative to the Mexican and Turkish home markets and other global markets.²¹²

Further, the record reflects that subject producers already have a strong interest in the U.S. market. They have continued to ship subject merchandise to the United States notwithstanding the orders; they have distribution networks in the United States;²¹³ their importers hold inventories in the United States;²¹⁴ and their export shipments were *** percent higher in interim 2020 than in interim 2019.²¹⁵ Not only do these subject countries have substantial cumulated excess capacity, even with the limited data available to the Commission on Turkey, but they exported substantial volumes of rebar, including to the United States. We find that, should the orders be revoked, the subject producers are likely to continue to direct exports to the U.S. market, and that they will have the incentive to increase that volume without the discipline of the orders.²¹⁶

²¹¹ Mexican Posthearing Brief, Response to Commissioner Questions at 39.

²¹² CR/PR at Figure IV-8, IV-49, and Table IV-24. For example, in 2019, the average unit value of Mexican exports to the U.S. was \$*** per short ton, compared to an average unit value of \$*** per short ton for exports to all other markets and \$*** per short ton for commercial home market shipments. CR/PR at Table IV-12. In 2019, the average unit value of Turkish exports to the U.S. was \$*** per short ton, compared to an average unit value of \$*** per short ton for exports to all other markets and \$*** per short ton for commercial home market shipments. CR/PR at Table IV-17.

²¹³ RTAC Posthearing Brief, Exhibit 53 (“Medtrade, Inc. was founded in 2003 for the purpose of selling its long products into the USA, as a subsidiary of Colakoglu Metalurji A.S., one of the largest steel producers in Turkey.”) ***. CR/PR at Table I-9. *See also* RTAC Prehearing Brief at 72.

²¹⁴ U.S. importers held inventories of *** short tons of rebar from the cumulated subject countries in interim 2020. CR/PR at Table IV-8.

²¹⁵ Calculated from CR/PR at Table IV-20. Total exports from the cumulated subject countries to the United States were *** short tons in interim 2019 and *** short tons in interim 2020. *Id.* We note that Mexican Respondents argue that the Section 232 Agreement would restrain increases in subject import volume from Mexico in the reasonably foreseeable future. Mexican Respondents Prehearing Brief at 7. We note, however, that subject imports from Mexico increased in interim 2020 when the Section 232 Agreement was in effect.

²¹⁶ As discussed above in the section regarding cumulation, and as further detailed in Section E.2. below, although Mexican Respondents argue that the Section 232 Agreement will limit subject imports from Mexico, we note that by eliminating the Section 232 tariffs on Mexico, and setting up a process to monitor imports that may, after consultations between the parties lead to re-imposition of duties if subject imports “surge meaningfully” “beyond historic trade volumes” (terms that are not fully defined), the Section 232 Agreement is likely to be less of a restraint on subject import volume from Mexico than the Section 232 tariffs. This conclusion of lessened restraint is consistent with the sharply higher subject imports from Mexico in interim 2020 after the Section 232 Agreement came into effect compared to interim 2019. As noted parenthetically above, the terms of the Section 232 Agreement are (Continued...)

We recognize that the increase in subject imports in interim 2020 came at the expense of nonsubject imports' market share rather than the domestic industry's market share. The share of the U.S. market held by nonsubject imports was *** percent in interim 2019 and *** percent in interim 2020 – it was *** percentage points lower in interim 2020 than in interim 2019.

Additionally, as discussed below, revocation of the orders would give importers more flexibility to use underselling to gain market share at the expense of domestic producers. We note that most market participants rate subject imports as comparable with nonsubject imports and the domestic like product on a range of enumerated factors,²¹⁷ that nonsubject imports are interchangeable with subject imports,²¹⁸ and that price is the first-most important purchasing factor for rebar.²¹⁹ Under these circumstances, we find that subject imports would likely increase upon revocation of the orders and take market share from the domestic industry in the reasonably foreseeable future.

Given the size and attractiveness of the U.S. market, the excess capacity and large volume of exports by the subject producers, their current and consistent presence in the U.S. market despite trade measures, and the higher prices obtained by subject producers for sales to the U.S. market relative to the Mexican and Turkish producers' home markets and other global markets, we conclude that the volume and market share of cumulated subject imports from Mexico and Turkey would likely be significant within a reasonably foreseeable time if the orders were revoked.

D. Likely Price Effects

1. The Original Investigations

In the original investigations, the Commission found that subject imports and domestically produced rebar were made to ASTM specifications, that they were highly substitutable, and that price was an important factor in purchasing decisions. The Commission collected data on the f.o.b. value of six pricing products and rejected respondent's arguments that the pricing data should be adjusted to account for higher freight expenses incurred by

(...Continued)

not fully defined, and there is no mechanism (or delineation of groupings of steel products) for the automatic re-imposition of Section 232 duties even if there is a "surge." Furthermore, as discussed below, we find that the CVD order under review has had a restraining effect distinct from the restraining effects of the antidumping order on rebar from Turkey and the countervailing duty order on imports from Habas, as evidenced for example by its restraining effects before the antidumping duty order on Turkey was imposed. The CVD order covers the vast majority of the Turkish rebar industry and that industry is large.

²¹⁷ CR/PR at Table II-14.

²¹⁸ CR/PR at Table II-15.

²¹⁹ CR/PR at Table II-11.

subject imports as the data did not indicate that U.S. freight costs accounted for a significant distinction between subject imports and the domestic like product.²²⁰

The Commission followed its usual practice of examining arms' length transactions between unaffiliated parties in its pricing data and not including transfers between affiliates, notwithstanding arguments by respondents that such data should be included in the pricing data. The Commission found that the pricing data collected by the Commission reflected approximately 32.5 percent of U.S. producers' domestic shipments.²²¹ Further, it found that the transfers by domestic producers to their downstream affiliates were, on average, ***, and that the average transfer values to these affiliates ***. The Commission found that *** would be consistent with a volume discount that producers give to purchasers of large volumes; and that *** would be less than the average margin of underselling by subject imports.²²² The Commission concluded that the pricing data reported by the domestic industry was reliable and representative and did not include transfer values in the pricing data.²²³

The Commission found that subject imports undersold the domestic like product in 155 out of 156 pricing quarterly comparisons at an average margin of underselling of 9.7 percent. The Commission found this underselling to be significant given the importance of pricing in purchasing decisions. The Commission further found that imports gained market share at the expense of the domestic industry while this pervasive underselling took place. The Commission rejected respondents' contention that the underselling data should be given little weight due to a domestic price premium that reflected purchaser preferences for domestically produced rebar over subject imports because the record showed that the domestic like product was substitutable with subject imports and that they competed against each other in the same U.S. market segments.²²⁴

The Commission did not find that subject imports depressed U.S. producers' prices to a significant degree. U.S. producers' prices and prices for subject imports from Mexico and Turkey all declined over the original investigations with one exception. The Commission found that rebar prices were affected by changes in the prices of steel scrap, the primary raw material input for rebar production. It further found that steel scrap prices declined by 14.3 percent over the original investigations and that the decline in U.S. producers' prices for the six pricing products ranged from 2.0 percent to 7.0 percent. Although the Commission acknowledged that other factory costs of the domestic producers rose, and that apparent U.S. consumption increased during the original investigations, the Commission found that in light of the

²²⁰ Original Determinations at 26.

²²¹ Original Determinations at 27.

²²² Confidential Original Determinations at 39-40.

²²³ Original Determinations at 26. The Commission also rejected respondents' arguments that the pricing data were unrepresentative because they did not include specific data for 60-foot rebar, for which respondents claimed there was a price premium. None of the parties suggested in their comments on the draft questionnaires in the original investigations that the Commission collect pricing data by length of rebar or specifically collect pricing data for 60-foot rebar. *Id.* at 27.

²²⁴ Original Determinations at 27-28.

magnitude of the decline in raw material costs it could not conclude that the subject imports depressed prices to a significant degree.²²⁵

The Commission also did not find that subject imports prevented price increases for the domestic like product that otherwise would have occurred given that the domestic industry's ratio of COGS to net sales was relatively flat during the original investigations. Consequently, the Commission found that the record did not indicate that the domestic producers' ability to recover their costs changed appreciably during the POI.²²⁶

The Commission concluded that the prices of the subject imports, which were pervasively lower than those of the domestic like product, caused the subject imports to gain market share at the expense of the domestic industry.²²⁷

2. The Current Reviews

As discussed above, the record indicates that there is a high degree of substitutability between domestically produced rebar and rebar imported from subject sources and price is one of the most important factors in purchasing rebar.²²⁸

The Commission collected quarterly pricing data for the total quantity and f.o.b. value of five rebar products.²²⁹ Seven U.S. producers, four importers of subject merchandise from Mexico, and six importers of subject merchandise from Turkey provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.²³⁰ Pricing data reported by these firms accounted for *** percent of U.S. producers' commercial shipments of rebar, *** percent of U.S. shipments of subject imports from Mexico, and *** percent of U.S. shipments of subject imports from Turkey in 2019.²³¹

We find that the likely significant volumes of cumulated subject imports following revocation of the orders would likely have significant adverse price effects on the domestic like product. In these reviews, even with the discipline of the orders, subject imports from Mexico and Turkey undersold the domestic like product in 200 out of 235 quarterly comparisons, or in 85.1 percent of quarterly comparisons, at an average margin of 14.8 percent.²³² Further, the

²²⁵ Original Determinations at 28.

²²⁶ Original Determinations at 29. The Commission stated that an increase in the COGS to net sales ratio from 2012 to 2013 was affected by an increase in other factory costs. *Id.*

²²⁷ Original Determinations at 29.

²²⁸ CR/PR at II-24, II-25, and Table II-12.

²²⁹ The Commission collected pricing data on the following five rebar products:

Product 1. – Straight ASTM A615, No. 3, grade 60 rebar.

Product 2. – Straight ASTM A615, No. 4, grade 60 rebar.

Product 3. – Straight ASTM A615, No. 5, grade 60 rebar.

Product 4. – Straight ASTM A615, No. 6, grade 60 rebar.

Product 5. – Straight ASTM A615, No. 3, grade 40 rebar. CR/PR at V-4.

²³⁰ CR/PR at V-4.

²³¹ CR/PR at V-4-5.

²³² CR/PR at Table V-9.

quarterly comparisons in which cumulated subject imports undersold the domestic like product involved 2.5 million short tons of subject rebar whereas the quarterly comparisons in which subject imports oversold the domestic like product involved less than 50,000 short tons of subject rebar.²³³ Thus, even with the orders in place, the record shows a pattern of subject imports pervasively underselling the domestic like product in most quarterly comparisons and in much larger quantities than were involved in the remaining quarterly comparisons. We consequently conclude that there would likely be significant price underselling should the orders under review be revoked.

We have examined price trends in these reviews. From the first quarter of 2014 to the first quarter of 2020, prices for the domestic like product and subject imports decreased overall and followed similar trends; prices fluctuated, generally decreasing from 2014 to 2016, increasing from 2016 to 2018, decreasing from 2018 to the end of 2019 (although subject import prices fluctuated more than domestic prices in this period), and then increasing in the first quarter of 2020.²³⁴ We find that these prices were affected by scrap prices which generally followed similar trends.²³⁵ ²³⁶ We further find that unit COGS fluctuated, but decreased by 12.4

²³³ CR/PR at Table V-9. As previously stated, the Commission found that subject imports from Mexico and Turkey undersold the domestic like product in 155 out of 156 quarterly pricing comparisons in the original investigations. Original Determinations at 27.

Mexican Respondents argues that Mexican producers have an incentive to sell their rebar at the highest price possible in the U.S. market because the Section 232 Agreement limits the volume of their exports to the United States. Mexican Respondents Prehearing Brief at 51. The record shows, however, that cumulated subject imports (including subject imports from Mexico) undersold the domestic like product before and after the Section 232 Agreement came into effect in 2019. CR/PR at Tables V-3, V-4, V-5, V-6, and V-7. Further, as discussed above we do not agree with Mexican Respondents' arguments that the Section 232 Agreement will prevent an increase in subject imports from Mexico in the event of revocation.

²³⁴ CR/PR at V-14-15, Figure V-7, and Table V-8.

²³⁵ CR/PR at V-1 and Figure V-1. RTAC notes that from the first quarter of 2019 to the first quarter of 2020, the spread between the domestic industry's U.S. shipment unit value and its unit raw material costs (the industry's "metal margin") narrowed from \$341 to \$310, and claims that "{t}his decrease of approximately \$31 per ton in the industry's metal margin translates into a direct hit of approximately *** million in the first quarter alone." RTAC Posthearing Brief Answers to Commissioner Questions at 61-62.

²³⁶ Turkish Respondents argue that prices in the U.S. and Turkey are similar because they are both driven by market conditions, most notably scrap prices. Turkish Respondents Prehearing Brief at 33. We agree that scrap prices have some effect on rebar prices but note that Turkish prices were below U.S. prices over the period of review. CR/PR at Figures V-2, V-3, V-4, V-5, and V-6.

percent from 2014 to 2019 and it was lower in interim 2020 than in interim 2019.²³⁷ The COGS to net sales value ratio also fluctuated and decreased over the period of review.²³⁸

Given the foregoing, including the incentives for subject producers to ship significant volumes of subject imports to the U.S. market upon revocation, their longstanding interest in the U.S. market, and the intensified price competition that would result without the discipline of the orders, we find that subject imports would likely undersell the U.S. product in increasing volumes leading to increased sales and market share for subject imports at the expense of the domestic industry. Although subject imports did not gain market share at the expense of domestic producers in interim 2020, we find, given the likely increase in subject imports in the event of revocation, price-based competition, and substitutability of rebar from all sources, that if the orders were revoked the domestic industry would also likely lose market share to the lower-priced cumulated subject imports in the reasonably foreseeable future.

E. Likely Impact

1. The Original Investigations

In the original investigations, the Commission found that although many of the indicators of the domestic industry's performance initially showed some improvements as demand increased, this changed as subject import volumes increased significantly and took market share at the expense of the domestic industry through significant and pervasive underselling.

The Commission found that the domestic industry's declining market share prevented it from fully benefiting from the increase in demand, and a number of key domestic industry performance indicators declined between 2012 and 2013, including production, capacity utilization, productivity, net sales quantity and value, net operating income and operating margin, while end-of-period inventories increased. The Commission found that as the domestic industry's market share declined by 5.6 percentage points between 2011 and 2013, its profitability likewise declined, with net operating income declining by 11 percent over the same period, and its operating margin similarly declining.²³⁹

The Commission found that the domestic industry's loss of market share and its inability to benefit fully from increased demand, both the results of subject imports, had direct effects on the industry's revenues and consequently its profitability. The Commission thus found that the significant volume of cumulated subject imports, and the gain in subject imports' market

²³⁷ CR/PR at III-35-36, Table III-11 and Table III-12. The domestic industry's unit COGS decreased overall from \$589 per short ton in 2014 to \$516 per short ton in 2019; it was \$551 per short ton in interim 2019 and \$489 per short ton in interim 2020. CR/PR at Tables III-11 and III-13.

²³⁸ CR/PR at Table III-13. The domestic industry's COGS to net sales ratio decreased overall from 92.9 percent in 2014 to 78.7 percent in 2019; it was 82.2 percent in interim 2019 and 80.8 percent in interim 2020. *Id.*

²³⁹ Original Determinations at 30-31.

share achieved at the expense of the domestic industry through significant and pervasive underselling, had a significant impact on the domestic industry.²⁴⁰

The Commission considered whether there were other factors that may have adversely impacted the domestic industry to ensure that injury from such factors was not attributed to subject imports. The Commission found that the declines in steel scrap raw material prices during the original investigations could not explain the domestic industry's loss of market share to subject imports and its consequent loss of revenues. With respect to nonsubject imports, the Commission found that subject imports gained more market share over the original investigations than nonsubject imports and that subject imports were sold at lower prices than nonsubject imports. The Commission had collected pricing data for Habas which showed that nonsubject imports from Habas were priced higher than subject imports from Turkey in 71 of 75 comparisons and were priced higher than subject imports from Mexico in 67 of 75 comparisons. Since subject imports gained more market share and were sold at lower prices than nonsubject imports, the Commission found that subject imports had injurious effects on the domestic industry distinct from any effects from nonsubject imports. The Commission concluded that the cumulated subject imports had a significant adverse impact on the domestic industry.²⁴¹ Based on the foregoing analysis, the Commission concluded that the domestic industry was materially injured by reason of subject imports from Mexico that were sold in the United States at LTFV and subject imports from Turkey that were subsidized by the government of Turkey.²⁴²

2. The Current Reviews

The record in these reviews indicate that the orders have restrained cumulated subject import volume, thereby contributing to the stability and performance of the U.S. rebar industry over the period of review. The domestic industry's production capacity and production increased overall from 2014 to 2019 and it was higher in interim 2020 than in interim 2019.²⁴³ The domestic industry's capacity utilization rate fluctuated, declining overall from 76.0 percent

²⁴⁰ Original Determinations at 32-33.

²⁴¹ Original Determinations at 33-34.

²⁴² Original Determinations at 37. The Commission also made negative critical circumstances determinations with respect to imports from Mexico that were subject to Commerce's critical circumstances determination and imports from Turkey that were subject to Commerce's critical circumstances determination. *Id.* at 34-37.

²⁴³ Total U.S. production capacity was 9.4 million short tons in 2014, 9.3 million short tons in 2015, 9.4 million short tons in 2016, 9.49 million short tons in 2017, 9.54 million short tons in 2018, 10.0 million short tons in 2019, 2.72 million short tons in interim 2019 and 2.73 million short tons in interim 2020. CR/PR at Table III-4.

Total U.S. production was 7.1 million short tons in 2014, 6.6 million short tons in 2015, 6.8 million short tons in 2016, 7.3 million short tons in 2017, 7.8 million short tons in 2018, 7.5 million short tons in 2019, 1.8 million short tons in interim 2019 and 1.9 million short tons in interim 2020. CR/PR at Table III-4.

in 2014 to 75.3 percent in 2019; it was 65.0 percent in interim 2019 and 69.4 percent in interim 2020.²⁴⁴ The quantity of the domestic industry's U.S. shipments increased.²⁴⁵ The domestic industry's share of the U.S. market also increased.²⁴⁶ The domestic industry's end-of-period inventories decreased over the period of review.²⁴⁷

The domestic industry's employment-related indicators showed modest improvement, although unit labor costs increased. The number of production related workers ("PRWs") increased from 2014 to 2019, but it was slightly lower in interim 2020 than in interim 2019. Total hours worked increased from 2014 to 2019 and it was slightly higher in interim 2020 than in interim 2019.²⁴⁸ Hours worked per PRW and productivity decreased slightly overall from 2014 to 2019, but they were slightly higher in interim 2020 than in interim 2019.²⁴⁹ Wages paid and hourly wages (dollars per hour) increased from 2014 to 2019 and were higher in interim

²⁴⁴ The domestic industry's capacity utilization rate was 76.0 percent in 2014, 71.0 percent in 2015, 71.8 percent in 2016, 76.7 percent in 2017, 81.7 percent in 2018, 75.3 percent in 2019, 65.0 percent in interim 2019 and 69.4 percent in interim 2020. CR/PR at Table III-4.

²⁴⁵ The domestic industry's U.S. shipments were 6.6 million short tons in 2014, 6.4 million short tons in 2015, 6.6 million short tons in 2016, 7.0 million short tons in 2017, 7.6 million short tons in 2018, 7.4 million short tons in 2019, 1.7 million short tons in interim 2019, and 1.9 million short tons in interim 2020. CR/PR at Table III-6.

²⁴⁶ U.S. producers' share of the U.S. market was 82.3 percent in 2014, 76.0 percent in 2015, 75.7 percent in 2016, 82.4 percent in 2017, 86.7 percent in 2018, 87.0 percent in 2019, 83.5 percent in interim 2019 and 87.3 percent in interim 2020. CR/PR at Table I-11.

²⁴⁷ U.S. producers' end-of-period inventories were 621,386 short tons in 2014, 540,897 short tons in 2015, 484,549 short tons in 2016, 514,311 short tons in 2017, 425,689 short tons in 2018, 483,498 short tons in 2019, 470,324 short tons in interim 2019, and 423,940 short tons in interim 2020. CR/PR at Table III-7.

²⁴⁸ The number of PRWs was 3,954 in 2014, 3,943 in 2015, 3,803 in 2016, 4,259 in 2017, 4,212 in 2018, 4,185 in 2019, 4,045 in interim 2019 and 4,016 in interim 2020. CR/PR at Table III-10.

Total hours worked (1,000 hours) were 8.5 million hours in 2014, 8.1 million hours in 2015, 8.0 million hours in 2016, 9.2 million hours in 2017, 9.2 million hours in 2018, and 8.9 million hours in 2019; they were 2.2 million hours in interim 2019 and 2.3 million hours in interim 2020. CR/PR at Table III-10.

²⁴⁹ Hours worked per PRW were 2,144 hours in 2014, 2,059 hours in 2015, 2,106 hours in 2016, 2,168 hours in 2017, 2,182 hours in 2018, 2,137 hours in 2019, 541 hours in interim 2019, and 569 hours in interim 2020. CR/PR at Table III-10.

Productivity (short tons per 1,000 hours) was 842.2 short tons in 2014, 812.3 short tons in 2015, 845.8 short tons in 2016, 788.7 short tons in 2017, 848.3 short tons in 2018, 841.3 short tons in 2019, 806.7 short tons in interim 2019, and 829.2 short tons in interim 2020. CR/PR at Table III-10.

2020 than in interim 2019.²⁵⁰ Unit labor costs increased and were higher in interim 2020 than in interim 2019.²⁵¹

The domestic industry's financial performance improved overall during the period of review. Its gross profits, net income, and operating income improved overall from 2014 to 2019, and they were higher in interim 2020 than in interim 2019.²⁵² The domestic industry's operating income margin increased overall from 2014 to 2019 and was higher in interim 2020 than in interim 2019.²⁵³ Capital expenditures increased overall from 2014 to 2019 and were higher in interim 2020 than in interim 2019.²⁵⁴

Given the improved condition of the domestic industry following the imposition of the orders, we do not find the domestic industry to be vulnerable.²⁵⁵ Over the period of review, the

²⁵⁰ Total wages paid were \$337.2 million in 2014, \$313.9 million in 2015, \$307.8 million in 2016, \$366.4 million in 2017, \$383.0 million in 2018, and \$377.2 million in 2019, \$92.4 million in interim 2019, and \$101.6 million in interim 2020. CR/PR at Table III-10.

Hourly wages (per hour) were \$39.77 in 2014, \$38.67 in 2015, \$38.43 in 2016, \$39.68 in 2017, \$41.68 in 2018, \$42.17 in 2019, \$42.22 in interim 2019 and \$44.49 in interim 2020. CR/PR at Table III-10.

²⁵¹ Unit labor costs (dollars per short tons) were \$47.23 in 2014, \$47.61 in 2015, \$45.43 in 2016, \$50.31 in 2017, \$49.13 in 2018, \$50.13 in 2019, \$52.34 in interim 2019, and \$53.66 in interim 2020. CR/PR at Table III-10.

²⁵² CR/PR at Table III-11. Gross profits were \$316.4 million in 2014, \$462.6 million in 2015, \$231.2 million in 2016, \$280.1 million in 2017, \$770.0 million in 2018, and \$1.0 billion in 2019, \$205.6 million in interim 2019, and \$227.4 million in interim 2020. Operating income was \$118.8 million in 2014, \$274.9 million in 2015, \$37.8 million in 2016, \$87.2 million in 2017, \$526.7 million in 2018, \$787.4 million in 2019, \$148.0 million in interim 2019 and \$167.4 million in interim 2020. Net income was \$*** in 2014, \$*** in 2015, \$*** in 2016, *** in 2017, \$*** in 2018, \$*** in 2019, \$*** in interim 2019, and \$*** in interim 2020. *Id.*

²⁵³ The domestic industry's operating income margin was 2.7 percent in 2014, 7.2 percent in 2015, 1.2 percent in 2016, 2.4 percent in 2017, 11.0 percent in 2018, 16.5 percent in 2019, 12.8 percent in interim 2019, and 14.2 percent in interim 2020. CR/PR at Table III-13. The domestic industry's net income margin was *** percent in 2014, *** percent in 2015, *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in interim 2019, and *** percent in interim 2020. CR/PR at Table III-13.

²⁵⁴ Capital expenditures were \$166.3 million in 2014, \$151.8 million in 2015, \$217.5 million in 2016, \$491.3 million in 2017, \$266.4 million in 2018, \$378.9 million in 2019, \$179.4 million in interim 2019, and \$188.2 million in interim 2020. CR/PR at Table III-16.

Research and development ("R&D") costs were \$*** in 2014, \$*** in 2015, \$*** in 2016, \$*** in 2017, \$*** in 2018, \$*** in 2019, \$*** in interim 2019, and \$*** in interim 2020. CR/PR at Table III-16.

U.S. producers had an operating return on assets of 7.8 percent in 2014, 19.4 percent in 2015, 2.6 percent in 2016, 5.6 percent in 2017, 27.8 percent in 2018, and 31.9 percent in 2019. CR/PR at Table III-16.

²⁵⁵ Chair Kearns took into account the data and other information on the record but does not make a finding as to the extent to which the industry is vulnerable. Regardless of whether the U.S. industry is vulnerable or not, it is clear that revocation of the order in this case would be likely to lead to (Continued...)

domestic industry has benefited from increased apparent U.S. consumption and a decline in raw material costs. We find that the orders under review here, as well as the other trade measures in the U.S. market, helped to improve the performance and stability of the U.S. industry.²⁵⁶

As discussed above, we have found that revocation of the AD order on subject imports of rebar from Mexico and the CVD order on subject imports of rebar from Turkey would likely lead to an increased and significant volume of cumulated subject imports that would likely significantly undersell the domestic like product to an even greater extent. The resulting price pressures would likely have the effect of causing the domestic industry to lose market share, revenue, or both, which would have a negative impact on the domestic industry's performance. In light of these likely adverse effects, we find that cumulated subject imports would likely have a significant impact on production, shipments, sales, market share, and revenue of the domestic industry if the orders were revoked. These reductions would have a direct adverse impact on the domestic industry's profitability and employment. Although apparent U.S. consumption increased over the period of review, it is reasonable to expect that demand will decline throughout 2020 and possibly 2021 as a result of the COVID-19 pandemic. As discussed earlier, in 2020 construction spending and GDP began to decline and market participants reported that the pandemic was beginning to affect the construction sector and/or the U.S. market for rebar. This likely decline in demand in the reasonably foreseeable future may make the U.S. rebar industry more susceptible to material injury by reason of subject imports.

In conducting our analysis of likely impact, we have also considered the likely effect on the domestic industry of factors other than the cumulated subject imports. Mexican and Turkish Respondents both argue that the order on subject merchandise from their respective country should be revoked because it has been ineffective over the review period, either because the subject imports from Mexico or the administrative review margins for the CVD order on Turkey had minimal to no effects on the domestic industry. Further, Mexican and Turkish Respondents contend that there are other more effective trade measures in place that benefit the U.S. rebar industry.²⁵⁷

We find that the orders effectively constrained subject import volume from both subject countries. Subject imports from Mexico sharply decreased in 2015 after the AD order was imposed in 2014 and they are at lower volume and market share levels in these reviews than in the original investigations.²⁵⁸ Although subject imports from Turkey increased after the CVD

(...Continued)

continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

²⁵⁶ We note that the domestic industry's profitability improved sharply in 2018 and 2019. Although the imposition of the Section 232 duties in 2018 likely played a role in the industry's improved performance, another factor appears to have been ***. CR/PR at III-24 and Table III-13.

²⁵⁷ Mexican Respondents Prehearing Brief at 26-31; Turkish Respondents Prehearing Brief at 2, 17-18.

²⁵⁸ Compare CR/PR at Historical Data Table C-1 at C-9 covering data from the original investigations to Appendix C, Summary Data Table C-1 at C-3. During the original investigations, subject import volume from Mexico ranged from 77,482 short tons to 338,200 short tons and had a market (Continued...)

order was imposed on Turkey, they increased at a slower rate than nonsubject imports from Turkey.²⁵⁹

With respect to the other trade measures that affect the U.S. market for rebar, we find that there is uncertainty as to the effects and duration of the Section 232 duties. Import volume data from interim 2020 show the ability of Turkish exporters of subject merchandise to substantially and quickly increase import volumes even with 25 percent Section 232 duties in place. There is also uncertainty as to the effect, if any, of the Section 232 Agreement between Mexico and the United States on subject imports from Mexico given the lack of specifics about how it will be administered.

Although Mexican Respondents argue that the Section 232 Agreement will limit subject imports from Mexico, we note, first of all, that we have exercised our discretion to consider subject imports cumulatively, so the relevant issue for the Commission is how subject imports will behave on a cumulated basis. In any case, by eliminating the Section 232 tariffs on Mexico, and alternatively setting up a process for monitoring and consultations that may or may not lead to the re-imposition of Section 232 tariffs depending, *inter alia*, on the application of undefined terms such as “surge meaningfully” and “beyond historic trade volumes,” we find that the record is insufficient to conclude that the Section 232 Agreement is likely to have the effect of limiting subject import volumes as Mexican Respondents claim. To this point, subject imports from Mexico were sharply higher in interim 2020 after the Section 232 Agreement came into effect, compared to interim 2019.

As for the antidumping duty order on Turkey and the countervailing duty order on Turkish producer Habas resulting from other investigations, again, we are considering subject imports cumulatively. We find that the CVD order under review has had a distinct restraining effect, as evidenced by its effects on subject imports relative to nonsubject imports from Turkey before the antidumping duty order on Turkey was imposed. Moreover, the antidumping duty order is aimed at imports sold at less than fair value and does not act as a discipline on imports that may benefit from subsidization; it would therefore not prevent injury to the domestic industry from subsidized subject imports from Turkey. Turkish Respondents argue that subject imports from Turkey will not have a significant impact on the domestic rebar industry if the CVD order on Turkey is revoked because only a portion of the Turkish industry is

(...Continued)

share ranging from 4.0 to 4.4 percent of the U.S. market. During these reviews, subject import volume from Mexico ranged from 3,494 short tons to 140,995 short tons and had a U.S. market share ranging from 0.0 to 2.8 percent.

²⁵⁹ Nonsubject imports from Turkey increased by *** percent from 2014 to 2015 while subject imports from Turkey increased by *** percent in that period. CR/PR at Table C-1 (Summary Data). Moreover, nonsubject imports from Turkey continued to gain market share in 2016, while subject imports from Turkey lost market share that year; not until 2017 did the market share of nonsubject imports from Turkey decline, as the antidumping duty order on rebar imports from Turkey and countervailing duty order on rebar imports from Habas were imposed. CR/PR at I-4 & Table C-1 (Summary Data).

subject to the CVD order.²⁶⁰ As discussed above, however, the CVD order covers the vast majority of the Turkish rebar industry and that industry is large.²⁶¹ Turkish Respondents also argue that the rates under the annual administrative reviews of the CVD order have been low or *de minimis*, so the revocation of the CVD order will have no significant impact on the volume and effect of imports.²⁶² We find that the discipline of an order can have a restraining effect on subject import volume and pricing.²⁶³ Therefore, we view the margins imposed during the period of review through Commerce's administrative review process with the order in place to have limited relevance to our decision.

Turkish Respondents have also argued that there is limited competition between cumulated subject imports and the domestic like product due to vertical integration by the domestic industry and Buy America(n) provisions,²⁶⁴ while Mexican Respondents argue that there is limited competition due to differences in product mix or channels of distribution between subject imports from Mexico and the domestic like product.²⁶⁵ We find that vertical integration does not fully shield the domestic industry from subject import competition. Five U.S. producers reported buying scrap at fair-market value prices.²⁶⁶ As discussed previously, responding purchasers reported that there were no differences in the method of determining prices for related or unrelated transactions and no supply preferences given by the related producer/supplier that were not given by unrelated producers/suppliers.²⁶⁷ While some U.S. producers have affiliated downstream purchasers, transfers to related purchasers were a declining minority of U.S. producers' U.S. shipments over the review period.²⁶⁸ Turkish producers assert that domestic producers are insulated from import competition because large

²⁶⁰ Turkish Respondents Prehearing Brief at 8.

²⁶¹ Turkish Respondents also argue that the subsidy found by Commerce underlying the countervailing duty order is no longer provided as an additional rationale for revoking the countervailable duty order. Turkish Respondents Prehearing Brief at 31. The SAA provides guidance that the Commission is not to calculate or otherwise determine dumping margins or net countervailable subsidies. SAA at 887. In any case, Commerce also determined that revocation of the CVD order on imports from Turkey would likely lead to continuation or recurrence of countervailable subsidies at a rate of 4.02 percent for one producer/exporter, and at a rate of 1.25 percent for all other Turkish producers/exporters (aside from Habas). CR/PR at Table I-6. Furthermore, RTAC provided a statement by Commerce that the subsidy had not been terminated. RTAC Posthearing Brief, Exhibit 5 at 7.

²⁶² Turkish Respondents Prehearing Brief at 8.

²⁶³ See *Stainless Steel Sheet and Strip from France, Germany, Italy, Japan, Korea, Mexico, Taiwan, and the United Kingdom*, Inv. Nos. 701-TA-381-382 (Review) and 731-TA-797-804 (Review), USITC Pub. 3788 (July 2005) at 14 n.85 and SAA at 853-54.

²⁶⁴ Turkish Respondents Posthearing Brief at 2-8.

²⁶⁵ Mexican Respondents' Prehearing Brief at 21-22.

²⁶⁶ CR/PR at III-36 n. 11.

²⁶⁷ CR/PR at II-5.

²⁶⁸ CR/PR at Table III-6.

U.S. producers acted as price leaders,²⁶⁹ but if price leadership occurred, it clearly did not foreclose extensive underselling by subject imports both before and during the review period.

Regarding Buy America(n) provisions, the record reflects, as it did in the original investigations, that these preferences affect a limited portion of the U.S. rebar market.²⁷⁰ With respect to Mexican Respondents' arguments, the record indicates substantial overlap in product mix and channels of distribution between subject imports from Mexico and the domestic like product.²⁷¹

We have also considered the role of nonsubject imports in the U.S. market. Nonsubject imports generally had higher average unit values than subject imports over the period of review and they have already lost much of their U.S. market share in interim 2020 to subject imports with lower average unit values.²⁷² In addition, there are existing trade measures against several nonsubject countries. For these reasons, and the shifts in market share already seen in interim 2020, we find that it is more likely that subject imports will take market share from the domestic industry in the reasonably foreseeable future.

We conclude that, if the orders were revoked likely volumes of subject imports from Mexico and Turkey would be likely to have a significant impact on the domestic industry within a reasonably foreseeable time.

V. Conclusion

For all the foregoing reasons, we determine that revocation of the CVD order on rebar from Turkey and the AD order on rebar from Mexico would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

²⁶⁹ Turkish Respondents' Posthearing Brief at 3.

²⁷⁰ Twenty-one out of 27 responding purchasers reported that approximately 15.6 percent of their purchases were required by law to be domestic purchases. CR/PR at II-28.

²⁷¹ CR/PR at Tables IV-2, IV-3, and IV-4 and Table II-5.

²⁷² CR/PR at Table C-1 (Summary Data).

Part I: Introduction

Background

On October 1, 2019, the U.S. International Trade Commission (“Commission” or “USITC”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),¹ that it had instituted reviews to determine whether revocation of the countervailing duty order on steel concrete reinforcing bar (“rebar”) from Turkey² and the antidumping duty order on rebar from Mexico would likely lead to the continuation or recurrence of material injury to a domestic industry.³ ⁴ On January 6, 2020, the Commission determined that it would conduct full reviews pursuant to section 751(c)(5) of the Act.⁵ The following tabulation presents information relating to the background and schedule of this proceeding:⁶

¹ 19 U.S.C. 1675(c).

² For the purposes of this report, subject rebar from Turkey excludes rebar produced by exporter Habas Sinai Ve Tibbi Gazlar Instihsal Endustrisis A.S. (“Habas”).

³ 84 FR 52126, October 1, 2019. All interested parties were requested to respond to this notice by submitting the information requested by the Commission.

⁴ In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. 84 FR 52067, October 1, 2019.

⁵ 85 FR 5036, January 28, 2020. The Commission found that both the domestic and respondent interested party group responses to its notice of institution were adequate.

⁶ The Commission’s notice of institution, notice to conduct full reviews, scheduling notice, and statement on adequacy are referenced in appendix A and may also be found at the Commission’s web site (internet address www.usitc.gov). Commissioners’ votes on whether to conduct expedited or full reviews may also be found at the web site. Appendix B presents the witnesses participating in the Commission’s hearing.

Effective date	Action
November 6, 2014	Commerce’s countervailing duty order on rebar from Turkey and antidumping duty order on rebar from Mexico (79 FR 65926, November 6, 2014; 79 FR 65925, November 6, 2014)
October 1, 2019	Commission’s institution of five-year reviews (84 FR 52126, October 1, 2019)
October 1, 2019	Commerce’s initiation of five-year reviews (84 FR 52067, October 1, 2019)
January 6, 2020	Commission’s determinations to conduct full five-year reviews (85 FR 5036, January 28, 2020)
January 28, 2020	Commerce’s final results of expedited five-year reviews of the countervailing duty order (85 FR 4945, January 28, 2020)
April 9, 2020	Commission’s scheduling of the reviews (85 FR 21266, April 16, 2020)
August 6, 2020	Commission’s hearing
September 16, 2020	Commission’s vote
October 7, 2020	Commission’s determinations and views

The original investigations

The original investigations resulted from petitions filed on September 4, 2013 with Commerce and the Commission by the RTAC and its individual members: Nucor, Charlotte, North Carolina; Gerdau, Tampa, Florida; CMC, Irving, Texas; Cascade Rolling Mills, Inc. (“Cascade”), McMinnville, Oregon, and Byer Steel Corporation (“Byer Steel”), Cincinnati, Ohio.⁷ On September 15, 2014, Commerce determined that imports of rebar from Mexico were being sold at less than fair value (“LTFV”) and imports of rebar from Turkey were being subsidized by the Government of Turkey.⁸ The Commission determined on October 28, 2014 that the domestic industry was materially injured by reason of LTFV imports of rebar from Mexico and imports of rebar subsidized by the Government of Turkey.⁹ On November 6, 2014, Commerce issued its antidumping and countervailing duty orders with the final weighted-average dumping

⁷ *Steel Concrete Reinforcing Bar from Mexico and Turkey, Inv. Nos. 701-TA-502 and 731-TA-1227 (Final)*, USITC Publication 4496, October 2014 (“Original publication”).

⁸ 79 FR 54963, September 15, 2014; and 79 FR 54967, September 15, 2014. Commerce also determined that imports of rebar from Turkey were not being sold at LTFV. 79 FR 54965, September 15, 2014. Accordingly, the Commission terminated its antidumping duty investigation with respect to imports of rebar from Turkey. 79 FR 57131, September 24, 2014.

⁹ 79 FR 65246, November 3, 2019.

margins for imports of rebar from Mexico ranging from 20.58 to 66.70 percent and a net subsidy rate of 1.25 percent for imports of rebar subsidized by the Government of Turkey.^{10 11}

On December 1, 2014, Mexican producer and exporter Deacero filed a request for a NAFTA Panel Review of the Commission's final antidumping duty injury determination with respect to rebar from Mexico. On July 14, 2016, the Panel issued its interim decision and order, in which it remanded the Commission's domestic like product finding but affirmed the Commission's holdings on the other challenged issues it addressed.¹²

The Panel remanded the Commission's finding that "rebar and in-scope deformed steel wire are both part of a single domestic like product." The Panel instructed the Commission on remand to "reconsider, based on the existing record evidence and on new information if the Commission elects to reopen the record, all six like product factors to determine whether Rebar and in-scope deformed steel wire are part of a single domestic like product." The Panel's decision asked the Commission to explain its domestic like product finding with respect to all six domestic like product factors, and the Panel found that the Commission needed to provide further explanation with respect to several of the domestic like product factors, particularly as to manufacturing facilities, production processes and employees, as well as producers' and customers' perceptions.¹³

On September 2, 2016, the Commission issued a Federal Register notice giving notice of remand.¹⁴ The notice stated that the Commission was not reopening the record, and was permitting the parties to file comments concerning how the Commission could best comply with the Panel's remand instructions, based solely on the information in the Commission's record. On October 19, 2016, the Commission filed its remand determination with the Panel. After considering the record as a whole, the Commission continued to find that there was a single domestic like product that is like the articles subject to these investigations. The Commission further determined that an industry in the United States was materially injured by

¹⁰ 79 FR 65925, November 6, 2014; and 79 FR 65926, November 6, 2014.

¹¹ During the original investigations, Commerce calculated a zero percent dumping margin and a de minimis subsidy rate for Turkish rebar producer and exporter Habas. Accordingly, Habas was treated as a nonsubject source. Therefore, although there was an "all others rate" for imports from Turkey in the countervailing duty investigation, Habas was not subject to that rate. *Investigation Nos. 701-TA-502 and 731-TA-1227 (Final): Steel Concrete Reinforcing Bar from Mexico and Turkey—Staff Report*, INV-MM-98, October 1, 2014, p. I-4, fn. 3.

¹² *Steel Concrete Reinforcing Bar from Mexico, Investigation No. 731-TA-1227 (Final) (Remand)*, USITC Publication 4645, October 2016, pp. 1-2.

¹³ *Ibid.*

¹⁴ 81 FR 60746, September 2, 2016.

reason of imports of rebar from Mexico found by Commerce to be sold in the United States at less than fair value.¹⁵ On February 6, 2017, the Panel unanimously upheld the Commission's remand determination.

Previous and related investigations

Rebar has been the subject of several prior import injury proceedings in the United States. Table I-2 presents information regarding previous safeguard, antidumping, and countervailing duty investigations, on rebar.

At the time of the filing of the petitions in 2016 for the Japan, Turkey, and Taiwan investigations, there was an existing countervailing duty order on steel reinforcing bar from the Republic of Turkey (the 2014 Turkey CVD order currently under review). The scope of the 2016 countervailing duty investigation with regard to rebar from Turkey covered only rebar produced and/or exported by those companies that were excluded from the 2014 Turkey CVD Order. At the time of the issuance of the 2014 Turkey CVD Order, Habas was the only excluded Turkish rebar producer or exporter.¹⁶ On July 14, 2017, following affirmative determinations by both the Commerce and the Commission, Commerce imposed antidumping duty on all imports of rebar from Turkey and countervailing duty orders on imports of rebar from Turkey produced and exported by Habas. The weighted average dumping margins ranged from 5.39 percent to 9.06 percent and the subsidy rate for Habas was 15.99 percent.¹⁷ These orders are currently in place.

¹⁵ *Steel Concrete Reinforcing Bar from Mexico, Investigation No. 731-TA-1227 (Final) (Remand)*, USITC Publication 4645, October 2016, p. 3.

¹⁶ 79 FR 65926, November 6, 2014.

¹⁷ 82 FR 32532, July 14, 2017 and 82 FR 32531, July 14, 2017.

Table I-1
Rebar: Previous and related Commission proceedings

Year	Inv. number	Country	USITC Publication	Current status
1964	AA1921-33	Canada	122	No outstanding antidumping duty order associated with this investigation.
1970	AA1921-62	Australia	314	No outstanding antidumping duty order associated with this investigation.
1973	AA1921-122	Mexico	605	Negative determination (Commission)
1997	731-TA-745	Turkey	3034	Revoked antidumping duty order (74 FR 266, January 5, 2009)
2000	731-TA-875	Indonesia	3425	Continuation of antidumping duty order (83 FR 50344, October 5, 2018)
2000	731-TA-880	Poland	3425	Continuation of antidumping duty order (83 FR 50344, October 5, 2018)
2000	731-TA-882	Ukraine	3425	Continuation of antidumping duty order (83 FR 50344, October 5, 2018)
2000	731-TA-873	Belarus	3440	Continuation of antidumping duty order (83 FR 50344, October 5, 2018)
2000	731-TA-874	China	3340	Continuation of antidumping duty order (83 FR 50344, October 5, 2018)
2000	731-TA-877	Korea	3440	Revoked antidumping duty order (72 FR 44830, August 9, 2007)
2000	731-TA-878	Latvia	3440	Continuation of antidumping duty order (83 FR 50344, October 5, 2018)
2000	731-TA-879	Moldova	3440	Continuation of antidumping duty order (83 FR 50344, October 5, 2018)
2001	TA-201-73	Safeguard	3479	Terminated by Presidential Proclamation 7741 of December 4, 2003 (68 FR 68483, December 8, 2003)
2016	701-TA-564 and 731-TA-1340	Turkey	4705	Antidumping duty order (82 FR 32532, July 14, 2017); Amended final CVD order (82 FR 32531, July 14, 2017)
2016	731-TA-1338	Japan	4705	Antidumping duty order (82 FR 32532, July 14, 2017)
2016	731-TA-1339	Taiwan	4724	Antidumping duty order (82 FR 45809, October 2, 2017)

Notes continued on next page.

Table I-1--Continued**Rebar: Previous and related Commission proceedings**

Note: In investigations AA1921-33 and AA1921-62 the Commission focused on a Pacific Northwest industry consisting of three producers in Washington and Oregon.

Note: In investigation AA1921-122 the Commission considered all U.S. facilities devoted to rebar production but gave special attention to rebar facilities within and outside Texas which produced most of the domestic rebar sold in that state during the years prior to the investigation.

Note: In making its determination in investigation 731-TA-745, the Commission concluded that appropriate circumstances existed for a regional industry analysis, with the region consisting of the U.S. producers in the "Eastern Tier." This region consisted of 22 contiguous states (Alabama, Connecticut, Delaware, Florida, Georgia, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Mississippi, New Hampshire, New Jersey, New York, North Carolina, Pennsylvania, Rhode Island, South Carolina, Tennessee, Vermont, Virginia, and West Virginia), plus Puerto Rico and the District of Columbia.

Source: U.S. International Trade Commission publications, Presidential Proclamations, and Federal Register notices.

Summary data

Table I-2 presents a summary of data from the terminal years of the original investigations (2013) and the current full five-year reviews (2019). Summary data for all periods from the original proceeding and the current reviews appear in Appendix C.

Table I-2

Rebar: Comparative data from the original investigations and current reviews, 2013 and 2109

Item	Original investigations	First reviews
	2013	2019
	Quantity (short tons)	
Apparent U.S. consumption	7,729,673	8,476,662
	Share of quantity (percent)	
Share of apparent U.S. consumption: U.S. producers' share	84.4	87.0
U.S. importers' share: Mexico	4.4	1.7
Turkey, subject	***	***
Subject sources	***	***
Turkey, nonsubject	***	***
All other sources	2.0	10.3
Nonsubject sources	***	***
All import sources	15.6	13.0
	Value (1,000 dollars)	
Apparent U.S. consumption	4,766,840	4,755,904
	Share of value (percent)	
Share of apparent U.S. consumption: U.S. producers' share	85.6	88.1
U.S. importers' share: Mexico	4.0	1.4
Turkey, subject	***	***
Subject sources	***	***
Turkey, nonsubject	***	***
All other sources	2.0	9.6
Nonsubject sources	***	***
All import sources	14.4	11.9

Table continued on next page.

Table I-2--Continued

Rebar: Comparative data from the original investigations and subsequent reviews, 2013 and 2019

Item	Original investigations	First reviews
	2013	2019
	Quantity (short tons); Value (1,000 dollars); and Unit Value (dollars per short ton)	
U.S. imports.--		
Mexico:		
Quantity	338,200	140,995
Value	188,960	77,383
Unit value	\$559	\$549
Turkey, subject:		
Quantity	***	***
Value	***	***
Unit value	***	***
Subject sources:		
Quantity	***	***
Value	***	***
Unit value	***	***
Turkey, nonsubject:		
Quantity	***	***
Value	***	***
Unit value	***	***
All other sources:		
Quantity	154,142	871,108
Value	95,759	517,317
Unit value	\$621	\$594
Nonsubject sources:		
Quantity	***	***
Value	***	***
Unit value	***	***
All import sources:		
Quantity	1,208,898	1,101,625
Value	686,610	645,422
Unit value	\$568	\$586

Table continued on next page.

Table I-2–Continued

Rebar: Comparative data from the original investigations and subsequent reviews, 2013 and 2019

Item	Original investigations	First reviews
	2013	2019
	Quantity (short tons); Value (1,000 dollars); and Unit Value (dollars per short ton)	
U.S. industry:		
Capacity (quantity)	9,911,957	9,990,430
Production (quantity)	6,776,007	7,524,429
Capacity utilization (percent)	68.4	75.3
U.S. shipments:		
Quantity	6,520,775	7,375,037
Value	4,080,230	4,755,904
Unit value	\$626	\$645
Ending inventory	550,880	483,498
Inventories/total shipments	***	***
Production workers	4,183	4,185
Hours worked (1,000)	8,369	8,944
Wages paid (1,000 dollars)	321,526	377,186
Hourly wages	\$38.42	\$42.17
Productivity (short tons per 1,000 hour)	810.0	841.3
Financial data:		
Net sales:		
Quantity	6,762,561	7,256,659
Value	4,266,236	4,762,366
Unit value	\$631	\$656
Cost of goods sold	3,930,134	3,747,151
Gross profit or (loss)	336,102	1,015,215
SG&A expense	177,621	227,840
Operating income or (loss)	158,481	787,375
Unit COGS	\$581	\$516
Unit operating income	\$23	\$109
COGS/ Sales (percent)	92.1	78.7
Operating income or (loss)/ Sales (percent)	3.7	16.5

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

Source: Office of Investigations memorandum INV-MM-100 (October 14, 2014), official U.S. import statistics, proprietary customs records, and data submitted in response to Commission questionnaires.

Figure I-1
Rebar: U.S. producers' U.S. shipments and U.S. imports, 2011-19

* * * * *

Source: Office of Investigations memorandum INV-MM-100 (October 14, 2014), official U.S. import statistics, proprietary customs records, and data submitted in response to Commission questionnaires.

Statutory criteria

Section 751(c) of the Act requires Commerce and the Commission to conduct a review no later than five years after the issuance of an antidumping or countervailing duty order or the suspension of an investigation to determine whether revocation of the order or termination of the suspended investigation “would be likely to lead to continuation or recurrence of dumping or a countervailable subsidy (as the case may be) and of material injury.”

Section 752(a) of the Act provides that in making its determination of likelihood of continuation or recurrence of material injury—

(1) IN GENERAL.-- . . . the Commission shall determine whether revocation of an order, or termination of a suspended investigation, would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time. The Commission shall consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated. The Commission shall take into account--

(A) its prior injury determinations, including the volume, price effect, and impact of imports of the subject merchandise on the industry before the order was issued or the suspension agreement was accepted,

(B) whether any improvement in the state of the industry is related to the order or the suspension agreement,

(C) whether the industry is vulnerable to material injury if the order is revoked or the suspension agreement is terminated, and

(D) in an antidumping proceeding . . ., (Commerce's findings) regarding duty absorption . . .

(2) VOLUME.--In evaluating the likely volume of imports of the subject merchandise if the order is revoked or the suspended investigation is terminated, the Commission shall consider whether the likely volume of imports of the subject merchandise would be significant if the order is revoked or the suspended investigation is terminated, either in absolute terms or relative to production or consumption in the United States. In so doing, the Commission shall consider all relevant economic factors, including--

(A) any likely increase in production capacity or existing unused production capacity in the exporting country,

(B) existing inventories of the subject merchandise, or likely increases in inventories,

(C) the existence of barriers to the importation of such merchandise into countries other than the United States, and

(D) 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.

(3) PRICE.--In evaluating the likely price effects of imports of the subject merchandise if the order is revoked or the suspended investigation is terminated, the Commission shall consider whether--

(A) there is likely to be significant price underselling by imports of the subject merchandise as compared to domestic like products, and

(B) imports of the subject merchandise are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of domestic like products.

(4) IMPACT ON THE INDUSTRY.--In evaluating the likely impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated, the Commission shall consider all relevant economic factors which are likely to have a bearing on the state of the industry in the United States, including, but not limited to--

(A) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity,

(B) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, and

(C) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.

The Commission shall evaluate all such relevant economic factors . . . within the context of the business cycle and the conditions of competition that are distinctive to the affected industry.

Section 752(a)(6) of the Act states further that in making its determination, “the Commission may consider the magnitude of the margin of dumping or the magnitude of the net countervailable subsidy. If a countervailable subsidy is involved, the Commission shall consider information regarding the nature of the countervailable subsidy and whether the subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement.”

Organization of report

Information obtained during the course of the reviews that relates to the statutory criteria is presented throughout this report. A summary of trade and financial data for rebar as collected in the reviews is presented in appendix C. U.S. industry data are based on the questionnaire responses of seven U.S. producers of rebar that are believed to have accounted for virtually all domestic production of rebar in 2019. U.S. import data and related information are based on Commerce's official import statistics and the questionnaire responses of eleven U.S. importers of rebar, accounting for 77.2 percent of the subject U.S. imports during 2019, including virtually all U.S. imports from Mexico and 28.7 percent of subject U.S. imports from Turkey. Foreign industry data and related information are based on the questionnaire responses of eight producers of rebar. Four producers in Mexico are estimated to account for 77 percent of total production in Mexico and four producers in Turkey are reported to account for 29 percent of total subject production in Turkey submitted questionnaire responses.¹⁸ Responses by U.S. producers, importers, purchasers, and foreign producers of rebar to a series of questions concerning the significance of the existing antidumping and countervailing duty orders and the likely effects of revocation of such orders are presented in appendix D. Additional shipment data are presented in appendix E, narrative responses of U.S. producers and purchasers regarding domestic like product are presented in appendix F, and section 232 actions by country are presented in appendix G.

¹⁸ One additional firm, ***, submitted a questionnaire on August 18, 2020. Because the information provided in this questionnaire was incomplete, Staff did not include the data in the compilations presented in this report. *** submitted a declaration on August 26, 2020 certifying that the firm produces rebar but does not export to the United States. *** did not provide a questionnaire.

Commerce's reviews¹⁹

Administrative reviews

Commerce has completed three administrative reviews of the outstanding antidumping duty orders on rebar from Mexico. Commerce has completed four administrative reviews of the outstanding countervailing duty order on rebar from Turkey.²⁰ The results of the administrative reviews are shown in tables I-3 and I-4.

¹⁹ Commerce has not conducted any changed circumstances review or scope rulings since the imposition of the orders. In addition, Commerce has not issued any duty absorption findings nor any company revocations since the imposition of the order.

²⁰ For previously reviewed or investigated companies not included in an administrative review, the cash deposit rate continues to be the company-specific rate published for the most recent period.

Table I-3**Rebar: Administrative reviews of the antidumping duty order for Mexico**

Date results published	Period of review	Producer or exporter	Margin (percent)
June 14, 2017; 82 FR 27233	2014-15	Deacero S.A.P.I. de C.V.	0.56
June 14, 2017; 82 FR 27233	2014-15	Grupo Simec S.A.B. de C.V.	0.00
June 14, 2018; 83 FR 27754	2015-16	Deacero S.A.P.I. de C.V.	0.00
June 14, 2018; 83 FR 27754	2015-16	Grupo Acerero S.A. de C.V.	0.00
June 14, 2018; 83 FR 27754	2015-16	All others	0.00
July 24, 2019; 84 FR 35599	2016-17	Deacero S.A.P.I. de C.V.	0.00
July 24, 2019; 84 FR 35599	2016-17	Grupo Simec S.A.B. de C.V.	3.65
July 24, 2019; 84 FR 35599	2016-17	All others	3.65
January 16, 2020; 85 FR 2702	2017-18	Deacero S.A.P.I. de C.V.	7.25
January 16, 2020; 85 FR 2702	2017-18	Grupo Simec S.A.B. de C.V.	6.75
January 16, 2020; 85 FR 2702	2017-18	All others	7.11

Note: The results from 2017-18 period of review are preliminary results.

Source: Cited Federal Register notices.

Table I-4**Rebar: Administrative reviews of the countervailing duty order for Turkey**

Date results published	Period of review	Producer or exporter	Subsidy rate ad valorem (percent)
June 12, 2017; 82 FR 26907	Sept. 15 – Dec. 31, 2014	Icdas Celik Enerji Tersane ve Ulasim Sanayi A.S	0.01
June 12, 2017; 82 FR 26907	Sept. 15 – Dec. 31, 2014	Kaptan Demir Celik Endustrisi ve Ticaret A.S. and Kaptan Metal Dış Ticaret ve Nakliyat A.S	0.02
June 12, 2017; 82 FR 26907	Sept. 15 – Dec. 31, 2014	All others	0.00
April 13, 2018; 83 FR 16051	2015	Icdas Celik Enerji Tersane ve Ulasim Sanayi A.S. and its cross-owned affiliates	0.02
April 13, 2018; 83 FR 16051	2015	Colakoglu Dis Ticaret A.S. and Colakoglu Metalurji A.S	0.18
April 13, 2018; 83 FR 16051	2015	Kaptan Demir Celik Endustrisi ve Ticaret A.S. and Kaptan Metal Dis Ticaret ve Nakliyat A.S.	0.02
April 13, 2018; 83 FR 16051	2015	All others	1.25
July 26, 2019; 84 FR 36051	2016	Icdas Celik Enerji Tersane ve Ulasim Sanayi A.S. and its cross-owned affiliates	2.76
July 26, 2019; 84 FR 36051	2016	Colakoglu Dis Ticaret A.S. and Colakoglu Metalurji A.S and their cross-owned affiliates	1.82
July 26, 2019; 84 FR 36051	2016	Kaptan Demir Celik Endustrisi ve Ticaret A.S. and Kaptan Metal Dış Ticaret ve Nakliyat A.S and their cross- owned affiliates	0.22
July 26, 2019; 84 FR 36051	2016	All others	2.29

Table continued on next page.

Table I-4 -- Continued

Rebar: Administrative reviews of the countervailing duty order for Turkey

Date results published	Period of review	Producer or exporter	Subsidy rate ad valorem (percent)
January 17, 2020; 85 FR 3030	2017	Icdas Celik Enerji Tersane ve Ulasim Sanayi A.S. and its cross-owned affiliates	0.41
January 17, 2020; 85 FR 3030	2017	Colakoglu Dis Ticaret A.S. and Colakoglu Metalurji A.S	1.82
January 17, 2020; 85 FR 3030	2017	Kaptan Demir Celik Endustrisi ve Ticaret A.S. and Kaptan Metal Dis Ticaret ve Nakliyat A.S. and their cross-owned affiliates	0.19
January 17, 2020; 85 FR 3030	2017	All others	2.29

Note: The results from 2017 period of review are preliminary results.

Source: Cited Federal Register notices.

Circumvention rulings

Commerce has conducted one circumvention review with respect to rebar from Mexico. On June 8, 2020, Commerce determined that rebar from Mexico produced and/or exported by Deacero S.A.P.I. de C.V. (“Deacero”) that is bent on one or both ends but otherwise meeting the description of in-scope merchandise is circumventing the antidumping duty order on rebar from Mexico.²¹ Commerce’s final decision did not include any other fabricated rebar.

Five-year reviews

Commerce has issued the final results of its expedited reviews with respect to both subject countries.²² Tables I-5 and I-6 present the dumping margins and subsidy rates calculated by Commerce in its original investigations and first reviews.

²¹ 85 FR 35065, June 8, 2020.

²² 85 FR 4945, January 28, 2020; 85 FR 6512, February 5, 2020.

Table I-5**Rebar: Commerce's original and first five-year dumping margins for producers/exporters in Mexico**

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Deacero S.A.P.I. de C.V.	20.58	66.70
Grupo Acerero S.A. de C.V.	66.70	66.70
Grupo Simec	66.70	66.70
All others	20.58	66.70

Source: 79 FR 65925, November 6, 2014; 85 FR 6512, February 5, 2020.

Table I-6**Rebar: Commerce's original and first five-year countervailable subsidy rates for producers/exporters in Turkey**

Producer/exporter	Original rate (percent)	First five-year review rate (percent)
Icdas Celik Enerji Tersane ve Ulasim Sanayi A.S	1.25	4.02
Kaptan Demir Celik Endustrisi ve Ticaret A.S. and Kaptan Metal Dis Ticaret ve Nakliyat A.S.	1.25	1.25
Colakoglu Dis Ticaret A.S. and Colakoglu Metalurji A.S.	1.25	1.25
Habas Sinai ve Tibbi Gazlar Istihsal Endustrisi A.S.	Excluded from the <i>Order</i>	Excluded from the <i>Order</i>
All others	1.25	1.25

Source: 79 FR 65926, November 6, 2014; 85 FR 4945, January 28, 2020.

The subject merchandise

Commerce's scope

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

The merchandise covered by the Order is steel concrete reinforcing bar imported in either straight length or coil form (rebar) regardless of metallurgy, length, diameter, or grade. The subject merchandise is classifiable in the Harmonized Tariff Schedule of the United States (HTSUS) primarily under item numbers 7213.10.0000, 7214.20.0000, and 7228.30.8010.

The subject merchandise may also enter under other HTSUS numbers including 7215.90.1000, 7215.90.5000, 7221.00.0015, 7221.00.0030, 7221.00.0045, 7222.11.0001, 7222.11.0057, 7222.11.0059, 7222.30.0001, 7227.20.0080, 7227.90.6085, 7228.20.1000, and 7228.60.6000. Specifically excluded are plain rounds (i.e., non-deformed or smooth rebar). Also excluded from the scope is deformed steel wire meeting ASTM A1064/A1064M with no bar markings (e.g., mill mark, size, or grade) and without being subject to an elongation test. HTSUS numbers are provided for convenience and customs purposes; however, the written description of the scope remains dispositive.^{23,24,25}

Tariff treatment

The merchandise subject to these reviews is imported primarily under the following provisions of the Harmonized Tariff Schedule of the United States (2014) ("HTS"): subheadings 7213.10.00 and 7214.20.00 and statistical reporting number 7228.30.8010.²⁶

HTS subheading 7213.10.00 covers concrete reinforcing bars and rod, of iron or nonalloy steel, hot-rolled, in irregularly wound coils. HTS subheading 7214.20.00 covers straight concrete reinforcing bars and rods, of iron or nonalloy steel, that are not further worked than forged, hot-rolled, hot-drawn, or hot-extruded, but including those twisted after rolling. HTS statistical reporting number 7228.30.8010 covers concrete reinforcing bars of other alloy steel, not

²³ 79 FR 54967, September 15, 2014.

²⁴ 79 FR 54965, September 15, 2014.

²⁵ 79 FR 54963, September 15, 2014.

²⁶ HTSUS (2020) Basic Edition, USITC Publication 5088, June 2020, ch. 72, pp. XV-72-20-21; XV 72-44.

further worked than hot-rolled, hot-drawn, or extruded. The general rate of duty for goods of each of these provisions is free.

On April 18, 2014, Commerce preliminarily determined that certain deformed steel wire products were included in the scope of these investigations.²⁷ On September 15, 2014, Commerce amended the scope to exclude certain deformed steel wire meeting ASTM A1064/A1064M with no bar markings (e.g., mill mark, size or grade) and without being subject to an elongation test. In-scope deformed steel wire (i.e., meeting ASTM A1064/A1064M with bar markings or with being subject to an elongation test) is not imported under HTS subheadings 7213.10.00 or 7214.20.00 or statistical reporting number 7228.30.8010, but rather may be imported under HTS statistical reporting number 7217.10.5090 and subheading 7217.10.60 and, depending on the characteristics of each shipment, may be imported under other provisions of HTS heading 7217 or 7223 (wire of stainless steel) or 7229 (wire of other alloy steel).²⁸

Section 232 tariff treatment

HTS headings 7213, 7214, and 7228 were included in the enumeration of iron and steel articles (imported on or after March 23, 2018) that became subject to the additional 25 percent ad valorem Section 232 duties.²⁹ See U.S. notes 16(a) and 16(b), subchapter III of HTS chapter 99.³⁰ At this time, imports of rebar from Australia, Canada, and Mexico are exempt from duties or quota limits; imports of rebar from Argentina (0 short tons); Brazil (24,408 short tons); and Korea (4,851 short tons) are exempt from duties but instead are subject to quota limits;³¹ and imports from all other countries are subject to 25 percent additional duties. Please see Appendix G for additional details.

The U.S. Department of Commerce allows individual importers to file section 232 exclusion requests for products not sufficiently available in the United States or for other

²⁷ Scope Comments Decision Memorandum for the Preliminary Determination of the Less-Than-Fair-Value Investigation of Steel Concrete Reinforcing Bar from Mexico and Turkey, Commerce Decision Memorandum, April 18, 2014. On June 19, 2014, Petitioner requested that Commerce amend the scope to exclude certain types of deformed steel wire. Petitioner, Steel Concrete Reinforcing Bar from Mexico and Turkey: Request to Amend Scope Language, letter to the Secretary of Commerce, June 19, 2014.

²⁸ 79 FR 54967, September 15, 2014.

²⁹ Adjusting Imports of Steel Into the United States, Presidential Proclamation 9705, March 8, 2018, 83 FR 11625, March 15, 2018

³⁰ HTSUS (2019) Revision 3, USITC Publication 4890, April 2019, pp. 99-III-5 - 99-III-6.

³¹ The composition of the quota product groups may not exactly match the product scope of this investigation. See the CBP quota bulletin at <https://www.cbp.gov/trade/quota/bulletins/qb-19-008-2019-absolute-quota-steel-mill-articles-first-quarter-limits> for a full list of product groups as well as their specified quotas and HTS definitions.

qualifying reasons. No 232 exclusion requests were made or granted for subject rebar products.³²

Treatment under section 232 with respect to the subject merchandise in these reviews is as follows:

Mexico - Imports of rebar from Mexico were initially exempted from the Section 232 additional duties when they became effective as of March 23, 2018.³³ On June 1, 2018, Mexico's exemption from the Section 232 duties was discontinued.³⁴ On May 20, 2019, Mexico's exemption from the Section 232 duties was reinstated after an agreement was reached between the United States and Mexico.³⁵ The agreement suspended all 232 tariffs for steel and aluminum as well as all tariffs applied by Mexico in retaliation. In its place, the United States and Mexico agreed to establish a process for monitoring steel and aluminum trade between the two countries. Rebar, listed as "Bars-Reinforcing," is specified among 54 product categories to be monitored for surges in imports. If a surge in one of the 54 product categories is identified, they could become subject to additional duties if consultation between the two countries fails to provide a solution.³⁶ Subject imports from Mexico otherwise remain exempt from restrictions under section 232.

Turkey - Imports of rebar from Turkey have been subject to the Section 232 duties since they initially became effective, but the rate of duty has been adjusted on two occasions. In August 10, 2018, the 25 percent ad valorem section 232 duties for Turkey were increased to 50 percent.³⁷ They remained at that level until May 23, 2019, when the duty was lowered back to 25 percent.³⁸ That remains the current rate.

³² U.S. Department of Commerce, Section 232 Exclusions Portal, <https://232app.azurewebsites.net/steelalum>, accessed 8/21/2020.

³³ *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9711, March 22, 2018, 83 FR 13361, March 28, 2018.

³⁴ *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9740, April 30, 2018, 83 FR 20683, May 7, 2018

³⁵ *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9894, May 19, 2019, 84 FR 23987, May 23, 2019.

³⁶ Joint Statement by the United States and Mexico on Section 232 Duties on Steel and Aluminum, May 17, 2019. <https://ustr.gov/about-us/policy-offices/press-office/press-releases/2019/may/united-states-announces-deal-canada-and>, retrieved July 21, 2020.

³⁷ *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9772, August 10, 2018, 83 FR 40429, August 15, 2018.

³⁸ *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9894, May 19, 2019, 84 FR 23987, May 23, 2019.

Section 301 tariff treatment

Section 301 of the Trade Act of 1974, as amended,³⁹ authorizes the Office of the U.S. Trade Representative (“USTR”), at the discretion of the President, to take appropriate action to respond to a country’s unfair trade practices. Products of China classified under in-scope HTS subheadings 7213.10.00, 7214.20.00, and statistical reporting number 7228.30.8010 were included in USTR’s fourth enumeration (“Tranche 4, List 1”) that became subject to the additional 10-percent ad valorem duties on or after September 1, 2019,⁴⁰ which was subsequently increased to 15 percent while retaining the same effective date.⁴¹ Effective February 14, 2020, the 15 percent duty was reduced to 7.5 percent for the products enumerated in Tranche 4, List 1.⁴²

The product

Description and applications⁴³

Rebar

Rebar is a long-rolled steel product that is commonly used in construction projects to provide strength to concrete. Rebar is manufactured as either plain round or deformed round bars. However, in the United States deformed rebar is used almost exclusively because it provides greater adherence to concrete due to its ridges.⁴⁴ Rebar can be shipped in either straight lengths or coils. Coiled rebar is produced in smaller sizes than straight lengths and is used for smaller, more complex applications.

³⁹ 19 U.S.C. § 2411.

⁴⁰ 84 FR 43304, August 20, 2019.

⁴¹ 84 FR 45821, August 30, 2019.

⁴² 84 FR 3741, January 22, 2020. See also U.S. notes 20(r) and 20(s) to subchapter III of HTS subchapter 99. These duties are in addition to the existing Section 232 duties on steel imports.

⁴³ Unless otherwise noted, this information is based on *Steel Concrete Reinforcing Bar from Mexico and Turkey, Inv. Nos. 701-TA-502 and 731-TA-1227 (Final)*, USITC Publication 4496, October 2014, pp. I-11 through I-14.

⁴⁴ Plain-round rebar tends to be used in concrete for special purposes, such as dowels at expansion joints where bars must slide in a metal or paper sleeve, for contraction joints in roads and runways, and for column spirals. Plain-round rebar offers only smooth, even surfaces for bonding with concrete. Because deformed rebar has greater surface contact (due to deformations) with the concrete compared with plain-round rebar, deformed rebar adheres to concrete better than plain-round rebar does. In building reinforcement applications where either deformed or plain-round rebar in the same diameter could be used, 40 percent more plain-round rebar would be needed than deformed rebar. Purposes and Types of Reinforcing Steel, found at <http://www.tpub.com/steelworker2/76.htm>, retrieved on July 6, 2020.

The construction industry is the principal consumer of rebar and uses it extensively to reinforce concrete structures. Embedding rebar in concrete enhances the concrete's compressional and tensional strength and controls cracking as concrete shrinks during curing or due to temperature fluctuations. Rebar resists tension, compression, temperature variation, and shear stresses in reinforced concrete because the surface protrusions on a deformed bar inhibit longitudinal movement relative to the surrounding concrete. During construction projects, rebar is placed in a form and concrete from a mixer is poured over it. Once the concrete has set, deformation is resisted and stresses are transferred from the concrete to the rebar by friction and adhesion along the surface of the steel. A smaller market for rebar is for mine bolts, which hold support structures in mines.

Rebar sold in the U.S. market is generally manufactured to conform to the test standards of the American Society for Testing and Materials ("ASTM") International, which specify for each bar size the nominal unit weight, nominal dimensions, and deformation requirements (dimension and spacing of deformations), as well as chemical composition, tensile strength, yield strength (grade), and elongation tolerances.⁴⁵ There are several ASTM specifications for rebar, based on steel composition. Generally, deformed rebar of these various ASTM specifications can be interchangeable with plain-round rebar, except for use in seismic areas.⁴⁶

To conform to ASTM specifications, deformed rebar is identified by bar markings—distinguishing sets of raised marks legibly rolled onto the surface of one side of the bar to denote: (1) the producer's hallmark, (2) mill designation, (3) size designation, (4) specification of steel type, and (5) minimum yield designation. Guidelines for use of deformed rebar in building construction are provided by the American Concrete Institute (ACI) 318 Code.

⁴⁵ The ASTM standards apply to both deformed and plain-round rebar, whether in straight lengths or coiled. There are separate and non-interchangeable standards for rebar with dimensions and designations in English units (e.g., ASTM A615) versus SI (metric) units (e.g., ASTM A615M).

⁴⁶ Deformed rebar is most commonly rolled from nonalloy billet steel to the requirements of ASTM A615/A615M. Rebar can also be re-rolled from the head (top) portion that has been slit from scrapped nonalloy steel rails or re-rolled from scrapped axles of railroad rolling stock and locomotives (ASTM A996/A996M, deformed rebar of either rail or axle steel; ASTM A616/A616M, deformed and plain rebar of rail steel; and A617/A617M, deformed and plain rebar of axle steel). For special applications (e.g., in seismic areas) that require a combination of strength, weldability, ductility, and bendability, ASTM A706/A706M (a high-strength low-alloy (HSLA) steel) is specified. Certain forged rebars of nonalloy or HSLA steel are covered under ASTM A970/970M. There is also a standard for deformed and plain rebar of stainless steel (ASTM A955/A955M) for special applications requiring corrosion resistance or controlled magnetic permeability (e.g., for avoiding interference with hospital imaging equipment).

Guidelines for use of deformed rebar in highway and bridge construction are provided by the American Association of State and Highway and Transportation Officials (“AASHTO”) Standard Specifications. The contents of the two specifications are similar and are applicable throughout the continental United States and in Puerto Rico.

Rebar is available in sizes #3 through #18, as specified by ASTM standards. These size indicators are about eight times the respective nominal diameters in inches (e.g., 3/8-inch bar is designated as size #3 and 1-inch rebar is designated as size #8),⁴⁷ although the relationship diverges somewhat for rebar larger than size #9.⁴⁸ Coiled rebar is only sold from sizes #3 to #6, as larger sizes of rebar cannot be coiled. In total, rebar is available in diameters ranging from 0.375 inches (size #3) to 2.257 inches (size #18).

Certain rebar sizes and lengths tend to predominate among end uses. A considerable portion of smaller sizes (i.e., #3-#5) and shorter lengths (i.e., 20-30 foot) is applied to light construction applications (e.g., residences, swimming pools, patios, and walkways). By contrast, heavy construction applications (e.g., high-rise buildings, commercial facilities, industrial structures, bridges, roads, etc.) use all sizes and lengths. The larger sizes (#6 and above) and longer lengths (60 feet or more) are used almost exclusively in heavy construction applications.⁴⁹

Rebar is shipped in either straight lengths or coils. Straight length rebar is available from mills in various lengths, from less than 20 feet to more than 60 feet. Coiled rebar is produced in accordance with ASTM A615 (Grades 40 and 60) and A706. Coiled rebar is preferred for use in smaller applications that have more complex shapes because coiled rebar is able to run efficiently through more complicated fabrication processes with less waste and scrap than straight length rebar.

Rebar may be coated by an epoxy (a powder-coated paint) after the manufacturing process to enhance corrosion resistance. Coated rebar is used in applications where the rebar is exposed to a high degree of salt, such as in roads, bridges and parking garages. Rebar may also be bent in the post-manufacturing fabrication process to reinforce the rebar joints.

⁴⁷ Nominal diameters of deformed rebar are equivalent to those of plain round bars of the same unit weight (mass) per foot (meter).

⁴⁸ Rebar is also available in metric sizes, with nominal diameters from 10 millimeters (mm) to 57 mm, as specified by ASTM standards.

⁴⁹ *Harris Supply Solutions’ Website, Rebar Sizes #3 to #18*, found at <http://www.harrissupplysolutions.com/3-rebar.html>, retrieved July 6, 2020.

Deformed steel wire

In general, deformed steel wire is a cold-drawn wire product used for the reinforcement of concrete. Deformed steel wire sold in the U.S. market is manufactured to conform to the test standards of ASTM A1064 or ASTM A496.⁵⁰ ASTM A1064 covers deformed wire, plain wire (for concrete), and welded wire reinforcement (mesh).⁵¹ ASTM A494 covers deformed wire. Each specification specifies the nominal unit weight and dimensions, including diameter and cross-sectional area, deformation requirements (depth and spacing), and tension strength (tensile and yield strength) requirements. Deformed steel wire is available in sizes D1 through D45, as specified by ASTM A494 and A1064. The size indicators refer to the cross-sectional area of the wire in increments of hundredths of an inch (e.g., D1-sized wire has a cross-sectional diameter of 0.010 square inches while D45-sized wire has a cross-sectional diameter of 0.450 square inches). Deformed steel wire is produced in diameters ranging from 0.113 inches (wire size D1) to 0.757 inches (wire size D45). The diameters of deformed steel wire produced in sizes D11 through D45 (0.374–0.757 inches) overlap with the diameters of rebar produced in sizes 3 through 6 (0.375–0.750 inches).

Deformed steel wire, defined broadly, is used in a wide range of concrete reinforcing applications. Deformed steel wire is often used to produce welded wire mesh for concrete reinforcement. Deformed steel wires are pre-straightened, sheared to the required length, and welded together to form the welded wire mesh. According to industry representatives, welded wire mesh made from deformed steel wire can substitute for rebar in certain applications. According to some industry estimates, 80 percent of the U.S. rebar market is in sizes that could potentially be replaced by welded wire mesh products.

Staff issued questionnaires to rebar producers and to known producers of deformed wire. No U.S. producer reported producing in-scope deformed steel wire (i.e., meeting ASTM A1064/A1064M with bar markings or with being subject to an elongation test) during the period of review.

⁵⁰ ASTM A1064, *Steel Wire and Welded Wire Reinforcement, Plain and Deformed, for Concrete*; ASTM A494, *Steel Wire, Deformed, for Concrete Reinforcement*.

⁵¹ ASTM A1064 does not require bar markings or an elongation test. ASTM International, *ASTMA1064/A1054M: Steel Wire and Welded Wire Reinforcement, Plain and Deformed, for Concrete*, 2009.

Manufacturing processes⁵²

Rebar

Rebar mills typically specialize in producing rebar either from (1) billet steel, (2) rail steel, or (3) axle steel, because each involves different starting materials and imposes somewhat different rolling requirements. The most common manufacturing process to produce rebar from billet steel consists of three stages: (1) melting steel scrap, (2) casting billets, and (3) hot-rolling the bar. In contrast, the manufacturing process for rebar produced from scrapped rail or axle steel, or from purchased billets, requires only reheating these materials and hot-rolling the bar.

In the United States, non-integrated “mini-mills” typically produce billets for rebar by melting steel scrap in electric arc furnaces. Once molten, liquid steel is poured from the furnace into a refractory-lined ladle, where any necessary alloys are added to affect the required chemical and physical properties. Molten steel must be cast into billets of the size and shape suitable for the rolling process. In the more common continuous strand-casting process, molten steel is poured from the ladle into a tundish (reservoir dam), which controls the rate of flow into the molds of the caster. A solid “skin” forms around the molten steel at the top openings of the mold, and as the columns of partially solidified steel descend through the caster, water sprays rapidly cool the cast steel (which helps minimize compositional segregation) to the point that the strands are completely solidified when emerging from the bottom of the caster.

Lengths of continuous-cast billets are flame cut at intervals, and then may be either sent directly for further processing or be cooled on a cooling bed and subsequently stored for later use.

Prior to rolling, newly cast billets, scrapped rails or scrapped railroad axles are heated to rolling temperature in a reheat furnace. The steel is reduced in size as it passes through successive rolling stands. Most modern rolling mills are in-line, and rebar of different sizes can be produced by changing the rolls. For deformed rebar, deformations are rolled onto the surface of the rebar as it passes through the final finishing stand, which has patterns cut into the grooves of the rolls.⁵³ After the rolling process, straight length rebar is cut to length before being sent to a cooling bed to be air-cooled. Coiled rebar, however, goes to a reforming tub,

⁵² Unless otherwise noted, this information is based on *Steel Concrete Reinforcing Bar from Mexico and Turkey, Inv. Nos. 701-TA-502 and 731-TA-1227 (Final)*, USITC Publication 4496, October 2014, pp. I-14 through I-16.

⁵³ When rolling plain rebar with uniformly smooth surfaces rather than with deformations, smooth-grooved rolls are substituted in the final finishing stand.

where it is spooled and cut to the desired weights or lengths. Testing for tensile properties, including an elongation test (a measure of ductility), is then performed on test specimens of either straight length rebar or coiled rebar that is subsequently straightened prior to testing.

Rebar can be water-quenched and tempered, rather than air-cooled. Water-quenching is a cooling process used to increase tensile strength in order for the rebar to comply with ASTM standards. Quenched-and-tempered rebar can meet the same physical property requirements of the ASTM A615/A615M specification without the addition of certain alloys to the steel billets that are rolled into rebar, and thus is slightly less expensive to produce. In this process (the Thermex process),⁵⁴ hot-rolled rebar passes through a water-quenching stand (a series of water coolers), which rapidly cools the outer case of the rebar, before the final finishing process. The quench-and-temper treatment causes a dual metallurgical structure to form in the cross-section of the bar, producing a rebar with a stronger outer case and a more ductile core.

Some U.S. rebar producers produce additional products using the same equipment, machinery, and production workers that are used to produce rebar, namely merchant bar, special-bar quality (SBQ) bar products, and wire rod. Merchant bar products include bars with round, square, flat, angled, and channeled cross sections, and are used by fabricators and manufacturers to produce a variety of products, including steel floor and roof joists, safety walkways, ornamental furniture, stair railings, and farm equipment. SBQ bar products are made from higher-quality carbon and alloy steels that have greater mechanical properties, metallurgical consistency, and dimensional accuracy than do merchant bar products. SBQ is principally used to produce automotive components. Wire rod (delivered in coil form) is used by manufacturers to provide a variety of products, such as chain-link fencing, nails, and wire.⁵⁵ SBQ bar products are typically priced highest among bar products, followed by merchant bar, wire rod, and rebar.

⁵⁴ Thermex refers to both the water-quench and tempering process, as well as the mill equipment used to produce rebar through this process. The Thermex process was developed and branded by Germany engineering firm Hennigsdorfer Stahl Engineering (HSE) in the 1970s.

⁵⁵ Schnitzer Steel, "Products," (available at http://www.schnitzersteel.com/steel_manufacturing_products.aspx, retrieved July 6, 2020).

Deformed steel wire

Deformed steel wire is produced from hot-rolled steel wire rod, the primary material input. Wire rod is first cleaned and descaled to remove any dirt or mill scale. Cleaning and descaling are accomplished chemically using a strong acid, or mechanically using abrasives. The cleaned and descaled wire rod is then coated with zinc phosphate, a lubricant to aid in the drawing process, and cold-drawn through a series of drawing dies to reduce the cross-sectional area. At the end of the drawing process, negative deformations (indentations) are rolled onto the surface of the wire at specified depths and dimensions in two or more lines spaced uniformly around the wire. The indentations increase the adherence of the wire to the concrete.

As noted above, Staff issued questionnaires to rebar producers and to known producers of deformed wire. No U.S. producer reported producing in-scope deformed steel wire (i.e., meeting ASTM A1064/A1064M with bar markings or with being subject to an elongation test) during the period of review.

Domestic like product issues

The Commission's decision regarding the appropriate domestic product(s) that are "like" the subject imported product is based on a number of factors including: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) common manufacturing facilities, production processes, and production employees; (5) customer and producer perceptions; and (6) price. In its original determinations, the Commission defined the domestic like product as consisting of steel concrete reinforcing bar imported in either straight length or coil form ("rebar"), regardless of metallurgy, length, diameter, or grade, corresponding to the scope of the investigations.⁵⁶ In its original determinations, the Commission defined the domestic industry as all U.S. producers of the domestic like product.⁵⁷ On December 1, 2014, Deacero filed a request for a NAFTA Panel Review of the Commission's final antidumping injury determination with respect to rebar from Mexico. On July 14, 2016, the Panel issued its interim decision and order, in which it remanded the Commission's domestic

⁵⁶ *Steel Concrete Reinforcing Bar from Mexico and Turkey, Inv. Nos. 701-TA-502 and 731-TA-1227 (Final)*, USITC Publication 3396, October 2014, p. I-10.

⁵⁷ *Steel Concrete Reinforcing Bar from Mexico and Turkey, Inv. Nos. 701-TA-502 and 731-TA-1227 (Final)*, USITC Publication 3396, October 2014, p. 9.

like product finding.⁵⁸ The NAFTA Panel remanded the Commission's finding that "rebar and in-scope deformed steel wire are both part of a single like product."⁵⁹ After the Commission considered the Panel's remand instructions, it continued to find in its remand determination that there is a single like product that is like the articles subject to these investigations.⁶⁰

In its notice of institution in these current five-year reviews, the Commission solicited comments from interested parties regarding the appropriate domestic like product and domestic industry.⁶¹ In their response to the Commission's notice of institution, the domestic interested parties and the Turkish producers and exporters indicated that they agree with the Commission's definitions of the domestic like product and the domestic industry that were adopted in the original investigations.^{62 63}

In its response to the Commission's notice of institution, the respondent interested parties indicated that they are evaluating other issues related to the definitions of the domestic like product or the domestic industry.⁶⁴ They contended that due to the anti-circumvention inquiry by the domestic interested parties, the domestic interested parties were attempting to expand the scope of the order to capture fabricated rebar. They further argued that fabricated rebar was excluded from the Commission's domestic industry and injury analysis during the original investigations, and that in the event that Commerce determines that fabricated (or bent) rebar should be included in the scope of the order, the Commission must include rebar fabricators as part of the domestic industry.⁶⁵ The domestic interested parties maintain that Commerce's anticircumvention inquiry should have no bearing on the Commission's definition of the domestic industry.⁶⁶

Respondents from Mexico requested that the Commission collect data concerning deformed steel wire and fabricated rebar as other possible domestic like products in their

⁵⁸ *Steel Concrete Reinforcing Bar from Mexico, Inv. No. 731-TA-1227 (Final) (Remand)*, USITC Publication 4645, October 2016, p. 1.

⁵⁹ *Steel Concrete Reinforcing Bar from Mexico, Inv. No. 731-TA-1227 (Final) (Remand)*, USITC Publication 4645, October 2016, p. 2.

⁶⁰ *Steel Concrete Reinforcing Bar from Mexico, Inv. No. 731-TA-1227 (Final) (Remand)*, USITC Publication 4645, October 2016, p. 3.

⁶¹ *Steel Concrete Reinforcing Bar From Mexico and Turkey; Institution of Five-Year Reviews*, 84 FR 52126, October 1, 2019.

⁶² *Domestic interested parties' response to the notice of institution*, October 31, 2019, p. 25.

⁶³ *Turkish producers and exporters' response to the notice of institution*, October 31, 2019, p. 17.

⁶⁴ *Mexican producers Deacero/Simec's response to the notice of institution*, October 31, 2019, p. 14.

⁶⁵ *Mexican producers Deacero/Simec's response to the notice of institution*, October 31, 2019, p. 14.

⁶⁶ *Domestic interested parties' comments on adequacy*, December 10, 2019, p. 5, fn. 16.

comments on the Commission's draft questionnaires.⁶⁷ Counsel for the domestic interested parties agreed with the definition of the domestic like product set forth in the original investigations.⁶⁸ No other interested party provided further comment on the domestic like product.

Based on Commission questionnaire responses, none of the U.S. producers' mills produces bent rebar. Similarly, no U.S. producer reported producing in-scope deformed steel wire (i.e., meeting ASTM A1064/A1064M with bar markings or with being subject to an elongation test). Nonetheless the Commission did request U.S. producers and U.S. purchasers to compare rebar with in-scope deformed wire on a number of issues. Their responses appear in appendix F.

U.S. market participants

U.S. producers

During the original investigations, ten firms supplied the Commission with information on their U.S. operations with respect to rebar. These firms accounted for virtually all U.S. production of rebar in 2013.⁶⁹ In these current proceedings, the Commission issued U.S. producers' questionnaires to 11 firms, seven of which provided the Commission with information on their product operations. These firms are believed to account for virtually all U.S. production of rebar in 2019. Presented in table I-7 is a list of current domestic producers of rebar and each company's position on continuation of the orders, production locations, related and/or affiliated firms, and share of reported production of rebar in 2019.

⁶⁷ *Mexican producers Deacero/Simec's comments on draft questionnaires*, April 21, 2020, pp. 2-3.

⁶⁸ *Domestic interested parties' comments on draft questionnaires*, April 21, 2020, p. 5.

⁶⁹ *Steel Concrete Reinforcing Bar from Mexico and Turkey, Inv. Nos. 701-TA-502 and 731-TA-1227 (Final)*, USITC Publication 3396, October 2014, p. III-1.

Table I-7

Rebar: U.S. producers, positions on orders, U.S. production locations and shares of 2019 reported U.S. production

Firm	Position on continuation of orders	Production location(s)	Share of production (percent)
Byer	***	Cincinnati, OH	***
Cascade	***	McMinnville, OR City of Industry, CA	***
CMC	***	Mesa, AZ Magnolia, AR Cayce, SC Seguin, TX Durant, OK Rancho Cucamonga, CA	***
Evraz	***	Pueblo, CO	***
Gerdau	***	Midlothian, TX Charlotte, NC Wilton, IA St. Paul, MN Rancho Cucamonga, CA Sayreville, NJ	***
Nucor	***	Charlotte, NC	***
SDI	***	Roanoke, VA Pittsboro, IN Columbia City, IN	***
Total			100.0

Note: There are four additional possible U.S. producers (ArcelorMittal USA, Keystone, Sherman Steel, and Texas Steel LLC) identified in the original investigations, believed to account for less than 5 percent of U.S. production.

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

As indicated in table I-8, *** U.S. producers are related to foreign producers of rebar and *** are related to U.S. importers of rebar.⁷⁰ In addition, as discussed in greater detail in Part III, *** U.S. producers directly import the subject merchandise and *** purchase the subject merchandise from U.S. importers.

⁷⁰ ***.

**Table I-8
Rebar: U.S. producers related and/or affiliated firms**

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

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

U.S. importers

In the original investigations, 18 U.S. importing firms supplied the Commission with usable information on their operations involving the importation of rebar, accounting for virtually all U.S. imports of rebar from Mexico, and 84.2 percent of U.S. imports of rebar from Turkey during 2013.⁷¹ In 2013, the largest importers of subject rebar from Mexico were ***, while the largest importers of subject rebar from Turkey were ***.⁷²

In the current proceedings, the Commission issued U.S. importers' questionnaires to 21 firms believed to be importers of rebar, as well as to all U.S. producers of rebar. Usable questionnaire responses were received from eleven firms, representing 73.2 percent of total imports, including virtually all U.S. imports from Mexico and 28.7 percent of subject U.S. imports from Turkey. Table I-9 lists all responding U.S. importers of rebar from Mexico and Turkey and other sources, their locations, and their shares of U.S. imports in 2019.

⁷¹ *Steel Concrete Reinforcing Bar from Mexico and Turkey*, Inv. Nos. 701-TA-502 and 731-TA-1227 (Final), USITC Publication 4496, October 2014, p. IV-1.

⁷² *Investigation Nos. 701-TA-502 and 731-TA-1227 (Final): Steel Concrete Reinforcing Bar from Mexico and Turkey—Staff Report*, INV-MM-98, October 1, 2014, p. IV-2.

Table I-9

Rebar: U.S. importers, source(s) of imports, U.S. headquarters, and shares of imports in 2019

Firm	Headquarters	Share of imports by source (percent)						
		Mexico	Turkey (excluding Habas)	Subject sources	Turkey (Habas only)	All other sources	Non-subject sources	All import sources
CDT	Istanbul, Turkey	***	***	***	***	***	***	***
CMC	Irving, TX	***	***	***	***	***	***	***
Deacero	Houston, TX	***	***	***	***	***	***	***
Harris	Seattle, WA	***	***	***	***	***	***	***
Icdas	Istanbul, Turkey	***	***	***	***	***	***	***
Intermetal	Miami, FL	***	***	***	***	***	***	***
Izmir Demir	Izmir, Turkey	***	***	***	***	***	***	***
Medtrade	Houston, TX	***	***	***	***	***	***	***
Simec	National City, CA	***	***	***	***	***	***	***
Steel and Pipes	Caguas, PR	***	***	***	***	***	***	***
Traxys	New York, NY	***	***	***	***	***	***	***
Total		100.0	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. Several firms importing subject merchandise during the period of review did not import during 2019.

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

U.S. purchasers

The Commission received 28 usable questionnaire responses from firms that bought rebar since 2017.⁷³ The largest purchasers of rebar were ***, and accounted for nearly two-thirds of all reported purchases of rebar in 2019. Unrelated large purchasers of rebar include ***.

Apparent U.S. consumption and U.S. market shares

Data concerning apparent U.S. consumption of rebar are shown in table I-10 and figure I-2. Apparent U.S. consumption rose from 2014 to 2019, matching an increase in U.S. producers' U.S. shipments. From 2014 to 2019, total imports declined, reflecting a decline in subject imports from Turkey during that same period. Subject imports from Mexico rose from 2014 to 2019. First quarter U.S. producers' U.S. shipments in 2020 were higher than those made in the first quarter of 2019. First quarter subject imports from Mexico and Turkey in 2020 were *** higher than those made in the first quarter of 2019. Nonsubject imports increased from 2014 to 2019 and first quarter nonsubject imports were *** lower than those made in the first quarter of 2019. Table I-11 presents U.S. market shares. The market share of U.S. producers' U.S. shipments increased from 82.3 percent in 2014 to 87.0 percent in 2019.

⁷³ Of the 22 responding purchasers, 19 purchased domestic rebar, 10 purchased imports of the subject merchandise from Mexico, 9 purchased imports of the subject merchandise from Turkey, and 13 purchased imports of rebar from other sources.

Table I-10**Rebar: U.S. shipments of domestic product, U.S. imports, and apparent U.S. consumption 2014-19, January to March 2019, and January to March 2020**

Item	Calendar Year					
	2014	2015	2016	2017	2018	2019
	Quantity (short tons)					
U.S. producers' U.S. shipments	6,620,676	6,386,240	6,580,706	6,995,285	7,586,072	7,375,037
U.S. imports from.-- Mexico	99,319	5,370	3,494	26,928	102,866	140,995
Turkey, subject	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***
All other sources	341,633	382,743	613,237	596,013	674,361	871,108
Nonsubject sources	***	***	***	***	***	***
All imports sources	1,422,152	2,013,421	2,115,909	1,495,515	1,161,951	1,101,625
Apparent consumption	8,042,828	8,399,661	8,696,615	8,490,800	8,748,023	8,476,662
	Value (1,000 dollars)					
U.S. producers' U.S. shipments	4,235,556	3,576,919	3,085,957	3,613,469	4,882,994	4,755,904
U.S. imports from.-- Mexico	56,250	2,417	1,358	13,190	60,529	77,383
Turkey, subject	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***
All other sources	203,351	179,498	237,503	284,937	442,848	517,317
Nonsubject sources	***	***	***	***	***	***
All imports sources	808,184	897,445	779,640	673,773	735,841	645,422
Apparent consumption	5,043,740	4,474,364	3,865,597	4,287,242	5,618,835	5,401,326

Table continued on next page.

Table I-10--Continued

Rebar: U.S. shipments of domestic product, U.S. imports, and apparent U.S. consumption 2014-19, January to March 2019, and January to March 2020

Item	January to March	
	2019	2020
	Quantity (short tons)	
U.S. producers' U.S. shipments	1,698,323	1,925,264
U.S. imports from.-- Mexico	13,939	61,466
Turkey, subject	***	***
Subject sources	***	***
Turkey, nonsubject	***	***
All other sources	313,206	91,581
Nonsubject sources	***	***
All imports sources	335,520	280,400
Apparent consumption	2,033,843	2,205,664
	Value (1,000 dollars)	
U.S. producers' U.S. shipments	1,139,334	1,166,394
U.S. imports from.-- Mexico	8,641	33,746
Turkey, subject	***	***
Subject sources	***	***
Turkey, nonsubject	***	***
All other sources	198,060	48,908
Nonsubject sources	***	***
All imports sources	213,147	145,401
Apparent consumption	1,352,481	1,311,795

Source: Compiled from data submitted in response to Commission questionnaires, official U.S. import statistics, and proprietary customs records using HTS statistical reporting numbers 7213.10.0000 and 7214.20.0000, accessed August 13, 2020.

Figure I-2
Rebar: Apparent U.S. consumption, 2014-19, January to March 2019, and January to March 2020

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires, official U.S. import statistics, and proprietary customs records using HTS statistical reporting numbers 7213.10.0000 and 7214.20.0000, accessed August 13, 2020.

Table I-11
Rebar: Market shares, 2014-19, January to March 2019, and January to March 2020

Item	Calendar Year					
	2014	2015	2016	2017	2018	2019
	Share of quantity (percent)					
U.S. producers' U.S. shipments	82.3	76.0	75.7	82.4	86.7	87.0
U.S. imports from.-- Mexico	1.2	0.1	0.0	0.3	1.2	1.7
Turkey, subject	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***
All other sources	4.2	4.6	7.1	7.0	7.7	10.3
Nonsubject sources	***	***	***	***	***	***
All imports sources	17.7	24.0	24.3	17.6	13.3	13.0
Apparent consumption	100.0	100.0	100.0	100.0	100.0	100.0
	Share of value (percent)					
U.S. producers' U.S. shipments	84.0	79.9	79.8	84.3	86.9	88.1
U.S. imports from.-- Mexico	1.1	0.1	0.0	0.3	1.1	1.4
Turkey, subject	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***
All other sources	4.0	4.0	6.1	6.6	7.9	9.6
Nonsubject sources	***	***	***	***	***	***
All imports sources	16.0	20.1	20.2	15.7	13.1	11.9
Apparent consumption	100.0	100.0	100.0	100.0	100.0	100.0

Table continued on next page.

Table I-11--Continued

Rebar: Market shares, 2014-19, January to March 2019, and January to March 2020

Item	January to March	
	2019	2020
	Share of quantity (percent)	
U.S. producers' U.S. shipments	83.5	87.3
U.S. imports from.-- Mexico	0.7	2.8
Turkey, subject	***	***
Subject sources	***	***
Turkey, nonsubject	***	***
All other sources	15.4	4.2
Nonsubject sources	***	***
All imports sources	16.5	12.7
Apparent consumption	100.0	100.0
	Share of value (percent)	
U.S. producers' U.S. shipments	84.2	88.9
U.S. imports from.-- Mexico	0.6	2.6
Turkey, subject	***	***
Subject sources	***	***
Turkey, nonsubject	***	***
All other sources	14.6	3.7
Nonsubject sources	***	***
All imports sources	15.8	11.1
Apparent consumption	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, official U.S. import statistics, and proprietary customs records using HTS statistical reporting numbers 7213.10.0000 and 7214.20.0000, accessed August 13, 2020.

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

U.S. market characteristics

The primary use of rebar is concrete reinforcement. As a result, the U.S. market for this product is tied closely to new construction activity in the United States.¹ Major end-use products requiring rebar include roads, bridges, highways, tunnels, commercial and industrial construction, residential construction, and public construction.² According to the Concrete Reinforcing Steel Institute (“CRSI”), public construction accounted for the largest share of domestic consumption of rebar in 2019, followed by non-residential buildings, residential buildings, and other/miscellaneous uses.³

While some manufactured rebar is used in construction applications with no further processing, a large share is also sold to fabricators that further process the rebar before it is finally used in construction applications. U.S. producers *** own purchasing firms that operate as fabricators and/or distributors. These purchasing firms obtain the rebar for fabrication or distribution from their parent companies and, in some cases, from other producers and import suppliers. U.S. producers and importers sell to the same types of customers, but the proportions vary.

Apparent U.S. consumption of rebar increased from 8.0 million short tons in 2014 to 8.5 million short tons in 2019, a net increase of 5.4 percent. U.S. producers’ share decreased from 82.3 percent in 2014 to 75.7 percent in 2016 before rising to 87.0 percent by 2019. Similarly, CRSI calculated that domestic consumption of rebar increased by 6.1 percent between 2014 and 2019.

Firms were asked if the imposition of tariffs on imported steel and aluminum products associated with Section 232 had an impact on the rebar market in the United States. Their responses appear in table II-1.

¹ Hearing transcript, p. 67 (Cross) and RTAC’s posthearing brief, pp. 27-28.

² Hearing transcript, p. 16 (Representative Wilson).

³ Concrete Reinforcing Steel Institute Domestic Reinforcing Bar Consumption, June 2020, http://www.crsi.org/cfcs/cmsIT/baseComponents/fileManagerProxy.cfc/2017-2_-_CRSI_Consumption_Report.pdf?method=GetFile&fileID=941EEB9C-093D-BFD6-B9EA04FFE130F1CA, retrieved June 29, 2020.

Table II-1
Rebar: U.S. producers', importers', and purchasers' assessment of the impact of Section 232 tariffs on steel and aluminum

Item	Increase	No change	Decrease	Fluctuate
Supply of U.S.-produced rebar				
Producers	4	1	---	2
Importers	6	2	---	---
Purchasers	19	2	2	2
Supply of imported rebar				
Producers	---	---	1	6
Importers	---	---	6	2
Purchasers	3	1	18	3
Price of rebar				
Producers	1	---	---	6
Importers	5	---	---	3
Purchasers	21	1	---	4
Overall demand in the rebar market				
Producers	2	4	---	1
Importers	1	7	---	---
Purchasers	5	15	---	5

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

Almost all U.S. producers and most responding importers and purchasers reported that Section 232 tariffs did have an impact on the rebar market. A majority of U.S. producers, importers, and purchasers reported an increase in the supply of domestic rebar and majorities of importers and purchasers reported a decrease in the supply of imported rebar. Most producers indicated the supply of imported rebar fluctuated. Majorities of importers and purchasers also reported increased prices due to the tariffs, whereas all but one producer again indicated that the price of rebar fluctuated. Majorities of all three firm types indicated the tariffs had not caused a change in demand.

Firms were also asked if the agreement between the United States and Mexico to eliminate all Section 232 duties on steel products from Mexico had any effect on rebar imported from Mexico.⁴ Six of 7 producers, 6 of 8 responding importers, and 17 of 26 responding purchasers indicated that the removal had an impact on the market.

⁴ Part I of this report contains further information regarding the history of the Section 232 tariffs with respect to rebar from Mexico. See also “Joint Statement by the United States and Mexico on Section 232 Duties on Steel and Aluminum” eliminating tariffs imposed under Section 232 as well as providing for consultations and re-imposition of duties “in the event that imports of aluminum or steel products surge meaningfully beyond historic volumes of trade over a period of time, with consideration of market share.” <https://ustr.gov/about-us/policy-offices/press-office/press-releases/2019/may/united-states-announces-deal-canada-and>, retrieved July 21, 2020.

U.S. purchasers

The Commission issued 62 purchaser questionnaires and received 28 usable questionnaire responses from firms that had purchased rebar since 2014.⁵ ⁶ Eleven responding purchasers are distributors, 10 are distributor/fabricators, 10 are end user/fabricators, one is a construction end user, and one described itself as a “distribution and trading company.” Responding U.S. purchasers were located throughout the United States. The largest purchasers of rebar were ***, accounting for nearly *** of all reported purchases of rebar in 2019. *** large purchasers of rebar include ***. Twenty-one of 27 responding purchasers reported that they compete for sales with their suppliers of rebar, whether domestic suppliers, import brokers, or other suppliers of imported rebar. Purchaser *** stated that “suppliers – both foreign and domestic – have adopted distribution-like strategies.”

⁵ One additional firm receiving the purchasers’ questionnaire reported it had not purchased rebar since January 1, 2014. The following firms provided full purchaser questionnaire responses: ***. Three purchasers (***) are related to U.S. producers of rebar. Four (***) are either related to or are an importer.

⁶ Of the 28 responding purchasers, 25 purchased domestic rebar, 11 purchased imports of the subject merchandise from Mexico, 11 purchased imports of the subject merchandise from Turkey, 15 purchased imports of rebar from other sources, and 4 purchased imports of rebar of unknown origin in 2019.

Independent Steel Alliance

Seven of 28 purchasers indicated that they are members of the Independent Steel Alliance (“ISA”), “a purchasing cooperative of independently-owned and operated rebar fabricators in the U.S. and Canada” which was formed to create partnerships with key suppliers by using the collective purchasing power of its members and distributes annual rebates to those members.⁷ Four purchasers reported purchasing rebar through the ISA, and two of 15 responding purchasers indicated that the ISA has had an impact on the rebar market or rebar prices. All 7 producers have sold to members of the ISA, though only *** noted that the sales were made under different conditions. It stated “Pricing is based on the market at the time of order placement. Annual volume rebate is issued to the Alliance and they distribute to their members.” Only 2 of 10 importers have sold to the members of the ISA, and no importer reported selling under any conditions that differ from those for other sales. No producer or importer reported that the ISA had any impact on the rebar market.

Related producers and suppliers

Five of 28 purchasers reported that they had purchased rebar from related producers or suppliers: ***,⁸ ***, ***. Although it reported having purchased rebar from a related producer or supplier, *** did not indicate any related producers or suppliers in its questionnaire response. Although a purchaser questionnaire response was not received from producer Byer Steel, Byer operates a full fabrication shop.⁹

⁷ <http://independentsteelalliance.com>, retrieved August 17, 2020. The ISA lists 36 members.

⁸ Producers *** indicated they had sold rebar to related fabricators. Producer *** indicated that it did not, but answered follow-up questions regarding sales to related fabricators. Those responses are not included in the summation of producer responses. Only one importer reported selling to related fabricators. However, this importer, ***, is also a producer, so its responses are taken into account in tabulations of producer responses. Purchaser *** indicated that it had purchased from a related supplier, but indicated that it had no related producers or importers.

⁹ <https://www.byersteelminded.com/Rebar-main.cfm.html>, retrieved July 6, 2020.

Purchasers responding “yes” were asked a series of questions about whether purchase conditions differ for these transactions. When asked whether the purchase process differs when dealing with a related producer or supplier, only one of the five purchasers indicated that it is different. *** stated “For related supplier we have an SAP stock transfer order mechanism based upon a monthly set market price. For unrelated suppliers, we would request a price for a set volume and generally the price is good for 30 days.”¹⁰ *** did not indicate the process differs, adding “Whether we purchase from our related or unrelated suppliers, the sales process is based on negotiating competitive pricing.” All five responding purchasers reported there are no differences in the method of determining prices for related or unrelated transactions. All five purchasers also reported that there are no supply preferences given by the related producer/supplier that are not given from unrelated producers/suppliers (e.g., firms allocating rebar to their related purchasers before selling on the open market).¹¹ Two of the five responding purchasers reported that credit terms are different, however. *** noted it has 30-day payment terms for unrelated suppliers but immediate intercompany payment for related suppliers. *** stated that, for purchases from ***, it pays “through a centralized cash management system {which} eliminates credit-related concerns.”¹²

All purchasers were asked if the relationships between U.S. producers of rebar and their affiliated scrap suppliers, fabricators, or distributors affected prices, purchase patterns, or competition in the rebar market. The majority of responding purchasers (17 of 28) indicated there had been such effects. Three of the 10 responding “no” were ***. Non-related purchasers described an increase in control of the market by purchasers related to producers. Table II-2 lists the effects of vertical integration described by purchasers. Purchasers were also asked about changes in the U.S. market since January 1, 2014, and those they anticipated. Responding firms described a variety of supply, demand, and pricing phenomena. Their responses are presented in tables II-3 and II-4. Whereas most purchasers described at least one change in the market, half did not describe any anticipated future changes.

¹⁰ ***, along with *** responded that there were no differences between the purchase processes. In addition, purchaser *** stated its terms differed due to price protection, although it also indicated it had no related supplier.

¹¹ All responding producers related to purchasers *** indicated there are no differences in price determination or supply preferences as well.

¹² Three of four responding producers (these purchasers’ related producers, as well as ***), indicated that credit terms differ for related fabricators. *** stated that payment is automatic for its related purchasers.

Table II-3—Continued

Rebar: U.S. purchasers' responses regarding changes in the market since January 1, 2014

Purchaser	Changes in the market
***	***
***	***
***	***
***	***

Note: Purchaser *** did not answer the question directly, but made reference to the responses it made to other questions.

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

Channels of distribution

U.S. producers sold mainly to fabricators (often with distribution networks) while importers from both Mexico and Turkey (other than Habas) sold mainly to distributors in most years, as shown in table II-5.

Table II-5

Rebar: U.S. producers' and importers' share of reported U.S. shipments, by sources and channels of distribution, 2014-19, January-March 2019, and January-March 2020

Item	Period							
	Calendar year						January-March	
	2014	2015	2016	2017	2018	2019	2019	2020
Share of reported shipments (percent)								
U.S. producers' U.S. shipments of rebar:								
Distributors	***	***	***	***	***	***	***	***
Fabricator/distributors	***	***	***	***	***	***	***	***
Fabricator/end users	***	***	***	***	***	***	***	***
End users	***	***	***	***	***	***	***	***
U.S. importers' U.S. shipments of rebar from Mexico:								
Distributors	***	***	***	***	***	***	***	***
Fabricator/distributors	***	***	***	***	***	***	***	***
Fabricator/end users	***	***	***	***	***	***	***	***
End users	***	***	***	***	***	***	***	***
U.S. importers' U.S. shipments of rebar from Turkey (excl. Habas):								
Distributors	***	***	***	***	***	***	***	***
Fabricator/distributors	***	***	***	***	***	***	***	***
Fabricator/end users	***	***	***	***	***	***	***	***
End users	***	***	***	***	***	***	***	***
U.S. importers' U.S. shipments of rebar from Turkey (Habas):								
Distributors	***	***	***	***	***	***	***	***
Fabricator/distributors	***	***	***	***	***	***	***	***
Fabricator/end users	***	***	***	***	***	***	***	***
End users	***	***	***	***	***	***	***	***
U.S. importers' U.S. shipments of rebar from all other sources:								
Distributors	***	***	***	***	***	***	***	***
Fabricator/distributors	***	***	***	***	***	***	***	***
Fabricator/end users	***	***	***	***	***	***	***	***
End users	***	***	***	***	***	***	***	***

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

Geographic distribution

U.S. producers reported selling rebar to all regions in the contiguous United States (table II-6). Importers of rebar from subject sources reported selling to all regions as well, although sales by importers of Mexican and Turkish rebar only overlapped in three regions. For U.S. producers, 16.4 percent of sales were within 100 miles of their production facility, 80.6 percent were between 101 and 1,000 miles, and 3.0 percent were over 1,000 miles. Importers sold 13.1 percent within 100 miles of their U.S. point of shipment, 53.0 percent between 101 and 1,000 miles, and 33.9 percent over 1,000 miles.

Table II-6
Rebar: Geographic market areas in the United States served by U.S. producers and importers

Region	U.S. producers	Importers from Mexico	Importers from Turkey	Importers from subject sources
Northeast	6	---	3	3
Midwest	7	2	1	2
Southeast	6	---	4	4
Central Southwest	6	2	3	5
Mountain	6	3	---	3
Pacific Coast	5	3	2	5
Other	4	---	2	2
All regions (except Other)	4	---	---	---
Reporting firms	7	4	6	9

Note: Regions are defined as follows: Northeast (CT, ME, MA, NH, NJ, NY, PA, RI, and VT), Midwest (IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI), Southeast (AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV), Central Southwest (AR, LA, OK, and TX), Mountains (AZ, CO, ID, MT, NV, NM, UT, and WY), Pacific Coast (CA, OR, and WA). Other is 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-7 provides a summary of the supply factors regarding rebar from U.S. producers and from subject countries.

Table II-7

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

Country	Capacity (1,000 short tons)		Capacity utilization (percent)		Ratio of inventories to total shipments (percent)		Shipments by market, 2019 (percent)		Able to shift to alternate products
	2014	2019	2014	2019	2014	2019	Home market shipments	Exports to non-U.S. markets	No. of firms reporting "yes"
United States	9,400	9,990	76.0	75.3	***	***	***	***	5 of 7
Mexico	***	***	***	***	***	***	***	***	3 of 3
Turkey	***	***	***	***	***	***	***	***	0 of 4
All subject foreign producers	***	***	***	***	***	***	***	***	3 of 7

Note: Responding U.S. producers accounted for the substantial majority of U.S. production of rebar in 2019. Responding foreign producer/exporter firms accounted for all or nearly all of U.S. imports of rebar from Mexico during 2019 but less than half of U.S. imports of rebar from Turkey. 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 rebar have the ability to respond to changes in demand with moderate to large changes in the quantity of shipments of U.S.-produced rebar to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity, the ability to shift production from alternate products using the same equipment and machinery and from export sources, and some limited inventories.¹³

Domestic rebar production capacity increased from 9.4 million short tons to 10.0 million short tons between 2014 and 2019. Capacity utilization decreased slightly, from 76.0 percent to 75.3 percent during that time. Exports declined over the period from *** percent of total shipments in 2014 to *** percent in 2019. Five of seven producers reported manufacturing other products on the same equipment as rebar, including wire rod, merchant bar, T-stock for steel fence posts, highway products, and other bar or rod products.

¹³ As discussed *infra*, producers reported selling 37.5 percent of their rebar in 2019 from inventories.

When asked about manufacturing different products using the same machinery and equipment, responding producers most frequently described an inability to switch away from producing rebar to other products due to limited demand for those other products rather than an inability to switch to producing rebar. *** stated that it manufactures to specific product demands, each of which has its own unique “demand profile.” RTAC states that “It is easy for rebar producers to shift production from other products made on the same machinery and equipment to production of rebar.”¹⁴

Fifteen of 28 purchasers noted that domestic supply had changed since January 1, 2014. Most purchasers reported that the U.S. had more mills or increased capacity.¹⁵ Two purchasers ascribed the increased ability to supply to antidumping and countervailing duties. Two noted that Gerdau was sold to CMC, with one (***) adding that “who can purchase depending on relationship and location” has changed; it is “able to purchase now from CMC, but struggle in other areas as they support other companies in those markets.” Purchaser *** noted that the consolidation of U.S. mills has limited supply and U.S. producers are shipping more to their own fabrication and distribution arms. Purchaser *** reported that “two more rebar mills are coming online in {the} U.S.” Purchaser *** reported that domestic mills had to put customers on allocation at times. Eleven of the 27 purchasers anticipate future changes in supply, with five expecting increased availability; purchaser *** attributed increased availability due to decreased demand, however. Purchaser *** noted that even with the increased capacity, it will not be enough to fully supply U.S. demand.

¹⁴ RTAC’s posthearing brief, p. 56.

¹⁵ Two purchasers which are also related to U.S. producers indicated that there were no changes in U.S. supply, but noted that there is either increased or ample U.S. capacity to produce rebar.

Subject imports from Mexico

Foreign producer *** stated that Mexico has four main rebar producers; four producers in Mexico responded to the USITC questionnaire. Based on available information, producers of rebar from Mexico have the ability to respond to changes in demand with moderate changes in the quantity of shipments of rebar to the U.S. market. This degree of responsiveness of supply is constrained by a moderate amount of available unused capacity and inventories but enhanced by a sizeable share of rebar exported, and the ability to shift production from alternative products and shift shipments from alternate markets to the United States.

Rebar production capacity in Mexico increased from *** short tons in 2014 to *** short tons in 2019. Capacity utilization declined – from *** percent to *** percent over the same period. The large majority of rebar that Mexican producers sell to the United States (*** percent) is produced-to-order and all is sold on the spot market. The share of Mexico’s shipments to its home market increased from *** percent in 2014 to *** percent in 2016 before decreasing to *** percent in 2019. As of 2019, its export shipments to the United States were *** percent of its total shipments (an increase from *** percent in 2016) and its export shipments to third country markets were *** percent (an increase from *** percent in 2017). Major export markets include ***. *** noted difficulty in switching shipments between countries, however, due to existing customer relationships. *** also stated that different countries have different specifications and that “developing clients in the U.S. is difficult, because even if a client already knows your company, there is usually a lengthy {qualification} process,” although no responding Mexican foreign producer noted a different product range in other export markets. Other products that responding Mexican foreign producers reportedly can produce on the same equipment as rebar include angles, beams, channels, flat bar, merchant bar, rounds, squares, wire rod, and other bar or rod products. *** listed several factors affecting its ability to shift production between product lines: transfers to its fabrication operations, long-standing relationships and commitments with clients in its home market and other export markets,¹⁶ and necessary tool modifications in the production line. It also stated that rebar is of secondary importance to its core business of wire

¹⁶ Deacero stated that it has 1,300 customers in Mexico, and serves customers in Central and South America. Hearing transcript, p. 175 (Guerra).

and wire products.¹⁷ *** noted time and related costs as well as customer commitments affected its ability to shift production between product lines.

Twenty-one of 28 responding purchasers reported that there had been changes in supply from subject countries. Most purchasers indicated that tariffs – antidumping, countervailing duty, and Section 232 – had had a restraining effect on the supply of rebar from subject countries. Purchaser *** stated that availability from Mexico had increased, however. *** noted that Mexican imports declined in 2014 but slowly began to rise until Section 232 tariffs were imposed, but have started to increase since that time, in particular because Mexico is no longer subject to those tariffs. Purchaser *** believes imports from Mexico will increase over time, as Mexican suppliers are the closest mills to many areas in the Southwest and southern California. Most purchasers did not anticipate any changes in supply from subject sources in the foreseeable future.¹⁸

One of three foreign producers in Mexico reported that there had been a change in supply of rebar from Mexico, noting that the Section 232 duties had an effect. All three, however, stated that the availability of rebar from Mexico had not changed since 2014.

Subject imports from Turkey

Based on available information, subject producers of rebar from Turkey have the ability to respond to changes in demand with large changes in the quantity of shipments of rebar 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. One factor mitigating responsiveness of supply is a limited ability to shift production to or from alternate products.

Reported rebar production capacity by subject producers in Turkey increased slightly from *** short tons in 2014 to *** short tons in 2019 (*** percent). Capacity utilization declined considerably, however, from *** to *** percent over the same period. All of the rebar subject producers in Turkey sell to the United States is sold from inventory held in the United States and is sold on the spot market. The share of Turkey's shipments to its home market remained between *** and *** percent in 2014-18 but decreased to *** percent in 2019. Its export shipments to the United States increased from *** percent in 2014 to *** percent in 2015 before declining each year, reaching *** percent in 2019. As a result, third-country market shipments accounted for the majority (*** percent) of its shipments in 2019.

¹⁷ Hearing transcript, p. 173 (Guerra).

¹⁸ Purchasers that were also producers, however, indicated they would anticipate increases if these orders were lifted.

Major export markets include countries located in Africa, Asia, Europe, Latin America, and the Middle East. Two Turkish rebar producers noted that U.S. sizes are measured in inches and their home market sizes are measured in millimeters, though foreign producer *** stated that they are almost similar and interchangeable. No responding rebar producer in Turkey reported the ability to shift production to or from alternate products. All four responding Turkish foreign producers reported that the product range is different in non-U.S. export markets.

As noted above, most purchasers (21 of 28) indicated there had been changes in the supply of subject imports since January 1, 2014, with most noting declines due to tariffs. Only *** reported any increase in supply from Turkey, which it noted occurred from 2015-17 until new orders were imposed, (but did not report whether or not it was imported from ***); it further noted that despite Section 232 tariffs, Turkey still “ships through” the tariffs. Purchaser *** reported that Turkish producer (Colakoglu) now stocks rebar in United States and has a U.S.-based sales arm (MedTrade) to sell directly to resellers and end users and that “[l]ead time has been erased.” Also as noted above, a majority of responding purchasers do not anticipate further changes to supply from Turkey. No foreign producers in Turkey reported that there had been a change in supply of rebar from Turkey, nor a change in availability, since 2014.

Imports from nonsubject sources

Imports of rebar from nonsubject sources accounted for 79.1 percent of total U.S. imports of rebar in 2019.¹⁹ According to official import statistics, the largest sources of nonsubject imports during 2014-19 were Spain and Italy. Combined, these countries accounted for 51.6 percent of imports from nonsubject countries in 2019. Nineteen of 28 responding purchasers indicated rebar supply from nonsubject sources had changed since January 1, 2014. Purchasers were somewhat mixed in their responses. Whereas Section 232 tariffs were noted as restricting availability of rebar by some purchasers, others noted that there was increased availability due to antidumping and countervailing duty tariffs. Countries noted as having increased availability include Canada, Italy, Portugal, and Spain, as well as Japan during 2014-16. Purchaser *** reported that the increased supply of rebar from Canada was cheaper than domestic sources. More than two-thirds of responding purchasers do not anticipate changes in nonsubject supply of rebar in the foreseeable future.

¹⁹ Based on data for HTS statistical reporting numbers 7213.10.0000 and 7214.20.0000.

Supply constraints

Six of 7 producers, 8 of 10 importers, and 20 of 28 purchasers reported that there have been no supply constraints in the rebar market since 2014.²⁰ Importer/purchaser *** noted that U.S. mills have reduced allocations. Purchaser *** stated that “{its} domestic suppliers have never been unable to give us what we need when we needed. The same is true of Mexican and Turkish rebar once it starts coming into the market.”²¹ Purchaser *** stated that both major domestic mills it buys from, (***), have had controlled order entry and purchaser *** reported that all its domestic mills have restricted it to its historical purchase average or less in each year since 2014. Purchaser *** has offered to purchase up to 100 percent of its needs from a certain mill but was told that mill had no excess capacity. Purchaser *** stated that domestic mills have required forward forecasting to ensure timeliness of availability. Purchaser *** stated that domestic mills used to have supply issues until the Section 232 tariff was enacted; neither mill it contacted could meet its demands beforehand. Purchaser *** remarked that domestic mills tend to support their own downstream fabrication operations and do so mainly through price.

Twenty-three of 28 purchasers indicated that there were no grades, sizes, or types of rebar that were only available from one source. Purchasers *** stated that the United States has the most availability of grade 75 and #14 and #18 rebar. Purchaser *** explained that “A706 and certain grades would be foolish to purchase elsewhere. Imports dominated the 20 ft market and now have found their way to longer lengths over time.”

²⁰ The only producer reporting a supply constraint, ***, reported that its only constraint was the ability to price competitively with imports from Turkey, Japan, and Taiwan.

²¹ Hearing transcript, p. 58 (Johnson).

New suppliers

Half of the 28 purchasers indicated that new suppliers entered the U.S. market since January 1, 2014, and 10 of the 28 expect additional entrants. Purchasers cited Acemar USA, American Steel Trade Corp, Intermetal, micro mills by CMC & Nucor, Nucor Sedalia, New World Trading, Promet Steel, Qatar Steel, Steel Dynamics (new facility in Columbus City, Indiana), Steel Hub, Toscelik Algeria, and Tosyali Algeria. In addition, one purchaser, *** reported new sources on a country basis: “We saw many new offers from Japanese, Taiwanese, and Turkish firms not subject to the order here from 2014-2016, since then we have seen some offers from firms in Spain, Italy, and Portugal.”

U.S. demand

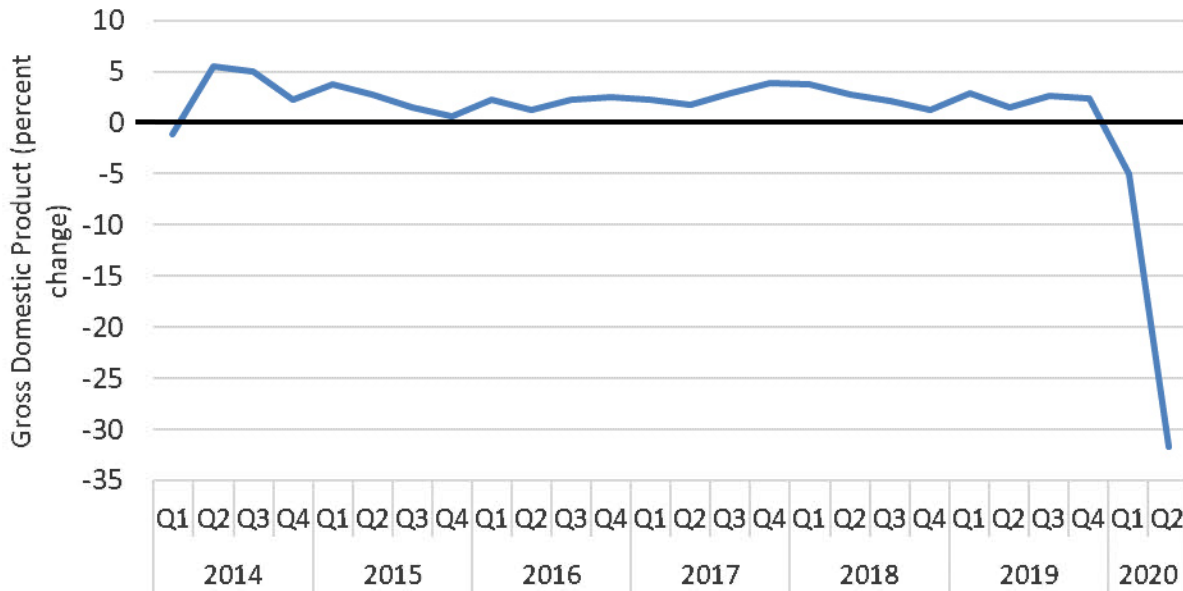
Based on available information, the overall demand for rebar is likely to experience small changes in response to changes in price. The main contributing factors are the limited substitutability of other products for rebar and its relatively small cost share in its major uses.

The overall U.S. demand for rebar is driven by the U.S. economy and construction spending. According to the CRSI, public construction accounted for 42.0 percent of domestic consumption of rebar in 2019, non-residential buildings accounted for 30.4 percent, residential buildings accounted for 23.3 percent, and other/miscellaneous uses accounted for 4.4 percent.²² The aggregate U.S. economy, as measured by percentage changes in real gross domestic product, has fluctuated between a high of 5.5 percent in the second quarter of 2014 and a low of -31.7 percent in the second quarter of 2020, when the effects of COVID-19 affected the U.S. economy (figure II-1). The American Institute of Architects’ Architecture Billings Index, cited as a leading indicator of nonresidential construction activity with lead times of 9-12 months was at around 40.0 in June and July 2020, higher than the 29.5 minimum in April, but still below the level indicating growth (50).²³ Six of seven U.S. producers, eight purchasers, and two foreign producers mentioned that the onset of COVID-19 during or after March 2020 is beginning to have an effect on the economy, the construction sector, and/or the U.S. market for rebar.

²² Concrete Reinforcing Steel Institute Domestic Reinforcing Bar Consumption, June 2020, [http://www.crsi.org/cfcs/cmsIT/baseComponents/fileManagerProxy.cfc/2017-2 -
CRSI Consumption Report.pdf?method=GetFile&fileID=941EEB9C-093D-BFD6-B9EA04FFE130F1CA](http://www.crsi.org/cfcs/cmsIT/baseComponents/fileManagerProxy.cfc/2017-2_-_CRSI_Consumption_Report.pdf?method=GetFile&fileID=941EEB9C-093D-BFD6-B9EA04FFE130F1CA),
retrieved June 29, 2020.

²³ Architecture Billings Index, <https://www.aia.org/resources/10046-the-architecture-billings-index>,
retrieved August 21, 2020.

Figure II-1
Percent change in real gross domestic product (GDP) growth, quarterly (seasonally adjusted, annual rates), January 2014-June 2020

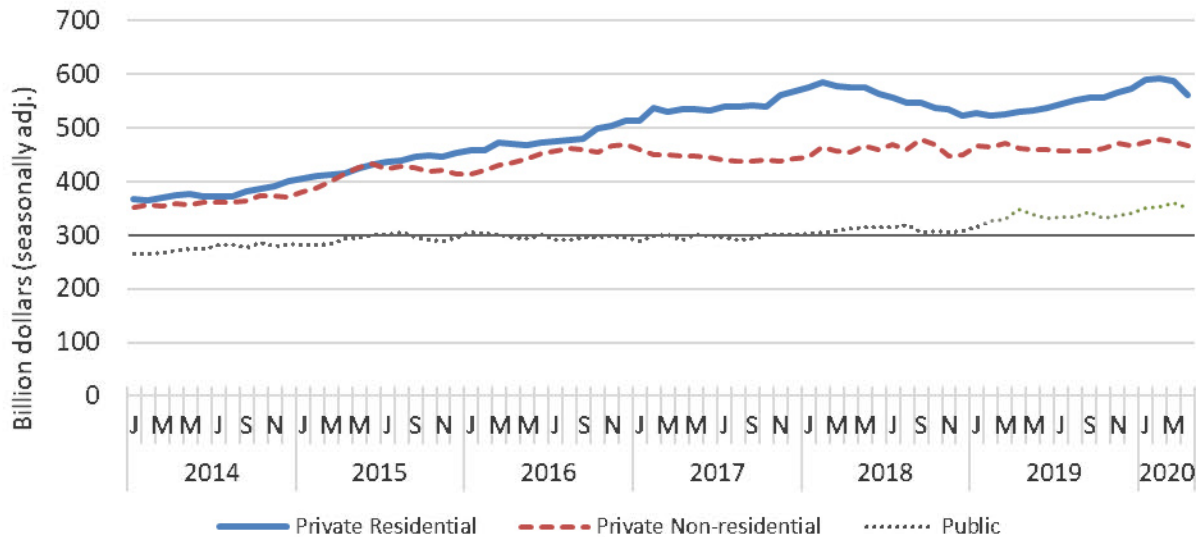


Source: Bureau of Economic Analysis, U.S. Department of Commerce, <https://apps.bea.gov/iTable/iTable.cfm?reqid=19&step=2#reqid=19&step=2&isuri=1&1921=survey>, accessed August 31, 2020.

The primary factor influencing rebar demand, construction spending, generally increased for all three main types of end uses of rebar, public construction, and private non-residential and residential construction on an annualized, seasonally adjusted basis (figure II-2).²⁴ Public and private non-residential construction spending increased more evenly than private residential construction spending, which peaked in April 2018, decreased through June 2019, and increased through January 2020 before declining through June 2020.

²⁴ Construction spending is seasonal in nature, typically reaching its highest yearly levels in late spring through late summer, which reduces demand for rebar in the fall and winter. <https://www.census.gov/construction/c30/c30index.html>, accessed July 1, 2020.

Figure II-2
Construction spending: Monthly total private residential, private non-residential, and public construction spending, annualized, seasonally adjusted, January 2014- June 2020



Source: U.S. Census Bureau, Construction Spending. <http://www.census.gov/econ/currentdata>, accessed August 21, 2020.

Rebar is used in different types of construction projects mainly to reinforce concrete in order to help concrete withstand tension forces.²⁵ Rebar accounts for a small share of the cost of the end-use products in which it is used. In the original investigations, rebar typically accounted for 2 to 5 percent of the cost of a construction project, whether residential, non-residential, or public like roads or bridges.²⁶ Six of 7 U.S. producers, all 10 responding importers, and 13 of 14 responding purchasers reported no changes in end uses since January 2014, and equal numbers indicated that they did not anticipate any changes in end uses for rebar.²⁷ U.S. producer *** stated that concrete has replaced steel in non-residential construction where seismic conditions are critical.

²⁵ “Types of rebar commonly used in construction,” <https://www.thebalancesmb.com/types-of-rebars-844455>, retrieved July 1, 2020.

²⁶ *Steel Concrete Reinforcing Bar from Mexico and Turkey*, Inv. Nos. 701-TA-502 and 731-TA-1227-1228 (Final), USITC Publication 4496, October 2014, Table V-8.

²⁷ Although U.S. producer *** indicated that it expects uses to change, noting decreasing demand for rebar in coal mines as mine roof bolts, it also stated that it does “not anticipate any changes {in end uses} in the future.” U.S. purchaser ***, the sole purchaser responding “yes” to both past and anticipated changes, referred only to capacity increases rather than any specific end use changes.

Business cycles

Six of 7 U.S. producers, 8 of 10 responding importers, and 13 of 28 purchasers indicated that the market was subject to business cycles, with nearly all reporting that this market is characterized by seasonal construction activity. Far fewer importers (1 of 10) and purchasers (5 of 28) reported that there are distinct conditions of competition within this market, although the same number of producers (6 of 7) reported so. Most frequently mentioned by these producers was the high fungibility of rebar and that low prices drive sales, particularly for imported rebar (although one producer noted increased competition from imports and domestic mills. One producer noted there has been declining demand with COVID-19 accelerating the decline, while another reported that Buy America is a distinct condition. During the hearing, it was reported that during recent litigation of a different case, the lead plaintiff was shipping quantities of steel from Turkey to Puerto Rico after Hurricane Maria, but had to put it in a free trade zone or special customs-bonded area; this may have impacted the market for rebar.²⁸

Five of 7 responding producers, 2 of 9 responding importers, and 7 of 19 responding purchasers anticipate there to be changes to business cycles or conditions of competition in the rebar market in the foreseeable future.²⁹ One of these purchasers (***) noted that “The consolidation of US rebar producers and tariffs have helped stabilize the US fabrication market. If mill owned fab shops aren't worried about losing ‘jobs’ to foreign competition the fabrication market stabilizes.”

Demand trends

Most responding producers, importers, and purchasers reported an increase in U.S. demand for rebar since January 1, 2014 (table II-8), whereas the majority of foreign producers indicated demand had not changed. A plurality of importers, purchasers, and foreign producers expect demand to remain unchanged over the next two years, whereas a majority of U.S. producers expect it to fluctuate. Twelve of 18 responding purchasers reported that changes in demand for their end use products had affected their demand for rebar.

²⁸ The case referenced was “Transpacific 232 litigation.” Hearing transcript, p. 281 (Nolan).

²⁹ Three of these purchasers are either domestic producers or owned by domestic producers.

With respect to demand outside the United States, a majority of U.S. producers reported that it had decreased since 2014 and that they anticipate it will continue to decline in the next two years (table II-9). A plurality of importers, along with majorities of purchasers and foreign producers, in contrast, indicated that there had been no change in demand outside the United States, and anticipate that that will continue in the next two years.

Table II-8
Rebar: Firms' responses regarding U.S. demand

Item	Increase	No change	Decrease	Fluctuate
Demand in the United States				
U.S. producers	5	---	---	2
Importers	4	3	1	1
Purchasers	12	9	1	5
Foreign producers	2	4	---	---
Anticipated future demand				
U.S. producers	---	---	3	4
Importers	1	5	2	1
Purchasers	3	9	5	7
Foreign producers	1	5	---	---
Demand for purchasers' final products since 2014				
Purchasers	12	2	1	3

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

Table II-9
Rebar: Firms' responses regarding demand outside the United States

Item	Increase	No change	Decrease	Fluctuate
Demand outside the United States				
U.S. producers	---	1	5	1
Importers	2	3	1	2
Purchasers	2	7	3	1
Foreign producers	1	4	---	2
Anticipated future demand outside the United States				
U.S. producers	---	---	6	1
Importers	1	4	2	1
Purchasers	3	8	5	7
Foreign producers	---	6	---	---
Demand in foreign producers' home market				
Mexico	1	---	---	1
Turkey	---	4	---	1
Anticipated demand in foreign producers' home market				
Mexico	1	1	---	---
Turkey	1	3	---	---

Note: One foreign producer marked both no change and fluctuate in the Turkish home market.

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

Foreign producers in Mexico reported that demand in their home market had either increased or fluctuated since 2014, and they anticipate it either increasing or remaining the same. They noted that there were a few main rebar producers in the country. Foreign producer *** stated that imports account for only 0.56 percent of total rebar consumed in Mexico, so “the real competition in our home market is between domestic producers.” All responding foreign producers stated they do not face import competition in their home market. While representatives for RTAC state that demand for rebar in Mexico is declining, respondent interested parties noted that demand in Mexico is strong.³⁰

Most foreign producers in Turkey reported that demand in their home market had remained the same since 2014 and anticipate it to remain the same. Each noted that it is a “competitive” market, with *** adding that it has more than 10 large integrated producers and numerous individual rolling mills, and that it anticipates a post-pandemic stimulus and ceasing of lockdown in its anticipated home market demand. All responding foreign producers stated they do not face import competition in their home market. A representative for RTAC testified that demand in Turkey is weak, however, currently due to COVID-19’s effect on the construction sector.³¹

Substitute products

In the original investigations, the number of substitutes for rebar was found to be limited. A majority of importers and purchasers reported that there were no substitutes for rebar, although a majority of producers did. Wire mesh was the most frequently mentioned substitutes for rebar, but deformed steel wire, fiber-reinforced concrete, pre-stressed cable, prestressed concrete strand (PC strand), and structural steel were also reported to be substitutes.³² In their questionnaire responses, 6 of 7 producers, all 10 responding importers, 21 of 28 purchasers, and all 7 foreign producers indicated that there had not been changes in substitutes for rebar since 2014. Fiberglass rebar were mentioned by three of the five purchasers noting changes in substitutes. Purchaser *** stated that fiberglass rebar has been around for 30 years but has gained traction in the last 5 years. All producers, the same number of importers, and 20 of 28 purchasers do not anticipate changes in substitutes for rebar in the foreseeable future.

³⁰ Hearing transcript, pp. 38-39 (Barney) and pp. 217-218 (Guerra).

³¹ Hearing transcript, p. 30 (Smith)

³² *Steel Concrete Reinforcing Bar from Mexico and Turkey*, Inv. Nos. 701-TA-502 and 731-TA-1227-1228 (Final), USITC Publication 4496, October 2014, p. 19.

Substitutability issues

The degree of substitution between domestic and imported rebar 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 a high degree of substitutability between domestically produced rebar and rebar imported from subject sources.

Lead times

Rebar is primarily sold on a produced-to-order basis. U.S. producers reported that 62.3 percent of their commercial shipments were produced-to-order, with lead times averaging 26 days, and importers reported that 81.0 percent of their shipments were produced-to-order, with lead times averaging 39 days. The remaining 37.7 percent of U.S. producers' commercial shipments were sold from inventories, with lead times averaging less than 2 days. For importers, 15.6 percent of their sales were from U.S. inventories and 3.4 percent were sold from foreign inventories. Lead times for sales from U.S. inventories averaged 5 days.³³ Foreign producers in Mexico reported that 79.9 percent of their sales are produced-to-order with lead times averaging 35 days. The remaining 20.1 percent sold from inventory have average lead times of 10 days. For foreign producers located in Turkey, a higher percentage is produced-to-order (93.5 percent), with lead times of 31 days. Their shipments from inventory (6.5 percent) have average lead times of 10 days as well.

Knowledge of country sources

Twenty-two purchasers indicated they had marketing/pricing knowledge of domestic product, 14 of product from Mexico, 15 of product from Turkey, and 12 of product from nonsubject countries.

³³ Lead times for sales out of foreign inventory were reported by ***.

As shown in table II-10, most purchasers and their customers “sometimes” make purchasing decisions based on the country of origin of the rebar. Most purchasers “usually” or “sometimes” make the decision based on the producer of the rebar, but a majority reported their customers “never” do. Only three purchasers, ***, which purchased 99 percent of its rebar domestically, and ***, which sourced all rebar domestically “always” make its decisions on the country of origin. Purchaser *** stated it has an agreement with its supplier *** to purchase 100 percent domestically. Most purchasers describing a preference indicated one for domestic product, with some pointing to “Buy America” or “Buy American” requirements. Purchaser *** stated they were “occasional” projects, while purchaser *** reported it was a small part of the market. Responding Turkish interested parties state that subject imports cannot serve certain sectors of the U.S. market, particularly with respect to public infrastructure projects due to “Buy America” provisions.³⁴ Domestic interested party RTAC notes that “Buy American” provisions are not an “absolute requirement” an foreign product may be used in certain instances if priced “cheaply enough.”³⁵

Table II-10
Rebar: Purchasing decisions based on producer and country of origin

Purchaser/customer decision	Always	Usually	Sometimes	Never
Purchaser makes decision based on producer	2	10	8	8
Purchaser’s customers make decision based on producer	---	---	8	19
Purchaser makes decision based on country	3	6	11	8
Purchaser’s customers make decision based on country	---	2	17	8

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

Factors affecting purchasing decisions

The most often cited top three factors firms consider in their purchasing decisions for rebar were price (24 firms), availability (17 firms), and quality (13 firms) as shown in table II-11. Price was the most frequently cited first-most important factor (cited by 14 firms), followed by quality (4 firms); price was the most frequently reported second-most important factor (8 firms); and availability was the most frequently reported third-most important factor (8 firms). The majority of purchasers (22 of 28) reported that they “usually” purchase the lowest-priced product.

³⁴ Turkish producers’ and exporters’ posthearing brief, pp. 6-8.

³⁵ RTAC’s posthearing brief, responses to Commissioners’ questions, pp. 39-40.

Table II-11**Rebar: Ranking of factors used in purchasing decisions as reported by U.S. purchasers, by factor**

Factor	First	Second	Third	Total
Price	14	8	2	24
Quality	4	3	6	13
Availability	2	7	8	17
Supplier relationship/traditional supplier	2	1	4	6
Domestic product	2	0	0	2
Service	0	2	0	2
Payment terms	0	1	2	3
Discounts	0	1	0	1
Delivery/Leadtime	0	0	2	2

Note: "Availability" includes one firms' first most important factor of "what mill will sell me in a particular market." Some firms' other important factors that were not among the top three: availability, domestic product, ease of doing business with supplier, payment terms, and supplier relationship.

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

Importance of specified purchase factors

Purchasers were asked to rate the importance of 15 factors in their purchasing decisions (table II-12). The factors rated as very important by more than half of responding purchasers were price (28), quality meets industry standards (26), availability (25), reliability of supply (23), delivery time (22), and product consistency (18). Factors important to purchasers in determining the quality of rebar include ASTM certification, chemistry, consistency in heat, shape and length, grade, straightness, packaging and bundling, rust, and tensile strength.

Table II-12**Rebar: Importance of purchase factors, as reported by U.S. purchasers, by factor**

Factor	Very important	Somewhat important	Not important
Price	28	---	---
Quality meets industry standards	26	2	---
Availability	25	3	---
Reliability of supply	23	5	---
Delivery time	22	5	1
Product consistency	18	8	2
U.S. transportation costs	10	16	1
Discounts offered	10	13	5
Product range	8	16	4
Delivery terms	7	17	4
Packaging	7	13	8
Payment terms	7	12	9
Technical support/service	5	12	11
Quality exceeds industry standards	4	11	13
Minimum quantity requirements	---	12	16

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

Supplier certification

A majority of purchasers (16 of 28) require that the rebar they buy be ASTM International-certified. Twenty of 24 responding purchasers, however, do not require suppliers themselves to become certified or qualified to sell rebar to their firm, and only one purchaser noted that a firm had failed to become certified or lost its certification. Purchaser *** noted that the rebar must meet ASTM standards, and purchaser *** stated that it is “no big process;” the material just has to meet generally established specifications. Purchaser ***, which noted a 30-day approval process, was the only purchaser to note that approval takes more than a day. It will inspect the material and packaging of a small trial order first. *** stated that Italian material that was water-cooled instead of air-cooled was not certified.³⁶

Changes in purchasing patterns

Purchasers were asked about changes in their purchasing patterns from different sources since January 1, 2014 (table II-13); 13 of 27 responding purchasers reported that they had changed suppliers since that time. Reasons reported for changes in sourcing included antidumping duties on Japan, availability, companies going out of business or being bought out (e.g., one purchaser noted Gerdau is now CMC), price, and sales representatives changing companies. Specifically, firms or sources that purchasers dropped or from which purchasers reduced purchase volumes include Acemar, C&F, Gerdau, Habas (Turkey), Macsteel, Metal Partners, Tata, and Vital Solutions, Japan (including Jonan Steel Corporation, Sanko Seiko Co, Ltd., and Chiyoda Steel Co., Ltd.), and Taiwan. Firms that purchasers added as suppliers or from which purchasers increase purchase volumes include Acemar, CMC USA, Deacero, domestic producers in general, Gerdau Canada, Intermetals, New World Trading, Nucor, Promet Steel, SDI Columbia City, and Steel Hub.³⁷ The majority of producers, importers, purchasers, and foreign producers indicated that the product range or product mix for their purchases had not changed since January 1, 2014, nor do they anticipate changes in the foreseeable future.

³⁶ *** stated that often it will not purchase from mills that sell water-cooled rebar.

³⁷ Purchaser *** did not describe whether it had added or dropped CMC, Duferco, and TATA.

Table II-13**Rebar: Changes in purchase patterns from U.S., subject, and nonsubject countries**

Source of purchases	Increased	Constant	Decreased	Fluctuated	Did not purchase
United States	16	7	2	3	---
Mexico	4	3	7	3	8
Turkey	---	---	17	4	4
All other sources	7	3	4	4	3
Other	---	3	3	3	8

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

Importance of purchasing domestic product

Most purchasers reported that at least some of their purchases were required to be U.S.-produced product; only 4 of 27 responding purchasers reported that none of their purchases were required to be U.S.-produced product. Twenty-one reported that domestic product was required by law (for an average of 15.6 percent of reported purchases), such as Buy America(n), 17 reported it was required by their customers (for an average of 9.7 percent of reported purchases), and 4 reported other preferences for domestic product (for an average of 1.0 percent of reported purchases). Reasons cited for preferring domestic product included: better perceived quality, faster lead times, and projects seeking LEED certification.

A number of relevant provisions that fall under the name “Buy American” or “Buy America” affect the market for rebar. CRSI notes general distinctions between the two.³⁸ RTAC cites federal acquisition guidelines that reference the Buy American Act which requires firms to add 6 percent to the cost of foreign material if competing against large firms or 12 percent if competing against small firms when determining reasonableness of cost.³⁹ Turkish importers’ and exporters reference both Buy American and Buy America provisions (referring to them as “Buy America(n)” provisions) when describing the impact of domestic product requirements. The U.S. Department of Transportation has listed and described some of these requirements which affect highways, railroads, and airport projects.⁴⁰ Some of these provisions note the requirement of using domestic content unless domestic material is unavailable, it would be inconsistent with public interest, or the “inclusion of domestic material will increase the cost of the overall project contract by more than 25 percent.”⁴¹

³⁸ “The “Buy American Act” was enacted in 1933. The Act requires the U.S. government to prefer U.S.-made products in its purchases, unless the head of the agency involved in the procurement has determined that the price of the domestic supplies are “unreasonable” or the purchase would be “inconsistent with the public interest.” A product is defined as U.S.-made if at least 50 percent of its constituent parts and/or material originated in the United States.

The “Buy America Act” was a provision of the Surface Transportation Assistance Act of 1982 and applies only to mass transit related procurements valued over \$100,000, and funded at least in part by Federal grants. This Act requires that Federal-aid funds may not be obligated for a project unless the product is manufactured in the U.S., including all its constituent parts. CRSI Engineering Technical Note ETN-M-4-14, “Frequently Asked Questions (FAQ) About Mechanical Splices, p.4.

³⁹ RTAC’s posthearing brief, responses to Commissioners’ questions, pp. 39-40. Federal Acquisition Regulations 25.105 and 25.2. <https://www.acquisition.gov/content/part-25-foreign-acquisition#i1093701>, retrieved August 21, 2020.

⁴⁰ Turkish producers’ and exporters’ posthearing brief, pp. 6-8.

⁴¹ U.S. Department of Transportation, “Buy America Provisions Side-by-Side,” March 13, 2012, <https://www.transportation.gov/buy-america-provisions-side-side-comparison>, retrieved August 21, 2020. These regulations include American Recovery and Reinvestment Act of 2009, Section 1605 – Buy American; Federal Aviation Administration 49 U.S.C. § 50101 – Buy American; Federal Highway Administration 23 U.S.C. § 313 – Buy America, 23 C.F.R. § 635.410; Federal Railroad Administration High Speed Rail Program 49 U.S.C. Chapters 244, 246; § 24405 – Buy America; National Railroad Passenger Corporation (AMTRAK) 49 U.S.C. § 24305; and Federal Transit Administration 49 U.S.C. § 5323(j) and 49 C.F.R. Part 661 (Buy America Requirements).

Comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a number of questions comparing rebar produced in the United States, Mexico, Turkey, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 15 factors (table II-14) for which they were asked to rate the importance.

Comparing U.S. rebar to that imported from Mexico, most purchasers reported the two to be comparable on all 15 factors, though an equal number of purchasers reported U.S. rebar to be superior to that from Mexico on delivery time. A majority of purchasers also indicated that rebar from the U.S. and Turkey are comparable on 12 factors. A majority noted that the U.S. was superior on delivery time and technical support/service, but Turkey was superior on price. U.S. product was reported to be superior on availability and delivery time when compared with that from nonsubject countries, but comparable on all other 13 factors. When comparing rebar from Mexico and Turkey to each other and to nonsubject countries, a plurality or majority of purchasers reported that they were comparable on all 15 factors. Price, availability, and delivery time were three of the four factors considered as “very important” by the greatest number of purchasers (table II-12).

Table II-14
Rebar: Purchasers' comparisons between U.S.-produced and imported product

Factor	U.S. vs. Mexico			U.S. vs. Turkey			Mexico vs. Turkey		
	S	C	I	S	C	I	S	C	I
Availability	11	11	---	12	12	---	6	11	2
Delivery terms	6	16	---	12	11	---	7	12	---
Delivery time	7	14	1	11	12	1	7	12	---
Discounts offered	1	15	6	2	16	5	1	18	---
Minimum quantity requirements	6	16	---	12	11	---	7	12	---
Packaging	3	18	---	4	19	---	1	18	---
Payment terms	2	19	1	5	16	3	4	14	1
Price	1	12	9	1	8	15	1	13	5
Product consistency	4	16	---	3	16	---	1	18	---
Product range	7	15	---	6	18	---	1	15	3
Quality meets industry standards	3	19	---	5	19	---	2	17	---
Quality exceeds industry standards	1	21	---	2	21	---	1	18	---
Reliability of supply	11	11	---	12	11	1	4	12	3
Technical support/service	8	13	---	13	10	---	5	13	---
U.S. transportation costs	2	20	---	4	17	2	3	15	1

Factor	U.S. vs. nonsubject			Mexico vs. nonsubject			Turkey vs. nonsubject		
	S	C	I	S	C	I	S	C	I
Availability	10	8	---	6	7	1	4	9	2
Delivery terms	9	9	---	5	9	---	2	12	1
Delivery time	9	9	---	4	9	1	3	11	1
Discounts offered	1	14	2	2	12	---	2	12	---
Minimum quantity requirements	9	9	---	5	9	---	2	12	1
Packaging	4	13	---	1	13	---	---	15	---
Payment terms	2	14	2	1	12	1	---	15	---
Price	---	10	8	4	10	---	5	9	1
Product consistency	5	13	---	2	11	1	1	14	---
Product range	5	13	---	3	9	2	2	12	1
Quality exceeds industry standards	1	16	---	2	12	---	---	14	---
Quality meets industry standards	2	16	---	2	12	---	---	14	---
Reliability of supply	8	10	---	6	7	1	3	10	2
Technical support/service	8	9	---	4	9	---	1	13	1
U.S. transportation costs	4	12	2	2	11	1	---	15	---

Note: A rating of superior means that price/U.S. transportation costs is generally lower. For example, if a firm reported "U.S. superior," it meant that the U.S. product was generally priced lower than the imported product.

Note: S=first listed country's product is superior; C=both countries' products are comparable; I=first list country's product is inferior.

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

Comparison of U.S.-produced and imported rebar

In order to determine whether U.S.-produced rebar can generally be used in the same applications as imports from Mexico and Turkey, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in table II-15, all domestic producers indicated that U.S. rebar is always interchangeable with rebar from any other source. A plurality of purchasers also reported that rebar is always interchangeable regardless of source. A plurality of importers responded that U.S. rebar is frequently interchangeable with that imported from Mexico and Turkey. Purchasers only noted lack of interchangeability if there are domestic requirements or preferences. Only foreign producer *** noted a lack of interchangeability between products for its home market and those it exports. It stated that “Specification requirements are different in the U.S., which makes it unlikely for products to be interchangeable.”

Table II-15
Rebar: Interchangeability between rebar produced in the United States and in other countries, by country pair

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
U.S. vs. subject countries:												
U.S. vs. Mexico	7	---	---	---	2	3	---	---	11	9	3	1
U.S. vs. Turkey	7	---	---	---	3	4	1	---	11	8	5	1
Subject countries comparisons:												
Mexico vs. Turkey	7	---	---	---	2	2	---	---	14	7	1	1
Nonsubject countries comparisons:												
U.S. vs. nonsubject	7	---	---	---	2	2	1	---	12	6	4	---
Mexico vs. nonsubject	7	---	---	---	2	2	---	---	14	6	1	---
Turkey vs. nonsubject	7	---	---	---	2	2	1	---	14	7	---	1

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

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

As can be seen from table II-16, most responding purchasers reported that domestically produced product always met minimum quality specifications, as did the rebar imported from Mexico and Turkey.

Table II-16**Rebar: Ability to meet minimum quality specifications, by source**

Source	Always	Usually	Sometimes	Rarely or never
United States	20	7	---	1
Mexico	12	6	---	1
Turkey	13	6	2	1
All other sources	8	6	1	1

Note: Purchasers were asked how often domestically produced or imported rebar meets minimum quality specifications for their own or their customers' uses.

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

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of rebar from the United States, subject, or nonsubject countries. As seen in table II-17, all responding producers reported there were never any non-price differences between rebar produced in any country. A plurality of importers noted the same for all country pairs except for U.S. vs. Turkey, for which a plurality reported sometimes. Most purchasers responded that there were sometimes or never factors other than price that were significant in the rebar market. Distinguishing factors noted by purchasers included: advantages from using the U.S. logistics/transportation network, availability of subject product with Mexican and nonsubject product necessitating advanced orders, domestic deliveries being spread out while import shipments generally arriving at one time, faster delivery of Mexican product than other imports, payment terms, and quickness of availability.

Table II-17**Rebar: Significance of differences other than price between rebar produced in the United States and in other countries, by country pair**

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of purchasers reporting				
	A	F	S	N	A	F	S	N	A	F	S	N	
U.S. vs. subject countries:													
U.S. vs. Mexico	---	---	---	7	---	1	1	2	2	4	9	10	
U.S. vs. Turkey	---	---	---	7	---	2	3	2	3	3	10	10	
Subject countries comparisons:													
Mexico vs. Turkey	---	---	---	6	---	---	---	2	2	2	10	9	
Nonsubject countries comparisons:													
U.S. vs. nonsubject	---	---	---	7	---	1	---	2	2	4	8	9	
Mexico vs. nonsubject	---	---	---	6	---	---	---	2	1	3	9	8	
Turkey vs. nonsubject	---	---	---	6	---	1	---	2	1	1	9	11	

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

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

Elasticity estimates

This section discusses elasticity estimates; parties were encouraged to comment on these estimates. Staff did not receive any comments on elasticity estimates.

U.S. supply elasticity

The domestic supply elasticity for rebar measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of rebar. The elasticity of domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced rebar. Analysis of these factors above indicates that the U.S. industry is likely to be able to moderately to substantially increase or decrease shipments to the U.S. market in response to a price change; an estimate in the range of 4 to 8 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for rebar measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of rebar. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the rebar in the production of any downstream products. Based on the available information, the aggregate demand for rebar is likely to be moderately inelastic; a range of -0.5 to -1.0 is suggested.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.⁴² Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced rebar and imported rebar is likely to be in the range of 3 to 6.

⁴² The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

Part III: Condition of the U.S. industry

Overview

The information in this section of the report was compiled from responses to the Commission’s questionnaires. Seven firms, which accounted for virtually all U.S. production of rebar during 2019, supplied information on their operations in these reviews: Byer Steel (“Byer”), Cascade Steel Rolling Mills, Inc. (“Cascade”), Commercial Metals Company (“CMC”), EVRAZ Inc. NA (“Evraz”), Gerdau Ameristeel US Inc. (“Gerdau”), Nucor Corporation (“Nucor”), and Steel Dynamics Inc (“SDI”).¹ The domestic industry has become increasingly concentrated, with CMC and Nucor accounting for *** percent of U.S. production in 2019, compared to *** percent in 2014.

Changes experienced by the industry

Domestic producers were asked to indicate whether their firm had experienced any plant openings, relocations, expansions, acquisitions, consolidations, closures, or prolonged shutdowns because of strikes or equipment failure; curtailment of production because of shortages of materials or other reasons, including revision of labor agreements; or any other change in the character of their operations or organization relating to the production of product since January 1, 2014. Six of the seven domestic producers indicated that they had experienced such changes; their responses are presented in table III-1.

¹ Four additional firms (ArcelorMittal USA, Keystone, Sherman Steel, and Texas Steel LLC) were identified during the original investigations as possible U.S. producers of rebar but are believed to account for less than 5 percent of U.S. production.

Table III-1
Rebar: U.S. producers' reported changes in operations

Item / Firm	Reported changes in operations
Plant openings:	
***	***
***	***
Expansions:	
***	***

Table continued on next page.

Table III-1—Continued
Rebar: U.S. producers' reported changes in operations

Item / Firm	Reported changes in operations
Acquisitions:	
***	***
Consolidations:	
***	***
***	***

Table continued on next page.

Table III-1—Continued
Rebar: U.S. producers' reported changes in operations

Item / Firm	Reported changes in operations
Prolonged shutdowns or curtailments:	
***	***
***	***
***	***
***	***
***	***
Revised labor agreements:	
***	***
Other:	
***	***
***	***

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

Developments in the U.S. industry

Table III-2 presents events in the U.S. industry since 2014.

Table III-2
Rebar: Developments in the U.S. industry since 2014

Date	Company	Event
December 2016	ArcelorMittal	Consolidation: In December 2016, Kyoei Steel Ltd. of Japan purchased the Vinton, Texas rolling mill from Bayou Steel Group. Subsequently, Kyoei Steel Ltd. launched a U.S. subsidiary to operate the facility known as Vinton Steel LLC.
January 2017	CMC	Acquisition: CMC announced that its subsidiary Owen Steel Company (South Carolina) signed a definitive asset agreement to acquire certain assets from SDI's Omnisource. The purchase consisted of seven recycling facilities in the southeastern portion of the United States to support the rebar mill operations in Cayce, SC.
February 2017	SDI	Expansion: SDI awarded the contract for an expansion at its Roanoke Bar Division in Roanoke, VA. The contract integrated a new reheating furnace, created a new finishing area, and expanded the mills product offering. After the upgrades, the Roanoke Bar Division anticipates doubling its production of rebar to over 200,000 short tons annually.
March 2017	Nucor	Expansion: Nucor announced that it would be upgrading its Marion, OH plant. It is Ohio's largest producer of rebar and signposts. Its current production capacity is 400,000 tons per year.
October 2017	CMC	Acquisition: CMC announced that subsidiary CMC Fabricators acquired all assets from MMFX Technologies Corporation in Irvine, CA. MMFX markets, sells and licenses the production of proprietary specialty steel products -- notably, the technology for the Chromx line of high strength corrosion-resistant rebar.

Table continued on next page.

Table III-2—Continued
Rebar: Developments in the U.S. industry since 2014

Date	Company	Event
November 2017	Nucor	Plant construction: Nucor announced that it would build a rebar micro mill in Sedalia, MO. The mill was strategically positioned to take advantage of the Nucor-acquired scrap business, The David J. Joseph Company. The new mill is projected to open in December 2019.
November 2017	Nucor	Plant construction: Nucor announced that it would build a full-range merchant bar quality mill at its existing Bourbonnais mill in Kankakee, IL. The mill has an annual capacity of approximately 500,000 short tons. The projected opening date for the mill is 2020.
November 2017	CMC	Expansion: CMC announced that the company would invest in a second spooler to produce hot-rolled, spooled rebar at its micro mill in Mesa, AZ and its new micro-mill in Durant, OK. The technology allows the company to offer spools from 1.5 to 4.8 short tons.
January 2018	Gerdau	Consolidation: Gerdau agreed to sell its Beaumont, TX wire rod mill and downstream operations (Beaumont Wire Products and Carrollton Wire Products) to Optimus Steel LLC. The mill has a melt shop capacity of approximately 700,000 short tons and can produce both wire rod and coiled rebar.
March 2018	Nucor	Plant construction: Nucor announced that it would build rebar micro mills in Frostproof, FL and Sedalia, MO. The mills will each have an annual capacity of approximately 350,000 short tons. The Sedalia, MO mill began production in 2020, while the Frostproof, FL mill is expected to begin production in late 2020.
April 2018	CMC	Plant construction: CMC held its dedication for its new rebar micro mill in Durant, OK. The mill has a capacity of 350,000 short tons.
November 2018	CMC	Acquisition: CMC concluded acquisition of certain U.S. rebar steel mill and fabrication assets from Gerdau. The acquisition consists of 33 U.S. rebar fabrication facilities as well as steel mills located in Knoxville, TN, Jacksonville, FL, Sayreville, NJ, and Rancho Cucamonga, CA. The facilities have an annual rolling mill capacity of approximately 2.5 million short tons.
March 2019	***	***
October 2019	CMC	Expansion: CMC reached an agreement with the city of Jacksonville to keep a 250-job mill open in the nearby town of Baldwin, FL. CMC had threatened to move operations elsewhere if it did not receive a \$450,000 Recaptured Enhanced Value Grant. These grants typically require the receiver to add an additional 10 jobs, but the grant was approved after CMC Steel told the city it will invest \$30 million over five years in real estate improvements, equipment and machinery at its 16770 Rebar Road facility.
May 2020	Gerdau	Plant closure: Gerdau will close its melting and rolling operations at its St. Paul, MN rebar mill. The closure and associated layoffs are expected to be completed by August 31, 2020.

Source: *Steel Concrete Reinforcing Bar from Belarus, China, Indonesia, Latvia, Moldova, Poland and Ukraine, Inv. Nos. 731-TA-873-875, 878-880, and 882 (Third Review)*, USITC Publication 4838, November 2018, table I-2a; Nucor, news releases; CMC, News releases; Gerdau, news releases. Ciston PR Newswire. Vinton Steel, news releases.

Anticipated changes in operations

The Commission asked domestic producers to report anticipated changes in the character of their operations relating to the production of rebar. Six of the seven responding firms reported anticipated changes to operations. Their responses appear in table III-3.

Table III-3
Rebar: Anticipated changes in the character of U.S. operations

Item / Firm	Anticipated changes in operations
***	***
***	***
***	***

Table III-3 –Continued

Rebar: Anticipated changes in the character of U.S. operations

Item / Firm	Anticipated changes in operations
***	***
***	***
***	***

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

U.S. production, capacity, and capacity utilization

Table III-4 presents U.S. producers' production, capacity, and capacity utilization. Table III-5 presents U.S. producers' overall capacity and production on shared machinery. U.S. production of rebar increased from 7,139,839 short tons in 2014 to 7,524,429 short tons in 2019. Several domestic producers attributed the lower levels of rebar production in 2015 and 2016 to an increase in subject imports, and subsequent higher levels of rebar production to the imposition of antidumping and countervailing duty orders in 2017. Capacity also increased from 2014 to 2019, outpacing the increases in production. Capacity utilization fluctuated, declining overall from 76.0 percent in 2014 to 75.3 percent in 2019. Annual capacity utilization was lowest in 2015 at 71.0 percent and highest in 2018 at 81.7 percent. Consistent with seasonal construction trends, capacity utilization levels in January-March were generally lower than annual capacity utilization levels.

U.S. producers reported the ability to manufacture other long products such as wire rod and merchant bar on the same machinery as rebar. From 2014 to 2019, rebar accounted for the majority of production on shared equipment, ranging between 53.8 percent and 57.1 percent. From 2014 to 2019, overall capacity utilization on the machinery used to make rebar largely matched rebar capacity utilization, decreasing from 76.4 percent in 2014 to 74.9 percent in 2019. Like rebar capacity utilization, overall capacity utilization was lowest in 2015 at 69.7 percent and highest in 2018 at 82.2 percent.

Table III-4

Rebar: U.S. producers' production, capacity, and capacity utilization, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Capacity (short tons)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
All firms	9,400,062	9,282,676	9,431,012	9,490,661	9,538,780	9,990,430	2,716,980	2,729,208
	Production (short tons)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
All firms	7,139,839	6,594,149	6,775,208	7,283,224	7,795,024	7,524,429	1,765,827	1,893,823

Table III-4 –Continued

Rebar: U.S. producers' production, capacity, and capacity utilization, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Capacity utilization (percent)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
All firms	76.0	71.0	71.8	76.7	81.7	75.3	65.0	69.4
	Share of production (percent)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Figure III-1

Rebar: U.S. producers' production, capacity, and capacity utilization, 2014-19, January to March 2019, and January to March 2020

* * * * *

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

Table III-5
Rebar: U.S. producers' overall capacity and production of products on the same machinery, 2014-
19, January to March 2019, and January to March 2020

Item	Calendar year					
	2014	2015	2016	2017	2018	2019
	Quantity (short tons)					
Overall capacity	17,367,762	17,506,262	17,617,918	17,457,379	17,425,712	17,592,379
Production of rebar.--						
In coils	***	***	***	***	***	***
In straight lengths	***	***	***	***	***	***
Deformed wire	***	***	***	***	***	***
All in-scope products	7,139,839	6,594,149	6,775,208	7,283,224	7,795,024	7,524,429
Production of other products.--						
Wire rod	***	***	***	***	***	***
Merchant bar	***	***	***	***	***	***
Other bar or rod	***	***	***	***	***	***
Excluded deformed wire	***	***	***	***	***	***
All other products	***	***	***	***	***	***
All out-of-scope products	6,127,906	5,607,575	5,533,702	6,291,916	6,525,532	5,653,928
Overall production	13,267,745	12,201,724	12,308,910	13,575,140	14,320,556	13,178,357
	Capacity utilization (percent)					
Overall capacity utilization	76.4	69.7	69.9	77.8	82.2	74.9
	Share of rebar production (percent)					
Share of rebar production.--						
In coils	***	***	***	***	***	***
In straight lengths	***	***	***	***	***	***
Deformed wire	***	***	***	***	***	***
All in-scope products	100.0	100.0	100.0	100.0	100.0	100.0
	Share of overall production (percent)					
Share of overall production.--						
In coils	***	***	***	***	***	***
In straight lengths	***	***	***	***	***	***
Deformed wire	***	***	***	***	***	***
All in-scope products	53.8	54.0	55.0	53.7	54.4	57.1
Wire rod	***	***	***	***	***	***
Merchant bar	***	***	***	***	***	***
Other bar or rod	***	***	***	***	***	***
Excluded deformed wire	***	***	***	***	***	***
All other products	***	***	***	***	***	***
All out-of-scope products	46.2	46.0	45.0	46.3	45.6	42.9
Overall production	100.0	100.0	100.0	100.0	100.0	100.0

Table continued on next page.

Table III-5—Continued

Rebar: U.S. producers' overall capacity and production of products on the same machinery, 2014-19, January to March 2019, and January to March 2020

Item	January to March	
	2019	2020
	Quantity (short tons)	
Overall capacity	4,694,990	4,694,990
Production of rebar.--		
In coils	***	***
In straight lengths	***	***
Deformed wire	***	***
All in-scope products	1,765,827	1,893,822
Production of other products.--		
Wire rod	***	***
Merchant bar	***	***
Other bar or rod	***	***
Excluded deformed wire	***	***
All other products	***	***
All out-of-scope products	1,514,213	1,598,785
Overall production	3,280,040	3,492,607
	Capacity utilization (percent)	
Overall capacity utilization	69.9	74.4
	Share of rebar production (percent)	
Share of rebar production.--		
In coils	***	***
In straight lengths	***	***
Deformed wire	***	***
All in-scope products	100.0	100.0
	Share of overall production (percent)	
Share of overall production.--		
In coils	***	***
In straight lengths	***	***
Deformed wire	***	***
All in-scope products	53.8	54.2
Wire rod	***	***
Merchant bar	***	***
Other bar or rod	***	***
Excluded deformed wire	***	***
All other products	***	***
All out-of-scope products	46.2	45.8
Overall production	100.0	100.0

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

Constraints on capacity

All seven responding U.S. producers reported constraints in the manufacturing process. Five of the seven firms reported market factors as the major production constraint. Given the capital-intensive production process, firms stated they need the ability to sell rebar at a high enough rate to cover production costs, and lower prices allegedly driven by imports limit the firms' ability to sell rebar at a high enough price. Additionally, *** reported weekly planned preventative maintenance and *** reported current equipment size and expansion space as further constraints on capacity and production.

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

Table III-6 presents U.S. producers' U.S. shipments, export shipments, and total shipments. The quantity of total rebar shipments increased from 2014 to 2019, largely reflecting an increase in commercial shipments, which made up *** percent of shipments by quantity in 2019, up from *** percent in 2014. Virtually all (*** percent) shipments remained in the United States in 2019, reflecting a general decline in rebar exports from 2014 to 2019.

The value of U.S. producers' rebar shipments generally tracked the quantity of such shipments. However, the average unit values of U.S. producers' transfers to related firms were lower in every full and partial year than those of U.S. commercial sales, and at times even lower than the average unit values of export shipments. The highest average unit values were those calculated for internal consumption, which consistently accounted for substantially less than *** percent of total shipments.

Table III-6

Rebar: U.S. producers' U.S. shipments, exports shipments, and total shipments, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year					
	2014	2015	2016	2017	2018	2019
	Quantity (short tons)					
Commercial shipments	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***
Transfers to related firms	***	***	***	***	***	***
U.S. shipments	6,620,676	6,386,240	6,580,706	6,995,285	7,586,072	7,375,037
Export shipments	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***
	Value (1,000 dollars)					
Commercial shipments	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***
Transfers to related firms	***	***	***	***	***	***
U.S. shipments	4,235,556	3,576,919	3,085,957	3,613,469	4,882,994	4,755,904
Export shipments	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***
	Unit value (dollars per short ton)					
Commercial shipments	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***
Transfers to related firms	***	***	***	***	***	***
U.S. shipments	640	560	469	517	644	645
Export shipments	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***
	Share of quantity (percent)					
Commercial shipments	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***
Transfers to related firms	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0
	Share of value (percent)					
Commercial shipments	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***
Transfers to related firms	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0

Table continued on next page.

Table III-6—Continued

Rebar: U.S. producers' U.S. shipments, exports shipments, and total shipments, 2014-19, January to March 2019, and January to March 2020

Item	January to March	
	2019	2020
	Quantity (short tons)	
Commercial shipments	***	***
Internal consumption	***	***
Transfers to related firms	***	***
U.S. shipments	1,698,323	1,925,264
Export shipments	***	***
Total shipments	***	***
	Value (1,000 dollars)	
Commercial shipments	***	***
Internal consumption	***	***
Transfers to related firms	***	***
U.S. shipments	1,139,334	1,166,394
Export shipments	***	***
Total shipments	***	***
	Unit value (dollars per short ton)	
Commercial shipments	***	***
Internal consumption	***	***
Transfers to related firms	***	***
U.S. shipments	671	606
Export shipments	***	***
Total shipments	***	***
	Share of quantity (percent)	
Commercial shipments	***	***
Internal consumption	***	***
Transfers to related firms	***	***
U.S. shipments	***	***
Export shipments	***	***
Total shipments	100.0	100.0
	Share of value (percent)	
Commercial shipments	***	***
Internal consumption	***	***
Transfers to related firms	***	***
U.S. shipments	***	***
Export shipments	***	***
Total shipments	100.0	100.0

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

U.S. producers' inventories

Table III-7 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. Inventories generally declined from 2014 to 2019. The ratio of inventories to U.S. production and U.S. shipments also declined from 8.7 and 9.4 percent, respectively, in 2014 to 6.4 and 6.6 percent, respectively, in 2019, while the ratio of inventories to total shipments exhibited a similar trend.

Table III-7
Rebar: U.S. producers' inventories, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Quantity (short tons)							
U.S. producers' end-of-period inventories	621,386	540,897	484,549	514,311	425,689	483,498	470,324	423,940
	Ratio (percent)							
Ratio of inventories to.--								
U.S. production	8.7	8.2	7.2	7.1	5.5	6.4	6.7	5.6
U.S. shipments	9.4	8.5	7.4	7.4	5.6	6.6	6.9	5.5
Total shipments	***	***	***	***	***	***	***	***

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

U.S. producers' imports

Table III-8 presents data on individual U.S. producers' U.S. production and U.S imports of rebar from subject sources. One firm (***) reported directly importing from 2014 to 2017, stating ***. ***, stated that in the market in which it operates, ***.

Table III-8

Rebar: U.S. producers' U.S. production, imports, and import ratios to U.S. production, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
Quantity (short tons)								
*** U.S. production	***	***	***	***	***	***	***	***
*** U.S. imports from.-- Mexico	***	***	***	***	***	***	***	***
Turkey, subject	***	***	***	***	***	***	***	***
Subject	***	***	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***	***
All import sources	***	***	***	***	***	***	***	***
Ratio (percent)								
*** ratio to U.S. production of imports from.-- Mexico	***	***	***	***	***	***	***	***
Turkey, subject	***	***	***	***	***	***	***	***
Subject	***	***	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***	***
All import sources	***	***	***	***	***	***	***	***
Narrative								
*** reason for importing	***							

Table continued on next page.

Table III-8 -- Continued

Rebar: U.S. producers' U.S. production, imports, and import ratios to U.S. production, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Quantity (short tons)							
*** U.S. production	***	***	***	***	***	***	***	***
*** U.S. imports from-- Mexico	***	***	***	***	***	***	***	***
Turkey, subject	***	***	***	***	***	***	***	***
Subject	***	***	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***	***
All import sources	***	***	***	***	***	***	***	***
	Ratio (percent)							
*** ratio to U.S. production of imports from-- Mexico	***	***	***	***	***	***	***	***
Turkey, subject	***	***	***	***	***	***	***	***
Subject	***	***	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***	***
All import sources	***	***	***	***	***	***	***	***
	Narrative							
*** reason for importing	***							

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

U.S. producers' purchases

Table III-9 presents data on individual U.S. producers' purchases. One firm (***) reported purchasing from 2014 to 2017, stating ***. *** indicated it purchased rebar ***.

Table III-9

Rebar: U.S. producers' U.S. production, purchases, and purchase ratios to U.S. production, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Quantity (short tons)							
*** U.S. production	***	***	***	***	***	***	***	***
*** purchases from.-- U.S. producers	***	***	***	***	***	***	***	***
*** Turkey, subject	***	***	***	***	***	***	***	***
*** Total purchases	***	***	***	***	***	***	***	***
	Narrative							
*** reason for purchasing	***							
	Quantity (short tons)							
*** U.S. production	***	***	***	***	***	***	***	***
*** purchases from.-- U.S. producers	***	***	***	***	***	***	***	***
	Narrative							
*** reason for purchasing	***							

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

U.S. employment, wages, and productivity

Table III-10 shows U.S. producers' employment-related data. Both production related workers and total hours worked increased from 2014 to 2019, consistent with the overall increase in rebar production. Simultaneously, hourly wages and total wages paid increased. However, productivity decreased slightly from 2014 to 2019 and unit labor costs increased by \$2.90 per short ton. Production related workers was lower in January to March 2020 compared with the same period in 2019. Hours, wages, and all related metrics were higher in January to March 2020 compared with the same period in 2019.

Table III-10

Rebar: Average number of production and related workers, hours worked, wages paid to such employees, hourly wages, productivity, and unit labor costs, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
Production and related workers (PRWs) (number)	3,954	3,943	3,803	4,259	4,212	4,185	4,045	4,016
Total hours worked (1,000 hours)	8,478	8,118	8,010	9,235	9,189	8,944	2,189	2,284
Hours worked per PRW (hours)	2,144	2,059	2,106	2,168	2,182	2,137	541	569
Wages paid (\$1,000)	337,204	313,937	307,796	366,435	382,986	377,186	92,426	101,622
Hourly wages (dollars per hour)	\$39.77	\$38.67	\$38.43	\$39.68	\$41.68	\$42.17	\$42.22	\$44.49
Productivity (short tons per 1,000 hours)	842.2	812.3	845.8	788.7	848.3	841.3	806.7	829.2
Unit labor costs (dollars per short tons)	\$47.23	\$47.61	\$45.43	\$50.31	\$49.13	\$50.13	\$52.34	\$53.66

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

Financial experience of U.S. producers

Background

Seven U.S. producers believed to account for the vast majority of sales of domestically produced rebar provided usable financial results on their rebar operations. *** reported financial data for fiscal years ending December 31 while *** reported financial data for fiscal years ending August 31. All responding U.S. producers provided their financial data on the basis of generally accepted accounting principles (GAAP).

Figure III-2 presents each responding producer's share of the total reported net sales quantity in 2019. Rebar manufacturing in the United States has become increasingly concentrated, with *** and *** accounting for *** percent of net sales in 2019. The remaining five responding U.S. producers ranged from *** percent to *** percent of net sales in 2019. The majority of U.S. producers manufacture multiple products, such as merchant-quality bar, wire rod, and SBQ bar, and own or are related to affiliates with ferrous scrap operations.²

Revenue primarily reflects commercial sales and transfers, but also includes a small amount of internal consumption reported by four U.S. producers.³ Commercial sales account for the largest share of total sales volume (*** percent to *** percent) and transfers account for the second largest share (*** percent to *** percent) during the period for which data were requested. Large volume producers' (***) transfers to related downstream fabrication operations and distributors accounted for *** percent by quantity and *** percent by value of their total net sales in 2019.

² Cascade purchases scrap from a related supplier (Schnitzer Steel Industries, Inc.), with its parent company operating 45 metal scrap recycling facilities in the U.S and Canada. Schnitzer 2019 10-K, p. 3. CMC operates 10 scrap metal processing plants in the U.S. to supply the company's mill segment and sell to unrelated entities. CMC 2019 Form 10-K, pp. 2 and 19. Gerdau's parent company operates 10 scrap recycling facilities in North America. Gerdau 2019 Form 20-F, p. 29. Nucor's related supplier (DJJ) operates six regional scrap companies in the United States. Nucor 2019 Form 10-K, p. 6. SDI's metals recycling operations operates in seven states and supplied 37 percent of its steel operations' ferrous scrap requirements during 2019. In its Form 10-K, SDI notes that its recycling operations provide security for its ferrous supply and enables just-in-time ferrous raw materials for its steel mills. SDI's 2019 Form 10-K, pp. 5 and 26.

³ Transfers to related firms were reported by ***, with the three large volume producers (***) accounting for virtually all transfers to related distributor/fabricator operations. Internal consumption was reported by (***), with *** accounting for the majority of internal consumption throughout the period for which data were collected.

Figure III-2
Rebar: Share of net sales quantity, by firm, 2019

* * * * *

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

Operations on rebar

Table III-11 presents aggregated data on U.S. producers' operations in relation to rebar, while table III-12 presents corresponding changes in average unit values. Table III-13 presents selected company-specific financial data. U.S. producers reported mixed financial results throughout the period of review, although the *** producers reported positive operating income from 2014 to 2019 and during both interim periods.

From 2014 to 2019, the U.S. rebar industry experienced several consolidations and expansions as well as prolonged shutdowns. Gerdau sold four of its rebar mills to CMC in 2018 and announced *** (see table III-2 for additional industry events).⁴

⁴ On November 5, 2018, Gerdau sold four rebar mills (***), steel cutting and bending units, and distribution centers to CMC for \$600 million. Gerdau's 2019 Form 20-F, pp. F-25 and F-26 (as filed) and ***'s U.S. producer questionnaire, II-2a.

Table III-11

Rebar: Results of operations of U.S. producers, 2014-19, January to March 2019, and January to March 2020

Item	Fiscal year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Quantity (short tons)							
Commercial shipments	***	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***	***
Transfers to related firms	***	***	***	***	***	***	***	***
Total net sales	7,059,974	6,681,424	6,826,023	7,240,990	7,602,632	7,256,659	1,721,193	1,953,381
	Value (1,000 dollars)							
Commercial shipments	***	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***	***
Transfers to related firms	***	***	***	***	***	***	***	***
Total net sales	4,478,267	3,801,287	3,217,158	3,688,364	4,781,842	4,762,366	1,154,464	1,182,949
Cost of goods sold.--								
Raw materials	2,761,159	1,910,669	1,572,790	2,123,679	2,662,836	2,211,033	567,791	577,657
Direct labor	317,252	303,923	310,685	312,517	317,076	320,078	76,060	87,067
Other factory costs	1,083,430	1,124,106	1,102,520	972,095	1,031,881	1,216,040	305,046	290,851
Total COGS	4,161,841	3,338,698	2,985,995	3,408,291	4,011,793	3,747,151	948,897	955,575
Gross profit	316,426	462,589	231,163	280,073	770,049	1,015,215	205,567	227,374
SG&A expense	197,585	187,676	193,335	192,899	243,364	227,840	57,536	59,976
Operating income or (loss)	118,841	274,913	37,828	87,174	526,685	787,375	148,031	167,398
All other expenses/(income), net	***	***	***	***	***	***	***	***
Net income or (loss)	***	***	***	***	***	***	***	***
Depreciation/amortization	135,581	109,096	113,508	108,823	110,677	120,914	29,027	31,905
Cash flow	207,201	337,620	127,936	105,486	570,794	880,649	171,706	193,285
	Unit value (dollars per short ton)							
Commercial shipments	***	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***	***
Transfers to related firms	***	***	***	***	***	***	***	***
Total net sales	634	569	471	509	629	656	671	606
Cost of goods sold.--								
Raw materials	391	286	230	293	350	305	330	296
Direct labor	45	45	46	43	42	44	44	45
Other factory costs	153	168	162	134	136	168	177	149
Average COGS	589	500	437	471	528	516	551	489
Gross profit	45	69	34	39	101	140	119	116
SG&A expense	28	28	28	27	32	31	33	31
Operating income or (loss)	17	41	6	12	69	109	86	86
Net income or (loss)	***	***	***	***	***	***	***	***

Table continued on next page.

Table III-11—Continued

Rebar: Results of operations of U.S. producers, 2014-19, January to March 2019, and January to March 2020

Item	Fiscal year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Ratio to COGS (percent)							
Cost of goods sold.--								
Raw materials	66.3	57.2	52.7	62.3	66.4	59.0	59.8	60.5
Direct labor	7.6	9.1	10.4	9.2	7.9	8.5	8.0	9.1
Other factory costs	26.0	33.7	36.9	28.5	25.7	32.5	32.1	30.4
Total COGS	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
	Ratio to net sales (percent)							
Cost of goods sold.--								
Raw materials	61.7	50.3	48.9	57.6	55.7	46.4	49.2	48.8
Direct labor	7.1	8.0	9.7	8.5	6.6	6.7	6.6	7.4
Other factory costs	24.2	29.6	34.3	26.4	21.6	25.5	26.4	24.6
Total COGS	92.9	87.8	92.8	92.4	83.9	78.7	82.2	80.8
Gross profit	7.1	12.2	7.2	7.6	16.1	21.3	17.8	19.2
SG&A expense	4.4	4.9	6.0	5.2	5.1	4.8	5.0	5.1
Operating income or (loss)	2.7	7.2	1.2	2.4	11.0	16.5	12.8	14.2
Net income or (loss)	***	***	***	***	***	***	***	***
	Number of firms reporting							
Operating losses	3	3	4	5	1	3	5	4
Net losses	3	3	5	5	2	3	5	3
Data	7	7	7	7	7	7	7	7

Note.—Unit value shown as “0” percent represent non-zero values less than “(0.5)” percent.

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

Table III-12

Rebar: Changes in AUVs between fiscal years and partial year periods

Item	Between fiscal years						January to March
	2014-19	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20
	Changes in AUVs (percent)						
Commercial shipments	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Transfers to related firms	***	***	***	***	***	***	***
Total net sales	▲3.5	▼(10.3)	▼(17.2)	▲8.1	▲23.5	▲4.3	▼(9.7)
Cost of goods sold.--							
Raw materials	▼(22.1)	▼(26.9)	▼(19.4)	▲27.3	▲19.4	▼(13.0)	▼(10.4)
Direct labor	▼(1.8)	▲1.2	▲0.1	▼(5.2)	▼(3.4)	▲5.8	▲0.9
Other factory costs	▲9.2	▲9.6	▼(4.0)	▼(16.9)	▲1.1	▲23.5	▼(16.0)
Average COGS	▼(12.4)	▼(15.2)	▼(12.5)	▲7.6	▲12.1	▼(2.1)	▼(11.3)
	Changes in unit values (dollars per short ton)						
Commercial shipments	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Transfers to related firms	***	***	***	***	***	***	***
Total net sales	▲21.96	▼(65.38)	▼(97.63)	▲38.07	▲119.60	▲27.30	▼(65.14)
Cost of goods sold.--							
Raw materials	▼(86.41)	▼(105.13)	▼(55.56)	▲62.87	▲56.97	▼(45.56)	▼(34.16)
Direct labor	▼(0.83)	▲0.55	▲0.03	▼(2.36)	▼(1.45)	▲2.40	▲0.38
Other factory costs	▲14.11	▲14.78	▼(6.73)	▼(27.27)	▲1.48	▲31.85	▼(28.33)
Average COGS	▼(73.12)	▼(89.80)	▼(62.26)	▲33.25	▲56.99	▼(11.31)	▼(62.11)
Gross profit	▲95.08	▲24.42	▼(35.37)	▲4.81	▲62.61	▲38.61	▼(3.03)
SG&A expense	▲3.41	▲0.10	▲0.23	▼(1.68)	▲5.37	▼(0.61)	▼(2.72)
Operating income or (loss)	▲91.67	▲24.31	▼(35.60)	▲6.50	▲57.24	▲39.23	▼(0.31)
Net income or (loss)	***	***	***	***	***	***	***

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

Table III-13

Rebar: Results of operations of U.S. producers, by company, 2014-19, January to March 2019, and January to March 2020

Item	Fiscal year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Net sales quantity (short tons)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Total net sales quantity	7,059,974	6,681,424	6,826,023	7,240,990	7,602,632	7,256,659	1,721,193	1,953,381
	Net sales value (1,000 dollars)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Total net sales value	4,478,267	3,801,287	3,217,158	3,688,364	4,781,842	4,762,366	1,154,464	1,182,949
	COGS (1,000 dollars)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Total COGS	4,161,841	3,338,698	2,985,995	3,408,291	4,011,793	3,747,151	948,897	955,575

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Table III-13—Continued
Rebar: Results of operations of U.S. producers, by company, 2014-19, January to March 2019, and
January to March 2020

Item	Fiscal year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Gross profit or (loss) (1,000 dollars)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Total gross profit or (loss)	316,426	462,589	231,163	280,073	770,049	1,015,215	205,567	227,374
	SG&A expenses (1,000 dollars)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Total SG&A expenses	197,585	187,676	193,335	192,899	243,364	227,840	57,536	59,976
	Operating income or (loss) (1,000 dollars)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Total operating income or (loss)	118,841	274,913	37,828	87,174	526,685	787,375	148,031	167,398

Table continued on next page.

Table III-13—Continued

Rebar: Results of operations of U.S. producers, by firm, 2014-19, January to March 2019, and January to March 2020

Item	Fiscal year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Net income or (loss) (1,000 dollars)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Total net income or (loss)	***	***	***	***	***	***	***	***
	COGS to net sales value (percent)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Average COGS to sales	92.9	87.8	92.8	92.4	83.9	78.7	82.2	80.8
	Gross profit or (loss) to net sales value (percent)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Average gross profit or (loss) to sales	7.1	12.2	7.2	7.6	16.1	21.3	17.8	19.2

Table continued on next page.

Table III-13—Continued

Rebar: Results of operations of U.S. producers, by firm, 2014-19, January to March 2019, and January to March 2020

Item	Fiscal year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	SG&A expenses to net sales value (percent)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evrz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Average SG&A expenses to sales	4.4	4.9	6.0	5.2	5.1	4.8	5.0	5.1
	Operating income or (loss) to net sales value (percent)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evrz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Average operating income or (loss) to sales	2.7	7.2	1.2	2.4	11.0	16.5	12.8	14.2
	Net income or (loss) to net sales value (percent)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evrz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Average net income or (loss) to sales	***	***	***	***	***	***	***	***

Table continued on next page.

Table III-13—Continued

Rebar: Results of operations of U.S. producers, by firm, 2014-19, January to March 2019, and January to March 2020

Item	Fiscal year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Unit net sales value (dollars per short ton)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Average unit net sales value	634	569	471	509	629	656	671	606
	Unit raw materials (dollars per short ton)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Average unit raw materials	391	286	230	293	350	305	330	296
	Unit direct labor (dollars per short ton)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Average unit direct labor	45	45	46	43	42	44	44	45

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Table III-13—Continued

Rebar: Results of operations of U.S. producers, by firm, 2014-19, January to March 2019, and January to March 2020

Item	Fiscal year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
Unit other factory costs (dollars per short ton)								
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Average unit other factory costs	153	168	162	134	136	168	177	149
Unit COGS (dollars per short ton)								
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Average unit COGS	589	500	437	471	528	516	551	489
Unit gross profit or (loss) (dollars per short ton)								
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdau	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Average unit gross profit or (loss)	45	69	34	39	101	140	119	116

Table continued on next page.

Table III-13—Continued

Rebar: Results of operations of U.S. producers, by firm, 2014-19, January to March 2019, and January to March 2020

Item	Fiscal year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Unit SG&A expense (dollars per short ton)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdaу	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Average unit SG&A expense	28	28	28	27	32	31	33	31
	Unit operating income or (loss) (dollars per short ton)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdaу	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Average unit operating income or (loss)	17	41	6	12	69	109	86	86
	Unit net income or (loss) (dollars per short ton)							
Byer	***	***	***	***	***	***	***	***
Cascade	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Evraz	***	***	***	***	***	***	***	***
Gerdaу	***	***	***	***	***	***	***	***
Nucor	***	***	***	***	***	***	***	***
SDI	***	***	***	***	***	***	***	***
Average unit net income or (loss)	***	***	***	***	***	***	***	***

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

Net sales

Total net sales increased 2.8 percent by quantity and 6.3 percent by value from 2014 to 2019; net sales quantity and value were both higher in January-March 2020 (“interim 2020”) than in January-March 2019 (“interim 2019”) (table III-11). Commercial sales represent the largest share of the U.S. industry’s overall revenue, ranging from *** percent to *** percent of total sales quantity and value from 2014 to 2019 and during both interim periods. U.S. shipments represent almost all commercial sales, with exports accounting for *** percent or less of commercial sales quantity and value from 2014 to 2019 (see table III-6). Transfer sales ranged from *** percent to *** percent of total net sales quantity and value from 2014 to 2019. Internal consumption represented *** to *** percent of net sales in both quantity and value throughout the period for which data were collected.

*** U.S. producers (***) reported positive net sales quantity and value growth from 2014 to 2019 while *** U.S. producers (***) reported declines.⁵ U.S. producers attributed the Section 232 tariffs as the primary factor for increased net sales in 2018 and 2019.⁶

Average unit values of rebar declined from \$634 per-short ton in 2014 to \$471 per-short ton in 2016 (the lowest per unit value) before increasing steadily to \$656 per-short ton in 2019 (the highest per unit value); the average unit value was lower in interim 2020 than in interim 2019 (table III-11). On a company-specific basis, all responding U.S. producers reported the same trends of declining per unit net sales values from 2014 to 2016 before increases in 2017 and 2018, while trends from 2018 to 2019 were mixed (table III-13). Only *** reported higher average unit values in interim 2020 than in interim 2019.

Cost of goods sold and gross profit or (loss)

Total cost of goods sold (“COGS”) fluctuated from 2014 to 2019, decreasing from 2014 to 2016 before increasing in 2017 and 2018 and then decreasing in 2019, resulting in an overall decrease of 10.0 percent from 2014 to 2019 (table III-11). COGS were higher in interim 2020 than in interim 2019. Average unit COGS decreased by 12.4 percent from 2014 to 2019 and

⁵ Prior to its acquisition of Gerdau’s rebar facilities in November 2018, large U.S. producer ***. ***. *** is the only smaller volume U.S. producer reporting increases in net sales quantity and value from 2014 to 2019.

⁶ See table II-1; see also email from ***, July 2, 2020, and emails from ***, July 3, 2020 and July 7, 2020.

was lower in interim 2020 than in interim 2019 (table III-12). As a ratio to net sales, COGS ranged from 78.7 percent to 92.9 percent during the period for which data were requested (table III-11).

Raw material costs represent the largest share of total COGS, ranging from 52.2 percent to 66.4 percent during the period for which data were requested (table III-11). Raw material costs declined by 19.9 percent from 2014 to 2019 and were higher in interim 2020 than in interim 2019.⁷ From year to year, raw material costs fluctuated in both absolute and average per unit values, with the lowest costs reported in 2016 and the highest costs reported in 2014 (table III-11). Aggregated raw material costs were higher while average per unit costs were lower in interim 2020 than in interim 2019 (table III-11). U.S. producers explained that raw material costs follow global prices for ferrous scrap (the main raw material for rebar) which fluctuated over the period for which data were collected.⁸ *** U.S. producers (***) explained that variation in product mix was not the driver for the raw material price fluctuations.⁹ The directional trend of company-specific average raw material costs tracked closely for all but one smaller volume U.S. producer (***).¹⁰ As a ratio to net sales, raw materials fluctuated, ranging from 46.4 percent to 61.7 percent during the period (table III-11). Table III-14 presents raw materials costs and acquisition methods.¹¹ Ferrous scrap accounted for most of the value of the raw materials used to produce rebar.

⁷ *** reported nonrecurring income of \$*** in 2014, \$*** in 2015, \$*** in 2016, and \$*** in 2017 from raw materials inventory adjustments.

⁸ ***. Email from ***, July 3, 2020.

⁹ *** characterized itself as a “price taker” when purchasing ferrous scrap and stated that “minor variations in product mix or raw material mix are normal and did not have a significant impact” on its raw material costs. *** explained that small variations in product mix exist ***. Emails from ***, July 3, 2020 and July 7, 2020.

¹⁰ ***. Email from ***, July 2, 2020.

¹¹ Five U.S. producers (***) reported purchasing ferrous scrap at fair market value from related entities in 2019.

Table III-14
Rebar: Raw materials costs and acquisition methods, 2019

Item	Fiscal year 2019			Acquisition method	
	Value (1,000 dollars)	Unit value (dollars per short ton)	Share of value (percent)	Produced	Purchase
Primary steel (billets)	***	***	***	***	***
Secondary steel (ferrous scrap)	***	***	***	***	***
Other material inputs	***	***	***	***	***
All raw materials	2,211,033	305	100.0		

Note: Other material inputs include alloy agents, refining materials, and electrodes.

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

Other factory costs represent the second largest share of total COGS, ranging from 25.7 percent to 36.9 percent during the period for which data were requested (table III-11). Other factory costs increased by 12.2 percent in absolute values from 2014 to 2019.¹² Average per unit other factory costs increased by 9.2 percent from 2014 to 2019 for the industry, while company-specific average per unit other factory costs varied widely year to year and across companies. Smaller volume producer *** reported the highest and lowest average other factory costs per unit among responding U.S. producers and *** producers *** also reported some of the lowest as well as the highest average per unit other factory costs. U.S. producers attributed these variations to increased production volume and other outside factors such as normal fluctuations in categorical costs (e.g., cost of natural gas and electrodes).¹³

Direct labor represents the smallest share of total COGS, ranging from 7.6 percent to 10.4 percent during the period for which data were requested (table III-11). In absolute values, direct labor costs increased by 0.9 percent from 2014 to 2019 and were higher in interim 2020 than in interim 2019 (table III-11). Average per unit direct labor cost remained somewhat

¹² *** reported nonrecurring expenses of \$*** in 2014, \$*** in 2016, \$*** in 2017, and \$*** in 2019 from ***, classified as other factory costs. *** also reported a nonrecurring income of \$*** in 2018 from ***, classified as other factory costs.

¹³ Emails from ***, July 3, 2020 and July 7, 2020.

stable, ranging from \$42 to \$46 per-short ton from 2014 to 2019 and \$44 to \$45 per-short ton during the interim periods (table III-11).¹⁴

As presented in table III-9, U.S. producers' gross profit increased by 220.8 percent from 2014 to 2019, from \$316 million in 2014 to \$1.0 billion in 2019 despite decreases in gross profits in 2016 and 2017. The gross profit decreases in 2016 and 2017 were attributable to the lower volume and lower average sales value of rebar in those annual periods (see table III-15). Gross margins fluctuated from 2014 to 2019, increasing from 7.1 percent in 2014 to 12.2 percent in 2015, then declining to 7.2 percent 2016 before increasing consistently starting in 2017, reaching 21.3 percent in 2019; gross margins were higher in interim 2020 than in interim 2019. The overall directional trend in gross profits tracked closely with fluctuations in net sales and raw material costs from 2014 to 2019.

SG&A expenses and operating income or (loss)

U.S. producers' selling, general, and administrative ("SG&A") expense ratios (i.e., total SG&A expenses divided by net sales) increased from 4.4 percent in 2014 to 4.8 percent in 2019, and were essentially unchanged between interim 2019 (5.0 percent) and interim 2020 (5.1 percent) (table III-11).¹⁵ General and administrative expenses made up most of total SG&A costs, with selling expenses making up less than one-sixth of total SG&A costs in any annual period.

U.S. producers' operating income largely resembled the directional pattern of gross profit, irregularly increasing from \$119 million in 2014 to \$787 million in 2019; operating income was higher in interim 2020 than in interim 2019. Operating margins (i.e., operating income divided by net sales) increased from 2.7 percent in 2014 to 16.5 percent in 2019 despite low operating margins of 1.2 percent in 2016 and 2.4 percent in 2017 (table III-11). On a company-specific basis, *** U.S. producers (***) reported positive

¹⁴ *** explained that lower sales and production levels in 2015 and 2016 resulted in higher average per unit direct labor costs. Both *** stated that increased profit sharing in good years also adds to increases in direct labor costs. In addition, *** raised the base pay of its employees by ***. Ibid.

¹⁵ *** reported nonrecurring expense of \$*** in 2014 from ***, classified as general and administrative expenses. *** reported nonrecurring expenses of \$*** in 2014, \$*** in 2015, and \$*** in 2016 related to ***, classified as SG&A. *** reported nonrecurring expense of \$*** in 2016 related to ***, classified as general and administrative expenses.

operating income in all periods while *** U.S. producers reported mixed operating results (table III-13).¹⁶

All other expenses and net income or (loss)

Classified below the operating income level are interest expenses, other expenses, and other income. In table III-11, these items are aggregated with the net amount shown. The net “all other expenses” fluctuated from 2014 to 2019 and was higher in interim 2020 than in interim 2019.^{17 18} The U.S. industry’s net profits fluctuated widely, mostly attributable to ***’s variable net losses that were offset by net income reported by ***.

¹⁶ ***.

¹⁷ With the exception of ***, U.S. producers reported interest expenses, with the large volume producers (***) accounting for the vast majority of interest expenses from 2014 to 2019. All other expenses and income were reported by ***.

¹⁸ *** reported nonrecurring income of \$*** in 2016 related to ***, classified as all other income items.

Variance analysis

A variance analysis for the operations of U.S. producers of rebar is presented in table III-15.¹⁹ The information for this variance analysis is derived from table III-11.

Table III-15

Rebar: Variance analysis on the operations of U.S. producers, between fiscal years and between partial year periods

Item	Between fiscal years						January to March
	2014-19	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20
Net sales:							
Price variance	159,338	(436,859)	(666,396)	275,629	909,267	198,131	(127,252)
Volume variance	124,761	(240,121)	82,267	195,577	184,211	(217,607)	155,737
Net sales variance	284,099	(676,980)	(584,129)	471,206	1,093,478	(19,476)	28,485
Cost of sales:							
Cost/expense variance	530,635	599,989	424,959	(240,772)	(433,279)	82,077	121,328
Volume variance	(115,945)	223,154	(72,256)	(181,524)	(170,223)	182,565	(128,006)
Total cost of sales variance	414,690	823,143	352,703	(422,296)	(603,502)	264,642	(6,678)
Gross profit variance	698,789	146,163	(231,426)	48,910	489,976	245,166	21,807
SG&A expenses:							
Cost/expense variance	(24,750)	(685)	(1,597)	12,189	(40,831)	4,449	5,322
Volume variance	(5,505)	10,594	(4,062)	(11,753)	(9,634)	11,075	(7,762)
Total SG&A expense variance	(30,255)	9,909	(5,659)	436	(50,465)	15,524	(2,440)
Operating income variance	668,534	156,072	(237,085)	49,346	439,511	260,690	19,367
Summarized as:							
Price variance	159,338	(436,859)	(666,396)	275,629	909,267	198,131	(127,252)
Net cost/expense variance	505,885	599,303	423,362	(228,582)	(474,110)	86,527	126,649
Net volume variance	3,311	(6,372)	5,950	2,300	4,354	(23,968)	19,969

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

¹⁹ The Commission's variance analysis is calculated in three parts: Sales variance, cost of sales variance (COGS variance), and SG&A expense 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 expense 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. 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 expense variances. The overall volume component of the variance analysis is generally small.

Capital expenditures, research and development expenses, assets, and return on assets

Table III-16 presents capital expenditures, research and development (“R&D”) expenses, assets, and return on assets of U.S. producers. Table III-17 provides the producers’ narrative responses regarding the nature and focus of their capital expenditures and R&D expenses as well as substantial changes in assets.

Table III-16
Rebar: Capital expenditures, R&D expenses, total assets, and ROA of U.S. producers, 2014-19, January-March 2019, and January-March 2020

Item	Fiscal year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Value (1,000 dollars)							
Capital expenditures	166,276	151,841	217,512	491,349	266,409	378,937	179,359	188,221
R&D expenses	***	***	***	***	***	***	***	***
Total net assets	1,518,496	1,415,006	1,452,172	1,565,572	1,892,631	2,471,640		
	Percent							
Operating ROA	7.8	19.4	2.6	5.6	27.8	31.9		

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

Table III-17

Rebar: Firms' narrative responses relating to capital expenditures, R&D expenses, and assets since January 1, 2014

Firm	Nature and focus of capital expenditures
***	***
***	***
***	***
***	***
***	***
***	***
***	***
	Nature and focus of R&D expenses
***	***
***	***
	Substantial changes in net assets
***	***
***	***
***	***

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

Part IV: U.S. imports and the foreign industries

U.S. imports

Overview

The Commission issued questionnaires to 23 potential importers of rebar between 2014 to 2019. Eleven firms provided data and information in response to the questionnaires, while three firms indicated that they had not imported product during the period for which data were collected. Based on official Commerce statistics for imports of rebar, importers' questionnaire data accounted for 77.2 percent of total subject imports during 2019. Firms responding to the Commission's questionnaire accounted for the following shares of individual subject country's subject imports (as a share of official import statistics) during 2019.

- Virtually all subject imports from Mexico during 2019
- More than a quarter of subject imports from Turkey during 2019
- More than a quarter of nonsubject imports during 2019.

In light of the data coverage by the Commission's questionnaires, unless otherwise noted, import data in this report are based on official Commerce statistics for rebar.¹

Imports from subject and nonsubject sources

Table IV-1 presents information on U.S. imports of rebar from Mexico and Turkey and all other sources over the period examined. Total imports of rebar declined from 2014 to 2019, reflecting a decline in imports of all rebar from Turkey. In 2017, an antidumping duty order was placed on imports of rebar from Turkey and a countervailing duty order was placed on imports of rebar from Habas, previously excluded from the countervailing duty order on rebar from Turkey. In contrast to the overall decline, imports of rebar from Mexico increased from 2014 to 2019. Following an initial drop from 99,319 short tons in 2014 to 3,494 short tons in 2016,

¹ The Commission issued questionnaires to those firms that, based on a review of data provided by ***, may have imported merchandise in 2014-19 under the following HTS statistical reporting numbers: 7213.10.0000, 7214.20.0000, and 7228.30.8010. U.S. imports of rebar under HTS statistical reporting number 7228.30.8010 (concrete reinforcing bars and rods of other alloy steel, not further worked than hot-rolled, hot-drawn or extruded) contain unexplained anomalies in reported volumes and calculated average unit values, and accordingly are not presented in this report. The total quantity of such imports in 2019 was 1,332 short tons, or approximately 0.1 percent of non-alloy steel rebar.

imports of rebar from Mexico increased to 140,995 short tons in 2019. While total imports of rebar were lower in January to March 2020 than in January to March 2019, imports from both Mexico and Turkey were higher during those same periods. Unit values of nonsubject imports were higher than unit values of subject imports in every full calendar year from 2014 to 2019.²

Table IV-1
Rebar: U.S. imports by source, 2014-19, January to March 2019, January to March 2020

Item	Calendar year					
	2014	2015	2016	2017	2018	2019
	Quantity (short tons)					
U.S. imports from.-- Mexico	99,319	5,370	3,494	26,928	102,866	140,995
Turkey, subject	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***
All other sources	341,633	382,743	613,237	596,013	674,361	871,108
Nonsubject sources	***	***	***	***	***	***
All import sources	1,422,152	2,013,421	2,115,909	1,495,515	1,161,951	1,101,625
	Value (1,000 dollars)					
U.S. imports from.-- Mexico	56,250	2,417	1,358	13,190	60,529	77,383
Turkey, subject	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***
All other sources	203,351	179,498	237,503	284,937	442,848	517,317
Nonsubject sources	***	***	***	***	***	***
All import sources	808,184	897,445	779,640	673,773	735,841	645,422
	Unit value (dollars per short ton)					
U.S. imports from.-- Mexico	566	450	389	490	588	549
Turkey, subject	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***
All other sources	595	469	387	478	657	594
Nonsubject sources	***	***	***	***	***	***
All import sources	568	446	368	451	633	586

Table continued on next page.

² The unit value of subject rebar from Turkey was higher in the first quarter of 2019 than the unit value of nonsubject imports during the same period.

Table IV-1—Continued

Rebar: U.S. imports by source, 2014-19, January to March 2019, January to March 2020

Item	January to March	
	2019	2020
	Quantity (short tons)	
U.S. imports from.-- Mexico	13,939	61,466
Turkey, subject	***	***
Subject sources	***	***
Turkey, nonsubject	***	***
All other sources	313,206	91,581
Nonsubject sources	***	***
All import sources	335,520	280,400
	Value (1,000 dollars)	
U.S. imports from.-- Mexico	8,641	33,746
Turkey, subject	***	***
Subject sources	***	***
Turkey, nonsubject	***	***
All other sources	198,060	48,908
Nonsubject sources	***	***
All import sources	213,147	145,401
	Unit value (dollars per short ton)	
U.S. imports from.-- Mexico	620	549
Turkey, subject	***	***
Subject sources	***	***
Turkey, nonsubject	***	***
All other sources	632	534
Nonsubject sources	***	***
All import sources	635	519

Table continued on next page.

Table IV-1—Continued

Rebar: U.S. imports by source, 2014-19, January to March 2019, January to March 2020

Item	Calendar year					
	2014	2015	2016	2017	2018	2019
	Share of quantity (percent)					
U.S. imports from.-- Mexico	7.0	0.3	0.2	1.8	8.9	12.8
Turkey, subject	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***
All other sources	24.0	19.0	29.0	39.9	58.0	79.1
Nonsubject sources	***	***	***	***	***	***
All import sources	100.0	100.0	100.0	100.0	100.0	100.0
	Share of value (percent)					
U.S. imports from.-- Mexico	7.0	0.3	0.2	2.0	8.2	12.0
Turkey, subject	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***
All other sources	25.2	20.0	30.5	42.3	60.2	80.2
Nonsubject sources	***	***	***	***	***	***
All import sources	100.0	100.0	100.0	100.0	100.0	100.0
	Ratio to U.S. production (percent)					
U.S. imports from.-- Mexico	1.4	0.1	0.1	0.4	1.3	1.9
Turkey, subject	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***
All other sources	4.8	5.8	9.1	8.2	8.7	11.6
Nonsubject sources	***	***	***	***	***	***
All import sources	19.9	30.5	31.2	20.5	14.9	14.6

Table continued on next page.

Table IV-1—Continued

Rebar: U.S. imports by source, 2014-19, January to March 2019, January to March 2020

Item	January to March	
	2019	2020
	Share of quantity (percent)	
U.S. imports from.-- Mexico	4.2	21.9
Turkey, subject	***	***
Subject sources	***	***
Turkey, nonsubject	***	***
All other sources	93.3	32.7
Nonsubject sources	***	***
All import sources	100.0	100.0
	Share of value (percent)	
U.S. imports from.-- Mexico	4.1	23.2
Turkey, subject	***	***
Subject sources	***	***
Turkey, nonsubject	***	***
All other sources	92.9	33.6
Nonsubject sources	***	***
All import sources	100.0	100.0
	Ratio to U.S. production (percent)	
U.S. imports from.-- Mexico	0.8	3.2
Turkey, subject	***	***
Subject sources	***	***
Turkey, nonsubject	***	***
All other sources	17.7	4.8
Nonsubject sources	***	***
All import sources	19.0	14.8

Source: Official U.S. import statistics and proprietary customs records using HTS statistical reporting numbers 7213.10.0000 and 7214.20.0000, accessed August 13, 2020.

Figure IV-1

Rebar: U.S. imports quantities and average unit values, 2014-19, January to March 2019, January to March 2020

* * * * *

Source: Official U.S. import statistics and proprietary customs records using HTS statistical reporting numbers 7213.10.0000 and 7214.20.0000, accessed August 13, 2020.

Cumulation considerations

In assessing whether U.S. imports from the subject countries are likely to compete with each other and with the domestic like product, the Commission 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

Tables IV-2, IV-3, and IV-4 present data on shipments of rebar by length, size, and grade respectively. The largest share (***) percent) of U.S. producers' shipments by length were greater than 60" in length compared with only *** percent of subject import shipments. Most shipments of subject imports (***) percent) were between 20" and 40" compared with *** percent of U.S. producers' shipments of that length. Subject imports from Mexico were present ***, with the largest amount in the 20" to 40", category followed by the 40" to 60" category. Subject imports from Turkey were present ***, with the largest amount in the 20" to 40" category followed by the 40" to 60" category.

Table IV-2
Rebar: U.S. producers' and U.S. importers' U.S. shipments by length, 2019

Source	U.S. shipments					
	Coiled	<20"	>=20" and <40"	>=40" and <60"	>=60"	All lengths
	Quantity (short tons)					
U.S. producers	***	***	***	***	***	***
Imports from.-- Mexico	***	***	***	***	***	***
Turkey, subject	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***
All other sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import Sources	***	***	***	***	***	***
U.S. producers and U.S. importers	***	***	***	***	***	***
	Share down (percent)					
U.S. producers	***	***	***	***	***	***
Imports from.-- Mexico	***	***	***	***	***	***
Turkey, subject	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***
All other sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import Sources	***	***	***	***	***	***
U.S. producers and U.S. importers	100.0	100.0	100.0	100.0	100.0	100.0
	Share across (percent)					
U.S. producers	***	***	***	***	***	100.0
Imports from.-- Mexico	***	***	***	***	***	100.0
Turkey, subject	***	***	***	***	***	100.0
Subject sources	***	***	***	***	***	100.0
Turkey, nonsubject	***	***	***	***	***	***
All other sources	***	***	***	***	***	100.0
Nonsubject sources	***	***	***	***	***	100.0
All import Sources	***	***	***	***	***	100.0
U.S. producers and U.S. importers	***	***	***	***	***	100.0

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

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

* * * * *

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

As shown in table IV-3, more than two-thirds of U.S. producers' shipments were in sizes 3-6. In terms of quantity of short tons, No. 5 rebar accounted for the largest share (***) percent), followed by No. 4 at *** percent, No. 6 at *** percent, and No. 3 at *** percent. Most shipments of subject imports from Mexico were somewhat thinner on average, with No. 4 accounting for *** percent followed by No. 3 (***) percent). Most shipments of subject imports from Turkey were No. 5 (***) percent), followed by No. 4 (***) percent) and No. 3 (***) percent).

Table IV-3
Rebar: U.S. producers' and U.S. importers' U.S. shipments by size, 2019

Source	U.S. shipments					
	No. 3	No. 4	No. 5	No. 6	Other sizes	All sizes
	Quantity (short tons)					
U.S. producers	***	***	***	***	***	***
Imports from.-- Mexico	***	***	***	***	***	***
Turkey, subject	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***
All other sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import Sources	***	***	***	***	***	***
U.S. producers and U.S. importers	***	***	***	***	***	***
	Share down (percent)					
U.S. producers	***	***	***	***	***	***
Imports from.-- Mexico	***	***	***	***	***	***
Turkey, subject	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***	***
All other sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import Sources	***	***	***	***	***	***
U.S. producers and U.S. importers	100.0	100.0	100.0	100.0	100.0	100.0
	Share across (percent)					
U.S. producers	***	***	***	***	***	100.0
Imports from.-- Mexico	***	***	***	***	***	100.0
Turkey, subject	***	***	***	***	***	100.0
Subject sources	***	***	***	***	***	100.0
Turkey, nonsubject	***	***	***	***	***	***
All other sources	***	***	***	***	***	100.0
Nonsubject sources	***	***	***	***	***	100.0
All import Sources	***	***	***	***	***	100.0
U.S. producers and U.S. importers	***	***	***	***	***	100.0

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

Figure IV-3
Rebar: U.S. producers' and U.S. importers' U.S. shipments by size, 2019

* * * * *

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

As shown in table IV-4, the vast majority (***) percent) of U.S. producers' shipments of rebar were grade 60 with *** percent and *** percent of shipments accounting for grade 40 and other grades respectively. Most (***) percent) shipments of subject imports from Mexico were also grade 60 followed by grade 40 (***) percent). Similarly, *** percent of shipments of subject imports from Turkey were grade 60 and *** percent were grade 40.

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

Source	U.S. shipments			
	Grade 40	Grade 60	Other grades	All grades
	Quantity (short tons)			
U.S. producers	***	***	***	***
Imports from.-- Mexico	***	***	***	***
Turkey, subject	***	***	***	***
Subject sources	***	***	***	***
Turkey, nonsubject	***	***	***	***
All other sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import Sources	***	***	***	***
U.S. producers and U.S. importers	***	***	***	***
	Share down (percent)			
U.S. producers	***	***	***	***
Imports from.-- Mexico	***	***	***	***
Turkey, subject	***	***	***	***
Subject sources	***	***	***	***
Turkey, nonsubject	***	***	***	***
All other sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import Sources	***	***	***	***
U.S. producers and U.S. importers	100.0	100.0	100.0	100.0
	Share across (percent)			
U.S. producers	***	***	***	100.0
Imports from.-- Mexico	***	***	***	100.0
Turkey, subject	***	***	***	100.0
Subject sources	***	***	***	100.0
Turkey, nonsubject	***	***	***	***
All other sources	***	***	***	100.0
Nonsubject sources	***	***	***	100.0
All import Sources	***	***	***	100.0
U.S. producers and U.S. importers	***	***	***	100.0

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

Figure IV-4
Rebar: U.S. producers' and U.S. importers' U.S. shipments by grade, 2019

* * * * *

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

Geographical markets

Table IV-5 presents U.S. imports of rebar by border of entry for 2019.³ Rebar entered through every border, with 74.6 percent of all imports and *** percent of subject imports entering through the South.

³ East includes Baltimore, Maryland; Boston, Massachusetts; Charleston, South Carolina; New York, New York; Ogdensburg, New York; Philadelphia, Pennsylvania; Portland, Maine; San Juan, Puerto Rico; St. Albans, Vermont; and Virgin Islands. North includes Charlotte, North Carolina; Chicago, Illinois; and Pembina, North Dakota. South includes El Paso, Texas; Houston-Galveston, Texas; Laredo, Texas; Miami, Florida; Mobile, Alabama; New Orleans, Louisiana, and Tampa, Florida. West includes Los Angeles, California; Nogales, Arizona; San Diego, California; and San Francisco, California.

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

Source	Border of entry				
	East	North	South	West	Total
	Quantity (short tons)				
Mexico	---	---	97,368	43,628	140,995
Turkey, subject	***	***	***	***	***
Subject sources	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***
All other sources	206,331	2,839	640,108	21,830	871,108
Nonsubject sources	***	***	***	***	***
All import Sources	211,813	2,908	821,447	65,458	1,101,625
	Share across (percent)				
Mexico	---	---	69.1	30.9	100.0
Turkey, subject	***	***	***	***	100.0
Subject sources	***	***	***	***	100.0
Turkey, nonsubject	***	***	***	***	100.0
All other sources	23.7	0.3	73.5	2.5	100.0
Nonsubject sources	***	***	***	***	100.0
All import Sources	19.2	0.3	74.6	5.9	100.0
	Share down (percent)				
Mexico	---	---	11.9	66.6	12.8
Turkey, subject	***	***	***	***	***
Subject sources	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***
All other sources	97.4	97.6	77.9	33.4	79.1
Nonsubject sources	***	***	***	***	***
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: Official U.S. import statistics and proprietary customs records using HTS statistical reporting numbers 7213.10.0000 and 7214.20.0000, accessed August 13, 2020.

Presence in the market

Table IV-6 presents monthly data on imports of rebar from January 2014 through June 2020. Subject imports were present in every month. Subject imports from Mexico were present every month except July 2014, with January 2014, April 2020, and May 2020 representing the three highest volume months. Subject imports from Turkey were present every month except ***, with October 2015, January 2017, and March 2017 representing the three highest volume months.

Table IV-6
Rebar: U.S. imports by month, January 2014 to June 2020

Month	Mexico	Turkey, subject	Subject sources	Turkey, nonsubject	All other sources	Nonsubject sources	All import sources
Quantity (short tons)							
2014.--							
January	35,008	***	***	***	47,560	***	220,760
February	25,549	***	***	***	18,598	***	92,102
March	22,723	***	***	***	13,566	***	144,861
April	14,647	***	***	***	30,631	***	118,050
May	185	***	***	***	31,597	***	83,112
June	167	***	***	***	5,777	***	69,398
July	---	***	***	***	13,129	***	43,842
August	294	***	***	***	23,176	***	132,032
September	261	***	***	***	59,043	***	114,665
October	35	***	***	***	24,961	***	146,305
November	81	***	***	***	41,239	***	158,536
December	368	***	***	***	32,357	***	98,490
2015.--							
January	382	***	***	***	26,137	***	154,883
February	509	***	***	***	25,643	***	161,555
March	479	***	***	***	52,346	***	268,503
April	499	***	***	***	37,356	***	206,826
May	321	***	***	***	45,207	***	152,657
June	228	***	***	***	31,304	***	106,690
July	476	***	***	***	12,124	***	184,291
August	258	***	***	***	67,443	***	190,782
September	298	***	***	***	26,345	***	107,142
October	787	***	***	***	25,005	***	229,902
November	515	***	***	***	16,952	***	123,986
December	619	***	***	***	16,881	***	126,204
2016.--							
January	402	***	***	***	23,861	***	139,455
February	474	***	***	***	46,654	***	180,146
March	230	***	***	***	23,537	***	198,563
April	393	***	***	***	51,957	***	158,157
May	206	***	***	***	42,213	***	149,734
June	318	***	***	***	89,533	***	209,928
July	183	***	***	***	69,743	***	291,168
August	471	***	***	***	105,804	***	223,320
September	403	***	***	***	58,571	***	167,264
October	88	***	***	***	42,207	***	117,025
November	46	***	***	***	27,783	***	138,761
December	282	***	***	***	31,373	***	142,386

Table continued on next page.

Table IV-6—Continued
Rebar: U.S. imports by month, January 2014 to June 2020

Month	Mexico	Turkey, subject	Subject sources	Turkey, nonsubject	All other sources	Nonsubject sources	All import sources
Quantity (short tons)							
2017.--							
January	83	***	***	***	21,158	***	219,488
February	57	***	***	***	49,571	***	163,607
March	169	***	***	***	38,405	***	244,406
April	311	***	***	***	9,595	***	79,175
May	155	***	***	***	33,538	***	99,358
June	1,070	***	***	***	85,100	***	198,276
July	2,013	***	***	***	89,500	***	122,465
August	2,159	***	***	***	40,467	***	53,611
September	3,951	***	***	***	89,942	***	122,282
October	6,049	***	***	***	37,078	***	80,279
November	3,050	***	***	***	57,167	***	60,217
December	7,861	***	***	***	44,491	***	52,352
2018.--							
January	7,106	***	***	***	27,388	***	95,573
February	9,152	***	***	***	10,857	***	39,979
March	6,413	***	***	***	45,577	***	125,856
April	16,453	***	***	***	99,783	***	183,754
May	11,504	***	***	***	111,090	***	164,569
June	4,421	***	***	***	28,827	***	47,973
July	5,034	***	***	***	122,278	***	136,759
August	9,494	***	***	***	80,280	***	156,550
September	9,554	***	***	***	30,946	***	69,262
October	10,156	***	***	***	41,499	***	52,236
November	10,339	***	***	***	41,701	***	52,064
December	3,239	***	***	***	34,137	***	37,376
2019.--							
January	4,387	***	***	***	120,390	***	128,250
February	3,382	***	***	***	100,608	***	106,453
March	6,170	***	***	***	92,208	***	100,816
April	12,951	***	***	***	80,002	***	92,953
May	10,106	***	***	***	118,043	***	148,843
June	14,857	***	***	***	83,142	***	98,206
July	18,454	***	***	***	74,190	***	93,135
August	8,617	***	***	***	79,522	***	88,194
September	17,691	***	***	***	37,941	***	76,362
October	14,463	***	***	***	33,279	***	61,454
November	10,612	***	***	***	25,481	***	61,355
December	19,303	***	***	***	26,301	***	45,605

Table continued on next page.

Table IV-6—Continued
Rebar: U.S. imports by month, January 2014 to June 2020

Month	Mexico	Turkey, subject	Subject sources	Turkey, nonsubject	All other sources	Nonsubject sources	All import sources
Quantity (short tons)							
2020.-- January	20,203	***	***	***	49,229	***	106,237
February	18,882	***	***	***	7,049	***	94,712
March	22,381	***	***	***	35,303	***	79,451
April	28,807	***	***	***	43,154	***	122,476
May	26,051	***	***	***	22,985	***	125,481
June	22,026	***	***	***	29,998	***	77,474

Source: Official U.S. import statistics and proprietary customs records using HTS statistical reporting numbers 7213.10.0000 and 7214.20.0000, accessed August 13, 2020.

Figure IV-5

Rebar: U.S. imports from individual subject sources by month, January 2014 through June 2020

* * * * *

Source: Official U.S. import statistics and proprietary customs records using HTS statistical reporting numbers 7213.10.0000 and 7214.20.0000, accessed August 13, 2020.

Figure IV-6

Rebar: U.S. imports from subject and nonsubject sources by month, January 2014 through June 2020

* * * * *

Source: Official U.S. import statistics and proprietary customs records using HTS statistical reporting numbers 7213.10.0000 and 7214.20.0000, accessed August 13, 2020.

U.S. importers' imports subsequent to March 31, 2020

The Commission requested importers to indicate whether they had imported or arranged for the importation of rebar from Mexico and Turkey for delivery after March 31, 2020, presented in table IV-7.

Table IV-7
Rebar: U.S. importers' arranged imports, April 2020 – March 2021

Item	Period				
	Apr-Jun 2020	Jul-Sep 2020	Oct-Dec 2020	Jan-Mar 2021	Total
	Quantity (short tons)				
Arranged U.S. imports from.--					
Mexico	***	***	***	***	***
Turkey, subject	***	***	***	***	***
Subject sources	***	***	***	***	***
Turkey, nonsubject	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

U.S. importers' inventories

Table IV-8 presents data for inventories of U.S. imports of rebar from Mexico and Turkey and all other sources held in the United States. Inventories of U.S. imports of rebar from subject sources declined from 2014 to 2019, driven entirely by declines in inventories of U.S. imports from Turkey. Additionally, the ratio of inventories of U.S. imports from Turkey to U.S. imports from Turkey, U.S. shipments of imports from Turkey, and total shipments of imports from Turkey increased from a low of *** percent for all three ratios in 2015 to a high of *** percent respectively in 2019.

Table IV-8

Rebar: U.S. importers' end-of-period inventories of imports, by source, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Inventories (short tons); Ratios (percent)							
Imports from Mexico: Inventories	***	***	***	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***	***	***	***
Imports from Turkey, subject: Inventories	***	***	***	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***	***	***	***
Imports from subject sources: Inventories	***	***	***	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***	***	***	***

Table continued on next page.

Table IV-8—Continued

Rebar: U.S. importers' end-of-period inventories of imports, by source, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
Imports from Turkey, nonsubject: Inventories	***	***	***	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***	***	***	***
Imports from all other sources: Inventories	***	***	***	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***	***	***	***
Imports from nonsubject sources: Inventories	***	***	***	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***	***	***	***
Imports from all import sources: Inventories	***	***	***	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***	***	***	***

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

Subject country producers

The industry in Mexico

Overview

The leading producers of rebar in Mexico are ArcelorMittal México, S.A. de C.V. (“ArcelorMittal”), Deacero S.A.P.I. de C.V. (“Deacero”), Grupo Simec SAB de CV (“Grupo Simec”), and Grupo Acerero, S.A. de C.V. (“Grupo Acerero”). All four firms submitted questionnaire responses and are believed to account for most of the rebar production in Mexico.⁴ According to *** data, Mexico produced *** short tons of rebar in 2019.⁵ The *** estimate of total Mexican rebar production capacity was *** short tons in 2019.⁶ Table IV- 9 presents information on the rebar operations of the responding producers and exporters in Mexico and table IV-10 presents recent developments in the Mexican industry.

Table IV-9
Rebar: Summary data for producers in Mexico, 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)
ArcelorMittal	***	***	***	***	***	***
Deacero	***	***	***	***	***	***
Grupo Acerero	***	***	***	***	***	***
Grupo Simec	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

⁴ One additional firm, ***, submitted a questionnaire on August 18, 2020. Because the information provided in this questionnaire was incomplete, Staff did not include the data in the compilations presented in this report. *** submitted a declaration on August 26, 2020 certifying that the firm produces rebar but does not export to the United States. *** did not provide a questionnaire.

⁵ ***, excerpts attached as Exhibit 11 in RTAC’s prehearing brief.

⁶ ***, excerpts attached as Exhibit 7 in RTAC’s prehearing brief.

Table IV-10
Recent developments in the Mexican industry

Date	Company	Event
September 2018	Danieli/Deacero	Expansion: Italy-based equipment maker Danieli announced that it would install steelmaking equipment capable of making 500,000 tons per year of bar and light sections at Deacero's Ramos Arizpe, Mexico mill.

Source: *Recycling Today*, "Deacero rolling mill starts up in September." September 20, 2018.

Changes in operations

As presented in table IV-11, producers in Mexico reported several operational and organizational changes since January 1, 2014.

Table IV-11
Rebar: Mexican producers' reported changes in operations since January 1, 2014

Item / Firm	Narrative
Expansions:	
***	***
Acquisitions:	
***	***
Consolidations:	
***	***
Revised labor agreements:	
***	***
Other:	
***	***

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

Operations on rebar

Table IV-12 presents production, capacity, and capacity utilization data for producers of rebar in Mexico. From 2014 to 2019, both capacity and inventories increased overall while production decreased. Most rebar produced in Mexico was consumed domestically, with home market shipments accounting for *** percent of all shipments in 2019. Approximately one quarter (*** percent) of all shipments were exports and *** percent of shipments were exported to the United States. As discussed further below, the largest individual share of all exports of rebar from Mexico are destined for Colombia. Despite an overall decline in total

exports, export shipments to the United States increased from 2014 to 2019 with a large dip in exports in 2015 and 2016. From 2014 to 2019 capacity utilization ranged between a low of *** percent in 2019 and a high of *** percent in 2015.

Table IV-12

Rebar: Mexican producers' capacity, production, shipments, and inventories, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
Quantity (short tons)								
Capacity	***	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***	***
Shipments: Internal consumption/ transfers	***	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***	***
Export shipments to: United States	***	***	***	***	***	***	***	***
European Union	***	***	***	***	***	***	***	***
Asia	***	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***	***
Value (1,000 dollars)								
Shipments: Internal consumption/ transfers	***	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***	***
Export shipments to: United States	***	***	***	***	***	***	***	***
European Union	***	***	***	***	***	***	***	***
Asia	***	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***	***

Table continued on next page.

Table IV-12—Continued

Rebar: Mexican producers' capacity, production, shipments, and inventories, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Unit value (dollars per short ton)							
Shipments: Internal consumption/ transfers	***	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***	***
Export shipments to:								
United States	***	***	***	***	***	***	***	***
European Union	***	***	***	***	***	***	***	***
Asia	***	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***	***
	Ratios and shares (percent)							
Capacity utilization	***	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***	***
Share of total shipments:								
Internal consumption/ transfers	***	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***	***
Export shipments to:								
United States	***	***	***	***	***	***	***	***
European Union	***	***	***	***	***	***	***	***
Asia	***	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Alternative products

As shown in table IV-13, responding Mexican producers produced some other products on the same equipment and machinery used to produce rebar, although rebar accounted for the large majority of product being manufactured. Wire rod made up most of the out-of-scope production and accounted for *** percent of all production on shared machinery in 2019. From 2014 to 2019, in-scope rebar accounted for between *** and *** percent of overall production.

Table IV-13

Rebar: Mexican producers' overall capacity and production on the same equipment as subject production, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year					
	2014	2015	2016	2017	2018	2019
	Quantity (short tons)					
Overall capacity	***	***	***	***	***	***
Production of rebar.--						
In coils	***	***	***	***	***	***
In straight lengths	***	***	***	***	***	***
Deformed wire	***	***	***	***	***	***
All in-scope products	***	***	***	***	***	***
Production of other products.--						
Wire rod	***	***	***	***	***	***
Merchant bar	***	***	***	***	***	***
Other bar or rod	***	***	***	***	***	***
Excluded deformed wire	***	***	***	***	***	***
All other products	***	***	***	***	***	***
All out-of-scope products	***	***	***	***	***	***
Overall production	***	***	***	***	***	***
	Capacity utilization (percent)					
Overall capacity utilization	***	***	***	***	***	***
	Share of rebar production (percent)					
Share of rebar production.--						
In coils	***	***	***	***	***	***
In straight lengths	***	***	***	***	***	***
Deformed wire	***	***	***	***	***	***
All in-scope products	100.0	100.0	100.0	100.0	100.0	100.0
	Share of overall production (percent)					
Share of overall production.--						
In coils	***	***	***	***	***	***
In straight lengths	***	***	***	***	***	***
Deformed wire	***	***	***	***	***	***
All in-scope products	***	***	***	***	***	***
Wire rod	***	***	***	***	***	***
Merchant bar	***	***	***	***	***	***
Other bar or rod	***	***	***	***	***	***
Excluded deformed wire	***	***	***	***	***	***
All other products	***	***	***	***	***	***
All out-of-scope products	***	***	***	***	***	***
Overall production	100.0	100.0	100.0	100.0	100.0	100.0

Table continued on next page.

Table IV-13 -- Continued

Rebar: Mexican producers' overall capacity and production on the same equipment as subject production, 2014-19, January to March 2019, and January to March 2020

Item	January to March	
	2019	2020
	Quantity (short tons)	
Overall capacity	***	***
Production of rebar.--		
In coils	***	***
In straight lengths	***	***
Deformed wire	***	***
All in-scope products	***	***
Production of other products.--		
Wire rod	***	***
Merchant bar	***	***
Other bar or rod	***	***
Excluded deformed wire	***	***
All other products	***	***
All out-of-scope products	***	***
Overall production	***	***
	Capacity utilization (percent)	
Overall capacity utilization	***	***
	Share of rebar production (percent)	
Share of rebar production.--		
In coils	***	***
In straight lengths	***	***
Deformed wire	***	***
All in-scope products	100.0	100.0
	Share of overall production (percent)	
Share of overall production.--		
In coils	***	***
In straight lengths	***	***
Deformed wire	***	***
All in-scope products	***	***
Wire rod	***	***
Merchant bar	***	***
Other bar or rod	***	***
Excluded deformed wire	***	***
All other products	***	***
All out-of-scope products	***	***
Overall production	100.0	100.0

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

Exports

According to GTA, the leading export markets for rebar from Mexico are Colombia, Canada, and the United States (table IV-14). During 2019, the United States was the third largest export market for rebar from Mexico, accounting for 18.6 percent, following Colombia, accounting for 43.0 percent, and Canada, accounting for 20.5 percent. The share of exports destined for the United States has increased from 6.3 percent in 2017 to 18.6 percent in 2019.

Table IV-14
Rebar: Exports from Mexico, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Value (1,000 dollars)		
United States	12,707	50,872	69,761
Colombia	120,064	175,665	161,557
Canada	---	1,861	76,865
Peru	25,674	40,706	26,871
Chile	23,367	35,623	24,938
Guatemala	10,340	14,539	11,994
Belize	4,538	3,429	3,290
All other destination markets	4,461	1,405	1
Total exports	201,151	324,101	375,278
	Share of value (percent)		
United States	6.3	15.7	18.6
Colombia	59.7	54.2	43.0
Canada	---	0.6	20.5
Peru	12.8	12.6	7.2
Chile	11.6	11.0	6.6
Guatemala	5.1	4.5	3.2
Belize	2.3	1.1	0.9
All other destination markets	2.2	0.4	0.0
Total exports	100.0	100.0	100.0

Source: Official imports statistics from Mexico (constructed export statistics for Mexico) under HS subheading 7213.10 and 7214.20 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed June 5, 2020.

The industry in Turkey

Overview

The rebar industry in Turkey consists of many firms, with few producers standing out as dominating the industry. Four firms provided questionnaire responses representing a reported 28.7 percent of all subject production of rebar in Turkey: Çolakoğlu Metalurji Anonim Şirketi (“Çolakoğlu”), Icdas Celic Enerji Tersane ve Ulasim Sanayi A.S. (“Icdas”), Izmir Demir Celic Sanayi A.S. (“Izmir Demir”), and Kroman Çelik Sanayii A.Ş. (“Kroman”).

In an additional response to the notice of institution, the Government of Turkey estimated that Turkey’s rebar production was *** in 2018. No information on capacity was provided. The Government of Turkey further reported that 25 Turkish companies produced rebar in 2018, 16 of which belong to the Turkish Steel Producers Association.⁷ According to data from ***, Turkey produced *** short tons of rebar in 2019, however this production estimate includes non-subject producer, Habas.⁸ According to *** capacity estimates, Habas represents *** percent of Turkish rebar production capacity. The *** estimate of total Turkish rebar production capacity was *** short tons in 2019.⁹

Table IV- 15 presents information on the rebar operations of the responding producers and exporters in Turkey and table IV-16 presents recent developments in the Turkish industry.

Table IV-15
Rebar: Summary data for subject Turkish producers, 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)
Colakoglu	***	***	***	***	***	***
Icdas	***	***	***	***	***	***
Izmir Demir	***	***	***	***	***	***
Kroman	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

⁷ Additional Response of the Government of the Republic of Turkey to the Notice of Institution. P. 6.

⁸ ***, excerpts attached as Exhibit 11 in RTAC’s prehearing brief.

⁹ ***, excerpts attached as Exhibit 7 in RTAC’s prehearing brief.

Table IV-16
Recent developments in the Turkish industry

Date	Company	Event
June 2019	Kardemir	Expansion: In June 2019, Kardemir announced plans to upgrade an existing blast furnace and oxygen converter. The upgrade is expected to increase overall steelmaking capacity from 2.41 million metric tons of liquid steel per year to 2.9 million metric tons per year.
September 2019	Kardemir	Expansion: In September 2019, Kardemir announced plans to build a new blast furnace with an annual production capacity of 1 million tons. The expansion is expected to increase production capacity and increase performance and productivity.

Note: While not all increased steelmaking capacity will be reserved for rebar production, Kardemir is Turkey's largest integrated long steel producer and a major supplier of rebar.

Source: South East Asia Iron and Steel Institute, "Kardemir begins hot-end revamp to increase steelmaking capacity." June 2019; Hurriyet daily news, "Steelmaker Kardemir plans new blast furnace investment." September 2019.

Changes in operations

One producer in Turkey reported operational and organizational changes since January 1, 2014. *** reported a ***.

Operations on rebar

Table IV-17 presents production, capacity, and capacity utilization. From 2014 to 2019, capacity increased slightly while production decreased by almost *** short tons. Total shipments decreased by more than *** short tons. Home market shipments decreased in both absolute and relative terms. While the quantity of exports decreased, the share of export shipments increased from *** percent in 2014 to *** percent in 2019. This increase in share was driven entirely by an increase in exports to Asia in both absolute and relative terms. From 2014 to 2019, exports of rebar to Asia *** from slightly more than *** short tons to almost *** short tons, accounting for *** percent of all shipments in 2019. Consistent with the increase in capacity and decline in production, capacity utilization fell from *** percent in 2014 to *** percent in 2019.

Table IV-17

Rebar: Subject Turkish producers' capacity, production, shipments, and inventories, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Quantity (short tons)							
Capacity	***	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***	***
Shipments: Internal consumption/ transfers	***	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***	***
Export shipments to:								
United States	***	***	***	***	***	***	***	***
European Union	***	***	***	***	***	***	***	***
Asia	***	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***	***
Exports to markets other than U.S.	***	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***	***

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Table IV-17—Continued

Rebar: Subject Turkish producers' capacity, production, shipments, and inventories, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Value (1,000 dollars)							
Shipments: Internal consumption/transfers	***	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***	***
Export shipments to:								
United States	***	***	***	***	***	***	***	***
European Union	***	***	***	***	***	***	***	***
Asia	***	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***	***
Exports to markets other than U.S.	***	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***	***
	Unit value (dollars per short ton)							
Shipments: Internal consumption/transfers	***	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***	***
Export shipments to:								
United States	***	***	***	***	***	***	***	***
European Union	***	***	***	***	***	***	***	***
Asia	***	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***	***
Exports to markets other than U.S.	***	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***	***

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Table IV-17—Continued

Rebar: Subject Turkish producers' capacity, production, shipments, and inventories, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Ratios and shares (percent)							
Capacity utilization	***	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***	***
Share of total shipments: Internal consumption/ transfers	***	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***	***
Export shipments to: United States	***	***	***	***	***	***	***	***
European Union	***	***	***	***	***	***	***	***
Asia	***	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***	***
Exports to markets other than U.S.	***	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Alternative products

As shown in table IV-18, responding Turkey firms produced other products on the same equipment and machinery used to produce rebar. Production of out-of-scope products increased from 2014 to 2019. Wire rod made up the majority of out-of-scope production and accounted for *** percent of all production on shared machinery in 2019, with merchant bar accounting for *** percent of all production. From 2014 to 2019, the share of in-scope rebar decreased from *** percent to *** percent of overall production.

Table IV-18
Rebar: Subject Turkish producers' overall capacity and production on the same equipment as subject production, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Quantity (short tons)							
Overall capacity	***	***	***	***	***	***	***	***
Production of rebar.-- In coils	***	***	***	***	***	***	***	***
In straight lengths	***	***	***	***	***	***	***	***
Deformed wire	***	***	***	***	***	***	***	***
All in-scope products	***	***	***	***	***	***	***	***
Production of other products.-- Wire rod	***	***	***	***	***	***	***	***
Merchant bar	***	***	***	***	***	***	***	***
Other bar or rod	***	***	***	***	***	***	***	***
Excluded deformed wire	***	***	***	***	***	***	***	***
All other products	***	***	***	***	***	***	***	***
All out-of-scope products	***	***	***	***	***	***	***	***
Total production	***	***	***	***	***	***	***	***
	Capacity utilization (percent)							
Capacity utilization	***	***	***	***	***	***	***	***

Table continued on next page.

Table IV-18—Continued

Rebar: Subject Turkish producers' overall capacity and production on the same equipment as subject production, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
Share of rebar production (percent)								
Production of rebar.--								
In coils	***	***	***	***	***	***	***	***
In straight lengths	***	***	***	***	***	***	***	***
Deformed wire	***	***	***	***	***	***	***	***
All in-scope products	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Share of overall production (percent)								
Production of rebar.--								
In coils	***	***	***	***	***	***	***	***
In straight lengths	***	***	***	***	***	***	***	***
Deformed wire	***	***	***	***	***	***	***	***
All in-scope products	***	***	***	***	***	***	***	***
Production of other products.--								
Wire rod	***	***	***	***	***	***	***	***
Merchant bar	***	***	***	***	***	***	***	***
Other bar or rod	***	***	***	***	***	***	***	***
Excluded deformed wire	***	***	***	***	***	***	***	***
All other products	***	***	***	***	***	***	***	***
All out-of-scope products	***	***	***	***	***	***	***	***
Total production	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Exports

According to GTA, the leading export markets for rebar from Turkey are Israel, Yemen, and Singapore (table IV-19). During 2019, the United States was not one of the top 10 export markets for rebar from Turkey, accounting for 1.6 percent. Israel is the largest destination, accounting for 17.9 percent, followed by Yemen, accounting for 15.5 percent, and Singapore, accounting for 10.7 percent.

Table IV-19
Rebar: Exports from Turkey, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (short tons)		
United States	729,528	339,200	117,312
Israel	959,411	1,093,690	1,278,649
Yemen	777,825	859,276	1,102,216
Singapore	536,420	494,700	761,030
Ethiopia	201,903	252,015	340,986
Hong Kong	301,289	394,863	237,210
Romania	141,197	276,206	226,629
Djibouti	63,314	130,461	193,663
Lebanon	79,501	134,381	165,958
All other destination markets	2,623,375	3,119,326	2,704,009
Total exports	6,413,763	7,094,119	7,127,662
	Value (1,000 dollars)		
United States	310,117	190,158	55,152
Israel	406,910	544,638	537,789
Yemen	313,422	410,888	437,887
Singapore	217,083	223,740	309,976
Ethiopia	80,310	124,476	141,560
Hong Kong	120,164	180,250	100,244
Romania	60,143	137,124	95,581
Djibouti	25,186	62,913	80,237
Lebanon	31,955	63,897	66,205
All other destination markets	1,085,316	1,541,004	1,148,900
Total exports	2,650,606	3,479,089	2,973,531

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Table IV-19—Continued
Rebar: Exports from Turkey, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Unit value (dollars per short ton)		
United States	425	561	470
Israel	424	498	421
Yemen	403	478	397
Singapore	405	452	407
Ethiopia	398	494	415
Hong Kong	399	456	423
Romania	426	496	422
Djibouti	398	482	414
Lebanon	402	475	399
All other destination markets	414	494	425
Total exports	413	490	417
	Share of quantity (percent)		
United States	11.4	4.8	1.6
Israel	15.0	15.4	17.9
Yemen	12.1	12.1	15.5
Singapore	8.4	7.0	10.7
Ethiopia	3.1	3.6	4.8
Hong Kong	4.7	5.6	3.3
Romania	2.2	3.9	3.2
Djibouti	1.0	1.8	2.7
Lebanon	1.2	1.9	2.3
All other destination markets	40.9	44.0	37.9
Total exports	100.0	100.0	100.0

Source: GTIS/GTA database.

Subject countries combined

Table IV-20 presents summary data on rebar operations of the reporting subject producers in the subject countries.

Table IV-20

Rebar: Data on the industry in subject countries, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Quantity (short tons)							
Capacity	***	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***	***
Shipments: Internal consumption/ transfers	***	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***	***
Export shipments to: United States	***	***	***	***	***	***	***	***
European Union	***	***	***	***	***	***	***	***
Asia	***	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***	***
Exports to markets other than U.S.	***	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***	***

Table continued on next page.

Table IV-20—Continued

Rebar: Data on the industry in subject countries, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Value (1,000 dollars)							
Shipments: Internal consumption/ transfers	***	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***	***
Export shipments to: United States	***	***	***	***	***	***	***	***
European Union	***	***	***	***	***	***	***	***
Asia	***	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***	***
Exports to markets other than U.S.	***	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***	***

Table continued on next page.

Table IV-20—Continued

Rebar: Data on the industry in subject countries, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Unit value (dollars per short ton)							
Shipments: Internal consumption/ transfers	***	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***	***
Export shipments to: United States	***	***	***	***	***	***	***	***
European Union	***	***	***	***	***	***	***	***
Asia	***	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***	***
Exports to markets other than U.S.	***	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***	***

Table continued on next page.

Table IV-20—Continued

Rebar: Data on the industry in subject countries, 2014-19, January to March 2019, and January to March 2020

Item	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
	Ratios and shares (percent)							
Capacity utilization	***	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***	***
Share of total shipments: Internal consumption/ transfers	***	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***	***
Export shipments to: United States	***	***	***	***	***	***	***	***
European Union	***	***	***	***	***	***	***	***
Asia	***	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***	***
Exports to markets other than U.S.	***	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Antidumping or countervailing duty orders in third-country markets

Antidumping and countervailing duty orders imposed by third countries on the subject trade partners are listed in Table IV-21.

Table IV-21

Rebar: Antidumping or countervailing duty actions in third-country markets, since 2014

Third country and subject products	Action Date	Subject partner(s)	Order (rates)
Egypt			
Bars and rods of iron alloy or non-alloy steel rebar, hot rolled in wound coil or bars or rods (Steel Rebar for construction)	Imposed June 2017; replaced December 2017	Turkey	Antidumping (from 10 percent to 19 percent of CIF value) (provisional measure)
Bars and rods of iron alloy or non-alloy steel rebar, hot rolled in wound coil or bars or rods (Steel Rebar for construction)	Imposed December 2017	Turkey	Antidumping (duty ranges from 7 percent of CIF value to 22.8 percent)
Malaysia			
Steel concrete reinforcing bar	Preliminary antidumping duties imposed September 2019	Turkey	Antidumping (duty ranges from 5.99 percent to 20.09 percent of CIF value)
Canada			
Hot-rolled deformed steel concrete reinforcing bar in straight lengths or coils, commonly identified as rebar, in various diameters up to and including 56.4 millimeters, in various finishes, excluding plain round bar and fabricated rebar products	Preliminary antidumping duties imposed September 2019	Turkey	Antidumping (3.8 percent of CIF value)
Chile			
Steel concrete reinforcing bars	Imposed May 2016	Mexico	Antidumping (11.01 percent) (provisional measure)
	Imposed November 2016; rescinded November 2017	Mexico	Antidumping (9.8 percent)

Source: WTO, "Definitive Antidumping Measures" semiannual reports of the tabulated third countries; third-country government agency official notices.

Safeguard measures in third-country markets

Ongoing safeguard investigations and safeguard measures imposed by third countries on the subject trade partners are listed in table IV-22.

Table IV-22

Rebar: Safeguard actions in third-country markets, since 2014

Third country and subject products	Action Date	Subject partner(s)	Order (rates)
Egypt			
Steel rebar (bars, rods and coils) for construction purposes	Initiated April 2019; rescinded July 2019	All countries	25 percent of CIF value
European Union			
Non alloy and other alloy wire rod (including steel rebar)	Initiated February 2019	Turkey	25 percent additional duty for imports above specified tariff-rate quota
		All countries	25 percent additional duty for imports above specified tariff-rate quota
Morocco			
Reinforcing bars with a diameter ranging from 5.5 to 40 millimeters	Initiated May 2013; extended December 2015; extended December 2018	All countries	\$0.06 per kilogram above tariff-rate quota

Source: WTO: Committee on Safeguards, notification reports of the tabulated third countries.

Global market

Table IV-23 presents estimates of apparent consumption data from ***, by country and globally, between 2015 and 2019. The leading global consumer of rebar is *** which consumed *** short tons in 2019. *** is followed by *** as the top five consumers of rebar. Globally, rebar consumption totaled *** short tons in 2019. Table IV-24 presents rebar production estimates from ***, by country and globally, between 2015 and 2019. *** is also the leading global producer of rebar, with production in 2019 estimated at *** short tons. The top five leading global producers of rebar are identical to the top five consumers listed above. Globally, rebar production totaled *** short tons in 2019.

Table IV-23
Rebar: Annual apparent consumption, by country, 2015-19

Country	Calendar year				
	2015	2016	2017	2018	2019
Apparent consumption (million short tons)					
China	***	***	***	***	***
India	***	***	***	***	***
South Korea	***	***	***	***	***
Turkey	***	***	***	***	***
Japan	***	***	***	***	***
United States	***	***	***	***	***
Russia	***	***	***	***	***
Vietnam	***	***	***	***	***
Taiwan	***	***	***	***	***
Egypt	***	***	***	***	***
Rest of World	***	***	***	***	***
World total	***	***	***	***	***

Source: ***, excerpts attached as Exhibit 11 in RTAC's prehearing brief.

Table IV-24
Rebar: Annual production by country, 2015-19

Country	Calendar year				
	2015	2016	2017	2018	2019
	Production (million short tons)				
China	***	***	***	***	***
India	***	***	***	***	***
South Korea	***	***	***	***	***
Turkey	***	***	***	***	***
Japan	***	***	***	***	***
United States	***	***	***	***	***
Russia	***	***	***	***	***
Vietnam	***	***	***	***	***
Taiwan	***	***	***	***	***
Egypt	***	***	***	***	***
Rest of World	***	***	***	***	***
World total	***	***	***	***	***

Source: ***, excerpts attached as Exhibit 11 in RTAC's prehearing brief.

Prices

As reported by ***, world prices for rebar fell between January 2014 and July 2020, from *** per short ton to *** per short ton during that time, but prices fluctuated throughout the period. The maximum world price for rebar during the period of review was in January 2014 when world prices reached *** per short ton. World prices fell to their lowest value in February 2016 when the world price was *** per short ton. Figure IV-5 presents the average world price of rebar between January 2014 and July 2020. Regionally, rebar prices in North America were higher than European and Asian rebar prices between January 2014 and July 2020 except for a two-month period in September – October 2017 when European prices rose above North American levels. Figure IV-6 presents prices of rebar by regions between January 2014 and July 2020.

Figure IV-7
Rebar: Average world price per short ton for rebar, January 2014-July 2020

* * * * *

Source: MEPS, International Steel Review, "World/Regional Average Transaction Prices," various issues.

Figure IV-8
Rebar: Prices per short ton by region, January 2014-July 2020

* * * * *

Source: MEPS, International Steel Review, "World/Regional Average Transaction Prices," various issues.

As presented in table IV-25, country-specific monthly transaction prices for rebar (also compiled by ***) show monthly price fluctuations across major producing countries. According to data compiled by ***, U.S. negotiated transaction prices for U.S.-produced rebar peaked at *** per short ton between June 2018 and October 2018 and again between March and April of 2019. U.S. rebar prices began to fall after April 2019, reaching a low point of *** per short ton in December 2019. Prices picked up slightly in early 2020, rising to *** per short ton in February and March 2020, but fell again to *** per short ton in July 2020.

In Europe, rebar prices have been markedly lower than U.S. prices since the middle of 2018. The largest price differential occurred in April 2019, when European Union average prices were *** per short ton less than U.S. rebar prices. The differential has decreased to *** per short ton as of July 2020.

Regarding Asian markets, Chinese market prices were consistently below, by *** per short ton, U.S. rebar prices, throughout January 2014 to July 2020. Korean rebar market prices were below those in the United States over the same period, by ***. Japanese market prices, likewise, were below U.S. prices from January 2014 through July 2020. As of July 2020, Japanese rebar prices were *** per short ton below U.S. prices.

Table IV-24

Rebar: Negotiated transaction prices (ex-mill) for rebar, by country and by month,
January 2014-July 2020

Period	Price (dollars per short ton)							
	United States	Canada	China	Japan	Korea	Poland	Czech & Slovak Reps.	European Union (average)
	2014							
January	***	***	***	***	***	***	***	***
February	***	***	***	***	***	***	***	***
March	***	***	***	***	***	***	***	***
April	***	***	***	***	***	***	***	***
May	***	***	***	***	***	***	***	***
June	***	***	***	***	***	***	***	***
July	***	***	***	***	***	***	***	***
August	***	***	***	***	***	***	***	***
September	***	***	***	***	***	***	***	***
October	***	***	***	***	***	***	***	***
November	***	***	***	***	***	***	***	***
December	***	***	***	***	***	***	***	***
	2015							
January	***	***	***	***	***	***	***	***
February	***	***	***	***	***	***	***	***
March	***	***	***	***	***	***	***	***
April	***	***	***	***	***	***	***	***
May	***	***	***	***	***	***	***	***
June	***	***	***	***	***	***	***	***
July	***	***	***	***	***	***	***	***
August	***	***	***	***	***	***	***	***
September	***	***	***	***	***	***	***	***
October	***	***	***	***	***	***	***	***
November	***	***	***	***	***	***	***	***
December	***	***	***	***	***	***	***	***

Table continued on next page.

Table IV-24 -- Continued

Rebar: Negotiated transaction prices (ex-mill) for rebar, by country and by month, January 2014-July 2020

Period	Price (per short ton)							
	United States	Canada	China	Japan	Korea	Poland	Czech & Slovak Reps.	European Union (average)
	2016							
January	***	***	***	***	***	***	***	***
February	***	***	***	***	***	***	***	***
March	***	***	***	***	***	***	***	***
April	***	***	***	***	***	***	***	***
May	***	***	***	***	***	***	***	***
June	***	***	***	***	***	***	***	***
July	***	***	***	***	***	***	***	***
August	***	***	***	***	***	***	***	***
September	***	***	***	***	***	***	***	***
October	***	***	***	***	***	***	***	***
November	***	***	***	***	***	***	***	***
December	***	***	***	***	***	***	***	***
	2017							
January	***	***	***	***	***	***	***	***
February	***	***	***	***	***	***	***	***
March	***	***	***	***	***	***	***	***
April	***	***	***	***	***	***	***	***
May	***	***	***	***	***	***	***	***
June	***	***	***	***	***	***	***	***
July	***	***	***	***	***	***	***	***
August	***	***	***	***	***	***	***	***
September	***	***	***	***	***	***	***	***
October	***	***	***	***	***	***	***	***
November	***	***	***	***	***	***	***	***
December	***	***	***	***	***	***	***	***

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Table IV-24 -- Continued

Rebar: Negotiated transaction prices (ex-mill) for rebar, by country and by month, January 2014-July 2020

	Price (dollars per short ton)							
	United States	Canada	China	Japan	Korea	Poland	Czech & Slovak Reps.	European Union (average)
	2018							
January	***	***	***	***	***	***	***	***
February	***	***	***	***	***	***	***	***
March	***	***	***	***	***	***	***	***
April	***	***	***	***	***	***	***	***
May	***	***	***	***	***	***	***	***
June	***	***	***	***	***	***	***	***
July	***	***	***	***	***	***	***	***
August	***	***	***	***	***	***	***	***
September	***	***	***	***	***	***	***	***
October	***	***	***	***	***	***	***	***
November	***	***	***	***	***	***	***	***
December	***	***	***	***	***	***	***	***
	2019							
January	***	***	***	***	***	***	***	***
February	***	***	***	***	***	***	***	***
March	***	***	***	***	***	***	***	***
April	***	***	***	***	***	***	***	***
May	***	***	***	***	***	***	***	***
June	***	***	***	***	***	***	***	***
July	***	***	***	***	***	***	***	***
August	***	***	***	***	***	***	***	***
September	***	***	***	***	***	***	***	***
October	***	***	***	***	***	***	***	***
November	***	***	***	***	***	***	***	***
December	***	***	***	***	***	***	***	***

Table continued on next page.

Table IV-24 -- Continued

Rebar: Negotiated transaction prices (ex-mill) for rebar, by country and by month, January 2014-July 2020

	Price (dollars per short ton)							
	United States	Canada	China	Japan	Korea	Poland	Czech & Slovak Reps.	European Union (average)
	2020							
January	***	***	***	***	***	***	***	***
February	***	***	***	***	***	***	***	***
March	***	***	***	***	***	***	***	***
April	***	***	***	***	***	***	***	***
May	***	***	***	***	***	***	***	***
June	***	***	***	***	***	***	***	***
July	***	***	***	***	***	***	***	***

Note: Prices are based on average transaction values negotiated in the month and paid by consumers and stockholders for prime material in the specified steel products. Prices are for regular business transactions between customers and their local steel mills, negotiated during the current month for delivery in the future. Transaction prices include all extras for the lowest priced grade of steel for the selected products sold ex-mill. Delivery charges and local taxes are not included in the quoted prices. Extended contract deals arranged in the domestic market, or agreements for lots of imported steel, are specifically excluded from prices.

Source: ***.

Part V: Pricing data

Factors affecting prices

Raw material costs

Rebar is produced primarily from scrap steel, and raw materials are the largest component of total cost of goods sold (“COGS”) for rebar. Raw materials accounted for approximately one-half to two-thirds of U.S. producers’ COGS, with sometimes-pronounced annual movements. The fluctuations tended to follow the price of scrap metal (figure V-1).¹ Six of 7 responding producers, along with 7 of 10 responding importers and all 7 responding foreign producers, noted that prices for raw materials used to make rebar have fluctuated since January 1, 2014. Most firms also anticipate raw material prices to continue to fluctuate. Twenty-five of 28 purchasers are familiar with the prices of the raw materials as well, and 18 noted that the raw material costs affect their purchase contracts.

Figure V-1
Scrap prices: Price of No. 1 heavy melt scrap, consumer prices, Chicago, January 2014 to June 2020

* * * * *

Source: American Metal Markets, accessed July 6, 2020.

¹ Data for the five domestic pricing products tended to follow a similar path to that of scrap prices. Correlations between average quarterly prices presented in Figure V-1 (lagged 1 quarter) and the quarterly prices of the six domestic pricing products presented later in Part V ranged between 0.70 and 0.77. Separating the data into pre-Section 232 (2014-2017) and post-Section 232 (2018-2020) correlations, however, increases the correlations to 0.87 and 0.91 for the earlier period and 0.78 to 0.92 for the later period.

Transportation costs to the U.S. market

Transportation costs as a ratio to customs value for rebar shipped from Mexico and Turkey to the United States during 2019 averaged 5.1 percent and 6.2 percent, respectively. These estimates were derived from official import data and represent the transportation and other charges on imports.²

U.S. inland transportation costs

Six of 7 U.S. producers and 6 of 10 responding importers reported that they typically arrange transportation to their customers. The U.S. producers reported that their U.S. inland transportation costs ranged from 5 to 15 percent (averaging 8.2 percent) while importers reported costs ranging from 4 to 10 percent (averaging 7.2 percent).³

Pricing practices

Pricing methods

As presented in table V-1, most U.S. producers and all importers sell using transaction-by-transaction negotiations. One producer (***) sells via set price lists and (***) instituted “foreign fighter” prices in 2014-16.⁴ Importer (***), sells via contracts and stated its other method is a “market-based” approach.

Table V-1

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

Method	U.S. producers	Importers
Transaction-by-transaction	6	10
Contract	---	1
Set price list	1	---
Other	1	1
Responding firms	7	10

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.

² The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2019 and then dividing by the customs value based on the HTS statistical reporting numbers 7213.10.0000 and 7214.20.0000, accessed July 20, 2020.

³ *** reported 100 percent; its response was not included.

⁴ “Foreign fighter” pricing refers to offering price matching (or near price matching) to prevailing import prices usually for a specific region. *Steel Concrete Reinforcing Bar from Japan and Turkey, Inv. Nos. 701-TA-564 and 731-TA-1338 and 1340 (Final)*, USITC Publication 4705, July 2017, p. II-13.

U.S. producers' primary pricing methods varied by firm, but nearly two-thirds of domestic sales were via short-term contract (table V-2). Three producers reported short-term contracts typically last 30 days, one reported they typically last 90 days, and another reported 90 to 180-day contract lengths. All importers' sales and all responding foreign producers' sales with the exception of ***, on the other hand, were on the spot market. Twenty-two of 28 purchasers indicated that their purchases of rebar involve negotiations based on a wide variety of factors beyond prices, such as availability, delivery dates, payment terms, quality, quantity, shipping time, and size and grade mix.

Table V-2

Rebar: 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	2.0	---
Annual contracts	---	---
Short-term contracts	65.8	---
Spot sales	32.3	100.0
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.

One producer fixes only price in its short-term contracts whereas four fix both price and quantity. Three of five U.S. producers' short-term contracts do not allow for price renegotiation. No producer reported fixing prices to raw material costs. ***.⁵ Purchasers contact suppliers frequently: 14 purchasers buy rebar daily, 8 weekly, 5 monthly, and 1 as needed. Twenty-four of 28 purchasers reported that they do not expect their purchasing frequency to change in the next two years. Eighteen of the 28 purchasers contact as few as one supplier, and most contact 3 or 4 suppliers at most.

Sales terms and discounts

Four producers sell on an f.o.b. basis and three sell on a delivered basis. For importers, a slight majority (6 of 10) also typically quote prices on an f.o.b. basis. Three producers offer quantity discounts and other types of discounts, whereas two have no discount policy. Nine of 10 importers reported having no discount policy.

⁵ Foreign producer ***, had short-term contracts that typically last 30 days and only fix quantity.

Price leadership

Purchasers identified a variety of price leaders. Of the 23 firms identifying one or more price leaders, 16 identified Nucor, 8 identified CMC, and 4 identified Gerdau. Three purchasers not related to producers identified import sources as price leaders: *** mentioned Deacero, *** mentioned Icdas and Deacero, and *** simply stated “imports” after mentioning Nucor and CMC. *** identified CSR. Purchasers most frequently reported that price changes will come in the form of a mill announcement letter, with multiple purchasers adding that once one mill will announce its prices are changing, other mills will follow. Nucor was recognized as usually the first mill to announce price changes by eight purchasers; purchaser *** added, “they have largely set pricing {t}rends for many years”.

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 rebar products shipped to unrelated U.S. customers during January 2014-March 2020.

Product 1.-- Straight ASTM A615, No. 3, grade 60 rebar.

Product 2.-- Straight ASTM A615, No. 4, grade 60 rebar.

Product 3.-- Straight ASTM A615, No. 5, grade 60 rebar.

Product 4.-- Straight ASTM A615, No. 6, grade 60 rebar.

Product 5.-- Straight ASTM A615, No. 3, grade 40 rebar.

Seven U.S. producers, 4 importers of rebar from Mexico, and 6 importers of rebar from Turkey⁶ provided usable pricing data for sales⁶ of the requested products, although not all firms reported pricing for all products for all quarters.⁷ Pricing data reported by these firms accounted for *** percent of U.S. producers’ commercial shipments of rebar, *** percent

⁶ As noted earlier, data for imports from Turkey exclude those exported or manufactured by Habas.

⁷ 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.

of U.S. shipments of subject imports from Mexico, and *** percent of U.S. shipments of subject imports from Turkey in 2019. Price data for products 1-5 are presented in tables V-3 to V-7 and figures V-2 to V-6.

Table V-3

Rebar: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter, January 2014-March 2020

Period	United States		Mexico			Turkey (subject)		
	Price (per short ton)	Quantity (short tons)	Price (per short ton)	Quantity (short tons)	Margin (percent)	Price (per short ton)	Quantity (short tons)	Margin (percent)
2014:								
Jan.-Mar.	650	46,314	***	***	***	***	***	***
Apr.-June	663	44,775	***	***	***	***	***	***
July-Sept.	663	53,535	***	***	***	***	***	***
Oct.-Dec.	666	40,219	***	***	***	***	***	***
2015:								
Jan.-Mar.	620	43,613	***	***	***	***	***	***
Apr.-June	585	48,121	***	***	***	***	***	***
July-Sept.	547	56,941	***	***	***	***	***	***
Oct.-Dec.	500	42,069	***	***	***	***	***	***
2016:								
Jan.-Mar.	456	50,056	***	***	***	***	***	***
Apr.-June	485	59,108	***	***	***	***	***	***
July-Sept.	485	48,416	***	***	***	***	***	***
Oct.-Dec.	475	45,172	***	***	***	***	***	***
2017:								
Jan.-Mar.	511	52,769	***	***	***	***	***	***
Apr.-June	511	58,132	***	***	***	***	***	***
July-Sept.	523	72,728	***	***	***	***	***	***
Oct.-Dec.	544	63,501	***	***	***	***	***	***
2018:								
Jan.-Mar.	595	70,480	***	***	***	***	***	***
Apr.-June	694	74,757	***	***	***	***	***	***
July-Sept.	720	70,898	***	***	***	***	***	***
Oct.-Dec.	718	58,826	***	***	***	***	***	***
2019:								
Jan.-Mar.	696	57,238	***	***	***	***	***	***
Apr.-June	673	70,195	***	***	***	***	***	***
July-Sept.	647	70,056	***	***	***	***	***	***
Oct.-Dec.	617	56,130	***	***	***	***	***	***
2020:								
Jan.-Mar.	618	63,137	***	***	***	***	***	***

Note: Product 1: Straight ASTM A615, No. 3, grade 60 rebar.

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

Table V-4

Rebar: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by quarter, January 2014-March 2020

Period	United States		Mexico			Turkey (subject)		
	Price (per short ton)	Quantity (short tons)	Price (per short ton)	Quantity (short tons)	Margin (percent)	Price (per short ton)	Quantity (short tons)	Margin (percent)
2014:								
Jan.-Mar.	642	140,289	***	***	***	***	***	***
Apr.-June	645	164,037	***	***	***	***	***	***
July-Sept.	649	185,650	***	***	***	***	***	***
Oct.-Dec.	656	152,488	***	***	***	***	***	***
2015:								
Jan.-Mar.	612	137,494	***	***	***	***	***	***
Apr.-June	578	160,579	***	***	***	***	***	***
July-Sept.	550	180,588	***	***	***	***	***	***
Oct.-Dec.	498	146,084	***	***	***	***	***	***
2016:								
Jan.-Mar.	453	167,505	***	***	***	***	***	***
Apr.-June	490	185,819	***	***	***	***	***	***
July-Sept.	497	156,148	***	***	***	***	***	***
Oct.-Dec.	474	164,990	***	***	***	***	***	***
2017:								
Jan.-Mar.	501	158,748	***	***	***	***	***	***
Apr.-June	508	170,366	***	***	***	***	***	***
July-Sept.	521	210,137	***	***	***	***	***	***
Oct.-Dec.	546	190,965	***	***	***	***	***	***
2018:								
Jan.-Mar.	591	211,858	***	***	***	***	***	***
Apr.-June	677	227,078	***	***	***	***	***	***
July-Sept.	700	209,832	***	***	***	***	***	***
Oct.-Dec.	706	184,301	***	***	***	***	***	***
2019:								
Jan.-Mar.	699	182,275	***	***	***	***	***	***
Apr.-June	686	194,558	***	***	***	***	***	***
July-Sept.	657	202,599	***	***	***	***	***	***
Oct.-Dec.	620	188,115	***	***	***	***	***	***
2020:								
Jan.-Mar.	624	172,721	***	***	***	***	***	***

Note: Product 2: Straight ASTM A615, No. 4, grade 60 rebar.

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

Table V-5

Rebar: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by quarter, January 2014-March 2020

Period	United States		Mexico			Turkey (subject)		
	Price (per short ton)	Quantity (short tons)	Price (per short ton)	Quantity (short tons)	Margin (percent)	Price (per short ton)	Quantity (short tons)	Margin (percent)
2014:								
Jan.-Mar.	638	165,557	***	***	***	***	***	***
Apr.-June	638	188,147	***	***	***	***	***	***
July-Sept.	640	220,651	***	***	***	***	***	***
Oct.-Dec.	647	174,723	***	***	***	***	***	***
2015:								
Jan.-Mar.	604	162,143	***	***	***	***	***	***
Apr.-June	573	190,797	***	***	***	***	***	***
July-Sept.	549	205,340	***	***	***	***	***	***
Oct.-Dec.	494	166,464	***	***	***	***	***	***
2016:								
Jan.-Mar.	450	201,797	***	***	***	***	***	***
Apr.-June	493	205,093	***	***	***	***	***	***
July-Sept.	501	182,729	***	***	***	***	***	***
Oct.-Dec.	469	206,430	***	***	***	***	***	***
2017:								
Jan.-Mar.	495	184,810	***	***	***	***	***	***
Apr.-June	501	194,464	***	***	***	***	***	***
July-Sept.	558	228,503	***	***	***	***	***	***
Oct.-Dec.	559	189,876	***	***	***	***	***	***
2018:								
Jan.-Mar.	578	237,357	***	***	***	***	***	***
Apr.-June	668	258,528	***	***	***	***	***	***
July-Sept.	689	248,174	***	***	***	***	***	***
Oct.-Dec.	691	210,098	***	***	***	***	***	***
2019:								
Jan.-Mar.	687	200,942	***	***	***	***	***	***
Apr.-June	672	206,044	***	***	***	***	***	***
July-Sept.	645	221,263	***	***	***	***	***	***
Oct.-Dec.	611	217,789	***	***	***	***	***	***
2020:								
Jan.-Mar.	611	226,515	***	***	***	***	***	***

Note: Product 3: Straight ASTM A615, No. 5, grade 60 rebar.

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

Table V-6

Rebar: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by quarter, January 2014-March 2020

Period	United States		Mexico			Turkey (subject)		
	Price (per short ton)	Quantity (short tons)	Price (per short ton)	Quantity (short tons)	Margin (percent)	Price (per short ton)	Quantity (short tons)	Margin (percent)
2014:								
Jan.-Mar.	654	116,121	***	***	***	***	***	***
Apr.-June	644	123,971	***	***	***	***	***	***
July-Sept.	644	138,144	***	***	***	***	***	***
Oct.-Dec.	653	122,078	***	***	***	***	***	***
2015:								
Jan.-Mar.	609	109,217	***	***	***	***	***	***
Apr.-June	582	124,325	***	***	***	***	***	***
July-Sept.	566	129,318	***	***	***	***	***	***
Oct.-Dec.	519	113,813	***	***	***	***	***	***
2016:								
Jan.-Mar.	474	121,427	***	***	***	***	***	***
Apr.-June	506	127,303	***	***	***	***	***	***
July-Sept.	517	118,674	***	***	***	***	***	***
Oct.-Dec.	488	136,252	***	***	***	***	***	***
2017:								
Jan.-Mar.	514	128,835	***	***	***	***	***	***
Apr.-June	510	131,126	***	***	***	***	***	***
July-Sept.	516	146,947	***	***	***	***	***	***
Oct.-Dec.	529	131,918	***	***	***	***	***	***
2018:								
Jan.-Mar.	568	149,880	***	***	***	***	***	***
Apr.-June	644	159,363	***	***	***	***	***	***
July-Sept.	661	159,719	***	***	***	***	***	***
Oct.-Dec.	674	122,796	***	***	***	***	***	***
2019:								
Jan.-Mar.	661	118,660	***	***	***	***	***	***
Apr.-June	660	127,942	***	***	***	***	***	***
July-Sept.	636	139,923	***	***	***	***	***	***
Oct.-Dec.	603	145,265	***	***	***	***	***	***
2020:								
Jan.-Mar.	617	145,137	***	***	***	***	***	***

Note: Product 4: Straight ASTM A615, No. 6, grade 60 rebar.

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

Table V-7

Rebar: Weighted-average f.o.b. prices and quantities of domestic and imported product 5 and margins of underselling/(overselling), by quarter, January 2014-March 2020

Period	United States		Mexico			Turkey (subject)		
	Price (per short ton)	Quantity (short tons)	Price (per short ton)	Quantity (short tons)	Margin (percent)	Price (per short ton)	Quantity (short tons)	Margin (percent)
2014:								
Jan.-Mar.	628	8,054	***	***	***	***	***	***
Apr.-June	632	8,106	***	***	***	***	***	***
July-Sept.	622	12,543	***	***	***	***	***	***
Oct.-Dec.	638	6,065	***	***	***	***	***	***
2015:								
Jan.-Mar.	585	8,084	***	***	***	***	***	***
Apr.-June	557	7,935	***	***	***	***	***	***
July-Sept.	525	7,124	***	***	***	***	***	***
Oct.-Dec.	450	6,371	***	***	***	***	***	***
2016:								
Jan.-Mar.	415	8,131	***	***	***	***	***	***
Apr.-June	471	10,176	***	***	***	***	***	***
July-Sept.	468	8,410	***	***	***	***	***	***
Oct.-Dec.	436	6,770	***	***	***	***	***	***
2017:								
Jan.-Mar.	487	9,572	***	***	***	***	***	***
Apr.-June	490	16,898	***	***	***	***	***	***
July-Sept.	524	13,223	***	***	***	***	***	***
Oct.-Dec.	541	10,652	***	***	***	***	***	***
2018:								
Jan.-Mar.	596	15,220	***	***	***	***	***	***
Apr.-June	683	15,070	***	***	***	***	***	***
July-Sept.	712	13,089	***	***	***	***	***	***
Oct.-Dec.	717	12,847	***	***	***	***	***	***
2019:								
Jan.-Mar.	715	10,107	***	***	***	***	***	***
Apr.-June	682	14,615	***	***	***	***	***	***
July-Sept.	658	11,976	***	***	***	***	***	***
Oct.-Dec.	614	10,689	***	***	***	***	***	***
2020:								
Jan.-Mar.	619	12,684	***	***	***	***	***	***

Note: Product 5: Straight ASTM A615, No. 3, grade 40 rebar.

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

Figure V-2
Rebar: Weighted-average prices and quantities of domestic and imported product 1, by quarter,
January 2014-March 2020

* * * * *

Product 1: Straight ASTM A615, No. 3, grade 60 rebar.

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

Figure V-3
Rebar: Weighted-average prices and quantities of domestic and imported product 2, by quarter,
January 2014-March 2020

* * * * *

Product 2: Straight ASTM A615, No. 4, grade 60 rebar.

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

Figure V-4
Rebar: Weighted-average prices and quantities of domestic and imported product 3, by quarter,
January 2014-March 2020

* * * * *

Product 3: Straight ASTM A615, No. 5, grade 60 rebar.

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

Figure V-5
Rebar: Weighted-average prices and quantities of domestic and imported product 4, by quarter,
January 2014-March 2020

* * * * *

Product 4: Straight ASTM A615, No. 6, grade 60 rebar.

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

Figure V-6
Rebar: Weighted-average prices and quantities of domestic and imported product 5, by quarter,
January 2014-March 2020

* * * * *

Product 5: Straight ASTM A615, No. 3, grade 40 rebar.

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

Price trends

Prices for all domestic products decreased from the first quarter of 2014 to the first quarter of 2016. They then increased through late 2018 before declining through the fourth quarter of 2019. Prices for all five domestic products increased in the first quarter of 2020. Over the entire period, prices decreased slightly. Prices for imports generally followed these trends as well, however the lower volumes of available data during certain quarters made prices behave somewhat more erratically for some products. Also, prices for imports from Mexico reached their lowest point later in 2016, and imports from both countries for most products reached their highest levels in the second quarter of 2018, when Section 232 tariffs were enacted. Table V-8 summarizes these overall price changes, by country and by product. As shown in the table, all pricing products for the United States and Turkey, along with three of five imported from Mexico demonstrated decreases between January 2014 and March 2020. Domestic price decreases ranged from *** to *** percent, while import price decreases for Mexico ranged from *** to *** percent and from *** to *** percent for subject imports from Turkey. Indexed price changes are presented in figure V-7.

Table V-8

Rebar: Summary of weighted-average f.o.b. prices for products 1-5 from the United States, Mexico, and Turkey

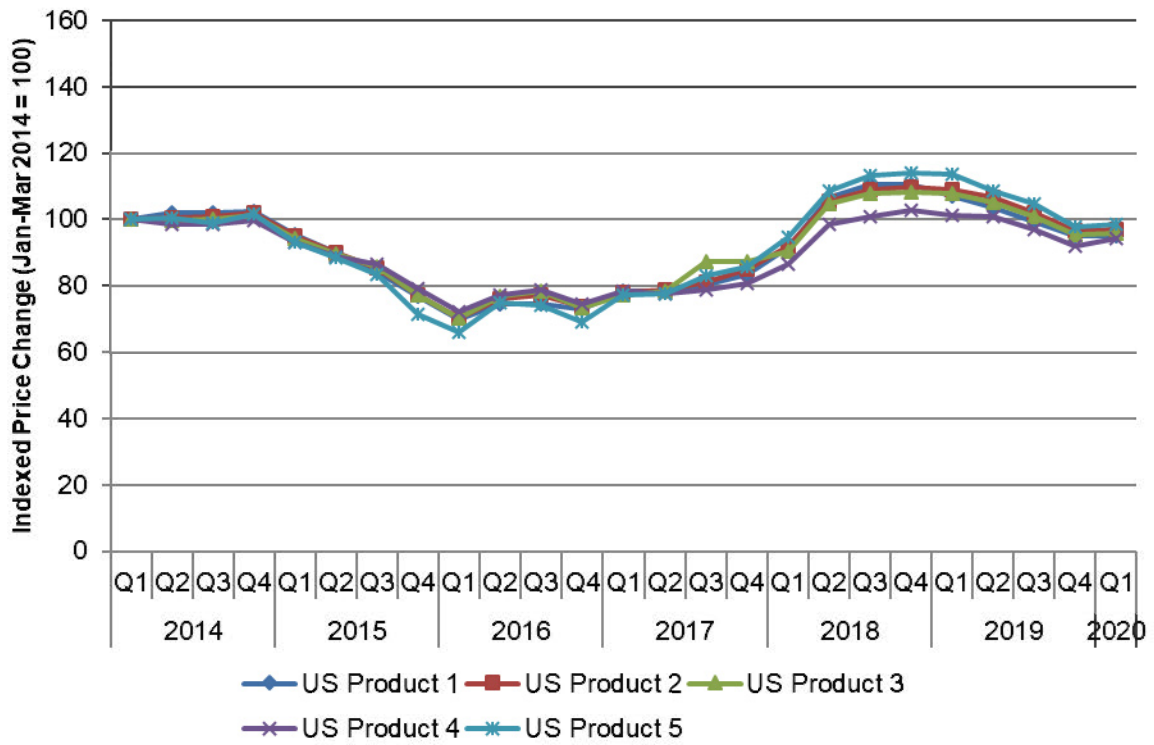
Item	Number of quarters	Low price (per short ton)	High price (per short ton)	Change in price (percent)
Product 1				
United States	25	456	720	▼ (4.8)
Mexico	25	***	***	▼ ***
Turkey	25	***	***	▼ ***
Product 2				
United States	25	453	706	▼ (2.8)
Mexico	25	***	***	▼ ***
Turkey	25	***	***	▼ ***
Product 3				
United States	25	450	691	▼ (4.2)
Mexico	25	***	***	▲ ***
Turkey	25	***	***	▼ ***
Product 4				
United States	25	474	674	▼ (5.6)
Mexico	24	***	***	▼ ***
Turkey	25	***	***	▼ ***
Product 5				
United States	25	415	717	▼ (1.5)
Mexico	13	***	***	▲ ***
Turkey	23	***	***	▼ ***

Note: Percentage change from the January-March 2014 to January-March 2020. A period change preceded by a “▲” represents an increase while a “▼” represents a decrease.

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

Figure V-7

Rebar: Indexed price levels, by country, January 2014-March 2020



* * * * *

Figure continued on next page.

Figure V-7—Continued
Rebar: Indexed price levels, by country, January 2014-March 2020

* * * * *

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

Price comparisons

As shown in table V-9, prices for product imported from Mexico were below those for U.S.-produced product in 91 of 112 instances (** short tons); margins of underselling ranged from ** to ** percent, averaging ** percent. With respect to rebar imported from Turkey (subject), underselling was apparent in 109 of 123 quarters (** short tons) with margins ranging from ** to ** percent and averaging ** percent. In the remaining quarters, imported rebar from Mexico and Turkey oversold domestic product. In 21 quarters, margins of overselling of rebar imported from Mexico ranged from ** to ** percent, averaging ** percent, and margins of overselling of rebar imported from Turkey ranged from ** to ** percent, averaging ** percent. All overselling for product imported from Turkey occurred in 2018 and 2019, starting in the second quarter when Section 232 duties were enacted. Prices for all products imported from Turkey in the second quarter of 2018 spiked and volumes declined by more than 90 percent for each product.

Table V-9

Rebar: Instances of underselling and the range and average of margins, by product, January 2014-March 2020

Product	Underselling				
	Number of quarters	Quantity (short tons)	Average margin (percent)	Margin range (percent)	
				Min	Max
Mexico					
Product 1	21	***	***	***	***
Product 2	21	***	***	***	***
Product 3	18	***	***	***	***
Product 4	20	***	***	***	***
Product 5	11	***	***	***	***
Mexico Total	91	305,408	10.5	0.1	26.4
Turkey					
Product 1	23	***	***	***	***
Product 2	23	***	***	***	***
Product 3	21	***	***	***	***
Product 4	21	***	***	***	***
Product 5	21	***	***	***	***
Turkey Total	109	2,191,458	18.4	0.5	38.2
Total	200	2,496,866	14.8	0.1	38.2

Product	Overselling				
	Number of quarters	Quantity (short tons)	Average margin (percent)	Margin range (percent)	
				Min	Max
Mexico					
Product 1	4	***	***	***	***
Product 2	4	***	***	***	***
Product 3	7	***	***	***	***
Product 4	4	***	***	***	***
Product 5	2	***	***	***	***
Mexico Total	21	33,614	(3.3)	(0.1)	(11.2)
Turkey					
Product 1	2	***	***	***	***
Product 2	2	***	***	***	***
Product 3	4	***	***	***	***
Product 4	4	***	***	***	***
Product 5	2	***	***	***	***
Turkey Total	14	13,587	(8.7)	(0.2)	(28.2)
Total	35	47,201	(5.4)	(0.1)	(28.2)

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

Notes continued on next page.

Table V-9—Continued

Rebar: Instances of underselling and the range and average of margins, by product, January 2014-March 2020

Note: In the original investigations, subject imports from Mexico were priced lower than domestic product in all 56 comparisons, with underselling margins ranging from 5.2 to 14.6 percent; subject imports from Turkey were priced lower than domestic product in 49 of 52 comparisons, with underselling margins ranging from 0.4 to 13.1 percent. *Steel Concrete Reinforcing Bar from Mexico and Turkey*, Inv. Nos. 701-TA-502 and 731-TA-1227-1228 (Final), USITC Pub. 4496 (Oct. 2014), Table V-14.

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

Domestic producers stated that the U.S. market is relatively healthy, and higher-priced when compared to other markets for rebar. Producer *** reported that the Mexican market “has collapsed.” Two producers reported that current prices in Turkey are near \$400 per metric ton. In addition to producers which also submitted an importer questionnaire, three importers stated that U.S. prices are higher than those in other markets,⁸ and one (***) noted that prices are similar. Importer *** stated that since U.S. prices are more expensive, it only purchased domestically produced rebar when the customer requires it. Importer *** attributed higher prices in the United States than in other developed countries to decreased competition from imported sources in the U.S. market. When asked how prices in the United States compare with prices in their home markets, one Mexican foreign producer and all Turkish foreign producers responded. *** stated that rebar prices in Mexico and the United States are similar because they are both driven by scrap prices, international prices, and both countries have duties (25 percent Section 232 duties in the United States and 15 percent safeguard duties in Mexico). Three foreign producers in Turkey stated that U.S. prices and those in their home market are similar and are driven by market conditions. The fourth responding Turkish foreign producer noted that U.S. and EU market prices are higher due to U.S. Section 232 duties and safeguard measures in the EU.

⁸ Importer *** specifically noted that U.S. rebar prices are very high compared with those in Turkey.

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
79 FR 65926, November 6, 2019	<i>Steel Concrete Reinforcing Bar From the Republic of Turkey: Countervailing Duty Order</i>	https://www.govinfo.gov/content/pkg/FR-2014-11-06/pdf/2014-26414.pdf
79 FR 65925, November 6, 2019	<i>Steel Concrete Reinforcing Bar From Mexico: Antidumping Duty Order</i>	https://www.govinfo.gov/content/pkg/FR-2014-11-06/pdf/2014-26411.pdf
84 FR 52126, October 1, 2019	<i>Steel Concrete Reinforcing Bar From Mexico and Turkey; Institution of Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2019-10-01/pdf/2019-20884.pdf
84 FR 52067, October 1, 2019	<i>Initiation of Five-Year (Sunset) Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2019-10-01/pdf/2019-21292.pdf
85 FR 5036, January 28, 2020	<i>Steel Concrete Reinforcing Bar From Mexico and Turkey; Notice of Commission Determination To Conduct Full Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2020-01-28/pdf/2020-01406.pdf
85 FR 4945, January 28, 2020	<i>Steel Concrete Reinforcing Bar From the Republic of Turkey: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order</i>	https://www.govinfo.gov/content/pkg/FR-2020-01-28/pdf/2020-01434.pdf
85 FR 21266, April 16, 2020	<i>Steel Concrete Reinforcing Bar from Mexico and Turkey; Scheduling of Full Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2020-04-16/pdf/2020-07961.pdf

Note.—The press release announcing the Commission’s determinations concerning adequacy and the conduct of a full or expedited review can be found at https://www.usitc.gov/sites/default/files/trade_remedy/731_ad_701_cvd/investigations/2019/Steel%20Concrete%20Reinforcing%20Bar%20from%20Mexico%20and%20Turkey/First%20Review%20%28Full%29/fr-notice_of_fullt_review.pdf. A summary of the Commission’s votes concerning adequacy and the conduct of a full or expedited review can be found at https://www.usitc.gov/sites/default/files/trade_remedy/731_ad_701_cvd/investigations/explanation_of_commission_determinations_on_adequacy_4.pdf.

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed participated in the United States International Trade Commission's hearing via video conference:

Subject: Steel Concrete Reinforcing Bar from Mexico and Turkey
Inv. Nos.: 701-TA-502 and 731-TA-1227 (Review)
Date and Time: August 6, 2020 - 9:30 a.m.

CONGRESSIONAL APPEARANCES:

The Honorable Joe Wilson, U.S. Representative, 2nd District, South Carolina

The Honorable John Katko, U.S. Representative, 24th District, New York

OPENING REMARKS:

In Support of Continuation (**Alan H. Price**, Wiley Rein LLP)
In Opposition to Continuation (**Rosa S. Jeong**, Greenberg Traurig, LLP;
and **Leah N. Scarpelli**, Arent Fox LLP)

In Support of the Continuation of Antidumping and Countervailing Duty Orders:

Wiley Rein LLP
Washington, DC
on behalf of

Rebar Trade Action Coalition ("RTAC")

Barbara Smith, President, Chief Executive Officer,
Chairman of the Board, Commercial Metals Company

Tracy Porter, Executive Vice President and Chief Operating Officer,
Commercial Metals Company

Billy Milligan, Vice President, Marketing and Enterprise Support,
Commercial Metals Company

**In Support of the Continuation of
Antidumping and Countervailing Duty Orders (continued):**

Don Barney, Director of Sales and Marketing, Bar Mill Group,
Nucor Corporation

Shayne Byer, Chief Executive Officer, Byer Steel

Tom Sondgeroth, Manager, Rebar Sales, United States
and Canada, Gerdau Ameristeel US Inc.

Chris Graham, Senior Vice President, Long Products Group,
Steel Dynamics, Inc.

Rob Webb, President, Southwestern Suppliers, Inc.

Jeff Veilleux, Vice President of Sales and Marketing,
PJ's Rebar, Inc.

Tim Johnson, Chief Operating Officer, Suncoast Post-Tension

Roy Houseman, Legislative Director, United Steelworkers

John Cross, Consultant, Crosswind Consulting

Dr. Seth Kaplan, President, International Economic Research, LLC

Alan H. Price)
John R. Shane)
) – OF COUNSEL
Maureen E. Thorson)
Adam M. Teslik)

**In Opposition to the Continuation of
Antidumping and Countervailing Duty Orders:**

Arent Fox LLP
Washington, DC
on behalf of

Çelik İhracatçıları Birliği – Steel Exporters Association (“ÇİB”)
Colakoglu Metalurji A.Ş. (“Colakoglu”)
Icdaş Çelik Enerji Tersane ve Ulaşım Sanayi A.S. (“Icdas”)
Kaptan Demir Çelik Endustrisi ve Ticaret, A.S. (“Kaptan”)

Murat Cebecioğlu, Export Manager, Icdas

Ugur Dalbeler, Chief Executive Officer, Colakoglu

Bulent Hacıoglu, Managing Partner, Trade Resources Company

Matthew M. Nolan)
) – OF COUNSEL
Leah N. Scarpelli)

Greenberg Traurig, LLP
Washington, DC
on behalf of

Deacero S.A.P.I. de C.V.
Deacero USA, Inc.
Grupo Simec

Antonio Guerra, Director of Market Strategy,
Deacero S.A.P.I. de C.V.

Oscar de la Torre, Steel Mill Products and
Solutions Sales Senior Manager, Deacero S.A.P.I. de C.V.

Miguel Bazan, Senior Manager for Merchants,
Beams & Rebar Division, Deacero USA, Inc.

Jim Dougan, Vice President, Economic Consulting Services, LLC

Irwin P. Altschuler)
Rosa S. Jeong)
Sonali Dohale) – OF COUNSEL
Franchiny M. Ovalle)
Axel S. Urie)

REBUTTAL/CLOSING REMARKS:

In Support of Continuation (**John R. Shane**, Wiley Rein LLP)

In Opposition to Continuation (**Irwin P. Altschuler**, Greenberg Traurig, LLP;
and **Matthew M. Nolan**, Arent Fox LLP)

-END-

APPENDIX C
SUMMARY DATA

Table C-1

Rebar: Summary data concerning the U.S. market, 2014-19, January to March 2019, and January to March 2020

(Quantity=short tons; Value=1,000 dollars; Productivity=short tons per 1,000 hours; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data							
	Calendar year						January to March	
	2014	2015	2016	2017	2018	2019	2019	2020
U.S. consumption quantity:								
Amount.....	8,042,828	8,399,661	8,696,615	8,490,800	8,748,023	8,476,662	2,033,843	2,205,664
Producers' share (fn1).....	82.3	76.0	75.7	82.4	86.7	87.0	83.5	87.3
Importers' share (fn1):								
Mexico.....	1.2	0.1	0.0	0.3	1.2	1.7	0.7	2.8
Turkey, subject.....	***	***	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***	***	***
Turkey, nonsubject.....	***	***	***	***	***	***	***	***
All other sources.....	4.2	4.6	7.1	7.0	7.7	10.3	15.4	4.2
Nonsubject sources.....	***	***	***	***	***	***	***	***
All import sources.....	17.7	24.0	24.3	17.6	13.3	13.0	16.5	12.7
U.S. consumption value:								
Amount.....	5,043,740	4,474,364	3,865,597	4,287,242	5,618,835	5,401,326	1,352,481	1,311,795
Producers' share (fn1):.....	84.0	79.9	79.8	84.3	86.9	88.1	84.2	88.9
Importers' share (fn1):								
Mexico.....	1.1	0.1	0.0	0.3	1.1	1.4	0.6	2.6
Turkey, subject.....	***	***	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***	***	***
Turkey, nonsubject.....	***	***	***	***	***	***	***	***
All other sources.....	4.0	4.0	6.1	6.6	7.9	9.6	14.6	3.7
Nonsubject sources.....	***	***	***	***	***	***	***	***
All import sources.....	16.0	20.1	20.2	15.7	13.1	11.9	15.8	11.1
U.S. imports from:								
Mexico:								
Quantity.....	99,319	5,370	3,494	26,928	102,866	140,995	13,939	61,466
Value.....	56,250	2,417	1,358	13,190	60,529	77,383	8,641	33,746
Unit value.....	\$566	\$450	\$389	\$490	\$588	\$549	620	549
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Turkey, subject:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Subject sources:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Turkey, nonsubject:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
All other sources:								
Quantity.....	341,633	382,743	613,237	596,013	674,361	871,108	313,206	91,581
Value.....	203,351	179,498	237,503	284,937	442,848	517,317	198,060	48,908
Unit value.....	\$595	\$469	\$387	\$478	\$657	\$594	632	534
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Nonsubject sources:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
All import sources:								
Quantity.....	1,422,152	2,013,421	2,115,909	1,495,515	1,161,951	1,101,625	335,520	280,400
Value.....	808,184	897,445	779,640	673,773	735,841	645,422	213,147	145,401
Unit value.....	\$568	\$446	\$368	\$451	\$633	\$586	635	519
Ending inventory quantity.....	***	***	***	***	***	***	***	***

Table continued on next page.

Table C-1--Continued
Rebar: Summary data concerning the U.S. market, 2014-19, January to March 2019, and January to March 2020

(Quantity=short tons; Value=1,000 dollars; Productivity=short tons per 1,000 hours; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Period changes						Jan-Mar 2019-20
	2014-19	2014-15	Comparison years		2017-18	2018-19	
			2015-16	2016-17			
U.S. consumption quantity:							
Amount.....	▲5.4	▲4.4	▲3.5	▼(2.4)	▲3.0	▼(3.1)	▲8.4
Producers' share (fn1).....	▲4.7	▼(6.3)	▼(0.4)	▲6.7	▲4.3	▲0.3	▲3.8
Importers' share (fn1):							
Mexico.....	▲0.4	▼(1.2)	▼(0.0)	▲0.3	▲0.9	▲0.5	▲2.1
Turkey, subject.....	▼***	▲***	▼***	▼***	▼***	▼***	▲***
Subject sources.....	▼***	▲***	▼***	▼***	▼***	▼***	▲***
Turkey, nonsubject.....	▼***	▲***	▲***	▼***	▼***	***	***
All other sources.....	▲6.0	▲0.3	▲2.5	▼(0.0)	▲0.7	▲2.6	▼(11.2)
Nonsubject sources.....	▲***	▲***	▲***	▼***	▼***	▲***	▼***
All import sources.....	▼(4.7)	▲6.3	▲0.4	▼(6.7)	▼(4.3)	▼(0.3)	▼(3.8)
U.S. consumption value:							
Amount.....	▲7.1	▼(11.3)	▼(13.6)	▲10.9	▲31.1	▼(3.9)	▼(3.0)
Producers' share (fn1).....	▲4.1	▼(4.0)	▼(0.1)	▲4.5	▲2.6	▲1.1	▲4.7
Importers' share (fn1):							
Mexico.....	▲0.3	▼(1.1)	▼(0.0)	▲0.3	▲0.8	▲0.4	▲1.9
Turkey, subject.....	▼***	▲***	▼***	▼***	▼***	▼***	▲***
Subject sources.....	▼***	▲***	▼***	▼***	▼***	▼***	▲***
Turkey, nonsubject.....	▼***	▲***	▲***	▼***	▼***	***	***
All other sources.....	▲5.5	▼(0.0)	▲2.1	▲0.5	▲1.2	▲1.7	▼(10.9)
Nonsubject sources.....	▲***	▲***	▲***	▼***	▼***	▲***	▼***
All import sources.....	▼(4.1)	▲4.0	▲0.1	▼(4.5)	▼(2.6)	▼(1.1)	▼(4.7)
U.S. imports from:							
Mexico:							
Quantity.....	▲42.0	▼(94.6)	▼(34.9)	▲670.8	▲282.0	▲37.1	▲341.0
Value.....	▲37.6	▼(95.7)	▼(43.8)	▲871.2	▲358.9	▲27.8	▲290.5
Unit value.....	▼(3.1)	▼(20.5)	▼(13.6)	▲26.0	▲20.1	▼(6.7)	▼(11.4)
Ending inventory quantity.....	▲***	***	***	▲***	▲***	▼***	▲***
Turkey, subject:							
Quantity.....	▼***	▲***	▼***	▼***	▼***	▼***	▲***
Value.....	▼***	▲***	▼***	▼***	▼***	▼***	▲***
Unit value.....	▲***	▼***	▼***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	▼***	▼***	▼***	▼***	▼***	▼***	▲***
Subject sources:							
Quantity.....	▼***	▲***	▼***	▼***	▼***	▼***	▲***
Value.....	▼***	▲***	▼***	▼***	▲***	▼***	▲***
Unit value.....	▼***	▼***	▼***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	▼***	▼***	▼***	▼***	▼***	▼***	▲***
Turkey, nonsubject							
Quantity.....	▼***	▲***	▲***	▼***	▼***	***	***
Value.....	▼***	▲***	▼***	▼***	▼***	***	***
Unit value.....	▼***	▼***	▼***	▲***	▼***	***	***
Ending inventory quantity.....	▼***	▼***	▼***	▼***	***	***	***
All other sources:							
Quantity.....	▲155.0	▲12.0	▲60.2	▼(2.8)	▲13.1	▲29.2	▼(70.8)
Value.....	▲154.4	▼(11.7)	▲32.3	▲20.0	▲55.4	▲16.8	▼(75.3)
Unit value.....	▼(0.2)	▼(21.2)	▼(17.4)	▲23.4	▲37.4	▼(9.6)	▼(15.5)
Ending inventory quantity.....	▼***	▼***	▲***	▼***	▼***	▲***	▼***
Nonsubject sources:							
Quantity.....	▲***	▲***	▲***	▼***	▼***	▲***	▼***
Value.....	▲***	▲***	▲***	▼***	▲***	▲***	▼***
Unit value.....	▲***	▼***	▼***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	▼***	▼***	▲***	▼***	▼***	▲***	▼***
All import sources:							
Quantity.....	▼(22.5)	▲41.6	▲5.1	▼(29.3)	▼(22.3)	▼(5.2)	▼(16.4)
Value.....	▼(20.1)	▲11.0	▼(13.1)	▼(13.6)	▲9.2	▼(12.3)	▼(31.8)
Unit value.....	▲3.1	▼(21.6)	▼(17.3)	▲22.3	▲40.6	▼(7.5)	▼(18.4)
Ending inventory quantity.....	▼***	▼***	▼***	▼***	▼***	▲***	▼***

Table continued on next page.

Table C-1--Continued

Rebar: Summary data concerning the U.S. market, 2014-19, January to March 2019, and January to March 2020

(Quantity=short tons; Value=1,000 dollars; Productivity=short tons per 1,000 hours; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data							
	2014	2015	Calendar year			2019	January to March	
			2016	2017	2018		2019	2020
U.S. producers':								
Average capacity quantity.....	9,400,062	9,282,676	9,431,012	9,490,661	9,538,780	9,990,430	2,716,980	2,729,208
Production quantity.....	7,139,839	6,594,149	6,775,208	7,283,224	7,795,024	7,524,429	1,765,827	1,893,823
Capacity utilization (fn1).....	76.0	71.0	71.8	76.7	81.7	75.3	65.0	69.4
U.S. shipments:								
Quantity.....	6,620,676	6,386,240	6,580,706	6,995,285	7,586,072	7,375,037	1,698,323	1,925,264
Value.....	4,235,556	3,576,919	3,085,957	3,613,469	4,882,994	4,755,904	1,139,334	1,166,394
Unit value.....	\$640	\$560	\$469	\$517	\$644	\$645	\$671	\$606
Export shipments:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	621,386	540,897	484,549	514,311	425,689	483,498	470,324	423,940
Inventories/total shipments (fn1).....	***	***	***	***	***	***	***	***
Production workers.....	3,954	3,943	3,803	4,259	4,212	4,185	4,045	4,016
Hours worked (1,000s).....	8,478	8,118	8,010	9,235	9,189	8,944	2,189	2,284
Wages paid (\$1,000).....	337,204	313,937	307,796	366,435	382,986	377,186	92,426	101,622
Hourly wages.....	\$39.77	\$38.67	\$38.43	\$39.68	\$41.68	\$42.17	\$42.22	\$44.49
Productivity.....	842.2	812.3	845.8	788.7	848.3	841.3	806.7	829.2
Unit labor costs.....	\$47.23	\$47.61	\$45.43	\$50.31	\$49.13	\$50.13	\$52.34	\$53.66
Net sales:								
Quantity.....	7,059,974	6,681,424	6,826,023	7,240,990	7,602,632	7,256,659	1,721,193	1,953,381
Value.....	4,478,267	3,801,287	3,217,158	3,688,364	4,781,842	4,762,366	1,154,464	1,182,949
Unit value.....	\$634	\$569	\$471	\$509	\$629	\$656	\$671	\$606
Cost of goods sold (COGS).....	4,161,841	3,338,698	2,985,995	3,408,291	4,011,793	3,747,151	948,897	955,575
Gross profit of (loss) (fn2).....	316,426	462,589	231,163	280,073	770,049	1,015,215	205,567	227,374
SG&A expenses.....	197,585	187,676	193,335	192,899	243,364	227,840	57,536	59,976
Operating income or (loss) (fn2).....	118,841	274,913	37,828	87,174	526,685	787,375	148,031	167,398
Net income or (loss) (fn2).....	***	***	***	***	***	***	***	***
Capital expenditures.....	166,276	151,841	217,512	491,349	266,409	378,937	179,359	188,221
Research and development expenses.....	***	***	***	***	***	***	***	***
Net assets.....	1,518,496	1,415,006	1,452,172	1,565,572	1,892,631	2,471,640	NA	NA
Unit COGS.....	\$589	\$500	\$437	\$471	\$528	\$516	\$551	\$489
Unit SG&A expenses.....	\$28	\$28	\$28	\$27	\$32	\$31	\$33	\$31
Unit operating income or (loss) (fn2).....	\$17	\$41	\$6	\$12	\$69	\$109	\$86	\$86
Unit net income or (loss) (fn2).....	***	***	***	***	***	***	***	***
COGS/ sales (fn1).....	92.9	87.8	92.8	92.4	83.9	78.7	82.2	80.8
Operating income or (loss)/ sales (fn1).....	2.7	7.2	1.2	2.4	11.0	16.5	12.8	14.2
Net income or (loss)/ sales (fn1).....	***	***	***	***	***	***	***	***

Table continued on next page.

Table C-1--Continued

Rebar: Summary data concerning the U.S. market, 2014-19, January to March 2019, and January to March 2020

(Quantity=short tons; Value=1,000 dollars; Productivity=short tons per 1,000 hours; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Period changes						Jan-Mar 2019-20
	2014-19	2014-15	Comparison years			2018-19	
			2015-16	2016-17	2017-18		
U.S. producers:							
Average capacity quantity.....	▲6.3	▼(1.2)	▲1.6	▲0.6	▲0.5	▲4.7	▲0.5
Production quantity.....	▲5.4	▼(7.6)	▲2.7	▲7.5	▲7.0	▼(3.5)	▲7.2
Capacity utilization (fn1).....	▼(0.6)	▼(4.9)	▲0.8	▲4.9	▲5.0	▼(6.4)	▲4.4
U.S. shipments:							
Quantity.....	▲11.4	▼(3.5)	▲3.0	▲6.3	▲8.4	▼(2.8)	▲13.4
Value.....	▲12.3	▼(15.6)	▼(13.7)	▲17.1	▲35.1	▼(2.6)	▲2.4
Unit value.....	▲0.8	▼(12.5)	▼(16.3)	▲10.2	▲24.6	▲0.2	▼(9.7)
Export shipments:							
Quantity.....	▼***	▼***	▼***	▲***	▼***	▼***	▲***
Value.....	▼***	▼***	▼***	▲***	▼***	▼***	▲***
Unit value.....	▼***	▼***	▼***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	▼(22.2)	▼(13.0)	▼(10.4)	▲6.1	▼(17.2)	▲13.6	▼(9.9)
Inventories/total shipments (fn1).....	▼***	▼***	▼***	▼***	▼***	▲***	▼***
Production workers.....	▲5.8	▼(0.3)	▼(3.6)	▲12.0	▼(1.1)	▼(0.6)	▼(0.7)
Hours worked (1,000s).....	▲5.5	▼(4.2)	▼(1.3)	▲15.3	▼(0.5)	▼(2.7)	▲4.3
Wages paid (\$1,000).....	▲11.9	▼(6.9)	▼(2.0)	▲19.1	▲4.5	▼(1.5)	▲9.9
Hourly wages.....	▲6.0	▼(2.8)	▼(0.6)	▲3.3	▲5.0	▲1.2	▲5.4
Productivity.....	▼(0.1)	▼(3.5)	▲4.1	▼(6.8)	▲7.6	▼(0.8)	▲2.8
Unit labor costs.....	▲6.1	▲0.8	▼(4.6)	▲10.7	▼(2.3)	▲2.0	▲2.5
Net sales:							
Quantity.....	▲2.8	▼(5.4)	▲2.2	▲6.1	▲5.0	▼(4.6)	▲13.5
Value.....	▲6.3	▼(15.1)	▼(15.4)	▲14.6	▲29.6	▼(0.4)	▲2.5
Unit value.....	▲3.5	▼(10.3)	▼(17.2)	▲8.1	▲23.5	▲4.3	▼(9.7)
Cost of goods sold (COGS).....	▼(10.0)	▼(19.8)	▼(10.6)	▲14.1	▲17.7	▼(6.6)	▲0.7
Gross profit of (loss) (fn2).....	▲220.8	▲46.2	▼(50.0)	▲21.2	▲174.9	▲31.8	▲10.6
SG&A expenses.....	▲15.3	▼(5.0)	▲3.0	▼(0.2)	▲26.2	▼(6.4)	▲4.2
Operating income or (loss) (fn2).....	▲562.5	▲131.3	▼(86.2)	▲130.4	▲504.2	▲49.5	▲13.1
Net income or (loss) (fn2).....	▲***	▲***	▼***	▼---	▲---	▲***	▲***
Capital expenditures.....	▲127.9	▼(8.7)	▲43.2	▲125.9	▼(45.8)	▲42.2	▲4.9
Research and development expenses.....	▲***	▲***	▼***	▲***	▼***	▼***	▼***
Net assets.....	▲62.8	▼(6.8)	▲2.6	▲7.8	▲20.9	▲30.6	NA
Unit COGS.....	▼(12.4)	▼(15.2)	▼(12.5)	▲7.6	▲12.1	▼(2.1)	▼(11.3)
Unit SG&A expenses.....	▲12.2	▲0.4	▲0.8	▼(5.9)	▲20.2	▼(1.9)	▼(8.1)
Unit operating income or (loss) (fn2).....	▲544.6	▲144.4	▼(86.5)	▲117.2	▲475.4	▲56.6	▼(0.4)
Unit net income or (loss) (fn2).....	▲***	▲***	▼***	▼---	▲---	▲***	▼***
COGS/ sales (fn1).....	▼(14.3)	▼(5.1)	▲5.0	▼(0.4)	▼(8.5)	▼(5.2)	▼(1.4)
Operating income or (loss)/ sales (fn1).....	▲13.9	▲4.6	▼(6.1)	▲1.2	▲8.7	▲5.5	▲1.3
Net income or (loss)/ sales (fn1).....	▲***	▲***	▼***	▼***	▲***	▲***	▲***

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 "---". Shares preceded by a "▲" represent an increase, while shares 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, official U.S. import statistics, and proprietary customs records using HTS statistical reporting numbers 7213.10.0000 and 7214.20.0000, accessed August 13, 2020.

HISTORICAL DATA

Table C-1

Rebar: Summary data concerning the U.S. market, 2011-13, January to March 2013, and January to March 2014

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Report data					Period changes			
	2011	Calendar year 2012	2013	January to March 2013	2014	2011-13	Calendar year 2011-12	2012-13	Jan-Mar 2013-14
U.S. consumption quantity:									
Amount.....	6,538,663	7,390,806	7,729,673	1,846,024	2,005,322	18.2	13.0	4.6	8.6
Producers' share (fn1).....	90.0	86.7	84.4	80.5	77.1	(5.6)	(3.2)	(2.4)	(3.4)
Importers' share (fn1):									
Mexico.....	4.3	4.0	4.4	4.2	4.2	0.0	(0.4)	0.4	(0.0)
Turkey (other than Habas).....	***	***	***	***	***	***	***	***	***
Subtotal (subject).....	***	***	***	***	***	***	***	***	***
Turkey (Habas).....	***	***	***	***	***	***	***	***	***
All others sources.....	1.6	0.7	2.0	0.7	3.7	0.4	(0.9)	1.3	3.0
Subtotal (nonsubject).....	***	***	***	***	***	***	***	***	***
Total imports.....	10.0	13.3	15.6	19.5	22.9	5.6	3.2	2.4	3.4
U.S. consumption value:									
Amount.....	4,272,296	4,765,461	4,766,840	1,161,105	1,245,819	11.6	11.5	0.0	7.3
Producers' share (fn1).....	90.4	87.3	85.6	82.5	78.8	(4.8)	(3.0)	(1.8)	(3.7)
Importers' share (fn1):									
Mexico.....	4.1	3.7	4.0	3.9	3.8	(0.1)	(0.4)	0.3	(0.1)
Turkey (other than Habas).....	***	***	***	***	***	***	***	***	***
Subtotal (subject).....	***	***	***	***	***	***	***	***	***
Turkey (Habas).....	***	***	***	***	***	***	***	***	***
All others sources.....	1.5	0.8	2.0	0.7	3.6	0.5	(0.7)	1.2	3.0
Subtotal (nonsubject).....	***	***	***	***	***	***	***	***	***
Total imports.....	9.6	12.7	14.4	17.5	21.2	4.8	3.0	1.8	3.7
U.S. importers' U.S. imports from:									
Mexico:									
Quantity.....	283,285	293,749	338,200	77,482	83,281	19.4	3.7	15.1	7.5
Value.....	174,697	174,015	188,960	44,855	46,938	8.2	(0.4)	8.6	4.6
Unit value.....	\$617	\$592	\$559	\$579	\$564	(9.4)	(3.9)	(5.7)	(2.6)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Turkey (other than Habas)									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Subtotal (subject)									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Turkey (Habas)									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All other sources:									
Quantity.....	104,752	52,064	154,142	12,326	73,813	47.1	(50.3)	196.1	498.9
Value.....	64,618	37,630	95,759	7,874	45,441	48.2	(41.8)	154.5	477.1
Unit value.....	\$617	\$723	\$621	\$639	\$616	0.7	17.2	(14.0)	(3.6)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Subtotal (nonsubject)									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Total imports:									
Quantity.....	655,418	979,431	1,208,898	360,186	460,117	84.4	49.4	23.4	27.7
Value.....	410,448	602,951	686,610	203,520	263,933	67.3	46.9	13.9	29.7
Unit value.....	\$626	\$616	\$568	\$565	\$574	(9.3)	(1.7)	(7.7)	1.5
Ending inventory quantity.....	7,257	47,473	93,968	67,055	134,450	1,194.9	554.2	97.9	100.5

Table continued next page

Table C-1 – continued

Rebar: Summary data concerning the U.S. market, 2011-13, January to March 2013, and January to March 2014

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Report data					Period changes			
	Calendar year		2013	January to March		2011-13	Calendar year		Jan-Mar 2013-14
	2011	2012		2013	2014		2011-12	2012-13	
U.S. producers:									
Average capacity quantity.....	9,632,001	9,816,490	9,911,957	2,522,772	2,521,331	2.9	1.9	1.0	(0.1)
Production quantity.....	6,327,968	6,831,468	6,776,007	1,558,702	1,665,052	7.1	8.0	(0.8)	6.8
Capacity utilization (fn1).....	65.7	69.6	68.4	61.8	66.0	2.7	3.9	(1.2)	4.3
U.S. shipments:									
Quantity.....	5,883,245	6,411,375	6,520,775	1,485,838	1,545,205	10.8	9.0	1.7	4.0
Value.....	3,861,848	4,162,510	4,080,230	957,585	981,886	5.7	7.8	(2.0)	2.5
Unit value.....	\$656	\$649	\$626	\$644	\$635	(4.7)	(1.1)	(3.6)	(1.4)
Export shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	484,796	545,398	550,880	562,035	605,110	13.6	12.5	1.0	7.7
Inventories/total shipments (fn1).....	***	***	***	***	***	***	***	***	***
Production workers:									
Hours worked (1,000s).....	3,966	4,078	4,183	4,087	4,133	5.5	2.8	2.6	1.1
Wages paid (\$1,000).....	7,977	8,251	8,369	1,996	2,134	4.9	3.4	1.4	6.9
Hourly wages.....	283,836	309,473	321,526	76,124	81,581	13.3	9.0	3.9	7.2
Productivity (short tons per 1,000 hours).....	\$35.58	\$37.51	\$38.42	\$38.14	\$38.23	8.0	5.4	2.4	0.2
Unit labor costs.....	793	828	810	781	780	2.1	4.4	(2.2)	(0.1)
Unit labor costs.....	\$44.85	\$45.30	\$47.45	\$48.84	\$49.00	5.8	1.0	4.7	0.3
Net sales:									
Quantity.....	6,252,358	6,763,455	6,762,561	1,542,114	1,610,824	8.2	8.2	(0.0)	4.5
Value.....	4,096,256	4,401,929	4,266,236	994,583	1,021,690	4.1	7.5	(3.1)	2.7
Unit value.....	\$655	\$651	\$631	\$645	\$634	(3.7)	(0.7)	(3.1)	(1.7)
Cost of goods sold (COGS).....	3,741,176	3,984,787	3,930,134	917,958	976,831	5.1	6.5	(1.4)	6.4
Gross profit of (loss).....	355,080	417,142	336,102	76,625	44,859	(5.3)	17.5	(19.4)	(41.5)
SG&A expenses.....	177,046	176,581	177,621	43,396	43,175	0.3	(0.3)	0.6	(0.5)
Operating income or (loss).....	178,034	240,561	158,481	33,229	1,684	(11.0)	35.1	(34.1)	(94.9)
Capital expenditures.....	54,169	83,315	126,256	20,975	17,026	133.1	53.8	51.5	(18.8)
Unit COGS.....	\$598	\$589	\$581	\$595	\$606	(2.9)	(1.5)	(1.4)	1.9
Unit SG&A expenses.....	\$28	\$26	\$26	\$28	\$27	(7.2)	(7.8)	0.6	(4.8)
Unit operating income or (loss).....	\$28	\$36	\$23	\$22	\$1	(17.7)	24.9	(34.1)	(95.1)
COGS/sales (fn1).....	91.3	90.5	92.1	92.3	95.6	0.8	(0.8)	1.6	3.3
Operating income or (loss)/sales (fn1).....	4.3	5.5	3.7	3.3	0.2	(0.6)	1.1	(1.8)	(3.2)

Notes:

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

Source : Compiled from data submitted in response to Commission questionnaires, official U.S. import statistics, and proprietary ***.

Table C-2

Deformed steel wire: Summary data concerning the U.S. market, 2011-13, January to March 2013, and January to March 2014

* * * * *

Table C-3

Rebar and deformed steel wire: Summary data concerning the U.S. market, 2011-13, January to March 2013, and January to March 2014

* * * * *

Table C-4

Deformed steel wire: Data on industry in Mexico, 2011-2013, January to March 2013, January to March 2014, and projected 2014-15

* * * * *

APPENDIX D

NARRATIVE RESPONSES: LIKELY EFFECT OF REVOCATION

Table D-1

Rebar: Firms' narratives on the impact of the orders and the likely impact of revocation

Item / Firm	Narrative
U.S. producers: Effect of order:	
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

Table D-1 -- Continued

Rebar: Firms' narratives on the impact of the orders and the likely impact of revocation

Item / Firm	Narrative
***	***
***	***
U.S. producers: Likely impact of revocation:	
***	***
***	***

Table continued on next page.

Table D-1 -- Continued

Rebar: Firms' narratives on the impact of the orders and the likely impact of revocation

Item / Firm	Narrative
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

Table D-1 -- Continued

Rebar: Firms' narratives on the impact of the orders and the likely impact of revocation

Item / Firm	Narrative
U.S. importers: Effect of order:	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
U.S. importers: Likely impact of revocation of order:	
***	***

Table continued on next page.

Table D-1 -- Continued

Rebar: Firms' narratives on the impact of the orders and the likely impact of revocation

Item / Firm	Narrative
***	***
***	***
***	***
***	***
***	***
U.S. purchasers:	Effect of order:
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

Table D-1 -- Continued

Rebar: Firms' narratives on the impact of the orders and the likely impact of revocation

Item / Firm	Narrative
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
U.S. purchasers: Likely impact of revocation:	
***	***
***	***
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***	***
***	***
***	***
***	***
***	***

Table continued on next page.

Table D-1 -- Continued

Rebar: Firms' narratives on the impact of the orders and the likely impact of revocation

Item / Firm	Narrative
***	***
***	***
***	***
***	***
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***	***
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***	***

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

APPENDIX E
ADDITIONAL SHIPMENT DATA

Table E-1
Rebar: U.S. producers' and U.S. importers' shipments by length, 2019

Item	Shipments by length					
	Coiled	<20"	>=20" and <40"	>=40" and <60"	>=60"	All lengths
Quantity (short tons)						
U.S. producers: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
Value (1,000 dollars)						
U.S. producers: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
Unit value (dollars per short ton)						
U.S. producers: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
Share of quantity across (percent)						
U.S. producers: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	100.0
U.S. shipments	***	***	***	***	***	100.0
Share of value across (percent)						
U.S. producers: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	100.0
U.S. shipments	***	***	***	***	***	100.0

Table continued on next page.

Table E-1—Continued
Rebar: U.S. producers' and U.S. importers' shipments by length, 2019

Item	Shipments by length					
	Coiled	<20"	>=20" and <40"	>=40" and <60"	>=60"	All lengths
	Quantity (short tons)					
U.S. importers: Mexico: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Value (1,000 dollars)					
U.S. importers: Mexico: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Unit value (dollars per short ton)					
U.S. importers: Mexico: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Share of quantity across (percent)					
U.S. importers: Mexico: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0
	Share of value across (percent)					
U.S. importers: Mexico: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0

Table continued on next page.

Table E-1—Continued
Rebar: U.S. producers' and U.S. importers' shipments by length, 2019

Item	Shipments by length					
	Coiled	<20"	>=20" and <40"	>=40" and <60"	>=60"	All lengths
	Quantity (short tons)					
U.S. importers: Turkey, subject: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Value (1,000 dollars)					
U.S. importers: Turkey, subject: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Unit value (dollars per short ton)					
U.S. importers: Turkey, subject: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Share of quantity across (percent)					
U.S. importers: Turkey, subject: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0
	Share of value across (percent)					
U.S. importers: Turkey, subject: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0

Table continued on next page.

Table E-1—Continued
Rebar: U.S. producers' and U.S. importers' shipments by length, 2019

Item	Shipments by length					
	Coiled	<20"	>=20" and <40"	>=40" and <60"	>=60"	All lengths
	Quantity (short tons)					
U.S. importers: Subject sources:						
Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Value (1,000 dollars)					
U.S. importers: Subject sources:						
Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Unit value (dollars per short ton)					
U.S. importers: Subject sources:						
Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Share of quantity across (percent)					
U.S. importers: Subject sources:						
Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0
	Share of value across (percent)					
U.S. importers: Subject sources:						
Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0

Table continued on next page.

Table E-1—Continued
Rebar: U.S. producers' and U.S. importers' shipments by length, 2019

Item	Shipments by length					
	Coiled	<20"	>=20" and <40"	>=40" and <60"	>=60"	All lengths
	Quantity (short tons)					
U.S. importers: Turkey, nonsubject: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Value (1,000 dollars)					
U.S. importers: Turkey, nonsubject: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Unit value (dollars per short ton)					
U.S. importers: Turkey, nonsubject: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Share of quantity across (percent)					
U.S. importers: Turkey, nonsubject: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Share of value across (percent)					
U.S. importers: Turkey, nonsubject: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***

Table continued on next page.

Table E-1—Continued
Rebar: U.S. producers' and U.S. importers' shipments by length, 2019

Item	Shipments by length					
	Coiled	<20"	>=20" and <40"	>=40" and <60"	>=60"	All lengths
	Quantity (short tons)					
U.S. importers: All other sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Value (1,000 dollars)					
U.S. importers: All other sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Unit value (dollars per short ton)					
U.S. importers: All other sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Share of quantity across (percent)					
U.S. importers: All other sources: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0
	Share of value across (percent)					
U.S. importers: All other sources: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0

Table continued on next page.

Table E-1—Continued
Rebar: U.S. producers' and U.S. importers' shipments by length, 2019

Item	Shipments by length					
	Coiled	<20"	>=20" and <40"	>=40" and <60"	>=60"	All lengths
	Quantity (short tons)					
U.S. importers: Nonsubject sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Value (1,000 dollars)					
U.S. importers: Nonsubject sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Unit value (dollars per short ton)					
U.S. importers: Nonsubject sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Share of quantity across (percent)					
U.S. importers: Nonsubject sources: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0
	Share of value across (percent)					
U.S. importers: Nonsubject sources: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0

Table continued on next page.

Table E-1—Continued
Rebar: U.S. producers' and U.S. importers' shipments by length, 2019

Item	Shipments by length					
	Coiled	<20"	>=20" and <40"	>=40" and <60"	>=60"	All lengths
	Quantity (short tons)					
U.S. importers: All import sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Value (1,000 dollars)					
U.S. importers: All import sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Unit value (dollars per short ton)					
U.S. importers: All import sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Share of quantity across (percent)					
U.S. importers: All import sources: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0
	Share of value across (percent)					
U.S. importers: All import sources: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	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.

Table E-2
Rebar: U.S. producers' and U.S. importers' shipments by size, 2019

Item	Shipments by size					
	No. 3	No. 4	No. 5	No. 6	Other sizes	All sizes
	Quantity (short tons)					
U.S. producers: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Value (1,000 dollars)					
U.S. producers: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Unit value (dollars per short ton)					
U.S. producers: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Share of quantity across (percent)					
U.S. producers: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	100.0
U.S. shipments	***	***	***	***	***	100.0
	Share of value across (percent)					
U.S. producers: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	100.0
U.S. shipments	***	***	***	***	***	100.0

Table continued on next page.

Table E-2—Continued
Rebar: U.S. producers' and U.S. importers' shipments by size, 2019

Item	Shipments by size					
	No. 3	No. 4	No. 5	No. 6	Other sizes	All sizes
	Quantity (short tons)					
U.S. importers: Mexico: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Value (1,000 dollars)					
U.S. importers: Mexico: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Unit value (dollars per short ton)					
U.S. importers: Mexico: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Share of quantity across (percent)					
U.S. importers: Mexico: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0
	Share of value across (percent)					
U.S. importers: Mexico: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0

Table continued on next page.

Table E-2—Continued
Rebar: U.S. producers' and U.S. importers' shipments by size, 2019

Item	Shipments by size					
	No. 3	No. 4	No. 5	No. 6	Other sizes	All sizes
	Quantity (short tons)					
U.S. importers: Turkey, subject: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Value (1,000 dollars)					
U.S. importers: Turkey, subject: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Unit value (dollars per short ton)					
U.S. importers: Turkey, subject: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Share of quantity across (percent)					
U.S. importers: Turkey, subject: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0
	Share of value across (percent)					
U.S. importers: Turkey, subject: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0

Table continued on next page.

Table E-2—Continued
Rebar: U.S. producers' and U.S. importers' shipments by size, 2019

Item	Shipments by size					
	No. 3	No. 4	No. 5	No. 6	Other sizes	All sizes
	Quantity (short tons)					
U.S. importers: Subject sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Value (1,000 dollars)					
U.S. importers: Subject sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Unit value (dollars per short ton)					
U.S. importers: Subject sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Share of quantity across (percent)					
U.S. importers: Subject sources: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0
	Share of value across (percent)					
U.S. importers: Subject sources: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0

Table continued on next page.

Table E-2—Continued
Rebar: U.S. producers' and U.S. importers' shipments by size, 2019

Item	Shipments by size					
	No. 3	No. 4	No. 5	No. 6	Other sizes	All sizes
	Quantity (short tons)					
U.S. importers: Turkey, nonsubject: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Value (1,000 dollars)					
U.S. importers: Turkey, nonsubject: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Unit value (dollars per short ton)					
U.S. importers: Turkey, nonsubject: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Share of quantity across (percent)					
U.S. importers: Turkey, nonsubject: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Share of value across (percent)					
U.S. importers: Turkey, nonsubject: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***

Table continued on next page.

Table E-2—Continued
Rebar: U.S. producers' and U.S. importers' shipments by size, 2019

Item	Shipments by size					
	No. 3	No. 4	No. 5	No. 6	Other sizes	All sizes
	Quantity (short tons)					
U.S. importers: All other sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Value (1,000 dollars)					
U.S. importers: All other sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Unit value (dollars per short ton)					
U.S. importers: All other sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Share of quantity across (percent)					
U.S. importers: All other sources: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0
	Share of value across (percent)					
U.S. importers: All other sources: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0

Table continued on next page.

Table E-2—Continued
Rebar: U.S. producers' and U.S. importers' shipments by size, 2019

Item	Shipments by size					
	No. 3	No. 4	No. 5	No. 6	Other sizes	All sizes
	Quantity (short tons)					
U.S. importers: Nonsubject sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Value (1,000 dollars)					
U.S. importers: Nonsubject sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Unit value (dollars per short ton)					
U.S. importers: Nonsubject sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Share of quantity across (percent)					
U.S. importers: Nonsubject sources: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0
	Share of value across (percent)					
U.S. importers: Nonsubject sources: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0

Table continued on next page.

Table E-2—Continued
Rebar: U.S. producers' and U.S. importers' shipments by size, 2019

Item	Shipments by size					
	No. 3	No. 4	No. 5	No. 6	Other sizes	All sizes
	Quantity (short tons)					
U.S. importers: All import sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Value (1,000 dollars)					
U.S. importers: All import sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Unit value (dollars per short ton)					
U.S. importers: All import sources: Commercial shipments	***	***	***	***	***	***
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	***
	Share of quantity across (percent)					
U.S. importers: All import sources: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	100.0
	Share of value across (percent)					
U.S. importers: All import sources: Commercial shipments	***	***	***	***	***	100.0
Internal consumption/transfers	***	***	***	***	***	***
U.S. shipments	***	***	***	***	***	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.

Table E-3
Rebar: U.S. producers' and U.S. importers' shipments by grade, 2019

Item	Shipments by grade			
	Grade 40	Grade 60	Other grades	All grades
Quantity (short tons)				
U.S. producers:				
Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
Value (1,000 dollars)				
U.S. producers:				
Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
Unit value (dollars per short ton)				
U.S. producers:				
Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
Share of quantity across (percent)				
U.S. producers:				
Commercial shipments	***	***	***	100.0
Internal consumption/transfers	***	***	***	100.0
U.S. shipments	***	***	***	100.0
Share of value across (percent)				
U.S. producers:				
Commercial shipments	***	***	***	100.0
Internal consumption/transfers	***	***	***	100.0
U.S. shipments	***	***	***	100.0

Table continued on next page.

Table E-3—Continued
Rebar: U.S. producers' and U.S. importers' shipments by grade, 2019

Item	Shipments by grade			
	Grade 40	Grade 60	Other grades	All grades
	Quantity (short tons)			
U.S. importers: Mexico: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Value (1,000 dollars)			
U.S. importers: Mexico: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Unit value (dollars per short ton)			
U.S. importers: Mexico: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Share of quantity across (percent)			
U.S. importers: Mexico: Commercial shipments	***	***	***	100.0
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	100.0
	Share of value across (percent)			
U.S. importers: Mexico: Commercial shipments	***	***	***	100.0
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	100.0

Table continued on next page.

Table E-3—Continued
Rebar: U.S. producers' and U.S. importers' shipments by grade, 2019

Item	Shipments by grade			
	Grade 40	Grade 60	Other grades	All grades
	Quantity (short tons)			
U.S. importers: Turkey, subject: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Value (1,000 dollars)			
U.S. importers: Turkey, subject: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Unit value (dollars per short ton)			
U.S. importers: Turkey, subject: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Share of quantity across (percent)			
U.S. importers: Turkey, subject: Commercial shipments	***	***	***	100.0
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	100.0
	Share of value across (percent)			
U.S. importers: Turkey, subject: Commercial shipments	***	***	***	100.0
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	100.0

Table continued on next page.

Table E-3—Continued
Rebar: U.S. producers' and U.S. importers' shipments by grade, 2019

Item	Shipments by grade			
	Grade 40	Grade 60	Other grades	All grades
	Quantity (short tons)			
U.S. importers: Subject sources: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Value (1,000 dollars)			
U.S. importers: Subject sources: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Unit value (dollars per short ton)			
U.S. importers: Subject sources: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Share of quantity across (percent)			
U.S. importers: Subject sources: Commercial shipments	***	***	***	100.0
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	100.0
	Share of value across (percent)			
U.S. importers: Subject sources: Commercial shipments	***	***	***	100.0
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	100.0

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Table E-3—Continued
Rebar: U.S. producers' and U.S. importers' shipments by grade, 2019

Item	Shipments by grade			
	Grade 40	Grade 60	Other grades	All grades
	Quantity (short tons)			
U.S. importers: Turkey, nonsubject: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Value (1,000 dollars)			
U.S. importers: Turkey, nonsubject: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Unit value (dollars per short ton)			
U.S. importers: Turkey, nonsubject: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Share of quantity across (percent)			
U.S. importers: Turkey, nonsubject: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Share of value across (percent)			
U.S. importers: Turkey, nonsubject: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***

Table continued on next page.

Table E-3—Continued
Rebar: U.S. producers' and U.S. importers' shipments by grade, 2019

Item	Shipments by grade			
	Grade 40	Grade 60	Other grades	All grades
	Quantity (short tons)			
U.S. importers: All other sources: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Value (1,000 dollars)			
U.S. importers: All other sources: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Unit value (dollars per short ton)			
U.S. importers: All other sources: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Share of quantity across (percent)			
U.S. importers: All other sources: Commercial shipments	***	***	***	100.0
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	100.0
	Share of value across (percent)			
U.S. importers: All other sources: Commercial shipments	***	***	***	100.0
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	100.0

Table continued on next page.

Table E-3—Continued
Rebar: U.S. producers' and U.S. importers' shipments by grade, 2019

Item	Shipments by grade			
	Grade 40	Grade 60	Other grades	All grades
	Quantity (short tons)			
U.S. importers: Nonsubject sources: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Value (1,000 dollars)			
U.S. importers: Nonsubject sources: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Unit value (dollars per short ton)			
U.S. importers: Nonsubject sources: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
	Share of quantity across (percent)			
U.S. importers: Nonsubject sources: Commercial shipments	***	***	***	100.0
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	100.0
	Share of value across (percent)			
U.S. importers: Nonsubject sources: Commercial shipments	***	***	***	100.0
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	100.0

Table continued on next page.

Table E-3—Continued
Rebar: U.S. producers' and U.S. importers' shipments by grade, 2019

Item	Shipments by grade			
	Grade 40	Grade 60	Other grades	All grades
Quantity (short tons)				
U.S. importers: All import sources: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
Value (1,000 dollars)				
U.S. importers: All import sources: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
Unit value (dollars per short ton)				
U.S. importers: All import sources: Commercial shipments	***	***	***	***
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	***
Share of quantity across (percent)				
U.S. importers: All import sources: Commercial shipments	***	***	***	100.0
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	100.0
Share of value across (percent)				
U.S. importers: All import sources: Commercial shipments	***	***	***	100.0
Internal consumption/transfers	***	***	***	***
U.S. shipments	***	***	***	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.

APPENDIX F

NARRATIVE RESPONSES: DOMESTIC LIKE PRODUCT

Table F-1

Rebar: U.S. producers' comparisons of in-scope steel concrete rebar and in-scope deformed steel wire by the like product factors

Item/Firm	Narrative
U.S. Producers: Physical characteristics	
***	***
***	***
***	***
***	***
***	***
U.S. Producers: Interchangeability	
***	***
***	***
***	***
***	***
***	***
U.S. Producers: Manufacturing	
***	***
***	***
***	***
***	***
***	***
U.S. Producers: Channels	
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

Table F-1 -- Continued

Rebar: U.S. producers' comparisons of in-scope steel concrete rebar and in-scope deformed steel wire by the like product factors

Item/Firm	Narrative
U.S. Producers: Perceptions	
***	***
***	***
***	***
***	***
***	***
U.S. Producers: Price	
***	***
***	***
***	***
***	***
***	***

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

Table F-2

Rebar: U.S. purchasers' comparisons of in-scope steel concrete rebar and in-scope deformed steel wire by the like product factors

Item/Firm	Narrative
U.S. Purchasers: Physical characteristics	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
U.S. Purchasers: Interchangeability	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
U.S. Purchasers: Manufacturing	
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

Table F-2 -- Continued

Rebar: U.S. purchasers' comparisons of in-scope steel concrete rebar and in-scope deformed steel wire by the like product factors

Item/Firm	Narrative
U.S. Purchasers: Channels	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
U.S. Purchasers: Perceptions	
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

Table F-2 -- Continued

Rebar: U.S. purchasers' comparisons of in-scope steel concrete rebar and in-scope deformed steel wire by the like product factors

Item/Firm	Narrative
U.S. Purchasers: Price	
***	***
***	***
***	***
***	***
***	***
***	***

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

Table F-3**Rebar: U.S. producers' and U.S. purchasers' comparisons of in-scope steel concrete rebar and in-scope deformed steel wire by the like product factors**

Item	U.S. producers				U.S. purchasers			
	Fully	Mostly	Somewhat	Never	Fully	Mostly	Somewhat	Never
Physical characteristics	4	1	---	---	3	2	5	2
Interchangeability	5	---	---	---	3	2	4	2
Manufacturing	1	4	---	---	1	4	2	4
Channels	5	---	---	---	4	4	3	1
Perceptions	5	---	---	---	4	1	4	3
Price	3	1	1	---	1	1	7	3

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

APPENDIX G

SECTION 232 ACTIONS BY COUNTRY

Table G-1
Section 232 actions: Presidential proclamations affecting imports of steel articles, since 2018

Item	Action and duration (effective dates)	Federal Register Notice
General action	The President implemented 25 percent ad valorem national-security duties on U.S. steel imports— March 23, 2018 to present.	83 FR 11625 ¹
Argentina	Exempted from duties— March 23, 2018 to April 30, 2018.	83 FR 13361 ²
	Exemption from duties continued— May 1, 2018 to May 31, 2018.	83 FR 20683 ³
	Exemption from duties continued, but subject to annual quota limits— June 1, 2018 to present.	83 FR 25857 ⁴
Australia	Exempted from duties— March 23, 2018 to April 30, 2018.	83 FR 13361 ²
	Exemption from duties continued— May 1, 2018 to May 31, 2018.	83 FR 20683 ³
	Exemption from duties continued— June 1, 2018 to present.	83 FR 40429 ⁵
Brazil	Exempted from duties— March 23, 2018 to April 30, 2018	83 FR 13361 ²
	Exemption from duties continued— May 1, 2018 to May 31, 2018	83 FR 20683 ³
	Exemption from duties continued, but subject to annual quota limits— June 1, 2018 to present.	83 FR 25857 ⁴
Canada	Exempted from duties— March 23, 2018 to May 31, 2018.	83 FR 11625 ¹
	Exemption from duties not continued— June 1, 2018 to May 19, 2019.	83 FR 20683 ³
	Exemption from duties reinstated— May 20, 2019 to present.	84 FR 23987 ⁶
European Union (“EU”) member countries	Exempted from duties— March 23, 2018 to April 30, 2018.	83 FR 13361 ²
	Exemption from duties continued— May 1, 2018 to May 31, 2018.	83 FR 20683 ³
	Exemption from duties not continued— June 1, 2018 to present.	83 FR 20683 ³
Korea	Exempted from duties— March 23, 2018 to April 30, 2018.	83 FR 13361 ²
	Exemption from duties continued, but subject to annual quota limits— May 1, 2018 to present.	83 FR 20683 ³
Mexico	Exempted from duties— March 23, 2018 to May 31, 2018.	83 FR 11625 ¹
	Exemption from duties not continued— June 1, 2018 to May 19, 2019.	83 FR 20683 ³
	Exemption from duties reinstated— May 20, 2019 to present.	84 FR 23987 ⁶
Turkey	Duty rate doubled to 50 percent ad valorem— August 13, 2018 to May 20, 2019.	83 FR 40429 ⁵
	Duty rate reduced from 50 percent to 25 percent ad valorem— May 21, 2019 to present.	84 FR 23421 ⁷

¹ *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9705, March 8, 2018, 83 FR 11625, March 15, 2018.

² *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9711, March 22, 2018, 83 FR 13361, March 28, 2018.

³ *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9740, April 30, 2018, 83 FR 20683, May 7, 2018.

⁴ *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9759, May 31, 2018, 83 FR 25857, June 5, 2018.

⁵ *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9772, August 10, 2018, 83 FR 40429, August 15, 2018.

⁶ *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9894, May 19, 2019, 84 FR 23987, May 23, 2019.

⁷ *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9886, May 16, 2019, 84 FR 23421, May 21, 2019.

Note.--Presidential Proclamation 9705 (clause (1)) defined "steel articles" at the Harmonized Tariff Schedule of the United States ("HTS") 6-digit level as: 7206.10 through 7216.50, 7216.99 through 7301.10, 7302.10, 7302.40 through 7302.90, and 7304.10 through 7306.90, including any subsequent revisions to these HTS classifications.

Note.—Annual quota limits for rebar are as follow:

Argentina: 0 metric tons (0 short tons)

Brazil: 22,142 metric tons (24,408 short tons)

Korea: 4,400 metric tons (4,851 short tons)